

CHLORINATED PARAFFINS

INDUSTRY ASSOCIATION

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July 1, 2007

Fatoumata Keita Ouane
Secretariat of the Stockholm Convention
POPs Review Committee
United Nations Environment Programme
11-13 chemin des Anémones
CH-1219, Châtelaine, Geneva
Switzerland
Via E-mail: ssc@pops.int

Re: Comments on Draft Risk Profile for Short-Chained Chlorinated Paraffins

Dear Ms. Ouane:

I am pleased to submit the attached comments on the United Nations Environment Programme's (UNEP) Draft Risk Profile for Short-Chained Chlorinated Paraffins (SCCPs) in response to UNEP's invitation of Parties and Observers to the Stockholm Convention. The Chlorinated Paraffins Industry Association (CPIA) represents the North American chlorinated paraffins (CPs) industry. Our interest in CPs is global given that chlorinated paraffins produced in North America are shipped and sold outside of North America as a chemical commodity as well as in formulated products. As you are likely aware, CPIA has been an active stakeholder in both the UNEP and the United Nations Economic Commission for Europe (UNECE) initiatives.

At the outset, I would like to express my appreciation to Canada for providing the CP industry with the opportunity to comment on the initial draft of the Risk Profile as part of the Work group activity. We appreciate our comments being considered in revising the draft Risk Profile for broader circulation within UNEP. While the revised document is certainly improved, there remain various issues that we believe should be critically reviewed by the UNEP delegates before proceeding to consider designating SCCPs as a POP under the Stockholm Convention.

As the attached comments highlight, we do not believe there is a sufficient scientific basis to conclude that SCCPs, "as a result of its long-range environmental transport" can lead to, "significant adverse human health and/or environmental effects, such that global action is warranted."

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As noted in Appendix E of the Stockholm Convention, the purpose of the Risk Profile is to “evaluate whether the chemical is likely, as a result of its long-range environmental transport, to lead to significant adverse human health and/or environmental effects, such that global action is warranted.” As such, we believe it is important to focus the Risk Profile on information that is directly relevant to assessing the impact from long-range environmental transport (LRET). While we recognize that, in the interest of completeness, it is prudent to incorporate information not associated with long-range transport (e.g., urban environment), we suggest that a clearer distinction be made between information directly relevant to assessing the effects from LRET and other information not directly germane to the goals of the Risk Profile.

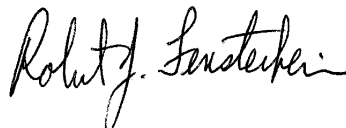
We were particularly pleased to see in the concluding section of the draft the quantitative assessment addressing potential to cause ecological harm. We believe that the concept of comparing effects and potential exposure is an appropriate means to assess possible “significant adverse human health and/or environmental effects.” We fail, however, to understand the justification for the view expressed that “when risks for persistent and bioaccumulative substances (such as SCCPs) are determined using standard methods, the risks may be underestimated,” particularly in the context of a compound that has been in commerce for many decades.

Table 23 of the draft compares exposure (EEV) and critical toxicity values (CTV) associated with different classes of receptors (e.g., pelagic organisms, benthic organisms). The maximum reported values used as the EEV (estimated exposure value) are largely from heavily industrialized areas close to the source and, as such, significantly overestimate the likely exposure from long-range transport. Nonetheless, even when these exaggerated estimates are used, the worst-case environmental levels are below the effect levels, as acknowledged in the draft Risk Profile. So that a more appropriate comparison can be made, we recommend presenting Risk Quotients that are based on levels from remote regions associated with LRET.

Overall, the CP industry stands by its earlier view that there is insignificant information to support the conclusion that SCCP may present a significant risk to human health and/or the environment from its long-range transport and encourages UNEP not to designate SCCPs as a POP under the Stockholm Convention.

Please let me know if I can clarify.

Sincerely,



Robert J. Fensterheim
Executive Director