

Responding to Canada's National Implementation Plan Under the Stockholm Convention on Persistent Organic Pollutants (POPs) Consultation Draft February 2005

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TABLE OF CONTENTS

INTRODUCTION.....	2
OVERARCHING ISSUES FOR CANADA'S NATIONAL IMPLEMENTATION PLAN.....	4
<i>Creating a Vision for Canada's National Implementation Plan on POPs</i>	4
<i>Need for Evaluation of Programs and Initiatives in Canada</i>	5
<i>Need for Regulatory Backstop for Canada's efforts on POPs.....</i>	5
<i>Strengthen Role of Transboundary Air ISSUES OFFICE, Environment Canada</i>	6
<i>Role of Effective Public Participation</i>	7
<i>Shifting Approach to Promote and Develop Non-Incineration Technology and Safe Alternatives</i>	8
<i>Canada's National Action Plan on Unintentional POPs.....</i>	8
<i>Addition of POPs to the Stockholm Convention on POPs.....</i>	11
<i>Canada's commitment to Financial and Technical Assistance</i>	12
ADDITIONAL COMMENTS RELATED TO SPECIFIC SECTIONS OF CANADA'S NIP	12
CONCLUDING REMARKS	14

INTRODUCTION

The Stockholm Convention on Persistent Organic Pollutants (POPs) entered into force on May 17th, 2004. Canada was the first country to sign and ratify the Convention when it was first signed at the Conference of the Plenipotentiaries in May 2001. As the first Conference of the Parties approaches, Canada is uniquely positioned to solidify its leadership role in the global community as it outlines the activities it expects to take to fulfil its obligations under the Convention. Other Parties will look to Canada's efforts as a potential model for effective action on POPs.

The development of Canada's NIP is one that will attract considerable interest from the global community. The Government of Canada has had three years to develop a NIP that would result in the elimination and reduction of POPs in the global environment. Canada's role throughout the intergovernmental negotiating process has been significant beginning with the resources it dedicated to conduct research on POPs, the involvement of various government departments in the negotiations, the inclusion of non-governmental stakeholders in the Canadian delegations to these negotiations and its financial commitment to the Convention through the Canada's POPs Fund. Hence, the expectations for Canada's NIP will be high.

In late 2003 and early 2004, pre-consultation discussions and meetings were organized by Environment Canada to discuss the scope of Canada's NIP. These sessions included participation from Health Canada, representatives from industry, environmental non-governmental organization (NGOs), aboriginal organizations, as well as some jurisdictional governments. As a result of participating in these consultations, the ENGOs submitted extensive comments on the components needed in Canada's National Implementation Plan during the pre development phase for Canada's NIP. The details of this report, entitled "**An NGO Submission to Environment Canada's Consultation on Canada's National Implementation Plan under the Stockholm Convention on Persistent Organic Pollutants (POPs): Demonstrating Canada's Commitment to the Reduction and Elimination of POPs**" (March 10, 2004) provide information for which the current proposals by Environment Canada on its NIP will be reviewed. The recommendations in this report remain relevant to this submission.

The comments submitted below are intended to supplement and/or expand on issues raised in the multi stakeholder consultations held on February 14th, 2005 in Ottawa by Environment Canada on its document, "Canada's National Implementation Plan Under the Stockholm Convention on Persistent Organic Pollutants: Consultation Draft " (February 2005).

The following key elements identified in our submission of March 10, 2004 are integral to Canada's NIP and repeated in this submission.

Canada's NIP should:

- be comprehensive in its approach;

- demonstrate transparency in its development;
- ensure effective public participation in all aspects of its development;
- undertake an assessment on the effectiveness of the programs and initiatives aimed at eliminating and reducing POPs;
- ensure an effective regulatory framework to support the programs and initiatives to ensure that the obligations and the spirit of the Stockholm Convention are reflected;
- require the implementation and promotion of safe substitutes and non incineration technologies for POPs;
- outline timeline for its implementation; and
- ensure that capacity and resources are available to implement all aspects of Canada's NIP.

