

# IPEN Views of Stockholm Convention COP8

April 2017

The following is a summary statement of IPEN views on issues that COP8 will be called upon to address:

### Technical assistance and regional centres

- COP8 should welcome the recommendations by regional centres on marine litter plastics and microplastics and invite them to continue future activities as outlined in Annex VI of UNEP/CHW.13/INF/29 - UNEP/POPS/COP.8/INF/26
- Considering the large remaining stockpiles of PCBs, technology transfer of non-combustion methods of destruction that meet Convention requirements is a high priority. Regional cooperation on this matter should be encouraged.
- Training on national reporting and collection of inventory data is critical to Convention implementation.
- Instead of workshops, a direct “*learning by doing*” approach could be more effective and sustainable in getting technical assistance for specific problems and learning how to tackle similar issues in the future.
- Regional centres should increase the involvement of public interest NGOs and civil society in their work through direct participation in the design and implementation of projects. This criterion should be included in their evaluations and reporting.

### Financial resources

- The COP8 estimate of net funding needs for the 2018–2022 GEF-7 time-period is approximately USD\$4.4 billion.<sup>1</sup> However, this figure underestimates actual needs since it does not include costs associated with the 14 New POPs added to the Convention’s initial list of 12 substances (as of COP7 in 2015). In addition, the study notes that in some cases, only 20 per cent of the PCB inventory or less is reported as known, indicating that PCB destruction costs could be much higher. Finally, the study assumes that data for a given country or countries are representative of all countries in the respective region regardless of size or national circumstances.
- The draft GEF-7 programming document allocates USD\$850 million for the chemicals and wastes focal area which includes POPs, mercury, SAICM, and ODS – approximately five-fold lower than the estimated needs.<sup>2</sup> There may be additional funding for chemicals work through the GEF-7 impact programs. However, it is clear that financial needs for Stockholm Convention implementation far exceed available funds through the GEF.
- The Special Programme should include a needs assessment in its design to ensure that it actually meets the needs of countries and its stated goals, particularly since it is time-limited.
- The COP should invite the Executive Board of the Special Programme to consider the important role of public interest NGO contributions to Convention implementation and institutional strengthening so as to dedicate some funding for NGO activities in line with Programme objectives.
- Since needs and obligations for new and additional funding outlined in Article 13 have not materialized, other sources of funding should be explored including economic instruments to recover costs from companies that have produced POPs and/or countries in which they are based.

### Compliance

- Article 17 requires the COP to develop a compliance system “*as soon as practicable.*” COP8 should finalize the agreement and comply now with the requirements of Article 17 by approving procedures and mechanisms for determining and treating non-compliance.
- Non-compliance mechanisms will help identify the priority needs for technical and financial support and should consider all Convention obligations. A compliance mechanism is a tool to assess the effectiveness of the implementation of the convention as well as reveal problems and assist countries in a timely and efficient manner.
- The Basel Convention has a compliance mechanism that provides a useful model for the Stockholm Convention, including a variety of triggers.<sup>3</sup>

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<sup>1</sup> UNEP/POPS/COP.8/INF/32

<sup>2</sup> <https://www.thegef.org/council-meeting-documents/gef-7-programming-directions-and-policy-agenda>

<sup>3</sup> <http://www.basel.int/TheConvention/ImplementationComplianceCommittee/Mandate/tabid/2296/Default.aspx>

- Non-compliance with Convention obligations, including non-compliance with reporting requirements, is undermining the ability of the Convention to achieve its objectives. For example, 78% of Parties have not turned in NIP updates for the 9 POPs listed in 2009. For most countries updates were due 26 August 2012.<sup>4</sup>

