

BRS Conventions COPs Highlights: Sunday, 4 May 2025

Each Convention addressed substantive issues, from listing of chemicals in the Rotterdam Convention (RC) and Stockholm Convention (SC) to technical matters under the Basel Convention (BC). The [meeting documents](#) can be found on the BRS website.

Basel Convention

Legal, Compliance and Governance Matters: Proposal by the Russian Federation to amend Article 6.2: The RUSSIAN FEDERATION introduced its revised proposal to specify 90 days for importing states to respond to the notifying state.

TAJKISTAN, SOUTH AFRICA, NIGERIA, CÔTE D'IVOIRE, BELARUS, BRAZIL, ETHIOPIA, ZIMBABWE, UZBEKISTAN, MALI, IRAQ, YEMEN, VENEZUELA, IRAN, UGANDA, NICARAGUA, and Saudi Arabia, for the ARAB GROUP, supported the proposal. ZAMBIA welcomed the proposal but emphasized, echoed by INDIA, that silence from the importing state should not be interpreted as consent.

The EU, SWITZERLAND, UKRAINE, NORWAY, the UK, JAPAN, NEW ZEALAND, and TRINIDAD AND TOBAGO opposed the proposal, arguing that it does not sufficiently address the problems that are considered priorities for improving the PIC procedure, may introduce further confusion, and involves a long and complex procedure with no guarantee that the amendment will enter into force. JAPAN called the proposal premature and asked for the small intersessional working group (SIWG) to consider it.

ARGENTINA and MALAYSIA expressed their preference for improving the PIC procedure through the recommendations of the SIWG instead of the Russian Federation's proposal.

Given varied views on whether a contact group should be established, consultations with interested parties will discuss the way forward.

Basel Convention Partnership Programme: The Secretariat introduced the documents (CHW.17/12/Rev.1, 18 and Add.1-3, CHW.17/INF/30, 45-50).

Leila Devia (Argentina), Co-Chair of the Partnership for Action on Challenges relating to E-waste (PACE II), reported on the implementation of the Partnership's programme of work. Noting initiatives and workshops on e-waste undertaken with support from the regional centres, TÜRKIYE, TRINIDAD AND TOBAGO, SWITZERLAND, MALDIVES, and PAKISTAN welcomed PACE-II's work. MALDIVES called for tailoring guidance to the particular challenges of small island developing states. GUINEA suggested Global Environment Facility support for importing countries to address the environmentally sound management (ESM) of e-waste.

The EU welcomed the report but said further work is needed before deciding on the future of the partnership. They proposed rewording the draft decision to finalize the draft guidance at COP18.

The COP adopted Part I of the decision with an amendment to reflect the EU's proposal on the PACE-II programme of work for 2026-2027, pending budget approval.

Lael Bertide-Josiah (Antigua and Barbuda), Chair of the Environmental Network for Optimizing Regulatory Compliance on Illegal Traffic (ENFORCE), introduced the progress report on the activities of the partnership (CHW.17/INF/51). The COP agreed to Part II of the draft decision.

Gabriela Medina (Uruguay), Co-Chair of the working group of the Household Waste Partnership, introduced the draft workplan of the partnership for the biennium 2026-2027 (CHW.17/18/Add.2).

The FRENCH SOLID WASTE PARTNERSHIP stressed the need to support Activity 3.2 from the workplan on joint outreach activities with the Partnership on Plastic Waste and others.

The COP adopted Part III of the draft decision on the BC Partnership Programme (CHW.17/18), pending budget approval.

Ole Thomas Thommesen, Co-Chair of the working group of the Partnership on Plastic Waste, introduced the draft workplan of the partnership for the biennium 2026-2027 (CHW.17/18/Add.3). CÔTE D'IVOIRE called for guidance clarifying "all types of plastic waste" and questioned if the work of the partnership would change once the legally binding instrument on plastics is adopted.

The COP adopted Part IV of the draft decision on the BC Partnership Programme (CHW.17/18), pending budget approval.

Scientific and technical matters: Classification and hazard characterization of wastes: The Secretariat introduced the documents (CHW.17/6, INF/11) addressing cooperation with the World Customs Organization on the Harmonized Commodity Description and Coding System. The COP agreed to the draft decision as presented, pending budget approval.

National reporting: The Secretariat presented the documents (CHW.17/7, INF/12-16, 19).

