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IPEN Intervention on the Listing of Chlorinated Naphthalenes, Hexachlorobutadiene, and Pentachlorophenol to the Stockholm Convention

Given by Pamela Miller, Alaska Community Action on Toxics, U.S.A.

Thank you Madame President. Good afternoon distinguished delegates, ladies and gentlemen. I am representing the views of IPEN on the recommendations of the POPs Review Committee to list the three new substances to the Convention: chlorinated naphthalenes in Annexes A and C, hexachlorobutadiene in Annexes A and C, both with no exemptions and pentachlorophenol (PCP) in Annex A. All three substances received rigorous scientific review by the POPRC and we support their recommendations and urge listing of PCP in Annex A with no exemptions.

The compelling evidence of PCP as a persistent, ubiquitous global contaminant in breast milk, blood, amniotic fluid, and other human tissues throughout the world, including Indigenous peoples of the Arctic—warrants swift and decisive global action. PCP is a dominant organic contaminant in wildlife and human biomonitoring studies, including populations in remote areas—providing justification for including PCP under Annex A of the Convention. A recent Arctic Monitoring and Assessment (AMAP) report showed there is a significant increase in PCP concentrations in blood serum of Inuit from Nunavik in Arctic Canada.

PCP is associated with adverse health effects including damage to the developing brain and nervous system, impairment of memory and learning, disruption to thyroid function, immune suppression, infertility, and increased risk of certain cancers such as non-Hodgkin lymphoma. In September 2014, the US National Toxicology Program re-classified PCP "as reasonably anticipated to be a human carcinogen." Regulatory controls and restrictions of this unmanageable POP have proven inadequate in protecting children from harmful exposures. In a 2014 paper published in the journal Lancet, PCP is among the industrial chemicals known to cause brain toxicity and neurological symptoms in humans, proving that the substance can reach the brain and exert toxicity to brain cells.

Emissions from PCP-treated wooden poles are one of the main sources of dioxins and furans, which are also released during manufacture and disposal of PCP, and contaminate soils and groundwater beneath PCP-treated utility poles. Hence PCP contributes substantially to the global toxic chemical burden.

We are encouraged about the viability and availability of cost effective alternatives to the use of PCP-treated wood, particularly non-chemical material substitutions for utility poles. In recent years, industry has developed innovative alternative materials such as fiberglass composite, recycled steel, concrete, as well as the undergrounding of wires. These alternatives are comparable or superior to PCP-treated wood in terms of strength and longevity, and they are in use in many countries, including Canada and USA.

These do not have to be disposed of as hazardous POPs-contaminated waste, so there are clear cost and environmental benefits of using these safer materials.

Annex B listing for a non-critical use that is not required to protect public health (as in the case of DDT) would undermine the integrity of the Convention and could result in the increased use of PCP. Therefore, we urge you to recommend PCP, its salts and esters for listing in Annex A.

Eliminating the production and use of PCP by listing it in Annex A with no exemptions would confer obvious health and environmental benefits by reducing exposures to PCP, dioxins and furans, and prevent further harm.