

**Update of guidance documents to assist parties in developing, reviewing and updating their national implementation plan**

**Revised guidance (Part A of the annex to decision SC-7/10)**

**Comments and responses to:**

- Revised Guidance for developing a national implementation plan for the Stockholm Convention on Persistent Organic Pollutants (UNEP/POPS/COP.7/INF/25)

### Guidance for developing a national implementation plan for the Stockholm Convention on Persistent Organic Pollutants

Origin	Issue area	Comment	Response
Canada	Could develop content regarding needs assessment	Decision SC-5/22 of May 2011 drew attention to the important link between NIPs and needs assessments. While we recognize that the document presents the needs assessment reporting format in the final annex to the guidance, we would suggest that a greater emphasis be placed on needs assessments within the body of the document.	Summary text inserted to address this issue (see section 8.4). Guidance on needs assessment for chemicals management has been developed by the IOMC and reference is made to it.  <b>Note:</b> The Stockholm Convention Secretariat may consider preparing a short, step-by-step guidance to assist countries on a needs assessment exercise focussed on POPs management and NIP implementation.
Mexico	General comments	We consider that the guidance to develop, update and review NIPs will be of great help, however, we believe that a successful implementation of the NIP and its action plans is complex. It depends on the institutional capacity, high political support and stakeholders' commitment and also it depends on assigning the adequate resources. <sup>1</sup>	Noted. No changes required
Monaco	General comments	We don't have significant experience in using them and how to improve their usefulness in order to provide comments on this document.	Noted. No changes required
Romania	General comments	All references should be checked for possible updates e.g. the inventory guidance for PBDE and PFOS are referenced to 2012 but now the 2015 update is available and should be used. Since DecaBDE is proposed for listing it would be best to include DecaBDE in the next updated NIP guidance. Can be added to the PBDEs guidance.	References have been updated DecaBDE has not yet been listed under the SC and therefore only POPs included in annexes A, B and C are subject of the current NIP Guidance.
Romania	6. Phase II – Establishment of POPs Inventories and Assessment of National Infrastructure and Capacity	In section 6.2 Outputs and outcomes a reference that countries should consider a tiered approach as outlined in the HBCD inventory Guidance. The “preliminary” in the inventories could be put into brackets. Meanwhile for PCB and pesticides the aim should be robust	This section already suggests a tiered approach for collecting information. No need to use brackets since this is a guidance document and the term “preliminary” is widely used in inventory

<sup>1</sup> The paragraph was translated by the Secretariat, no official translation was made.

		inventories. We also propose to mention Sustainable Development Goals under section 6.5 (e.g. chemicals management, waste management and disposal, pollution control, MEA implementation, sustainable development and related goals).	guidance under the SC. Mention to SDGs has been added in section 6.5
Romania	7. Phase III – Priority Assessment and Objective Setting	When setting up the objectives Parties need to be encouraged to develop S.M.A.R.T objectives (Specific, Measurable, Achievable, Relevant/Realistic, Time-bound/Timely), as well as indicators to be able to measure the progress achieved in the Stockholm Convention implementation; this kind of approach can have significant importance in the effectiveness evaluation process too. Also, it should be indicated that when setting-up the priorities and objectives a correlation need to be made with the possible donor institutions financing priorities. Moreover, to overcome any overlaps, this section should mention that the objectives and priorities for POPs management need to be correlated with any other priorities relevant and/or linked to POPs management. Also, an update including recently listed POPs should be carried out.	S.M.A.R.T considerations incorporated in sections 7.1 and 7.2. A full description of this approach is beyond the scope of the guidance. Section 7.2 already highlights linkages and synergies to other MEAs which address POPs management (e.g. Basel and Rotterdam Conventions)
Romania	8. Phase IV – Formulation of National Implementation Plan	We propose adding in section 8.1, third bullet point “and related goals” after the sustainable development.	Text has been inserted
Romania	Annexes	We propose to be completed in the same way for new added POPs (endosulfan, HBCD, HCB, PCP, its salts and esters and PCN).	Agreed. For the 2015 listed POPs (HCB, PCP and PCN) draft inventory guidance is now available, not yet adopted by COP but reference is made to it in the relevant annexes.
Romania	Annex 1: National Implementation Plan for the Stockholm Convention on Persistent Organic Pollutants – Suggested	We propose that Table on Potential stakeholders or information sources regarding the new POPs be completed with the potential stakeholders or information sources for the new POPs added to the Convention in 2011, 2013 and 2015. We propose updating the Figure on “Possible project management structure” by adding thematic task team for new added POPs (in case of PBDEs we propose to be defined as POP-BFRs and will include PBDEs, HBB, HBCD and if listed, DecaBDE) and also add PCBs Task team.	Done

