

Quick Guide to IPEN Views on POPRC13

October 2017

Dicofol

Dicofol is a miticidal pesticide related to DDT that has been used on fruits, vegetables, cotton, tea, and orchids. Dicofol is highly toxic to aquatic organisms and damages reproduction in birds. In mammals, dicofol damages the brain, thyroid, liver, and adrenal glands. Dicofol and/or its metabolites have been found in milk, baby formula, eggs, fruits, vegetables, human breast milk, colostrum and blood. The successful prohibition of the production, sale and use of dicofol by a wide number of countries growing different crops within different geographies and climatic conditions indicates that technically and economically viable alternatives exist. Agroecological and integrated pest management practices have proven to be efficient as an alternative to dicofol in a number of countries for a variety of crops, including in developing countries.

> Dicofol should be recommended for listing in Annex A with no exemptions.

PFOA

PFOA should be recommended for listing in Annex A due to its extreme persistence and links to high cholesterol, ulcerative colitis, thyroid disease, testicular cancer, kidney cancer and pregnancy induced hypertension in humans. There is a concern about conflict of interest as the drafters of the Risk Management Evaluation are an industry consultancy with a client list that includes companies that make fluorinated compounds and/or use PFOA in their manufacturing processes.¹ Many of the proposed PFOA exemptions cannot be justified.

1. Equipment to make semiconductors, spare parts, and infrastructure
The justification for this exemption is based on “low” EU releases and “stringent” practices. The document does not mention the possibility of higher PFOA use or different conditions of use in the rest of the world. The proposal does not specifically describe what would be exempted and Norway’s exemptions expired in 2016. The POPRC should not recommend global exemptions that are poorly defined, particularly when they lack supporting evidence.
2. Semiconductors or compound semiconductors
No information is provided about the function of PFOA in semiconductors, how widespread it is, or about alternatives for this use. In fact, the document provides no justification for the proposed exemption other than the fact that EU and Canada granted an exemption for it. The POPRC should not recommend global exemptions that are poorly defined and not even justified.
3. Photolithography processes for semiconductors or etching processes
The industry admits that “several companies” continue to use PFOA in these processes. This implies that some (or the majority of) companies have phased-out the use of PFOA. The companies that have already discontinued use of PFOA should get the economic benefit of a global ban on this use. No exemption is justified.
4. Technical textiles
The German industry claims PFOA is needed for performance but admits concerns over losing €6 billion in sales. The proposal does not state what specific products the exemption would cover or how worker protection can be achieved without relying on a toxic chemical-impregnated textile. Exemptions should not be recommended if they are undefined and do not have independent verification of performance claims or needs.

¹ BiPRO’s corporate clients include CEFIC, Saint-Gobain, Dow Europe GmbH, Bayer AG, 3M, RAG Aktiengesellschaft, Daimler AG, Robert Bosch GmbH, H.C. Starck, TIMCAL AG, Federation of Europena Producers of Abrasives, Silicon Carbide Manufacturers Association, Association of German Abrasive Manufacturers, Deutscher Industrieverband Keramische Fliesen und Platten e.V. <http://www.bipro.de/en/referenzen/auftraggeber/>

