PERMANENT MISSION OF THE REPUBLIC OF
INDONESIA TO THE UNITED NATIONS,
THE WORLD TRADE ORGANIZATION AND
OTHER INTERNATIONAL ORGANIZATIONS
IN GENEVA

No. : 317/ADM/2012

The Permanent Mission of the Republic of Indonesia to the United Nations, the WTO and other International Organizations in Geneva presents its compliments to the Secretariat of the Stockholm Convention and, in reference to the latter's letters dated 30 April 2012, 1 June 2012 and 4 June 2012, has the honour to transmit herewith the technical comments of the Government of Indonesia on

- the draft technical paper on the identification and assessment on alternatives to the use of perfluorooctane sulfonic acid in open applications;
- the draft review of the additional information on chemical alternatives to hexabromocyclododecane and the production and use of hexabromocyclododecane; and
- the three draft reports on alternatives to endosulfan and DDT.

The Permanent Mission of the Republic of Indonesia to the United Nations, the WTO and other International Organizations in Geneva avails itself of this opportunity to renew to the Secretariat of the Stockholm Convention the assurances of its highest consideration.

Geneva, 9 July 2012

PERMANENT MISSION OF THE REPUBLIC OF INDONESIA
GENEVA

Secretariat of the Stockholm Convention
attn: POPs Review Committee
GENEVA

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Our Ref : B- 144 E/Dep.IV/LH/KJS/06/2012 22 June 2012
Encl. : One set
Subject : Comments on the draft technical paper on the identification and assessment on alternatives to the use of PFOs in open applications, draft review of the addition information on HBCD and draft reports on alternatives to endosulfan and DDT

Mr. Jim Willis
Executive Secretary
Secretariat of the Stockholm Convention
Att: POPs Review Committee
United Nations Environment Programme
11-13 chemin des Anémones
CH-1219, Chatelaine, Geneva, Switzerland
Fax: (+41 22) 917 8098

Dear Mr. Willis

Referring to your letter dated 30 April 2012, 1 June 2012, and 4 June 2012 regarding the above subject, I would like to inform you that

1. In general, PFOs is still used in fire fighting foams, metal plating, electric and electronic parts, chemically driven oil production, carpets, leather and apparel, textile and upholstery, paper and packaging, rubber and plastics, coating and coating additivies. There is no information on PFOS usage and its alternatives yet, since there is lack of expertise and budget in conducting the inventory.
2. In the field of aviation hydraulic fluid usage, Indonesian commercial airlines already use SKYDROL LD4, SKYDROL 500 B4, and AEROSHELL FLUID 41 as alternatif to PFOs.
3. In the field of pesticide, PFOs is never registered as pesticide for insect baits for control of leaf-cutting ants from *Atta spp. and Acromyrmex spp.* However, PFOS can be replaced with other chemicals such as Chlorpirifos, Cypermethrin, Fipronil, Abamectin, Deltamethrin, Fenitrothion.
4. There is no production of PFOs in Indonesia. PFOs are imported as mixture substance.
5. Hexabromocyclododecane is still used in Indonesia for production of plastic pellets. This chemical mainly is imported. Currently, we are collecting the information on its import and use.
6. Endosulfan and DDT is banned in Indonesia as stated in Regulation of Ministry of Agriculture No. 24/Permentan/SR.140/4/2011 concerning requirements and procedure of pesticide registration. There are several alternatives for these chemicals such as Alpha cypermethrin, Cypermethrin, Bendiocarb, Bifenthrin, Chlorpyriphos, Dicofol. Malathion, etc.

Further information as attached.

Thank you for your kind cooperation.