### POPS waste

- COP8 should adopt the following low POP content levels:
  - PCDDs and PCDFs: 1 ug TEQ/kg (1 ppb)<sup>5</sup>
  - HBCD: 100 mg/kg (100 ppm)
  - HexaBDE, HeptaBDE, TetraBDE, PentaBDE as a sum: 50 mg/kg (50 ppm)
  - Polychlorinated naphthalenes (PCNs): 10 mg/kg (10 ppm)
  - PCBs: 10 mg/kg (10 ppm)
  - Pentachlorophenol (PCP): 1 mg/kg (1 ppm)
  - Hexachlorobutadiene (HCBd): 10 mg/kg (10 ppm)
- Products containing POPs should be labelled in order to effectively manage them in waste streams and in inventories. This should include products recycled under currently permitted exemptions.
- PCP technical guidelines<sup>6</sup> para 96 should delete the text in brackets and read: “*Destruction and irreversible transformation methods for the environmentally sound disposal of wastes with a content of PCP, its salts and esters above 1-100 mg/kg are available in subsection IV.G.2 of the general technical guidelines.*”
- Work to establish levels of destruction, low POPs content, and other POPs wastes issues for newly listed POPs should be carried out collaboratively by appropriate bodies of both the Basel and Stockholm Conventions including the POPRC, Toolkit, and BAT/BEP expert groups and not simply handed to Basel Convention bodies.
- The COP should urge Parties to also apply the BAT/BEP guidelines to source categories listed in Annex C of the Convention, particularly those listed among ESM technologies in the Basel Technical Guidelines.
- In the technical guidelines, POPs waste destruction options should not only list incineration and cement kiln co-incineration technologies but also non-combustion techniques such as Gas Phase Chemical Reduction (GPCR) and/or Base Catalysed Decomposition (BCD).
- New non-combustion technologies such as Copper Mediated Destruction should be added to the updated General Technical Guidelines on POPs wastes.
- Preference should be given to non-combustion techniques for POPs destruction to avoid undermining treaty objectives through promotion of technologies that create wastes contaminated by unintentionally-produced POPs.

### Rules of procedure

- Parties should support effective operation of the Convention by removing the brackets in Rule 45.1 to permit voting when all efforts at consensus have been exhausted.

### Listing of New POPs<sup>7</sup>

The POPRC has determined that each of the three new candidate POPs is likely, as a result of long-range environmental transport, to lead to significant adverse effects on human health and the environment, such that global action is warranted.

#### 1) Decabromodiphenyl ether (DecaBDE) in Annex A

- DecaBDE should be listed in Annex A with no exemptions.
- DecaBDE is primarily used as a flame retardant chemical in the plastic housings of computers and TVs, making it a key component of electronic waste. It has also been used in textiles, upholstered furniture, and mattresses.
- DecaBDE is one of the most prevalent flame retardant chemicals in the global environment and one of the predominant PBDE flame retardants in Arctic air and deposition samples.
- DecaBDE bioaccumulates in aquatic and terrestrial species and found in elevated concentrations in top predators. It contaminates wildlife that serves as traditional food for Indigenous Peoples.
- Toxicity studies indicate potential for adverse developmental, neurotoxic, and reproductive effects, and DecaBDE or its degradation products may also act as endocrine disruptors.
- The proposed exemptions for auto spare parts are vague and could include as many as 800 parts.

<sup>4</sup> <http://chm.pops.int/Countries/Reporting/NationalReports/tabid/3668/Default.aspx>

<sup>5</sup> Includes dioxin-like PCBs

<sup>6</sup> UNEP/CHW.13/6/Add.3

<sup>7</sup> IPEN Guide to New POPs, April 2017: <http://ipen.org/news/ipen-guide-listing-2017-pops-candidates>

- The aviation and auto industries can substitute DecaBDE in new parts. For spare parts, the auto industry should use retrofitting and generic spare parts that do not contain DecaBDE (e.g. wires, hoses, cables, pipes, and fabric.)
- The vague auto parts exemptions also have a potential impact on developing countries that receive older vehicles. POPRC Decision POPRC-12/4 states, *“that the increasing waste burden in developing countries from older vehicles that continue to be serviced with spare parts that contain DecaBDE is a concern.”* Developing countries should not have to deal with an increased DecaBDE waste burden simply because the EU auto industry does not want to substitute spare parts for ones that do not contain DecaBDE.
- COP8 should resist any proposal to create a recycling exemption for materials containing DecaBDE. The POPRC examined the impact of this type of exemption for COP5 and recommended against it, urging governments to, *“eliminate brominated diphenyl ethers from the recycling streams as swiftly as possible.”* The Committee noted that recycling materials containing POPs *“will inevitably result in wider human and environmental contamination”* and *“loss of the long-term credibility of recycling.”*
- The review of listed brominated diphenyl ethers notes that illegal shipments of WEEE originate from Europe, North America, Japan, Australia and the USA with common destinations in Asia (including China, Hong Kong, India, Pakistan and Vietnam) and Africa (including Ghana, Nigeria, and Benin). The elements necessary to ensure the environmentally sound management of WEEE and ELV do not exist in the majority of developing countries.
- A recent IPEN survey of plastic children’s products from 26 countries found OctaBDE and DecaBDE in 90% of them.<sup>8</sup> Toxic chemicals found in e-waste should not be “recycled” into children’s toys.
- If exemptions are granted, they should be for specific parts and the listing should require labelling new products that contain DecaBDE so that Parties can fulfil requirements under Article 6. This would be similar to what was agreed upon when listing HBCD (SC-6/13).

