UNEP/GEF PROJECT: INTEGRATED STOCKHOLM CONVENTION TOOLKIT TO IMPROVE THE TRANSMISSION OF INFORMATION UNDER ARTICLES 07 AND 15 (GEF ID 9884)

GAP ANALYSIS

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INTRODUCTION

- main sources of data used to evaluate the implementation of the SC are the NIP and the National Reports submitted to the secretariat of the Stockholm Convention under Articles 7 and 15
- indicator of the successful implementation of the convention is the reduction and/or elimination of overall POPs releases.

INTRODUCTION

- imperative that Parties provide adequate data (both quantitative and qualitative) in order to allow the effectiveness evaluation process of the SC on POPs.
- data and information from NIP and National reports used to identify gaps and overlaps between data and information requested and that generated during NIP development and/or update process
- analysis will form the foundation for development of an electronic toolkit that will be used to enhance compliance with the SC through improved transmission, accessibility and use of data contained in NIPs (Article 7) and National Reports (Article 15).

OBJECTIVES OF ANALYSIS

- The objectives of this analysis are to:
- 1. Assess the information in the National reports submitted by Saint Lucia to the SC and highlight the gaps on POPs qualitative and quantitative data;
- 2. Assess the information in the NIP submitted by Saint Lucia to the SC and highlight the the gaps on POPs qualitative and quantitative data;
- 3. Identify the differences between the data included in the national reports and the data presented in the NIP(s);
- 4. Make recommendations for future streamlining of data revision/collection process under National Reports and NIPs focusing on addressing gaps (both quantitative and qualitative).

METHODOLOGY

Relevant documents were screened Data classified as qualitative or quantitative

Data compiled based on the objectives

Analysis was reviewed

DATA AND INFORMATION REQUESTED TO BE INCLUDED FOR ARTICLE 15 REPORTING

- Part A: general information
- **Part B**: information on the measures taken by the Party to implement the provisions of the Stockholm Convention and the effectiveness of such measures in meeting the objectives of the SC
- Part C: information on progress in eliminating polychlorinated biphenyls (PCB) in accordance with subparagraph (g) of Part II of Annex A to the Convention
- **Part D**: Information specifically on the progress made in eliminating perfluorooctane sulfonic acid, its salts and perfluorooctane sulfonyl fluoride in accordance with paragraph 3 in Part III of Annex B to the Convention
- Part E: Additional information and comments

DATA AND INFORMATION REQUESTED TO BE INCLUDED IN THE NIP (ARTICLE 7)

- 1. Identifying and implementing measures to reduce or eliminate releases from intentional production and use as well as from unintentional production.
- 2. Registering for specific exemptions that Parties which have the need to continue the use of POPs with exemption might further use these POPs and register for exemptions.
- 3. Identifying and implementing measures to reduce or eliminate releases from stockpiles and wastes.
- 4. Developing and implementing a plan for the implementation of the obligations under the SC.

DATA AND INFORMATION REQUESTED TO BE INCLUDED IN THE NIP

5. Targeting additional chemicals for listing in Annexes A, B and/or C.

- 6. Facilitating or undertaking exchange of information relevant to the reduction or elimination or production, use and release of POPs and exchange information regarding alternatives to POPs.
- 7. Promoting and facilitating awareness among policy and decision makers regarding POPs.
- 8. Undertaking appropriate research, development, monitoring and cooperation pertaining to POPs, within each Party's capabilities and resource.

GAPS IN QUALITATIVE DATA FOR ARTICLE 15 REPORTING

All questions were answered for cycle 4 National Report and majority of data were adequately reported with just three exceptions as follows:

- Information on technical assistance received from the parties was not reported (Q 32.1).
- The types of incentives provided were not listed (Q32.2).
- The estimated total use of insect baits for control of leaf cutting ants was not reported (Part D, Q 6.1).

Only one gap was noted in cycle 3 reporting for Saint Lucia. Element 3.4 (Table 8), development and capacity-building proposals and priorities was not reported.

GAPS IN QUALITATIVE DATA FOR ARTICLE 7 REPORTING

- There were no notable gaps in the 2020 NIP (Table 8).
- All data requested were adequately reported. However, a few gaps in data reporting were observed in the 2006 NIP.
- Data for the elements 2.3.9; 2.3.13; 2.3.19; 3.3.5-3.3.8 and 3.3.17 were not reported.
- In addition, according to the NIP guidelines, supporting information in terms of Annexes A2 –A4 was not provided in the 2006 NIP. However this information was provided in the 2020 NIP but not as separate Appendices.

DIFFERENCES BETWEEN DATA PRESENTED IN THE NATIONAL REPORT AND DATA INCLUDED IN THE NIP

Data Type	National Report (Article 15)	NIP (Article 7)
Qualitative	 Yes/no Selected responses No details given 	 Detailed measures Detailed strategies Detailed action plans Historical narratives/descriptions
Quantitative	Inventories/ specific quantities	Specific Quantities

DIFFERENCES BETWEEN DATA PRESENTED IN THE NATIONAL REPORT AND DATA INCLUDED IN THE NIP

- The qualitative data in the National Report are in less detail than the qualitative data reported in the NIP as a result of the questions in the National Report being more closed ended (mainly yes/no or selection). However, the qualitative data in the NIP described measures, strategies and action plans in detail.
- The information in the NIP included more detailed historical data whereas the National Report mainly reported historical data in the inventories (quantitative) and as yes/no.
- Table 8 identifies elements found in the NIP but not in the National Reports; elements found in the National Reports but not in the NIP; and elements found in both the NIP and the National Reports.

