

April 21, 2015

The Honourable Robert Nicholson
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The Honourable Leona Aglukkaq
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The Honourable Rona Ambrose, P.C., M.P.
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Re: Listing chlorinated naphthalenes (CNs), Hexachlorobutadiene (HCBD) and pentachlorophenol (PCP) for elimination under the Stockholm Convention on POPs

Dear Ministers:

We the undersigned represent Canadian organizations in support of public and occupational health, environmental justice, and conservation. Recognizing the opportunity of the upcoming Conference of the Parties (COP7) of the Stockholm Convention on Persistent Organic Pollutants (POPs) in May 2015, we strongly recommend that the Canadian Government support the inclusion of chlorinated naphthalenes (CNs), Hexachlorobutadiene (HCBD) to Annex A (elimination) and Annex C without exemptions and pentachlorophenol (PCP) in Annex A for global elimination with no exemptions. Over the past decade, Canada has demonstrated leadership for global actions to eliminate POPs under the Stockholm Convention in recognition of the impact of POPs on the health of Canadians and the environment, particularly in the arctic region. We urge you to continue to act on POPs by supporting the global elimination of these POPs under the Stockholm Convention on POPs.

Chlorinated naphthalenes and Hexachlorobutadiene

The expert committee of the Stockholm Convention, the POPs Review Committee (POPRC) recommended the listing of CNs and HCBD at the Ninth meeting of the POPRC in 2013. CNs were used in industrial applications (e.g., cable insulation, capacitors, gauge and heat exchange fluids, instrument seals and solvents). HCBD was imported into Canada and used as a solvent. HCBD is also generated unintentionally as a by-product during the production of chlorinated chemicals including tetrachloroethylene, trichloroethylene, and carbon tetrachloride.^{1,2} Canada is well positioned to support the listing of HBCDs and CNs to Annex A (elimination) and C (unintentional production) without exemptions. It has concluded that CNs and HCBD are toxic under the *Canadian Environmental Protection Act* and has taken regulatory measures to prohibit the manufacture, use, sale, offer for sale and import of these POPs through the *Prohibition of Certain Toxic Substances Regulations*. Furthermore, there has been no manufacture of these chemicals in Canada.

Pentachlorophenol

The (POPRC) determined that pentachlorophenol (PCP) meets scientific criteria as a POP for its persistence, bioaccumulation, and adverse effects and that it will, as a result of its long-range environmental transport, “lead to significant adverse human health and environmental effects such that global action is warranted.” At the most recent meeting in October 2014, the POPRC recommended listing of PCP in Annex A of the Convention.³

PCP is a persistent and ubiquitous contaminant found in the breast milk, blood, amniotic fluid, adipose tissue, and seminal fluid of people throughout the world, including Indigenous peoples of the Arctic. The chemical 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.⁴ In September 2014, the U.S. National Toxicology Program’s Report on Carcinogens re-classified PCP “as reasonably anticipated to be a human carcinogen.”⁵ Regulatory controls are not sufficient to protect workers and communities. According to CAREX, approximately 4,300 Canadians are exposed to PCP in workplace settings, with farm

¹ Environment Canada. 2015. Hexachlorobutadiene. <http://www.chemicalsubstanceschimiques.gc.ca/fact-fait/hexachlorobutadiene-eng.php>

² Environment Canada. 2015. Upcoming Meetings of the Conferences of the Parties (COP) to the Stockholm, Basel, and Rotterdam Conventions, May 4-15, 2015. Presented at the TripleCOP Webinar, dated February 25, 2015.

³ Risk Management Evaluation on Pentachlorophenol and Its Salts and Esters. October 2014. POPs Review Committee of the Stockholm Convention on Persistent Organic Pollutants. UNEP/POPS/POPRC.10/10/Add.1.

