

April 5, 2006 (version incorporating all comments received to date)

Second Draft

Format for submitting pursuant to Article 8 of the Stockholm Convention the information specified in Annex F of the Convention

In accordance with paragraph 7 (a) of Article 8 and Annex F, the POPs Review Committee shall undertake a risk management evaluation that includes an analysis of possible control measures for a chemical under consideration for inclusion in the Convention. For this purpose, relevant information should be provided relating to socioeconomic considerations associated with possible control measures to enable a decision to be taken by the Conference of the Parties. Such information should reflect due regard for the differing capabilities and conditions among the Parties and should include consideration of the indicative list of items included in Annex F and any other relevant information.

Comment [AC1]: EC

Comment [AC2]: EC

Comment [AC3]: IPEN

Parties and observers are invited to submit information relating to the considerations specified in Annex F to be taken into account in the risk management evaluation. A draft outline of the risk management evaluation has been prepared (see....). The Committee has prepared a risk profile for the chemical under consideration, which includes relevant data on production, uses and releases of the chemical and thus includes much information relevant to the development of the risk management evaluation. The risk profile is available at [website].^{1,2}

Comment [AC4]: EC

Comment [US5]: "Provides a basis" seems overly broad.

Deleted: provides a basis for

To facilitate the task of the Committee, Parties and observers are invited to use the format below when submitting the information. Please insert summary information in the format and provide clear and precise references for that information, wherever possible. It is not required to provide information under all items. The explanatory notes under each item have been developed by the POPs Review Committee and are meant to guide and assist the providers of information and have no legal status.

Comment [AC6]: IPEN

The information should preferably be submitted in English. If information is submitted only in another official UN language (Arabic, Chinese, French, Spanish or Russian), the Secretariat will aim to provide for translation of the information.

Information should be submitted to the Secretariat of the Convention, preferably by e-mail:

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) 797 34 60
E-mail: ssc@pops.int

¹ EC : Reference to the relevant Risk Profile prepared for the chemical in question should be added because it will include relevant data on production, uses and releases of the chemical, i.e. it will provide the basis for identification and analysis of control measures. [Per comment above, while the Risk Profile will certainly include information relevant to the identification and analysis of control measures, suggesting that it will "provide the basis for identification and analysis of control measures" seems too broad in light of the additional, socio-economic considerations that need to be taken into account.]

² EC : It should be considered whether POPRC, when agreeing on a risk profile, could already give an indicative list of possible control measures for the chemical in question. This would facilitate the task of Parties and observers to give input to the analysis. Otherwise, it would be necessary to ask the provider of information, to clearly explain what they consider as 'possible control measures'. [note: Recognizing it would be useful to provide a framework/indicative list to guide information submission, suggesting risk management options before the appropriate evaluation seems inappropriate and might limit the scope of information submitted and subsequent analyses.] I agree that we should object to this language

The deadline for submitting the information is [date]

Chemical name (as used by the POPS Review Committee (POPRC))	
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Explanatory note:

1. A chemical undergoing a risk management evaluation has already satisfied the screening criteria set in paragraph 4 (a) of Article 8 of the Convention. Also, a risk profile has been conducted for this chemical in accordance with paragraph 6 of Article 8 and with Annex E to the Convention. Therefore, at this stage there must be adequate information about the chemical, its chemical identity and properties, including names and structure (See Annex D). [\[note: Is this intended to be an explanatory note? It does not seem needed as the item “Chemical name \(as used by the POPRC\)” seems pretty self-explanatory - or necessarily appropriate \(e.g., the last sentence suggests there is adequate info on the chemical and its properties. Adequate info on what – and what properties/ adequate for what purpose?\)](#)

Comment [AC7]: Proposed change based on suggestion by IPEN

Introductory information	
Name of the submitting Party/observer	
Contact details (name, telephone, e-mail) of the submitting Party/observer	
Date of submission	

(a) Efficacy and efficiency of possible control measures³ in meeting risk reduction goals (provide summary information and relevant references):	
(i) Technical feasibility	
(ii) Costs, including environmental and health costs	

Comment [AC8]: EC

Explanatory notes

1. “Possible control measures” refers to Articles 3, 5 and 6 of the Convention and includes measures to prohibit the production and use of chemicals listed in Annex A subject to the provisions of that Annex; measures to restrict the production and use of chemicals listed in Annex B subject to the provisions of that Annex; and, measures to prevent or reduce formation and release of chemicals listed in Annex C subject to the provisions of that Annex. More than one control measure is possible for the same chemical substance. Consideration should be given to the full range of possible control measures including, pollution prevention options, restriction of a substance’s production or use for specified purposes, and elimination of the substance entirely.

2. “Risk reduction goals” refer to targets/goals to reduce levels in the environment/exposure of a substance such that the long-range environmental transport of a substance is unlikely to lead to significant adverse human health and/or environmental effects.

