Canada's Comments on the POPs Review Committee
Draft Risk Profiles and Draft Risk Management Evaluations
June 2008

Risk Profiles

Short-chain chlorinated paraffins:

The revised Draft Risk Profile on short chain chlorinated paraffins provides sufficient and appropriate evidence that SCCPs meet the criteria outlined in Annex E of the Stockholm Convention. As such, Canada supports proceeding to the preparation of a Risk Management Evaluation for SCCPs.

Risk Management Evaluations

Alpha hexachlorocyclohexane, Beta hexachlorocyclohexane:

Please see the attached draft Risk Management Evaluation for alpha hexachlorocyclohexane. Comments are provided in the text in revision mode. Please note the comments apply equally to the beta isomer risk management evaluation.

Pentachlorobenzene:

Please see the attached draft Risk Management Evaluation for pentachlorobenze for comments provided in revision mode. In addition Canada has the following comments on the proposed risk management measures described in the *Draft Risk Management Evaluation (RME) for Pentachlorobenze*: addition to Annex A for elimination of intentional production and use, and addition to Annex C to minimize unintentional uses.

Regarding addition to Annex A for elimination of intentional production and use, the Committee in the Draft Risk Management Evaluation recommends listing PeCBs in Annex A without any specific exemptions. Canada suggests adding a specific exemption or note to Annex A for PeCBs used in PCB applications so that use exemptions are aligned with PCB uses as provided for in Annex A, Part II. With an exemption or note, PeCBs in PCBs would be subject to the same elimination schedule as PCBs.

Regarding the addition to Annex C to control unintentional uses, the Committee recommends in the Draft Risk Management Evaluation listing of PeCB in Annex C. An Annex C listing would subject PeCB to the measures under Article 5 of the Convention which includes: 'an evaluation of current and projected releases, including the development and maintenance of source inventories and release estimates, taking into account source categories identified in Annex C'. It should, however, be noted that our information indicates that there are no measured emission data and emission factors for PeCB. This may require further consideration and discussion. In Canada, significant measures to reduce emissions from unintentional sources are already being undertaken and the

proposed addition to Annex C will help to reduce PeCB levels due to the long range transport of this substance.

Commercial octabromodiphenyl:

Please see the attached draft Risk Management Evaluation for commercial octabromodiphenyl ether for comments provided in revision mode. In addition, Canada has the following comments on the proposed risk management measures described in the *Draft Risk Management Evaluation (RME) for* commercial octabromodiphenyl ether: addition to Annex A for elimination of intentional production and use of polybrominated diphenylethers (PBDE) congeners having POP characteristics.

Canada finds that the information would support listing the penta, hexa, and tetra isomers in Annex A because of their POPs characteristics. The information submitted previously by Canada, namely the assessment of PBDEs carried out under authority of the *Canadian Environmental Protection Act, 1999*, concluded that the tetra, penta, and hexa PBDE homologues were persistent and bioaccumulative. Canada's domestic risk assessment, however, did not find that hepta is bioaccumulative. In our view, there is insufficient evidence of bioaccumulation for hepta to meet the screening criteria outlined in Annex D. In addition, the available information did not support concluding that the octa and nona homologues were bioaccumulative. While Canada continues to investigate the ability of PBDE homologues, notably the deca form, to debrominate or accumulate in organisms, we believe that information currently does not fully support paragraph 4 in Decision POPRC-3/6 with regards to octa and nona components.

Based on the POPs characteristics information of the components, Canada could support the proposal to add tetra, penta, and hexa to the Convention. Alternatively, based on these POPs characteristics, Canada could support the listing of c-octabromodiphenyl ether.