⁴ Risk Profile for Pentachlorophenol and Its Salts and Esters. October 2013. POPs Review Committee of the Stockholm Convention on Persistent Organic Pollutants. UNEP/POPS/POPRC.9/13/Add.3

⁵ NTP (National Toxicology Program). 2014. Report on Carcinogens, Thirteenth Edition. Research Triangle Park, NC: U.S. Department of Health and Human Services, Public Health Service. <http://ntp.niehs.nih.gov/pubhealth/roc/roc13/>

workers and electrical power line and cable workers representing the largest exposed groups.⁶ Children are exposed to this carcinogenic substance while they are playing in and around PCP-treated poles in residential areas and near schools and parks. Recent studies have confirmed that children in the U.S. are still being exposed to pentachlorophenol, even though PCP was banned for almost all uses in 1987 except for wood preservation of utility poles.⁷ PCP-treated poles are being re-used in landscaping, livestock enclosures, and gardening applications which can also result in hazardous and unnecessary exposures.

Dioxins and furans are produced and released as dangerous by-products in the manufacturing of PCP, as well as during use and disposal of PCP-treated wood. PCP, dioxins and furans have been demonstrated to contaminate soils and groundwater beneath treated poles. Dioxins and furans associated with PCP contribute to the global load and add to the costs for cleanup of facilities, disposal of wastes, and public health. Emissions from PCP-treated wooden poles are one of the main sources of polychlorodibenzo-p-dioxins and furans (PCDD/Fs). In Canada, their emissions from in-service poles were estimated to be 47% of total national emissions to soil reported in the National Canadian Pollutant Inventory.^{8,9}

At least 36 countries have banned the use of PCP because of its high toxicity and its hazards to environmental and human health. PCP produced exclusively in México is marketed in the U.S. and Canada. These two countries are major users of PCP comprising approximately 83% of global use.¹⁰

Safe and economically viable non-chemical alternatives (e.g. naturally resistant hardwoods, concrete, steel, and fibreglass reinforced composite) are readily available and are used broadly in Canada. In fact, PCP is used on only 15% of the wood utility poles that are chemically treated.¹¹ The continued use of PCP adds to the mounting chemical threat to the health of Canadians and the global environment. ***Therefore, we call upon the government to support the listing of PCP in Annex A of the Stockholm Convention with no exemptions. We urge the government to develop and implement a plan to phase-out the manufacture and use of PCP in Canada. We also urge the government to support the Annex A listing of CNs and HCBd at the upcoming COP in May 2015.***

⁶ CAREX. 2014. Pentachlorophenol. http://www.carexcanada.ca/en/pentachlorophenol/occupational_estimate/

⁷ Morgan, M, P Jones and J Sobus. 2015. Short-Term Variability and Predictors of Urinary Pentachlorophenol Levels in Ohio Preschool Children. *Int. J. Res. Public Health* 12:800-815.

⁸ Risk Management Evaluation on Pentachlorophenol and Its Salts and Esters. October 2014. POPs Review Committee of the Stockholm Convention on Persistent Organic Pollutants. UNEP/POPS/POPRC.10/10/Add.1.

⁹ Bulle, C, R Samson, and L Deschênes. 2010. Enhanced Migration of Polychlorodibenzo-p-dioxins and furans in the Presence of Pentachlorophenol –Treated Oil in Soil around Utility Poles: Screening Model Validation. *Environmental Toxicology and Chemistry* 29(3):582–590.

¹⁰ Risk Management Evaluation on Pentachlorophenol and Its Salts and Esters. October 2014. POPs Review Committee of the Stockholm Convention on Persistent Organic Pollutants. UNEP/POPS/POPRC.10/10/Add.1.

¹¹ Risk Management Evaluation on Pentachlorophenol and Its Salts and Esters. October 2014. POPs Review Committee of the Stockholm Convention on Persistent Organic Pollutants. UNEP/POPS/POPRC.10/10/Add.1.

Thank you for your commitment to protecting the health of our environment and people.

Sincerely,

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KANCED (KAN Centre for Environment and Development) (ON) (Contact: Peter Podobed, info@kanced.org)

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The New Brunswick Lung Association (NB) (Contact: Barbara MacKinnon, PhD, President and CEO, 506-455-8961, ext. 102, barb.mackinnon@nb.lung.ca)

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Reach for Unbleached Foundation (BC) (Contact: Delores Broten, Senior Policy Advisor, 250-339-6117 delores@rfu.org)

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