### 2) Short-chain chlorinated paraffins (SCCPs) in Annex A

- SCCPs should be listed in Annex A with no specific exemptions as recommended by the POPRC along with an additional remark in note “i” of Annex A requiring limitation of SCCPs in other chlorinated paraffin mixtures.
- SCCPs are primarily used as lubricants in metal cutting and as a flame retardant in PVC plastics, rubber, and carpet.
- SCCPs have been found in children’s products such as toys, stickers, clothing, sports gear, childcare articles, and in kitchen utensils above permitted levels, some at high levels up to 11% in concentration. Hand blenders used to prepare baby food leak SCCPs under normal use. A recent IPEN study found extraordinarily high levels of SCCPs in certain toys, at concentrations up to 19,808 ppm.
- According to a recent scientific paper, *“no other persistent human-made chemical has been produced in such quantities [as SCCPs]”* and there is some indication that production is increasing.
- SCCPs bioaccumulate in the aquatic food web and in birds. They are found in Arctic biota that serve as traditional foods for northern Indigenous Peoples (such as fish, seabirds, seals, walrus, and whales) at levels comparable to known POPs. SCCPs are also found in the breast milk of Arctic Indigenous women.
- They are toxic to aquatic organisms at low concentrations, disrupt endocrine function, and are suspected to cause cancer in humans.
- The use of SCCPs in metal cutting can be substituted with vegetable oil-based formulations. These are widely available and provide better heat dissipation and produce less smoke during machining.
- There are alternative plasticizers and sealants that can provide the same function without using SCCPs.

### 3) Hexachlorobutadiene (HCB) in Annex C

- HCB is already listed in Annex A and should now be listed in Annex C as recommended by the POPRC.
- No ongoing deliberate use is known and measures that reduce unintentionally-produced POPs such as dioxins and furans will also be effective for HCB. In addition, unintentional releases can be minimized by alternative production processes, improved process control, emission control measures, and implementing currently available safer alternatives for perchloroethylene and trichloroethylene.
- HCB is persistent in air and bioaccumulates in aquatic species. Monitoring of Arctic species demonstrates long-range transport predicted by modelling studies.
- Laboratory studies indicate renal and genotoxicity. HCB is classified as a possible human carcinogen.

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<sup>8</sup> <http://ipen.org/documents/pops-recycling-contaminates-childrens-toys-toxic-flame-retardants>

## Effectiveness evaluation

- Lack of national reporting and NIP updates are serious obstacles to robust effectiveness evaluation. For example, 39% of Parties have never turned in a single report. The quality of existing reports should be evaluated.
- The monitoring results showing increased levels of PentaBDE, OctaBDE, HBCD, PFOS, and endosulfan raise concerns about the effectiveness of eliminating New POPs.
- Greater effectiveness in implementing Article 3 paras 3 and 4 should be urged to prevent regrettable substitutes for POPs – including for POPs candidates.
- The Convention has not effectively reduced and eliminated DDT. The report notes that in the 2010 – 2014 time-period ~3268 tonnes/year of DDT has been used – 97% of it in one country.
- The effectiveness of Article 5 implementation needs significant improvement. Few Parties have defined BAT, developed complete inventories, and less than 1/3 have measures that promote or require BAT/BEP. The quality of the national action plans should be investigated.
- The small number of Parties indicating that they have measures in place to deal with management of wastes and stockpiles highlights the need for the BAT/BEP expert group to develop a guidance document on management of POPs contaminated sites – especially since only 18% of Parties have performed some remediation.
- There is poor effectiveness in the implementation of PCBs elimination. The report indicates that only 17% of the total global amount has been eliminated with looming deadlines in 2025/2028. The COP should urge greater development and technical assistance for non-combustion methods of PCBs destruction that do not form POPs.
- Due to the vast production, use and release of POPs, the health and well-being of Arctic Indigenous Peoples has been disproportionately harmed. Stringent and swift actions by States are urgently needed to protect the health and well-being, lands and territories of Indigenous Peoples and all peoples globally. Indigenous peoples should be given the opportunity to fully participate as members of the expert committees of the Stockholm Convention and provide input on the global monitoring plan and effectiveness evaluation.