NIGERIA, BANGLADESH, DOMINICAN REPUBLIC, PAKISTAN, SRI LANKA, INDIA, and CAMEROON underscored the need for training on data-gathering and reporting. SRI LANKA called for allowing submission of partial data when that is the only available option, and CAMEROON for simplifying the format and for financial backup.

The EU called for further development of the electronic system to ensure comparability and for amending the draft decision to reflect this. ARGENTINA also highlighted the need for further clarity, including on excluding countries of transit.

The UK and SOUTH AFRICA called for proper consideration of possible revisions to table 9 of the national reporting format (cases of illegal traffic closed in the prior year) and supported either further discussion in a contact group or deferring the question to COP18.

The COP decided to refer possible revisions to table 9 and the manual for completing the national reporting format to the contact group on Technical Matters, but otherwise agreed to the draft decision with the amendment proposed by the EU, pending budget approval.

Electronic approaches to the notification and movement documents: The Secretariat presented the relevant documents containing the proposed draft decision (CHW.17/8) and recommendations (INF/17).

TÜRKIYE, the EU, MALI, SWITZERLAND, CAMEROON, TRINIDAD AND TOBAGO, TANZANIA, and MALDIVES welcomed work by the SIWG and supported further work as outlined in the draft decision. The EU suggested additional wording for the draft decision on prioritizing decentralized approaches, and on nominating experts with experience in developing software for customs, and in PIC.

SWITZERLAND suggested a closer alignment of this work with the SIWG on improving the PIC procedure.

CAMEROON highlighted their interoperability challenges after developing a national electronic export and import system. TANZANIA requested technical and financial support to ensure participation in the global notification system once developed.

The RUSSIAN FEDERATION stated that the electronic notification system does not solve all issues facing the PIC procedure since a single platform requires financial and security considerations, as well as a decision on the use of artificial intelligence.

BC COP President Anita Sowińska noted general support. The Secretariat will prepare a revised draft decision.

Amendments to Annexes II, VIII and IX on e-waste: The COP considered the document (CHW.17/10) to update the technical guidelines on POPs and on ships to reflect adjustments consequential to the adoption of the e-waste amendments.

SWITZERLAND called for removing outdated codes once all parties have opted into the amendments.

The EU, echoed by COLOMBIA and THAILAND, supported the draft decision and urged to keep e-waste in the work program of the Implementation and Compliance Committee. They also called for guidance on the identification of e-waste and the procedure to follow when one party applies the amendments and another does not.

The COP will consider the updated draft decision later in the plenary.

Rotterdam Convention

Listing of chemicals in Annex III: Developments for Action by the COP on the Chemical Review Committee (CRC): The Secretariat introduced the report and draft decision (RC/COP.12/5 and INF/5/Rev.1). Nolzuko Gwayi, CRC Chair, reported on the CRC's activities, including on the impact of budget cuts on the Committee. She suggested that some observers tried influencing CRC members to go beyond the Committee's mandate.

Several welcomed the orientation workshops organized by the Secretariat. Many also supported the CRC's work, in particular the decision guidance documents (DGDs). While several countries noted their work to ban pesticides, others pointed out that the RC is about information exchange only. There were calls for finance and technical assistance.

The EU, the UK, and NORWAY suggested including a process for the CRC to identify and elect its next Chair on an interim basis.

The RC COP adopted the decision, with the addition of the process for electing the new Chair, and two new members from Latvia and the Netherlands.

Delegates also noted that if members from the Eastern European region are not identified by 6 May, the paragraph on membership from that region will be deleted.

Methyl bromide: The Secretariat presented relevant documents, including a draft decision proposing to list methyl bromide in Annex III of the RC as a pesticide (RC/COP.12/14), draft DGD (RC/COP.12/14), and CRC recommendations and rationale (RC/COP.12/INF/13).

Many countries supported the listing. Many stated that it will supplement the implementation of the Montreal Protocol on Substances that Deplete the Ozone Layer, which allows use

only for quarantine and pre-shipment uses. The EU proposed an amendment to note that methyl bromide is regulated by the Montreal Protocol and other international rules. Several parties also noted that listing under RC does not constitute a ban but rather contributes to informed decision making.

DOMINICAN REPUBLIC highlighted the limited and regulated use of methyl bromide and requested a technical process to identify viable and accessible alternatives and a risk assessment for local uses.

ARGENTINA, INDONESIA, INDIA, IRAN, and CHILE stressed that methyl bromide is already extensively regulated by the Montreal Protocol, and no alternatives are available for use in strawberries and tomatoes, or in quarantine and pre-shipment applications. INDONESIA requested additional clarifications on the rationale for listing. INDIA expressed reservations, and ARGENTINA, IRAN, and CHILE, echoed by the US, opposed the listing, citing potential negative implications for the trade of methyl bromide and, in turn, food security and prevention of pest infestations.