Overall, the draft document presented by Environment Canada in February 2005 demonstrates a good start in developing Canada's NIP. However, upon careful review of the draft NIP for Canada, several elements included in ENGO submission of March 2004 were not adequately incorporated or addressed into the draft presented in February 2005. A few of the gaps identified in Canada's draft NIP include:

- *weak vision for promoting a NIP that is based on elimination and prevention of POPs while promoting of safe alternatives and non incinerating technologies,*
- *the absence of an evaluation of Canada's programs on toxic substances such as POPs in particular with respect to unintentional POPs,*
- *lack of commitment by Environment Canada to recommend programs and/or regulations specifically designed to meet the obligations of the Stockholm Convention,*
- *lack of timelines and targets that are required to measure progress on implementation efforts,*
- *sufficient detail to outline level of public engagement and consultation at all stages implementing the Stockholm Convention, including commitment to resources for capacity building,*
- *a detailed process in Canada to identify and nominate additional POPs in Canada beyond the efforts to categorize Domestic Substances List under CEPA, and*
- *a firm commitment by Canada on additional funding directed to developing countries and countries in transition to meet the obligations of the Convention.*

Without an adequate response to these issues, the draft NIP cannot guarantee that Canada will effectively meet its obligations under the Stockholm Convention on Persistent Organic Pollutants.

We strongly urge Environment Canada to consider the issues raised by NGOs in this submission as well as the submission of March 2004 to strengthen Canada's draft NIP in the time leading up to the First Conference of the Parties in Uruguay in May 2005 and to 2006 when Parties to the Stockholm Convention are expected to formally submit their NIP to the POPs Secretariat for review. This plan will be viewed a a global model.

OVERARCHING ISSUES FOR CANADA'S NATIONAL IMPLEMENTATION PLAN

CREATING A VISION FOR CANADA'S NATIONAL IMPLEMENTATION PLAN ON POPS

Much time has been spent on talking about Canada's efforts in the Stockholm Convention to date. The level of commitment by Canada on POPs should be heightened further now that the implementation phase is underway. Canada remains a major contributor to the levels of POPs but also a recipient of POPS from domestic and global sources. We urge Canada to develop a NIP whose goal is the ultimate elimination of POPs from the global environment. Canada's NIP should not only aim to meet the obligations of the Stockholm Convention but exceed it.

NGOs are concerned that the exercise of developing a NIP will be limited to creating an inventory of programs in Canada. During the pre-consultation discussion on the development of Canada's NIP, some stakeholders suggested that current programs and initiatives underway in Canada were sufficient to meet the obligations of the Convention. In fact, it is wholly inadequate for Canada's NIP to provide simply an inventory of current programs in Canada. The real value in Canada's NIP will be identifying the resources and the additional efforts needed for Canada to meet its obligations under the Stockholm Convention.

Timelines and Targets

Therefore, the inclusion of timelines and targets for reductions and ultimate elimination are critical elements in the NIP. It would further entrench Canada's commitment on POPs and require departments to monitor progress towards the Convention goals. In the event that the progress towards the Convention goals are slow, the presence of timelines allows for the development of contingency plan for affected sectors and an accountability mechanism for the public. Moreover, the timelines may trigger innovation among the affected industry that use, produce or release POPs.

Taking a Preventative Approach

Canada's efforts on POPs must be seen as ground-breaking. Therefore its efforts should be entrenched in Canada's pollution prevention strategy, which calls for prevention of toxic substances at the source as a key element in the strategy. This approach would promote the development and application of safe alternatives and techniques. NIP development and its eventual implementation will require adequate resources and capacity to ensure the protection of human health and environment. Such a vision for Canada's NIP is well supported by the legal text of the Convention and the intent of the Stockholm Convention obligations.