## Effectiveness evaluation framework

General indicators of effectiveness should include whether any countries that have not ratified the amendments listing new POPs are major producers, users, importers, exporters, or emitters of these POPs.

- More information is needed about POPs in products including use, import, export and releases.
- Article 3: Providing both the date and the overall number of Parties taking measures would be more informative; report should include data on quantities of POPs used; ask whether assessment schemes cover POPs criteria; and include information on chemical and non-chemical alternatives to POPs. The chemical industry should report on efforts to comply with Article 3 paras 3 and 4 about alternatives that do not have POPs characteristics or other harmful characteristics as outlined in the POPRC Alternatives Guidance.
- Article 4: Important to include an indicator that determines whether Parties have transitioned to alternative products and processes and not just encourage more exemptions.
- Article 5: Important to keep all 7 indicators – this is a poorly implemented part of the Convention, in particular for PCDD/Fs which lack inventories and control in part due to flexible low POPs content levels.
- Article 6: Improve data collection for key indicator 6: Quantity of wastes identified and destroyed over time (includes wastes of products and articles consisting of or contaminated with POPs); other indicators should be modified to better assess implementation; what strategies used to identify contaminated sites; describe strategies used to identify products and wastes containing POPs; number of products and wastes identified as containing POPs.
- Article 7: Effectiveness should include whether national stakeholders participated in the NIPs, including consultation with women's groups and groups involved in the health of children; also include listing of New POPs and the resulting need to update the NIPs in indicator 3; include some qualitative information on how effectively the NIP has actually been implemented.
- Article 9: The indicator should include the number Parties who exchanged information on alternatives to POPs; also, the number of parties who have participated in the clearinghouse mechanism.
- Article 10: The indicators should be modified to fully consider Article 10 obligations to promote and facilitate public input to Convention implementation and programs for educational programs for women, children and the least educated. The effectiveness evaluation should also measure the extent to which Parties have implemented publicly available PRTR systems.
- Article 11: Include an indicator for the number of parties that make data and information from research, development, management and monitoring activities publicly accessible.

- Articles 12 and 13: Useful to include some qualitative information about the type of technical transfer including information sharing, data collection and inventories, strengthening regulations, BAT/BEP, safer alternatives, and dealing with POPs stockpiles and contaminated sites; evaluation of the financial mechanism should use information from the financial mechanism review including the needs assessment, aspects of the need for adequacy, predictability, the timely flow of funds and the importance of burden sharing.
- Article 15: Qualitative information about the quality of reports would be useful.
- Article 17: An indicator should indicate if an adequate compliance mechanism has been established.

### Global monitoring plan

- The monitoring programme still leaves significant data gaps in Africa, Asia, CEE, GRULAC, the Arctic and Antarctica; this should be addressed as a priority so that Convention effectiveness can be adequately measured.
- Newly listed POPs should be incorporated into the monitoring plan as soon as possible going forward with an accompanying improvement in laboratory measurement capacity.
- Global monitoring should include countries that have produced POPs and those requesting exemptions and/or acceptable purposes.
- The monitoring plan should include a subset of hotspot sites since these contribute to wider contamination from long-range transport, including potential accelerated releases and transport due to climate warming.
- The monitoring plan should also be updated to include POPs in traditional and market food sources, particularly traditional foods of Arctic Indigenous Peoples including fish, marine mammals, rendered oils, blubber, liver and other organ tissues.
- Free-range poultry eggs should be monitored as they have been shown to be a good indicator of overall contamination of the environment by certain POPs including PCDD/Fs, PCBs, DDT, PBDEs and HBCD.
- Indigenous Peoples can contribute to global monitoring by sharing data and research findings from community based research. Traditional Ecological Knowledge of Indigenous Peoples, which is scientific knowledge passed on for many generations, can complement and strengthen global monitoring programs conducted under the treaty.