Sincerely,

Masnellyarti Hilman
Stockholm Convention Focal Point/
Deputy Minister for Hazardous Substance, Hazardous Waste and Solid Waste Management, Ministry of Environment

Cc:
1. Minister of Environment, Republic of Indonesia (as a report);
2. Permanent Missions Republic of Indonesia to the United Nation in Geneve;
3. Director General Industrial International Cooperation, Ministry of Industry, Republic of Indonesia
4. Chair of Pesticide Committe, Ministry of Agriculture, Republic of Indonesia

Attachment Letter Number : B- 144 E/Dep.IV/LH/KJS/06/2012

Date : 22 June 2012

ADDITIONAL COMMENTS OR INFORMATION ON PFOS

<table>
<tr><th>NO</th><th>FIELD</th><th>COMMENTS OR INFORMATION</th></tr>
<tr><td>1</td><td>Aviation hydraulic fluids</td><td>Indonesian commercial airlines already use SKYDROL LD4, SKYDROL 500 B4, and AEROSHELL FLUID 41 as alternatif to PFOs. All of them is trade name, their chemical composition as follows:
<table>
<tr><td>SKYDROL LD 4</td><td>Substance
tributyl phosphate
dibutyl phenyl phosphate
butyl diphenyl phosphate
2-ethylhexyl 7-oxabicyclo[4.1.0] heptane-3-carboxylate
2,6-di-tert-butyl-p-cresol</td><td>CAS No.
126-73-8
2528-36-1
2752-95-6
62256-00-2
128-37-0</td><td>EC No.
204-800-2
219-772-7
220-398-1
263-471-3
204-881-4</td><td>EC Classification
Xn, R22, R38, R40

Xi, R43
</td><td>% w/w
58,2 %
20,0 - 30,0 %
5,0 - 10,0 %
<=10,0 %
1,0 - 5,0 %</td></tr>
<tr><td>SKYDROL 500 B4</td><td>Substance
tributyl phosphate
dibutyl phenyl phosphate
butyl diphenyl phosphate
2-ethylhexyl 7-oxabicyclo[4.1.0] heptane-3-Carboxylate</td><td>CAS No.
126-73-8
2528-36-1
2752-95-6
62256-00-2</td><td>EC No.
204-800-2
219-772-
220-398-
263-471-3</td><td>EC Classification
Xn, R22, R38, R40

Xi, R43</td><td>% w/w
19,8 %
7 %
1 %
<=10,0 %</td></tr>
<tr><td>AEROSHELL FLUID 41</td><td>Highly Refined Petroleum Oil Mixture* 80-90
Additives Mixture 10-20
* Contains: 64742-53-6</td><td></td><td></td><td></td><td></td></tr>
</table>
In addition, there are several aviation hydraulic fluids, that may be contain PFOS around 0.1% which are still used in Indonesia. The further inventory is needed.</td></tr>
<tr><td>2</td><td>Fire foam fighting</td><td>It is still use in Indonesia. There is no information on PFOS usage and its alternatives yet, since there is lack of expertise and budget in conducting the inventory.</td></tr>
<tr><td>3</td><td>Pesticides</td><td>PFOs is never registered as pesticide for insect baits for control of leaf-cutting ants from Atta spp. and Acromyrmex spp. However, PFOS can be replaced with other chemicals such as Chlorpirifos, Cypermethrin, Fipronil, Abamectin, Deltamethrin, and Fenitrothion. Chlorpirifos is prohibited to use as household pesticide.</td></tr>
<tr><td>4</td><td>Metal plating</td><td>It is still use in Indonesia.There is no information on PFOS usage and its alternatives yet, since there is lack of expertise and budget in conducting the inventory.</td></tr>
<tr><td>5</td><td>Electric and electronic parts for some color printer and color copy machines</td><td>It is still use in Indonesia.There is no information on PFOS usage and its alternatives yet, since there is lack of expertise and budget in conducting the inventory.</td></tr>
<tr><td>6</td><td>Chemically driven oil production</td><td>It is still use in Indonesia.There is no information on PFOS usage and its alternatives yet, since there is lack</td></tr>
</table>

		of expertise and budget in conducting the inventory.
7	Carpet, leather, apparel, textile and upholstery	It is still use in Indonesia.There is no information on PFOS usage and its alternatives yet, since there is lack of expertise and budget in conducting the inventory.
8	Paper and packaging, rubber and plastic	It is still use in Indonesia.There is no information on PFOS usage and its alternatives yet, since there is lack of expertise and budget in conducting the inventory.
9	Coating and coating additives	It is still use in Indonesia.There is no information on PFOS usage and its alternatives yet, since there is lack of expertise and budget in conducting the inventory.