

## WHAT IS HIDDEN BEHIND THE PROPOSED LOW POPS CONTENT LEVELS IN WASTE?

1. Low POPs Content Levels mark a limit and a demarcation that distinguishes between two groups of waste containing one or more POP; waste above the limit is 'POPs waste' and below the limit is 'not POPs waste'; though they are both contaminated by POPs at different concentrations. Here, there is a huge risk to keep society in "a false sense of security" in the face of a real risk of exposure to POPs.
2. Low POPs Content Levels proposed in the updated Basel general technical guidelines for the PBDEs, HBCD, SCCPs and PCDDs/F are not protective of human health and environment. If adopted as such by the COP, they will continue to allow the dispersal of POPs in many countries as constituents in primary or recycled articles or products (PDBEs, HBCD and SCCPs) or as toxic raw materials (dioxins in fly ashes) without the capacity or resources to manage them. This poses as a serious ethical problem and can create a Human Rights violation involving lack of protection from toxic chemicals and waste. The weak levels currently proposed for Low POPs Content Levels will lead to unnecessary and significant increases in human exposure from a lack of control in the trade of contaminated wastes.

### Weak Low POPs Content Levels hide these realities behind the curtain!

Weak Low POPs Content Levels provide:

- i. A license to circumvent the principles of the Basel Convention, to "legally" export and "allow" the 'recycling' of POP wastes in developing countries mostly through obsolete polluting technologies or informal sector as is the case for e-waste;

*Example of dioxins: A strong LPCLs of 1 ppb for dioxin means waste incinerators in EU will generate approximately 2,250,000 tonne of fly ash that is recognized as dioxins waste; but if the weak LPCLs of 15 ppb for dioxin is adopted, the quantity of dioxin waste (contaminated by these POPs above defined level and hazardous waste in fact) generated from the same level of activity will drop to 100,000 tonnes. The balance of **2,150,000 tonnes** will be available on the global market as merely a commodity or will be considered as general non-hazardous waste. Part of such could end up in Africa (feedstock in cement production, raw material dam and building constructions etc.). Waste with dioxins levels well below 15 ppb has been demonstrated to contaminate the soil and final resulted in dioxins contamination in poultry eggs that exceed the safe consumption limits (DiGangi and Petrlik 2005). Simply a big portion of dioxins in waste incineration fly ash which can reach around 10 kg TEQ per each year globally will get out of control.*

- ii. A loophole to legitimize producers of POPs waste avoiding their responsibility for environmentally sound management of waste containing POPs under the Stockholm Convention;
- iii. A sneaky way to satisfy the lobby of the industrial associations (very present in the negotiations) to continue recycling highly toxic plastics into new products, simply to keep industry's life easy, cheap and profitable;

- iv. A mechanism to manipulate all convention parties to support a proposed EU regulation on DecaBDE which stipulates that from March 2<sup>nd</sup>, 2019, DecaBDE will be subject to a limit of 500 ppm or 1000 ppm for its use as a constituent in the production and placing on the market of another substance, a mixture, an article or part of it;
- v. A denial of the human rights in the face of the elevated risk of exposure to chemicals in products and hazardous wastes;

**Solution:** Regulatory measures to reduce releases of the above-mentioned POPs from articles and resulting wastes items (through recycling mostly in the informal sector or obsolete technology in Africa) to our environment and subsequently our food chain **MUST** be based on the following strong Low POPs Content Levels:

- **1 ppb** (= 1 ng/g WHO-TEQ) for PCDD/Fs + dl-PCBs
- **100 ppm** (= 100 mg/kg) for HBCD
- **50 ppm** (= 50 mg/kg) for sum of PBDEs (including Deca-BDE)
- **100 ppm** (= 100 mg/kg) for SCCPs