The ENVIRONMENT AND SUSTAINABLE DEVELOPMENT ORGANIZATION (ESDO) highlighted that subjecting methyl bromide to the PIC procedure will contribute to informed decision making and is an important step to the eventual phase out.

The contact group on listings, co-chaired by Marit Randall (Norway) and Caroline Theka (Malawi), was established.

Mercury: The Secretariat introduced the draft decision (COP.12/13), draft DGD (Add.1), and CRC's rationale and comments received (INF/11, 12).

Many countries supported listing in the RC to complement the Minamata Convention on Mercury. The EU noted the need to ensure coherence with the Minamata Convention's trade provisions and drew attention to its conference room paper (CRP) on this issue (CRP.7).

ARGENTINA and the RUSSIAN FEDERATION opposed listing, citing additional burdens and duplication with the Minamata Convention. INDIA expressed reservations, noting it registered for exemptions for some mercury-containing products under the Minamata Convention. KYRGYZSTAN opposed listing, owing to concerns of the impact that listing could have on its export-oriented mercury industry. The RUSSIAN FEDERATION called for expert input on the implications of listing for mercury-containing products. KAZAKHSTAN and CHINA looked forward to contact group discussions.

IPEN noted that despite being regulated under the Minamata Convention, mercury still poses a challenge when mercury is imported for allowed industrial uses, but is illegally diverted for use in artisanal small-scale gold mining (ASGM). They supported the PIC procedure and restriction of volumes for mercury.

The CENTER FOR PUBLIC HEALTH AND ENVIRONMENTAL DEVELOPMENT (CEPHED) urged listing to support implementation of Nepal's mercury-free healthcare policy and efforts to address recently discovered mercury-emitting uses in gold plating.

The issue, including the EU's CRP, was forwarded to the contact group on RC listings.

Iprodione: The Secretariat presented relevant documents, including the draft decision to list iprodione in Annex III as a pesticide (RC/COP.12/11) and draft DGD (RC/COP.12/11/Add.1).

MALAYSIA, SERBIA, BOSNIA AND HERZEGOVINA, SOUTH AFRICA, MAURITIUS, and TANZANIA supported listing.

The EU, NORWAY, and SWITZERLAND supported listing, concerned about the growing list of CRC-recommended listings on which the COP cannot reach an agreement. DOMINICAN REPUBLIC, while supporting the listing, called for technical work on reasonable alternatives before making a final decision.

ECUADOR and GUATEMALA opposed the listing, citing wide use in multiple foods including bananas, rice, tomatoes,

and papayas. Concerned about the potential implications of RC listing on food security and suggesting that scientific data does not support global regulation, they called for strengthened support and information exchange instead.

RC COP President Hammad Shamimi suspended the discussions until 5 May.

Contact Groups

Joint Issues: The contact group, co-chaired by Ole Thomas Thommesen (Norway) and Artak Khachatryan (Armenia), focused on international cooperation and coordination.

On regional conventions, delegates discussed initiating discussions to facilitate cooperation, synergies, and partnerships with the Waigani Convention on hazardous and radioactive waste, for the South Pacific, in addition to the Bamako Convention, for Africa. Concern was expressed about diluting efforts and the importance of addressing the specific needs of the African region. The group added a reference to the Waigani Convention. A proposal to add a reference to “among others” was rejected, with delegates noting their preference to start with these conventions.

On engagement with the Bern Process on cooperation among biodiversity-related multilateral environmental agreements (MEAs) and promoting cooperation and policy coherence among MEAs at the national level, the group agreed to keep reference to “taking into account national circumstances, needs and priorities.” The group compromised to specify that these efforts can be “through, as appropriate, a whole of government and whole of society approach.”

On including ESM of waste in their nationally determined contributions to the Paris Agreement, a group of countries opposed the text and proposed adding a reference to developed countries’ obligations to provide finance under the UN Framework Convention on Climate Change. The paragraph was deleted.

On plastics, delegates had opposing views on referring to the report “Addressing Chemicals of Concern in Plastics through MEAs.” While some called for keeping the reference, others said it could influence ongoing discussions in the Intergovernmental Negotiating Committee (INC) where there are differences over chemicals of concern in plastics. A suggested compromise removed the specific reference to the report, “acknowledged” the presence and participation of the Basel, Rotterdam, and Stockholm (BRS) Secretariat in the INC, and “recognized” the activities undertaken. The latter point was not acceptable to several countries that wanted a more proactive request for engagement.