Romania	Annex 3: Assessment of PCBs	we propose that the Tasks section be completed by adding a new tasks such as carrying out a preliminary inventory or update the existing inventory of PCB in open applications, which are currently missing (Annex A, Part II, para (f) of the Stockholm Convention calls upon Parties to identify open applications and manage them in an environmentally sound manner).	Such task was already included (see 4th bullet of Annex 3)
Romania	Annex 6: Assessment of Releases of Unintentionally Produced Chemicals	We propose to be completed in respect to PCN and possibly HCBd depending on the outcome of POPRC process	Annex already includes general guidance for U-POPs Note: HCBd is not yet listed under Annex C
Romania	Annex 7: Recommended Elements for Consideration in Outline of NIP	<p>For clarity and easy reference, we suggest subdividing the section 2.2 in three sub-sections, as follows: 2.2.1 Policy framework; 2.2.2 Regulatory framework; 2.2.3 Stakeholders and roles.</p> <p>Section 2.3.1 says for POPs pesticides “historical, current, and projected future production, use, import, and export; existing policy and regulatory framework; summary of available monitoring data (environment, food, humans) and health impacts”. However, then for the other POPs “Assessment of POP X” it would be better to say at the beginning of Section 2.3 that for the individual POPs groups the respective “historical, current, and projected future production, use, import, and export; existing policy and regulatory framework” to be described. Then start with 2.3.1 Assessment of pesticide etc.</p> <p>The topic of “summary of available monitoring data (environment, food, humans) and health impacts” is rather in the chapters on monitoring (2.3.9 “Existing programmes for monitoring releases and environmental and human health impacts, including findings” and 2.3.14 “Identification of impacted populations or environments, estimated scale and magnitude of threats to public health and environmental quality, and social implications for workers and local communities”). This should not be in two sections. To be clarified.</p> <p>To avoid the overlap between section 2.3.9 Existing programmes for monitoring releases and environmental and human health impacts, including findings and section 2.3.14 Identification of impacted</p>	<p>Done</p> <p>Done</p> <p>Done</p>

		<p>populations or environments, estimated scale and magnitude of threats to public health and environmental quality, and social implications for workers and local communities; our suggestion is (see below also the new sections titles, modified according to our suggestion) to:</p> <ul style="list-style-type: none"> <li>- include the current section 2.3.14 as section 2.3.10, directly after the current section 2.3.9.</li> <li>- take out the human health impacts from the title of section 2.3.9 and place it only in the new section 2.3.10.</li> </ul> <p>“2.3.9 Existing programmes for monitoring releases and environmental impacts, including findings 2.3.10 Identification of impacted populations or environments, estimated scale and magnitude of threats to public health and environmental quality, and social implications for workers and local communities”</p> <p>Regarding section 2.3.13, we propose removing from the title the aspect of “management” and rename it as 2.3.13 Overview of technical infrastructure for POPs assessment, measurement, analysis, alternatives and prevention measures, research and development – linkage to international programmes and projects and add a new section 2.3.14 Overview of technical infrastructure for POPs management and destruction, as the topic of technical infrastructure for POPs management and destruction is an important one and need to be clearly differentiated from the technical infrastructure for POPs assessment, measurement, analysis, alternatives and prevention measures, research and development.</p> <p>We propose that section 3.6 NIP implementation status be moved as section 2.4 placed after the section 2.3.16, as the previous NIP implementation status is part of the assessment of the POPs issue in the country, carried out during inventory phase. In sections 3.2 or 3.3 to set of “objectives and priorities” should be mentioned. In section 3.3 it is confusing and not correct to describe here between</p>	<p>There seems to be no overlap as Section 2.3.9 on Monitoring refers to existing programmes and findings in the field and lab, while Section 2.3.14 focuses on the identification and assessment of the impacts. Therefore no changes made.</p> <p>Done</p> <p>Done</p>
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United Kingdom	General comments	<p>With reference to the third (3) request for comments on the revised/updated and additional guidance on implementation plans, I regret that we have been unable to consult widely and can only offer our comments in respect of our experience of having recently prepared the UK’s second National Implementation Plan. In this respect the documents provide the appropriate level of detail to guide the administrative, resource and technical needs which need to be considered to set up the structures necessary for effective</p>	Noted. No changes required

		<p>implementation of the requirements of the Stockholm Convention. Both the strategic governance and practical implementation needs are well covered. The importance of stakeholder engagement is usefully stressed, as is the need for appropriate application of project management tools. It is clear that advanced as well as developing economies can benefit from the content which provides useful reference material at the heart of which is the importance of considering local circumstances/resources when developing and implementing compliance requirements.</p>	