One key area in which Canada can demonstrate this vision is in the obligation to add additional POPs to the Stockholm Convention. Canada is well positioned to show leadership in this area. Through its efforts to categorize the Domestic Substances List (DSL) under the Canadian Environmental Protection Act, 1999 (CEPA 1999), Canada is

already able to identify substances that may have the POPs characteristics. It is not too premature to identify possible POPs for addition to the Stockholm Convention. Similarly in the area of financial assistance, Canada can provide additional financial funding to the Canada's POPs Fund which has not been replenished since its inception.

Recommendation: Canada's NIP should not be an inventory of programs and initiatives related to POPs but should include timelines and targets to assess Canada's progress on meeting its obligations under the Stockholm Convention.

Recommendation: Canada should plan to eliminate all POPs in Canada by 2014, ten years after the Stockholm Convention entered into force.

NEED FOR EVALUATION OF PROGRAMS AND INITIATIVES IN CANADA

Currently, the lack of evaluation on the programs in Canada to address toxic substance creates a significant gap in the development of Canada's NIP. There are many regulatory and non-regulatory programs focused on POPs and other toxic substances being implemented in Canada, but the public and NGOs do not have a clear understanding of the effectiveness of these programs and initiatives. NGOs and the public are asked to accept that progress on toxic substances in Canada is being made without sufficient evidence. In fact, reports from the Auditor General office and OECD suggest that Canada efforts on toxic substances are inadequate. Despite stakeholders raising this issue in previous consultations, the draft NIP does not address this matter in its current draft.

The lack of information on the progress made on toxic substances is a good reason why Canadians require a NIP that includes additional information of new programs and resources that will be initiated to address POPs in Canada. The results of such an evaluation process will identify gaps in the current approach on POPs as well as help to prioritize where resources and capacity should be directed by Environment Canada as well as other affected government departments.

Recommendation: Canada's workplan in developing Canada's NIP should include an evaluation of current programs in Canada and provinces in addressing POPs specifically. Such an evaluation process should include data and case studies demonstrating success as well as a transparent process for public input.

NEED FOR REGULATORY BACKSTOP FOR CANADA'S EFFORTS ON POPs

POP's in Canada can be dealt with under several statutes. The *Pest Control Product Act* is the main statute to assess and manage pesticides, while CEPA is the main statute identifying, assessing and managing industrial chemicals. Further, various non-regulatory and regulatory programs control different aspects of toxic substances in Canada. The Persistence and Bioaccumulation Regulations under CEPA provide the legal instrument to identify potential POPs in Canada but the assessment and eventual management of these substances must follow the CEPA prescription. While the

pesticides identified in the Stockholm Convention have been regulated the unintentional POPs remain a significant problem. Canada's NIP needs a strong regulatory backstop to stop the release and generation of these substances.

A regulation specifically targetting the Stockholm Convention can bridge the gaps between the various statutes in Canada by providing a comprehensive framework that will include:

- How POPs will be identified and assessed in Canada;
- Articulate how Canada NIP plans to meet its obligation under the Convention;
- A process for identifying appropriate programs necessary to meet the goals of the Convention;
- Outline a mechanism for reporting and evaluating progress on POPs;
- Timelines and Targets to eliminate POPs in Canada.

This regulation would give needed authority to complete the tasks in Canada's NIP.

- **Recommendation: Canada should develop a POPs regulation that bridge the gaps in the existing statutes and regulations related to POPs. This regulation would give needed authority to complete the tasks in Canada's NIP.**

STRENGTHEN ROLE OF TRANSBOUNDARY AIR ISSUES OFFICE, ENVIRONMENT CANADA

The Transboundary Air Issues Office of Environment Canada has been given the responsibility for co-ordinating the development of Canada's NIP. However, the draft NIP suggest that its coordinating function is very limited in scope. Given the importance of this international agreement, this office does not appear to have authority required to direct or propose actions and initiatives that can add value to the Canada's efforts under POPs. In our view, the effectiveness of Canada NIP will be directly affected by the level of authority given to the government office responsible for overseeing its implementation and the capacity and resources directed to this office for the necessary activities. Unless this approach changes and the role of the office is expanded Canada's leadership on POPs may be threatened.