This was left unresolved and is the only remaining issue for the contact group.

BC Technical Matters: The contact group, co-chaired by Nawaf Bilasi (Saudi Arabia) and Martien Janssen (the Netherlands), focused on the remaining draft decision on the technical guidelines (CHW.17/5). On UV-328, delegates left in brackets a paragraph entrusting the Secretariat with reflecting adjustments following the possible adoption of the SC amendment on UV-328 in the corresponding technical guidelines. The brackets will be removed once the SC adopts its decision.

On the POPs waste technical guidelines, discussions further specified that capacity is a challenge to setting low-POP content values, not only “knowledge limitations.” They prioritized the provisional values that have not yet been agreed upon in the forthcoming review of the provisional low-POP content values. The contact group added a new paragraph inviting parties and observers to submit to the Secretariat the information requested by the SIWG using the format for the collection of information on low-POP content definitions provided in CHW/OEWG.14/INF/38/Rev.1.

The contact group then turned to the EU’s and Chile’s CRP (CHW.17/CRP.3) on used textiles and textile wastes. The CRP requests the Secretariat to prepare a report on possible options available under the BC to be considered by the Open-Ended

Working Group (OEWG) at its fifteenth meeting. After discussion, the group removed the consideration of options on textile waste under the BC from the OEWG work programme. Discussions continued into the evening.

BC Legal: The contact group, co-chaired by Perine Nkosi Kasonde (Zambia) and Jason Dunn (Australia), heard from small groups tasked with formulating proposed language. On a recovery operation for preparing for re-use, the small group said they tried to close the identified loopholes, proposing: “preparing substances or objects that would otherwise be submitted to other operations listed in this Annex, with the intention of making them functional.” Some expressed concerns that “functional” was a broad term that is not clear to regulatory authorities.

On releases to the atmosphere, some countries called for clarification to allow for how gases and waste are treated differently in national legislation. Delegates exchanged views on what is considered a waste operation, on whether to include other examples besides venting of gases, whether to refer to any gas or only those contained in waste, and whether to refer to materials instead of gases to also capture solid and liquid waste and avoid confining this operation to gases. Attempts to clarify language continued in small groups.

RC Listing: Co-Chair Marit Randall (Norway) invited general comments. On methyl bromide, several parties reiterated their concern regarding overlap with the Montreal Protocol, which allows certain uses, and objected to listing in the RC. One party explained that listing would only create an obligation to submit an import response for parties that agree to continue to import. Another party noted that the Montreal Protocol involves stronger requirements for trade than the RC, which, for another party, was a sufficient reason not to list under the RC.

On mercury, parties reiterated their opposition, noting duplication with the Minamata Convention. The Secretariat clarified the relationship between the Minamata Convention and the RC, including that while Minamata regulates trade in mercury-containing products, the proposed listing under the RC relates to the pure substance. An observer reported that mercury imported legally for allowed industrial uses is often illegally diverted to harmful uses like ASGM, and countries would benefit from an RC listing, which would allow better import control.

The Co-Chairs noted no general agreement on either listing. Parties agreed to move paragraphs suggested by the EU in plenary for methyl bromide and in CRP.7 for mercury to their respective supplementary decisions.

In the Corridors

There is a whole week left, yet time seems limited. The SC negotiators felt pressure to finish, even though “many countries have already lost their POPs experts.” The joint issues group didn’t quite finish its work. Compromises had become too much, and asking for one more word proved a step too far. The Co-Chairs persisted in vain, unsure if they could secure another timeslot. Even the BC Legal contact group that started early in the first week worried about running out of time.

Throughout the day, delegates poured over treaty texts. They searched physical copies of the SC, in the hopes of finding a solution to prevent precedent by amending the UV-328 listing to permit a new use of a POP. On screens, digital versions of the Montreal Protocol, International Plant Protection Convention, Minamata Convention, and the Paris Agreement were also helpful to navigate the growing density of treaties.

For the RC, overlap among treaties prompted questions about its added value. For some, including mercury in the PIC procedure was more useful than including methyl bromide. The Minamata Convention has fewer parties than the RC, but the Montreal Protocol has more. Methyl bromide is tightly restricted, remaining use is reported, and trade requires licenses. “There might only be a downside to adding this one,” worried a delegate who was fully aware that an RC listing is not a ban.

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