

Comments and responses on the Draft guidance on sampling, screening and analysis of persistent organic pollutants in products and articles (2013)

Origin	Issue area	Comment	Response
Canada	Overarching:	<p>We have reviewed to ensure (1) the guidance presented is consistent with other documents already issued by the Basel and Stockholm Convention; (2) the information is valuable for the intended audience; (3) the text is clear and unambiguous and supported by existing references. See below for high-level comments, and the changes tracked in the documents attached.</p> <p>We suggest that the disclaimers be strengthened to remind the reader that, while reasonable efforts have been made in reviewing the guidance document, in the case of any discrepancy between the information contained in the guidance document and the Stockholm Convention on POPs, the text of the Convention would prevail.</p>	Considered and modified
Canada	Overarching:	<p>We are concerned with the level of resources required to review, and the potential for errors caused by, the duplication between these documents and guidance material that already exists under other agreements, particularly as it relates to environmentally sound management of wastes and the availability of existing guidance under Basel. This area might be a good candidate for efficiencies between BRS conventions.</p>	Considered and references to Basel Guidelines have been included
Canada	Sampling, Screening and Analysis of POPs in Articles	<p>The scope of chemicals addressed in this guidance document should be clarified. For example, although it says all new POP from 2009 and 2011, it appears to be missing Hexachlorocyclohexane and Lindane (2009), and Endosulfan (2011).</p> <p>The document should also be careful not to mention substances which, to date, have not been adopted for listing to the Convention, such as SCCAs, octa and decaBDE, and all PFCs. While HBCD is another new POP (2013), it is the subject of a separate guidance document and can be left out from this one.</p>	<p>The scope of the guidance is only for industrial and unintentional POPs in articles and products. The guidance does not address POPs Pesticides, as stated in the introductory section.</p> <p>PCN, PCP and HCBd have been incorporated to the guidance</p> <p>SCCP and DecaBDE are recommended for listing at COP-8 in May 2017. This is mentioned in the guidance with relevant reference to COP8 Working Documents.</p> <p>PFCs are mentioned to some extent</p>

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			in the guidance, however noting that they are not listed in the Stockholm Convention. These chemicals are considered under SAICM, and the relevance of synergies is therefore highlighted.
Canada	Sampling, Screening and Analysis of POPs in Articles	It may be difficult for some parties to implement the analysis of all treated articles proposed. Going forward, it may be helpful if guidance was given on the more hazardous articles or those that contribute the most to the overall environmental loading so that countries could focus their efforts where it is most valuable.	The relevance of articles is mentioned where information is available.
Canada	Sampling, Screening and Analysis of POPs in Articles	We are concerned with the overlap between some of the information presented in this document and in the seven technical guidelines of the Basel Convention on POPs, which also cover sampling, monitoring and analysis. While the information appears to be accurate and consistent, we would like to suggest that the document defer to the authority of the Basel Convention and guidance developed under it instead of duplicated here.	The Stockholm Convention addresses POPs through a life cycle approach and their presence in articles and products are better addressed under the Stockholm Convention. Practical examples have been included in the guidance. Waste is a minor part of the current SC guidance and where relevant, links to Basel Convention guidelines are highlighted.
Canada		Care should be taken to ensure the document is aimed at helping Parties develop their national implementation plans (NIP). As such, statements like “companies need to assure” (in Annex 1-B) could be reformulated to focus on what a NIP should consider, and avoid statements that appear to put obligations on companies directly.	Considered and modified
Canada		Certain references need to be validated, taking into account documents that have since been updated.	References where updated and considerably extended
Canada	Page 11	Best to identify specifically which PBDEs are being referred to	Considered and modified
Canada	Page 11	Should list them explicitly for certainty. It is no longer accurate to say “newly listed” since HBCD was added in 2013 but not included in this document. Care should be taken to ensure the information is current and relevant, and not affected by the passage of time.	Modified to “additionally listed”

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Canada	Page 13	Recommend keeping language as consistent as possible with the Convention, which lists PeCB (not PeCBz). This correction applies throughout.	PeCBz was substituted by PeCB as in Convention text (although this is rather the abbreviation of Pentachlorobiphenyl)
Canada	Page 13	Verify reference number and title, also reference 4 (2012d) was revised in May 2015	The reference has been update d
Canada	Page 13	Addition of text referencing to Basel Guidelines	Text was added
Canada	Page 14	Care should be taken to ensure the information is current and relevant. In this case, each POP addressed by this guidance should be explicitly listed for certainty.	Paragraph is added to clarify the scope of the guidance
Canada	Page 14	Inventory development is addressed through separate guidance documents	This guidance supports the inventory development on Tier III level and reference is made to it where deemed appropriate. For example, impact factors of plastic for recycling need to be determined and this guidance may be used for this purpose.
Canada	Page 14	It may be helpful to provide a small paragraph explaining why the original 12 POPs (other than HCB, PCDD, PCDF and PCB?) are not discussed in this document.	Considered and added
Canada	Page 15	Please specify for clarity	Considered and specified
Canada	Page 17	Care should be taken to ensure the information is current.	Information was updated. The IEC 62321-6 standard has been developed and published and reference to it is made here.
Canada	Page 18	Not all PFCs are listed on the Convention. If this is meant to include specific POPs they should be listed.	Considered
Canada	Page 20	SCCPs and PFOA have not been listed	Considered and added that "SCCPs are recommended for listing at COP8 and that PFOA is not listed in the Stockholm Convention but currently assessed by POPRC and