The creation of an inventory of programs already in place in Canada on POPs and other toxic substances is important but the added value of having the Transboundary Air Issues Branch coordinate Canada's POPs efforts is the knowledge and understanding of how the various programs fit and what new efforts are required with respects to POPs in Canada. The office is appropriately positioned in Environment Canada to make recommendations and develop programs unique to POPs in Canada.

There are several key areas where the Transboundary Air Issues office may have some influence with regards to POPs. The first is in the area of categorization of the DSL, which can already identify a several DSL substances that meet the criteria for persistence (P), bioaccumulation (B) and inherent toxicity (human and non-humans organisms) (iT).

The Existing Substances Branch offices in Environment Canada and Health Canada are responsible for categorization activities but have yet to identify the complete list of substances that meet these criteria. The Transboundary Air Issues office can identify this as the gap and require the Existing Substances Branch to provide the list of substances meeting the criteria. This office can also provide recommendations to current programs such as the National Pollutant Release Inventory (NPRI) to expand its reporting requirements to include all POPs, in particular, PCBs. In its current form, the draft NIP fails to provide details that describe how these programs can add value to addressing POPs in Canada. In these two examples, if the proposed changes were made to the programs, there would be very minimal changes but there is a significant and immediate improvement to the quality of Canada's NIP.

Recommendation: The role of the Transboundary Air Issues office should extend beyond a coordinating function for development of Canada's NIP. Its role should include both a coordinating function as well as identifying current programs and additional programs that are required to address POPs in Canada (i.e., identifying DSL substances that meet P, B and iT criteria; expand reporting requirements under NPRI to include PCBs).

Recommendation: The office of the Transboundary Air Issues office should be given adequate resources to execute its POPs activities, coordinate with other government departments, develop programs specifically on POPs, and build capacity among government departments as well as stakeholders.

ROLE OF EFFECTIVE PUBLIC PARTICIPATION

Throughout the negotiations, Canada made a commitment to include a strong public participation component. Canada's efforts to include public participation in the Canadian delegation was unique amongst the countries involved in the negotiation process. Despite its earlier efforts in late 2003 and early 2004 to engage various stakeholders through a pre-consultation advisory committee, public participation on Canada's NIP has been limited to the one workshop in February 2005.

Public participation remains a critical element of the work on POPs in Canada. The experience of stakeholders in consultations addressing various aspects of assessment and management of toxic substances in Canada (e.g., Canada-wide standards (CWS), NPRI and risk management processes) will continue to be invaluable to Environment Canada as it further develops its NIP. Environment Canada is strongly urged to seek public support and input throughout the process of developing and reviewing Canada's NIP. This type of dialogue is not only required under the Stockholm Convention but necessary if Canada is to be successful in its implementation efforts. This history of active multi-stakeholder participation must be maintained in the process of drafting Canada's NIP. Further, to ensure that public participation is effective, adequate support and resources should be secured for this purpose. The NGO submission of March 2004 recommended that a permanent public advisory committee be established to seek public participation in every aspect of developing the NIP.

Recommendation: Environment Canada is strongly urged to establish a permanent advisory body that will ensure a process for public input and engagement in Canada's efforts to implement the obligations of the Stockholm Convention. This advisory group can coordinate regular meetings/teleconferences which may complement with online consultation.

Recommendation: Adequate support and resources should be secured to effectively include public participation.

SHIFTING APPROACH TO PROMOTE AND DEVELOP NON-INCINERATION TECHNOLOGY AND SAFE ALTERNATIVES

The language of the Stockholm Convention as well as Canada's own domestic legislation, CEPA1999, provides the appropriate legal text to support the elimination of toxic substances. Further, CEPA 1999 and Canada's Pollution Prevention Strategy provide additional language to require pollution prevention planning for toxic substances. Through the Stockholm Convention, Canada has an opportunity to further these efforts. As stated earlier, the elimination of POPs and preventing the creation of POPs should be the basis for Canada's NIP and its National Action Plan (NAP) for unintentional POPs.