DIFFERENCES BETWEEN DATA PRESENTED IN THE NATIONAL REPORT AND DATA INCLUDED IN THE NIP

• Although the following elements are overlaps in data reporting, the data presented in the NIPs are both qualitative and quantitative in nature but in the National Reports they are quantitative in nature. (See Table 8, elements 2.3.2; 2.3.7; 2.3.8; 2.4; 3.3.2- 3.3.7; 3.3.9; 3.3.10)

GENERAL RECOMMENDATIONS

STREAMLINING THE POPS DATA AND INFORMATION COLLECTION PROCESSES WITH THE AIM OF STRENGTHENING THE INTERLINKAGES BETWEEN THE ARTICLE 15 REPORTING AND NIP DEVELOPMENT/UPDATE PREPARATION BY:

a. developing/updating internal procedures (defining joint team, workflow, timing, responsibilities) to jointly address the POPs data and information collection processes within the Article 15 reporting and NIP development/update preparation;

b. ensuring periodical joint training on the new developments under the Article 15 reporting and NIP development/update preparation, as well as on the data and information needs, with special focus on overlaps and gaps within the Article 15 reporting and NIP development/update preparation, data collection and presentation formats;

c. ensuring participation and collaboration between the team(s) dealing with the Article 15 reporting and NIP development/update preparation and the other relevant teams acting e.g. on climate change and mercury, waste and contaminated sites management, when conducting the data collection process

GENERAL RECOMMENDATIONS

STREAMLINING THE POPS DATA AND INFORMATION COLLECTION PROCESSES WITH THE AIM OF STRENGTHENING THE INTERLINKAGES BETWEEN THE ARTICLE 15 REPORTING AND NIP DEVELOPMENT/UPDATE PREPARATION BY:

d. building a repository of the common data sources and needs and conducting joint activities for POPs data collection and compilation within the Article 15 reporting and NIP development/update preparation;

e. developing/updating a common QA/QC management system for validation of inventory data;

f. synchronizing/updating the data management systems available to store data and information (data sources, activity data collected, inventory data collected/generated/estimated; technological processes etc.) from both processes.

RECOMMENDATIONS FOR REPORTING QUALITATIVE DATA

- It was reported that Saint Lucia currently has no legislation/policy for the management of UPOPs; NIP 2.3.10 (Table 4, #22). Any efforts towards establishing such legislation/policy should be included in the report.
- Article 11 of the Stockholm Convention requires each Party to encourage and/or undertake an appropriate programme of monitoring and research to identify new candidate chemicals and alternatives. Since it was reported that this is lacking (Table 4 #30), Saint Lucia's proposed action plan to address research, development and monitoring described in Table 3-15 of the 2020 NIP update for the SC on POPS could be referenced as supporting data.

RECOMMENDATIONS FOR REPORTING QUALITATIVE DATA

Saint Lucia has reported that the country currently has no infrastructure in place for POPs management and destruction (Table 4, #37)

The action plan presented in Table 3-9 of the 2020 NIP update for the SC on POPs and is in accordance with Article 6 of the SC on the sound management of POPs stockpiles and POPs wastes. Reference to this action plan can provide information to support the intention to implement infrastructure for POPS management and destruction.

RECOMMENDATIONS FOR REPORTING QUALITATIVE DATA

- All action plans should include the resources required for effective implementation. Such details will be useful for obtaining funding and a greater level of implementation.
- When the year is required as qualitative data, it should not be omitted (see Table 2; 34, 35, 36).
- Page 53 of the Regional Manual Persistent Organic Pollutants (POPs) inventory development for National Implementation Plans (2017) contains information on alternative substances to replace the need and use for POPs such as: PFOS, HBCD, endosulfan, Lindane, DDT, and PCP.

RECOMMENDATIONS FOR REPORTING QUANTITATIVE DATA

Reporting of estimates for UPOPs should be specific and not combined.
 Section 7.4.2 of the Regional Manual Persistent Organic Pollutants (POPs) inventory development for National Implementation Plans (NIPs) update in the Caribbean (2017) describes the gathering of information on individual sources. For example, "...the detailed updated inventory of PCDD/PCDF for the Caribbean countries allows the identification of priority sources of all UPOPs..." page 47.

RECOMMENDATIONS FOR REPORTING QUANTITATIVE DATA

Some of the quantitative data reported were broad estimates which does not give a true indication of the Saint Lucian context regarding the reporting obligations of the SC. The Regional Manual Persistent Organic Pollutants (POPs) inventory development for National Implementation Plans (NIPs) update in the Caribbean (2017) provides detailed information on data collection for inventory update and development for POPs pesticides, PCBs and PCNs, POP-PBDEs, HBCD, PFOS and related chemicals, and other UPOPs (PCDD/PCDF,HCB, HCBD, PeCBz).

RECOMMENDATIONS FOR REPORTING QUANTITATIVE DATA

- Greater effort at ensuring source inventories are updated and valid is necessary. In some cases data were not available (Table 5; 2.3.2) or there was insufficient data for reporting purposes (Table 5; 2.3.4).
- Data reporting should be complete. For instance if the value is zero, then a zero should be reported (see Table 3, 2,3,4,5,6)

QUESTIONS/DISCUSSION