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			found to meet the POP criteria”
Canada	Page 21	The footnote contains helpful text and should be added to the main body as suggested below.	Considered and modified
Canada	Page 37	Consider introducing the two commercial mixtures as related to the PBDEs actually listed in Annex A of the Convention.	A paragraph was added to introduce PBDEs and PBB listed in the convention
Canada	Page 45	Please be consistent when referring to the commercial mixtures	Considered and modified
Canada	Page 46	Please be consistent when referring to the commercial mixtures. In this case, not clear if “technical OctaBDE” = c-Octa, or pure octaBDE (note lowercase).	It is c-OctaBDE. Modified
Canada	Page 47	Please be consistent with the c- preface for the commercial mixtures to avoid possible confusion	Considered and modified
Canada	Page 50	Recommend keeping language as consistent as possible with the Convention, which says “formed and released unintentionally”. The Convention does not state “unintentionally produced”. In this case, however, it is not necessary to specify.	Considered and modified
Canada	Page 50	Note that “mixtures” is not used in the convention, and using this term without proper introduction may cause confusion. If this guidance document is meant to draw attention to mixtures, this could be introduced more clearly.	Considered and deleted
Canada	Page 52	Recommend keeping language as consistent as possible with the Convention, including specific references wherever applicable	Considered and added
Canada	Page 60	While the term “good” in this sense has been used under Basel, its definition has been the subject of many discussions (under Basel) and we suggest avoiding its use. Recommend keeping language here as consistent as possible with the Stockholm Convention.	Considered and deleted and included suggested text
Canada	Page 60	Please include reference.	Reference included
Canada	Page 63	Recommend avoiding the use of such qualifiers given the rapid decline of residual PentaBDE in-service.	Considered and deleted
Canada	Page 63	Care should be taken to ensure the document is written with a view to help Parties develop their national implementation plans (NIP), and avoid statements that appear to put obligations on companies directly.	Considered and modified
Canada	Page 64	Note that “Mixtures” is not used in the convention, and using this term without proper introduction may cause confusion. If this guidance document is meant to draw attention to mixtures, this could be introduced more clearly.	Considered and modified
Canada	Page 64	Recommend keeping language as consistent as possible with the Convention, including specific references where applicable.	Considered and modified

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Canada	Page 71 and 72	Please be consistent when referring to the commercial mixtures	Modified
Canada	Page 90	Please be consistent when referring to the commercial mixtures. In this case, not clear if c-Octa or pure octaBDE.	It is c-OcaBDE. Modified
Romania	Overall comment	We propose to be completed with information for new added POPs which may be present in products and articles (HBCD, PCP, its salts and esters and PCN).	Considered. HBCD, PCP its salts and esters and PCN as well as HCBD have been incorporated.
HBCD Industry Group	Comments made to the monitoring part of HBCD inventory guidance (comment A 99 to A 102)	Background: The HBCD inventory guidance contained in the Annex a part on sampling and analysis of HBCD. This part was commented and corrected by the HBCD Industry Group.	Sections of the monitoring part from the Annex of the inventory guidance have been incorporated in the Guidance on Sampling, Screening and Analysis. The comments and corrections were considered and integrated
HBCD Industry Group	Comments made to the monitoring part of HBCD inventory guidance	Please note that the study is available here: Schlummer M., Vogelsang J., Fiedler D., Gruber L., Wolz G., 2015 ,Rapid identification of polystyrene foam wastes containing hexabromocyclododecane or its alternative polymeric brominated flame retardant by X-ray fluorescence spectroscopy (Waste Management Research July 2015, Vol. 33, No. 7, 662-670) http://wmr.sagepub.com/content/33/7/662	The publication is considered in the updated Guidance on Sampling, Screening and Analysis and is additionally described as a case study for screening of HBCD in the Annex.
HBCD Industry Group	Comments made to the monitoring part of HBCD inventory guidance	Please refer to the document submitted together with the comments of the HBCD IG on the Inventory Guidance. (Referring to: Determination of HBCD in Polystyrene Foams with the GC-FID Technique, HBCD Industry Group, September 2015).	The analytical method was considered and is included as method in the updated HBCD monitoring part in the Guidance on Sampling, Screening and Analysis
HBCD Industry Group	Comments made to the monitoring part of HBCD inventory guidance	Suggestion on adding NMR technology as screening tool. D. Jeanerat, M. Pupier, S. Schweizer, Y. N. Mitrev, P. Favreau, M. Kohler, Chemosphere 144 (2016), 1391-1397).	The NMR screening method was considered and is included as screening method in the updated HBCD monitoring part in the Guidance on Sampling, Screening and Analysis