For Canada, the NIP and NAP should clearly articulate a hierarchy that gives priority to the development and promotion of safe alternatives to POPs over control measures or end of pipe technology. To date, Canada's efforts to address POPs and other toxic substances continue to focus on control measures. The levels of detection for specific substances are based on the sensitivity of the technology. Canada can make significant contributions in promoting safe alternatives if the commitment and resources are directed to the prevention of all POPs - intentional as well as unintentional.

In the current draft of Canada's NIP and the NAP, the role of developing and promoting safe alternatives and non incinerating technologies to address POPs is weak. As stated in earlier sections of this submission, the emphasis of the NIP on providing an inventory of programs related to POPs in Canada is inadequate and does not create an environment that will elevate the importance of promoting and identifying safe alternatives to POPs of any kind in Canada.

Recommendation: Canada's NIP and NAP should include strong language on the need to promote and develop emerging non-incineration technologies and safe techniques to address all POPs.

CANADA'S NATIONAL ACTION PLAN ON UNINTENTIONAL POPS

Many of the issues raised in the context of the NIP are relevant to the development of Canada's NAP on unintentional POPs (UPOPs). Since Canada has already taken steps to prohibit and ban the use of the POPs pesticides listed in the Stockholm Convention, it is essential that its approach to UPOPs results in the ultimate elimination of these

substances. Anything less than an ultimate elimination will not guarantee protection to human health and environment from exposure to POPs.

The challenge on the UPOPs in Canada is significant. Like that of the NIP, the NAP for Canada should not simply be an inventory of existing programs but include additional action needed on UPOPs for existing and new sources. In fact, the NAP for Canada should aim to only consider those techniques and safe substitutes that do not result in the production of new POPs or other toxic substances.

The main elements necessary for a comprehensive approach in developing Canada's NAP include:

- Effective public participation and transparency in all aspects of developing the NAP;
- An effective regulatory framework to support the programs and initiatives in the NAP;
- An overarching principle/objective supporting the goal of ultimate elimination of UPOPs in Canada and the prevention of the production of additional POPs;
- Requirements to implement and promote safe substitutes and non-incineration technologies for POPs;
- A process/set of criteria to be applied when assessing Best Available Techniques (BAT)/Best Environmental Practices (BEP)
- Targets and timeframes by which UPOPs will be reduced and ultimately eliminated from Canada; and
- Capacity and resources to promote the actions to be taken under Canada's NAP.

The current draft of the NAP demonstrates a good start to the process. In keeping with the elements identified as critical to Canada's NAP, the following gaps have been identified in the current draft:

- To date, no evaluation has been undertaken to assess the effectiveness of Canada's programs and initiatives to address UPOPs and identify new programs that may provide added benefits to Canada's efforts on UPOPs. Such an evaluation should include real measurements and actions taken to reduce and eliminate toxic substances;
- A critical component for Canada's NAP is the implementation of Best Available Techniques (BAT) and Best Environmental Practices (BEP). The current draft NAP would improve significantly if Canada provided information on when and how facilities covered under the NAP are required to review BAT and BEP to their operations. Given the resources and investments by facilities to technologies, the development of safe technology and non incinerating technologies should be given priority in this approach.
- No criteria or process is described as to what would be considered BAT. Since technology is evolving, the NAP should articulate when and how new technology will be considered and required by facilities.

