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INTERGOVERNMENTAL NEGOTIATING COMMITTEE FOR AN
INTERNATIONAL LEGALLY BINDING INSTRUMENT
FOR IMPLEMENTING INTERNATIONAL ACTION ON
CERTAIN PERSISTENT ORGANIC POLLUTANTS

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Item 5 of the provisional agenda*

Preparations for the Conference of the Parties

**COMPARATIVE ANALYSIS OF COMMENTS ON THE “STANDARDIZED TOOLKIT FOR
IDENTIFICATION AND QUANTIFICATION OF DIOXIN AND FURAN RELEASES”
AND ACTIONS TOWARDS THE REVISION OF THE TOOLKIT****

Note by the secretariat

1. Paragraph 1 of article 5 of the Stockholm Convention on Persistent Organic Pollutants requires each Party to develop an action plan to identify, characterize and address the release of the chemicals listed in annex C. The evaluation of current and projected releases, including the development and maintenance of source inventories and release estimates, taking into account the source categories identified in Annex C are part of the action plans. At its sixth session, the Intergovernmental Negotiating Committee acknowledged that the “Standardized Toolkit for Identification and Quantification of Dioxin and Furan Releases” (Toolkit) of the United Nations Environment Programme provided a basis for the development of provisional guidance on the evaluation of current and projected releases of chemicals listed in annex C as the guidance to evaluate current and projected releases of unintentional persistent organic pollutants (POPs), and Governments and others were invited to provide the secretariat with comments on how the Toolkit can be updated and expanded before 31 December 2002.

2. In response to the Committee’s request, nine Governments (including one on behalf of a regional economic integration organization), one intergovernmental organization and two non-governmental organizations submitted comments to the secretariat. The actual submissions are compiled in document UNEP/POPS/INC.7/INF/17. Further comments and recommendations on the Toolkit were received during six subregional workshops held in Africa, Asia, Latin America and South Pacific Islands that are also included in document UNEP/POPS/INC.7/INF/17.

* UNEP/POPS/INC.7/1

** References: Stockholm Convention, article 5 and annex C; report of the Intergovernmental Negotiating Committee on its sixth session (UNEP/POPS/INC.6/22), annex I, decision INC-6/4.

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3. The revised version of the Toolkit, *1st edition, May 2003*, was posted on the Convention web site www.pops.int on 5 June 2003. At the current session of the Committee, *1st edition, May 2003* is available in document UNEP/POPS/INC.7/INF/14.
4. The annex to the present note presents an analysis prepared by the secretariat of all the comments referred to in paragraph 2 above and the manner in which they have been reflected in the revised edition of the Toolkit. The annex has not been formally edited.

Annex

ANALYSIS OF COMMENTS ON THE TOOLKIT

1. In general, there was support for not changing the structure and methodology of the Toolkit and for not changing its emission factors at this time. Comments highlighted the goals of the Toolkit as it needing to be:

- scientifically based,
- comprehensive, easy to read, follow, and apply;
- logical and pragmatic in its approach;
- classes and emission factors grouped and presented on a reasonable and practical basis; and
- suitable for establishment of internationally comparable inventories.

2. Some comments supported the need for a process to update or revise the present Toolkit.

3. More specifically, as noted in UNEP/POPS/INC.7/7, the comments to the draft Toolkit can be categorized as: editorial issues, edits and inconsistencies; technical items easily included in the revision; complex technical items not readily accommodated in the time available; and policy and other issues out of scope of this PCDD/PCDF Toolkit. For each of these categories, an analysis of the comments received and the manner in which they are reflected in the 1st edition of the Toolkit is provided below:

(a) Editorial issues, edits, and inconsistencies:

- i. Terms and abbreviations have been harmonized, *e.g.*, “release” is used throughout the Toolkit to address any kind of discharge from a source being to air, water, land, products, and residues. “Emission” is only used for releases to air.
- ii. Units have been clarified, especially when referring to volumes of air;
- iii. Definitions have been added to reflect the difference in normalizations applied in various countries (*e.g.*, references to temperature, oxygen content).
- iv. Questionnaires have been changed to more user-friendly formats that can be applied directly by countries to collect information.
- v. Emission factors have been referenced;
- vi. The goals of the Toolkit within the Stockholm Convention are clarified (namely, to indicate its use as an order-of-magnitude estimation of PCDD/PCDF releases per source category).
- vii. The basis for selection of scientific terms is clarified (I-TEF *vs.* WHO-TEFs, congener-specific emission factors, *etc.*).

(b) Technical items easily included in the revision:

- i. A section was added to reference inventory work done under other conventions or agreements (new Chapter 2.3 – Further Reading).
- ii. A section listing the relevance of the source categories in the Toolkit to Annex C of the Convention has been added at the beginning of each main source category (Chapter 6 of the Toolkit).
- iii. The section on ferrous and non-ferrous metals (Chapter 6.2) has been expanded with further technology information. The distinction between primary and secondary processes within this category has been detailed.

- iv. The section on non-thermal treatment of waste oil recycling (Chapter: X.X) has been rewritten and the emission factor was removed since it referred to thermal treatment of waste oils. This activity has been now included in Main Category 5 – heavy oil fuelled motors.
 - v. The results from the PCDD/PCDF sampling and analysis program performed in Thailand (2001) on seven sources were included into this edition of the Toolkit and results were put into perspective with emission factors and technology description in the Toolkit.
 - vi. Guidance was added to direct data collectors to sources of information, e.g., health authorities for hospital waste incineration; and fire brigades for estimating frequency and size of accidental fires including forest fires;
- (c) Complex technical items not readily accommodated in the time available:
- i. Comments from Governments of some developed countries suggested that the Toolkit would not be applicable to developing country circumstances. That view was not raised by developing countries that had applied the Toolkit and found it applicable and handy. The results are shown in the Annex 2 – Inventories made with the Toolkit.
 - ii. Several submissions suggested that some sources were missing, though none were specified. However, some local circumstances were identified during the application of the Toolkit, especially in the Asian context, that were not adequately reflected in the Toolkit, e.g., there is no emission factor for the making of activated carbon/charcoal (a common fuel in many developing countries) from wood, and there is no emission factor for the drying of copra. In addition, some countries found it difficult to categorize locally manufactured stoves, furnaces or other equipment according to the classes given in the Toolkit. Solutions are suggested that use existing emission factors that are as close as possible to the local situation encountered. There is a need to determine emission factors that better accommodate developing countries' situations.
 - iii. It was suggested that there is a need to verify emission factors that take into account conditions and performances in developing countries.
 - iv. Comments noted the lack of emission factors for releases especially to water and residues. Such data are presently not available and need to be generated.
 - v. The proposed use of national categorisation of sources, e.g., SNAP-codes, Philippine Industry code, etc., could not be reconciled with the goal of establishment of internationally comparable inventories.
- (d) Issues outside the scope of this revision of the Toolkit:
- i. The present Toolkit addressed releases of PCDD/PCDF only. It does not include other non-intentionally generated POPs, e.g., polychlorinated biphenyls and hexachlorobenzene. There is a need for guidance on how to establish release inventories for those additional substances.
 - ii. The proposed development and use of simple, fast and cheap bioassays to verify emission factors from technologies in developing countries.