

## **Intervention on Short-Chained Chlorinated Paraffins (SCCPs)**

Thank you Madame Chair. My name is Pamela Miller, Executive Director of Alaska Community Action on Toxics and Co-Chair of IPEN.

We congratulate the work of the Drafter of the Risk Management Evaluation (RME) for SCCPs, the Chair and Members. We support a recommendation for the listing of SCCPs in Annex A with no specific exemptions as the most effective control measure. A recent scientific paper noted that “no other persistent anthropogenic chemical has been produced in such quantities [as SCCPs].” There is some indication that production is increasing. The time is long overdue for the elimination of this harmful chemical that has contaminated the global environment.

We are concerned about the high levels of SCCPs that are found in other chlorinated paraffin (CP) mixtures at concentrations ranging up to 24.9%. And noting the significant amounts of SCCPs associated with the manufacture of other CP mixtures, it is prudent to specify the restriction of SCCPs in other CP mixtures in accordance with provisions of Article 3 of the Convention (RME para 157). In order to prevent regrettable substitutions, MCCPs (medium-chained chlorinated paraffins) and LCCPs (long-chained chlorinated paraffins), as well as other chemical alternatives that exhibit POPs or other hazardous properties should not be considered as alternatives to SCCPs.

It is clear from the RME that technically feasible, cost-effective, alternatives are available for all known uses. We appreciate the presentation of viable non-chemical alternatives for the primary uses of SCCPs including bio-based alternatives and alternative techniques such as supercritical CO<sub>2</sub>, dry- and cryogenic machining for metalworking; and non-chemical alternatives for flame retardant applications.

It is particularly concerning that analyses of new products in countries where SCCPs are banned found the continued presence in such articles as children’s toys and clothing, sports wares, childcare articles, kitchen utensils, electronics, and bathroom articles, some in high concentrations and above permitted levels—some containing stunning levels and up to 11% in concentration. New products are therefore likely to be a significant pathway for human exposure, and particularly harmful for infants and children.

There is an urgent for action to eliminate SCCPs which have been demonstrated to be of global concern due to persistence, long-range transport, bioaccumulation, and adverse effects to the environment and human health. The issue of short-chained chlorinated paraffins (SCCPs) holds more than a scientific interest for me. I grew up in a small town in Dover Ohio, in the US, the site of a primary manufacturing facility for SCCPs until recently—our neighborhood and my family has suffered cancers and other health disparities due to the flagrant and illegal discharges to air, water, and land. SCCPs are now a major concern for the health of traditional foods and peoples of the Arctic where I now live and work.

We support a recommendation of Annex A listing with no exemptions.