- Canada can and should require that the BAT be applied to all sources of UPOPs not just those listed in the Stockholm Convention. The application of BAT/BEP for new and existing sources of POPs is in appropriate. Without demanding the use of BAT for all sources, the release of UPOPs is perpetuated. It is necessary to send the appropriate signal to affected industries that innovation in the area of UPOPs is desired. This would be further enhanced if the necessary resources and investments are secured to promote the development of safe alternatives.
- There is no direction or details on how safe alternatives will be promoted and developed for UPOPs (i.e., development of product stewardships programs, safe substitutes) in Canada. Part II, p. 7 provides some information for the pulp and paper sector but much more details is required.
- There is very limited information on action to be undertaken to address PCBs in Canada, in contrast to the focus given to address dioxins and furans. Given the known health effects associated with exposure to PCB, the NAP fails to demonstrate Canada's commitment to address PCB as a by-product in a comprehensive manner. The current proposed regulations on the imports of PCB waste in Canada does not support an elimination strategy. In fact, it provides a disturbing signal that Canada is open to accepting PCB waste from other jurisdictions or exporting even for "environmentally sound management". Canada's approach for PCB wastes should rely on non-incinerating technology to manage these wastes because of potential of other toxic substances being released from these processes.
- The inventory of UPOPs in Canada lacks adequate reporting in the NPRI program. For example, NPRI does not require the reporting of PCBs in Canada. While this issue has been discussed by the NPRI Working Group without resolution, it is critical that Environment Canada proceed to add PCBs to the NPRI immediately.
- There are no Limits of Quantification (LOQs) specified for PCBs and Hexachlorbenzene (HCB). The NAP provides LOQs for dioxins and furans but for no LOQs for other UPOPs. Since the goal of ultimate elimination under CEPA is based on establishing LOQs, it is critical that these levels be established and incorporated in the NAP. Further, commentary in NAP should include how LOQs will be reviewed in the context of emerging and clean technology.

Recommendation: The NAP for UPOPs must contain the same elements found in the NIP to ensure that the NAP meets and exceeds the goals of the Stockholm Convention.

Recommendation: A comprehensive plan to eliminate sources of PCBs as a by product of industrial process should be included in Canada NAP.

ADDITION OF POPS TO THE STOCKHOLM CONVENTION ON POPS

One of the key obligations under the Stockholm Convention is the process to add POPs on the Annexes of the Convention. This is an area which provides significant opportunities for Canada to continue its efforts for highlighting POPs for consideration. The limited toxicity data available for most of the substances found on the market to date poses an obstacle in identifying such substances of concern. Canada's efforts to categorize all 23 000 substances on its Domestic Substances List (DSL) for the following criteria: persistence, bioaccumulation and inherent toxicity are innovative. By 2006, the preliminary data necessary to determine POP like characteristics will be available for many of the DSL substances. This program should enable Canada to develop a list of substances that have POP like characteristics for further consideration in the context of the Stockholm Convention. Unfortunately, the draft NIP provides weak language on this matter. It does not propose an explanation or a process on whether the list of POPs will be available to the public.

Canada's NIP can be strengthened significantly if it can provide commitment that it will identify on a separate list all substances on the DSL that meet all three criteria (i.e., persistence, bioaccumulation and inherent toxicity). Those substances meeting all three criteria should automatically be added to Schedule 1 of CEPA and appropriate risk management processes undertaken. These substances should also be nominated for consideration by the POP Review committee established under the Stockholm Convention.

Recommendation: The NIP should outline how the information gathered from its domestic processes (including the Pest Control Product Act and CEPA 1999) will be used to nominate POPs for consideration by the global community under Stockholm. Both chapter 3 and chapter 8 of the draft NIP do not adequately address this.

For new substances, it is difficult for the public to determine which of the substances requiring notification under the New Substances Notification Regulations meet the three criteria. In fact, the notification process does not explicitly require that the information on persistence and bioaccumulation and inherent toxicity be submitted for all new substances. Furthermore, the public's lack of access to information contained in the notification package make it even more difficult to ensure that Canada can adequately identify all substances that are persistent, bioaccumulative and inherently toxic.

Canada is well positioned to support nomination for several POPs substances in the upcoming months. These substances include polybrominated diphenyl ethers (PBDEs) and perfluorooctane sulfonate (PFOs). The screening level risk assessments for these substances have been completed in draft for Canada and the recommendation to add these substances to Schedule 1 indicates that they are relevant in the Canadian context. Added with the evidence being gathered by other jurisdictions, Canada's NIP should include commentary that these chemicals should be considered for nomination to the POP Review Committee in the near future.

Recommendation: Environment Canada should list all substances from categorization program meeting the criteria for persistence, bioaccumulation and inherent toxicity.