### Exemptions and acceptable purposes

- Parties should promptly eliminate their reliance on specific exemptions and acceptable purposes and introduce safer alternatives as soon as possible.
- On the interpretation of Article 4 para 4: The five-year time period should begin on the initial date of entry into force of the COP's decision.
- On the interpretation of Article 4 para 7: A specific exemption may be extended once for a period of five years by a decision of the COP only for the Party that requests it.
- On the interpretation of Article 4 para 9: When a specific exemption is no longer in effect for any Parties, no new registrations for the exemption may be made.

### PBDE evaluation and review

- COP8 should end the toxic recycling exemption for brominated diphenyl ethers in parts IV and V of Annex A.
- The toxic recycling exemption places additional burdens on developing countries that receive recycled products or wastes containing PBDEs, including e-waste.<sup>9</sup>
- The toxic recycling exemption in parts IV and V of Annex A leads to PBDE flame retardants found in electronic waste being recycled into children's products.<sup>10</sup>
- The POPRC examination of the recycling exemption for the COP recommended to, *"eliminate brominated diphenyl ethers from the recycling streams as swiftly as possible"* noting that, *"Failure to do so will inevitably result in wider human and environmental contamination and the dispersal of brominated diphenyl ethers into*

<sup>9</sup>Updated information presented in UNEP/POPS/COP.8/7 indicates that *"developing countries also receive articles that may contain POP-BDEs in the form of second-hand/used goods or as wastes, originating mainly from developed countries...It is estimated that at least 50 % of WEEE is collected outside of the official take-back systems in the EU, part of which is then exported to developing countries as used equipment or illegally. Illegal shipments originate mainly from Europe, North America, Japan and Australia the USA with common destinations in Asia (including China, Hong Kong, India, Pakistan and Vietnam) and Africa (including Ghana, Nigeria, and Benin). In addition to WEEE, plastics from WEEE are also reported to be exported to developing countries in Asia."*

<sup>10</sup><http://ipen.org/documents/pops-recycling-contaminates-childrens-toys-toxic-flame-retardants>

*matrices from which recovery is not technically or economically feasible and in the loss of the long-term credibility of recycling.”<sup>11</sup>*

- The COP should request development of guidance on non-combustion methods for PBDEs destruction and discourage their incineration or co-incineration in cement kilns as they are a source of brominated dioxins.

### PFOS

- The COP should support the options for possible action following review of PFOS acceptable purposes to be discussed at COP9.
- COP8 should reinforce Article 3 para 3 and 4 in the decision on PFOS to remind Parties that substances with POPs characteristics should not be substitutes for PFOS, nor for candidate POPs under evaluation by the POPRC.<sup>12 13</sup>
- Parties should consider nominating two alternatives to PFOS identified by the POPRC as meeting or possibly meeting Annex D criteria: octamethylcyclotetrasiloxane (D4) and chlorpyrifos.

### Toolkit and BAT/BEP

- The TOR should be modified to include providing information on non-chemical alternatives
- The BAT/BEP Guidelines should also include guidance for all ESM technologies listed in the General Technical Guidelines for POPs Wastes, including non-combustion technologies (e.g. GPCR, BCD and others)
- A guidance document for inventory and management of sites contaminated by POPs should be developed by the BAT/BEP Expert Group.
- The Toolkit should add unintentional HCBd releases if listed in Annex C.

### Reporting

- Parties need to comply with national reporting as required by Article 15; according to the Convention website<sup>14</sup> only 24% of parties turned in required reports by November 2014. The COP should establish a goal of 100% reporting for the fourth report prior to COP9.
- Eligible Parties should be able to receive financial assistance to prepare national reports and technical assistance from the secretariat and regional centres. Montreal Protocol, CBD, and UNFCCC provide financial assistance with reporting and this is strongly associated with higher reporting rates.<sup>15</sup>
- Information that Parties have generated on pollutant releases, stockpiles, PCBs and other POPs should be compiled and made available on the Convention website.

### DDT

- The Convention has not effectively reduced and eliminated DDT. The report notes that in the 2010 – 2014 time-period ~3268 tonnes/year of DDT has been used – 97% of it in one country.
- Reporting on DDT by Parties should be significantly improved - 7 Parties in the DDT Register that did not submit questionnaires for 2012-2014 should do so as soon as possible.
- Parties that have used DDT but who are not on the DDT Register should report as soon as possible.<sup>16</sup>
- Further research on and implementation of non-chemical methods and strategies for disease vector control should be accelerated including increasing support to scale-up IVM and community participation.
- Parties should report strategies for malaria control including implementation of non-chemical methods.
- Use of DDT in indoor residual spray should be limited as much as possible in favour of safer alternatives and taking into consideration the impact of disease and insecticide resistance.