PFOA continued

5. Membranes for medical textiles, filtration in water treatment, production processes and effluent treatment
The document provides no justification for considering this exemption other than the fact that the EU granted it. The document does not state what specifically would be exempted. Since water treatment facilities have been identified as one of the most PFOA-contaminated areas with high potential to disperse PFOA into the wider environment, this use should not be exempted. There are fluorine-free alternatives for use in medical textiles. No exemption is justified.
 6. Aqueous film-forming foams for firefighting
Firefighting foams containing PFOA and other fluorinated substances are a dispersive use and a key source of water pollution and soil contamination in many sites around the world, including as a result of training exercises. Alternatives that do not contain PFOA or fluorinated substances are available and display similar performance to PFOA-containing foams. Dispersive uses of PFOA are especially serious due to widespread contamination of drinking water, and cannot be removed with carbon filters, thereby making it very difficult and costly to clean PFOA-contaminated water. The availability of technically feasible fluorine-free foams and the time frame of entry into force of a PFOA amendment (2020) argues that no exemption should be granted.
 7. Medical devices
The EU granted this exemption until 2032 in their PFOA regulation based on the request of a single manufacturer. The document does not name which medical devices use PFOA or which ones would receive the exemption. In fact, no justification is provided other than the fact that EU and Norway granted an exemption for it and Canada does not regulate this use. Global exemptions should not be recommended if specific products are not named and no information about alternatives is presented.
 8. Production of implantable medical devices
The document does not name which medical devices use PFOA or which ones would receive the exemption. In fact, no justification is provided other than the fact that EU and Norway granted an exemption for it and Canada does not regulate this use. Global exemptions should not be recommended if specific products are not named and no information about alternatives is presented.
 9. Photographic coatings applied to films, papers or printing plates
This is an obsolete use of PFOA since it has essentially been replaced by digital imaging. The draft Risk Management Evaluation notes that, *“Digital imaging will replace the need for PFOA in photo-imaging and the transition is occurring rapidly.”* There is no justification for continuing this archaic use of PFOA when it has been replaced by digital technologies. No exemption should be granted for this use.
 10. Transport of intermediates to enable reprocessing at another site
This proposed exemption opens the door to waste dumping in developing and transition countries under the guise of “reprocessing.” In many countries, none of the “stringent” measures described as EU practice could be effectively implemented or enforced. This exemption could result in significant further releases of PFOA and should not be granted.
 11. Use of perfluoro iodide to make perfluorooctyl bromide for pharmaceutical products
This exemption is proposed on behalf of a single company: Daikin (Japan). In 2015, more than 100 governments agreed that environmentally persistent pharmaceutical products are an emerging policy issue of global concern. The POPRC should not recommend a global exemption just because a single company requested one. Global exemptions for environmentally persistent pharmaceutical products should not be recommended.
- > PFOA should be recommended for listing in Annex A with no exemptions as none of the proposed exemptions have provided sufficient information for their justification. Any considerations of exemptions should be specific, include independent sources for claims about alternatives, and be consistent with the Convention objective to prioritize protection of human health and the environment from POPs.

Perfluorohexane sulfonic acid (PFHxS)

PFHxS is a regrettable substitute for PFOS. It does not degrade via photolysis and is structurally similar to PFOS and is not expected to undergo hydrolysis. PFHxS biomagnifies in the food chain in the Arctic with BMF > 1 and humans accumulate it with a very slow elimination half-life of approximately 8 years. PFHxS is detected in remote regions, including in the Arctic and Antarctic where it is found in the environment and in biota, including in humans. Studies indicate that PFHxS undergoes long-range environmental transport to polar regions via oceanic transport, and possibly via air in the form of volatile precursors that degrade to PFHxS locally. PFHxS is one of the most frequently detected PFAS in humans together with PFOS and PFOA (above 98% detection in five international cohorts). It has been detected in human umbilical blood, serum and breast milk. PFHxS has negative effects on brain development, the thyroid hormone system, and metabolism.

> PFHxS meets Annex D screening criteria and should move forward to evaluation of its Risk Profile characteristics in Annex E.

PFOS evaluation

The POPRC should establish an intersessional working group to evaluate the current acceptable purposes and specific exemptions for PFOS. The POPRC alternatives guidance should be used as the basis of the work (UNEP/POPS/POPRC.5/10/Add.1). The assessment should focus on functional needs and how substitutes can address these functions. Alternatives should not only consider chemicals but also include innovative changes in the design of products, industrial processes and other practices. Since COP8 has requested information regarding alternatives to the use of sulfluramid, experts in agroecology should be consulted – especially since this is a direct release to the environment. The secretariat should communicate directly with the Parties that have registered exemptions and acceptable purposes to determine progress with substitution for these uses.

> Due to the extreme persistence of PFOS along with its other POPs properties the evaluation should make every effort to identify alternatives so that acceptable purposes can be either ended or moved to the category of time-limited specific exemptions.

###