Recommendation: All substances in the DSL meeting the criteria for persistence, bioaccumulation and inherent toxicity should be added to Schedule 1 of CEPA without further assessment and appropriate risk management process followed. These substances should be nominated to the POPs Review Committee.

Recommendation: Data for persistence, bioaccumulation and inherent toxicity should be required for all new substances and pesticides to Canada. This type of information should be accessible to the public.

Recommendation: Substances such as PBDEs and PFOs should be highlighted as potential POPs for nomination to the POPs Review Committee.

CANADA'S COMMITMENT TO FINANCIAL AND TECHNICAL ASSISTANCE

Canada's initial commitment of \$20 million established the Canada's POPs Fund. No further commitment has been made in this area. Given that the review of the Canada's POPs Fund has been completed, the NIP should include further details on Canada's efforts to consider a replenishment of the Canada's POPs Fund. These funds have a significant impact on developing countries' needs for implementing the Stockholm Convention.

Further, Canada should consider a POPs Fund to support domestic efforts on POPs as well. Communities in Canada working specifically to address POPs related issues would benefit from such a fund by way of capacity building.

Recommendation: Canada's NIP should include commentary on the process for replenishing the Canada's POPs Fund.

ADDITIONAL COMMENTS RELATED TO SPECIFIC SECTIONS OF CANADA'S NIP

Chapter 3

- Commentary on the National Pollutants Release Inventory (NPRI) should be strengthened to ensure that the program is expanded to include reporting on all POPs. Currently PCBs is not required for reporting under NPRI but the Stockholm Convention requires an inventory of all POPs.

Section 5.8

- Canada should articulate what details would be included in the review of NIP and NAP and the supporting document, including an evaluation of current efforts, that will be required to support a review of the plans.

Section 7.1 - Public Information, awareness and education

- Additional information is required and necessary to demonstrate how POPs affect vulnerable communities, in particular, children, women of child bearing age, workers, and aboriginal communities. Such information will assist policy makers design programs accordingly.
- Canadian NGOs have significant knowledge in the development of pollutant inventories, pollution prevention strategies, policy and legislative development and promoting public participation that is relevant to POPs and the Stockholm Convention. Canada has been effective in sharing its expertise and has demonstrated through this process that such information is critical on the global scale. More resources should be directed to programs in Canada that support these efforts including biomonitoring programs, evaluation process and improvements to pollutant inventories.

Recommendation: Canada should increase efforts that raise awareness on POPs, the obligations of the Stockholm Convention and the efforts that lead to the elimination of POPs. Specifically, increased efforts should be made to vulnerable communities affected by POPs such as children, workers, women and Aboriginals.

Section 8.3 and 8.5 Reporting and Evaluation

- The current draft does not provide an adequate explanation on how Canada intends to report on its progress under the NIP. The draft provides a short list of programs that will assist with this reporting requirement. The list should include all programs that will be considered in this requirement. This section will improve significantly if a baseline is established for reporting purposes that allow the public to determine if progress on POPs are being made.
- A review and evaluation of the programs identified in the NIP is a required obligation under the Stockholm Convention. These should be required every two years to ensure that any gaps in the NIP are address adequately and in a timely manner. The evaluation process should include both quantitative and qualitative data on domestic efforts and other international agreements/initiatives that are related to POPs. The evaluation process should have a strong component for public participation.

Recommendation: The reporting mechanism should include a baseline year to allow for accountability. Reports outlining the findings for reporting should be produced and available electronically.

Recommendation: The evaluation process should include both quantitative and qualitative data on domestic efforts and other international agreements/initiatives

that are related to POPs. The evaluation process should have a strong component for public participation.

CONCLUDING REMARKS

The draft NIP presented and discussed in the February 2005 workshop provides a good starting point for developing Canada's NIP. A number of issues and gaps have been identified in this submission which we hope will be carefully considered by Environment Canada in the upcoming months. NGOs and other stakeholders would like to ensure that the NIP that Canada submits to the POPs Secretariat by 2006 demonstrates leadership and vision for other countries to follow.