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<sup>11</sup> Stockholm Convention on Persistent Organic Pollutants (2011) Work programmes on new persistent organic pollutants, UNEP/POPS/COP.5/15

<sup>12</sup> Article 3 para 3: “Each Party that has one or more regulatory and assessment schemes for new pesticides or new industrial chemicals shall take measures to regulate with the aim of preventing the production and use of new pesticides or new industrial chemicals which, taking into consideration the criteria in paragraph 1 of Annex D, exhibit the characteristics of persistent organic pollutants.”

<sup>13</sup> Article 3 para 4: “Each Party that has one or more regulatory and assessment schemes for pesticides or industrial chemicals shall, where appropriate, take into consideration within these schemes the criteria in paragraph 1 of Annex D when conducting assessments of pesticides or industrial chemicals currently in use.”

<sup>14</sup> <http://chm.pops.int/Countries/Reporting/NationalReports/tabid/3668/Default.aspx>

<sup>15</sup> UNEP/POPS/COP.6/INF/28

<sup>16</sup> UNEP/POPS/COP.8/INF/6

- Technical support should be focused on deployment of non-chemical DDT alternatives that are made publicly available in understandable local languages.
- More publicly available timely updates and reporting are needed from the Global Alliance for the Development and Deployment of Products, Methods and Strategies as Alternatives to DDT for Disease Vector Control.
- The DDT Toolkit should include safer non-chemical alternatives instead of just describing how to use DDT.

### PCBs

- Standardized inventories, banning of sale and distribution, and elimination of PCBs under Convention requirements needs to be aggressively expedited. Only 20 per cent of the total quantity of liquids and equipment containing or contaminated with PCB has been eliminated to date.<sup>17</sup> Non-legacy sources also need to be addressed.
- The COP should establish a small intersessional working group to prepare a report on progress towards the elimination of PCBs for consideration at COP9.
- The COP should request development of guidance on non-combustion methods for PCBs destruction and discourage incineration or co-incineration of PCBs in cement kilns as they are a source category of POPs in Annex C. Regional cooperation on this matter should be encouraged.
- The Secretariat, PEN, and regional centres should work with public interest NGOs to increase information and awareness-raising campaigns on PCBs impact on human health and the environment, inventory and elimination.
- Good practice examples from national PCB inventories should be collected and become part of information and awareness raising campaigns.

### NIPS

- 78% of Parties have not turned in NIP updates for the 9 POPs listed in 2009. For most countries updates were due 26 August 2012. This needs to be completed as urgently as possible.
- Parties should strengthen multi-stakeholder consultation in the design and implementation of NIPs to enable an effective, inclusive, and regular public participation process and to comply with commitments in Articles 7 and 10.
- The guidance on the updating of NIPs should be amended to include instructions on developing inventories and assessments of PCBs.
- The Secretariat should identify practical problems that might be faced by Parties in developing or updating their NIPs including collecting data for evaluation and review of POPs and organizing multi-stakeholder consultations.

### Export certification

- Information in the third national reports shows an increase in exports and imports of chemicals listed in Annexes A or B for which permitted uses are in still in effect – opposite to the intent of the Convention.<sup>18</sup> Parties should undertake immediate measures to prevent the import and export of listed POPs in line with treaty obligations.
- The export certification form shown in UNEP/POPS/COP.8/31/Add.1 should explicitly state that this form is required every time export takes place.
- In the export certification form shown in UNEP/POPS/COP.8/31/Add.1, Section 1 (1) should be modified to be more explicit: *“Please describe the necessary measures taken to minimize or prevent releases of the imported chemical in order to protect human health and the environment, such as legislation, regulatory instruments, or administrative or policy guidelines. Please provide supporting documentation.”*

### Illegal traffic

- COP8 should request the secretariat to update a report on using the synergies of the three conventions to mobilise maximum efforts to combat illegal traffic of hazardous chemicals and wastes, including loopholes for repair, reuse, and/or recycling.

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<sup>17</sup> UNEP/POPS/COP.8/6

<sup>18</sup> UNEP/POPS/COP.7/10