3. Costs of implementing the control measure, including environmental and health costs

4. If relevant, provide information related to the identification of critical [or otherwise potentially acceptable](#) uses for which there may be no suitable alternative or for which the analysis of socioeconomic factors justify the inclusion of an exemption when considering listing decisions under the Convention.

Comment [AC9]: ICCA-WCC-CLI

Comment [AC10]: ICCA-WCC-CLI

Comment [AC11]: ICCA-WCC-CLI

³ [EC: See previous footnote 2]

5.. Where relevant and possible “costs” should be expressed in US dollars per year⁴

Comment [AC12]: See comment by IPEN, in footnote 4

(b) Alternatives (products and processes) (provide summary information and relevant references):	
Describe alternatives	
(i) Technical feasibility	
(ii) Costs, including environmental and health costs	IPEN: see comment in footnote 4
(iii) Efficacy	This item could be further clarified, see explanatory note 3
(iv) Risk	This item could be further clarified, see explanatory note 4
(v) Availability	
(vi) Accessibility	

Comment [AC13]: ICCA-WCC-CLI

Explanatory notes

1. A brief description of the alternative product or process and, if appropriate, for which sector(s) it would be relevant.
2. If several alternatives could be envisaged for the chemical under consideration, including non-chemical alternatives, provide a set of information under this section for each alternative.
3. The evaluation of the efficacy should include any information on the benefits and limitations of potential alternatives, as well as the identification of any critical uses for which there are no alternatives. The evaluation should be conducted on a life-cycle basis evaluating performance and impact over the entire life-cycle of any alternatives.
4. The evaluation of the risk of the alternative should include any information on whether the proposed alternative has been thoroughly tested/evaluated in order to avoid inadvertently increasing risks to human health and the environment. The evaluation should include any information on potential risks associated with untested alternatives and any increased risk over the life-cycle of the alternative – including manufacture, distribution, use, maintenance and disposal.
5. Regarding “risk”, if the alternative has not been tried or tested, information on projected impacts may also be useful.
6. Specify if the information provided might be subject to considerations regarding specific needs and circumstances of developing countries.
7. Information or comments on improving the availability and accessibility of alternatives may also be useful.

Comment [AC14]: IPEN

Comment [AC15]: ICCA-WCC-CLI

Comment [AC16]: ICCA-WCC-CLI

Comment [AC17]: IPEN

Comment [AC18]: IPEN

(c) Positive and/or negative impacts on society of implementing possible control measures (provide summary information and relevant references):	
(i) Health, including public, environmental and occupational health	
(ii) Agriculture, including aquaculture	

⁴ [IPEN: It might be too limiting to request costs in US dollars. For most countries, it is nearly impossible to cost in dollar terms the impacts on the environment and health of particular management options]

and forestry	
(iii) Biota (biodiversity)	
(iv) Economic aspects	
(v) Movement towards sustainable development	[EC: This is a very general consideration; an example would help]
(vi) Social costs	

Explanatory notes

1. Socio-economic considerations should include, among other things, any information on the impact (if any) on local manufacturing, including the capital costs associated with transitioning to the alternatives.

Comment [AC19]: ICCA-WCC-CLI

(d) Waste and disposal implications (in particular, obsolete stocks of pesticides and clean-up of contaminated sites) (provide summary information and relevant references):	
(i) Technical feasibility	
(ii) Costs	

Explanatory notes

1. Specify if the information provided might be subject to considerations regarding specific needs and circumstances of developing countries.

(e) Access to information and public education (provide summary information and relevant references):
[EC: This is a very general consideration; an example would help]

Explanatory notes

1. Information requested herein regards information access and public education for both the control measures and the alternatives.

Comment [AC20]: IPEN

(f) Status of control and monitoring capacity (provide summary information and relevant references):

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Explanatory notes

1. What is required here is information on monitoring capacity for the chemical under consideration – not monitoring capacity for the alternatives.

Comment [AC21]: IPEN

(g) Any national or regional control actions already taken, including information on alternatives, and other relevant risk management information:
IEC: This could be moved to the beginning of the format

Explanatory notes

1. Actions or measures taken could include non-regulatory initiatives.
2. Information should include whether the control actions have been cost-effective and have had a measurable impact on reducing levels in the environment and contributed to achieving risk reduction goals.

Comment [AC22]: ICCA-WCC-CLI

Other relevant information for the risk management evaluation:

Explanatory notes

1. The above list of items is only indicative. Any other relevant information for the risk management evaluation should also be provided.
2. Any information relevant to whether certain risk management options/control measures are likely to distort competition and/or whether such options/measures are consistent with other international obligations – in particular commitments under the WTO such as the Technical Barriers to Trade and the Sanitary and Phytosanitary agreements

Comment [AC23]: ICCA-WCC-CLI