

**Secretariat of the Stockholm Convention**

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**Mr. Juergen Helbig**

International Chemicals Policy Coordinator  
DG Environment, Unit ENV.B2 - Safe and Sustainable Chemicals  
European Commission 1049 Brussels, Belgium  
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Notification on the possible breach of the Stockholm Convention

Dear Secretariat of the Stockholm Convention,  
Dear Mr. Juergen Helbig,  
Dear Sir, Madam,

Greenpeace Hungary (Greenpeace Magyarország Egyesület) got informed that stockpiles of up to 100 tonnes of HCH (mixture of different isomers Hexachlorocyclohexane) are being stored illegally in a degraded Budapest basement, built in 1938. The exact location concerned is at the current site of Vinyl Vegyipari Kft. (address: 19-23. Illatos út, 1097 Budapest, HUNGARY 38230/17 hrsz.), the former site of Budapesti Vegyiművek Zrt. FA, now under liquidation. The hazardous waste is stored in scattered sacks, covered partly by rainwater - the HCH saturated water is likely to leak into the groundwater.

According to the documentation attached (in Hungarian) the Hungarian Authority (Pest Megyei Kormányhivatal Környezetvédelmi és Természetvédelmi Főosztály, e-mail: [orszagoszoldhatosag@pest.gov.hu](mailto:orszagoszoldhatosag@pest.gov.hu), 1016 Budapest, Mészáros u. 58/A, head of department: [REDACTED]) has been aware of the illegal stockpile for seven years, since Vinyl Kft. already notified them about this issue in 2015, when they found the dilapidated basement. After judicial proceeding, the authority obliged in a 2020 decree (PE-06/KTF/08512-15/2020 - attached) the then bankrupt Budapesti Vegyiművek Zrt. FA and the appointed liquidator firm to remove the toxic waste from the site. However, the bankrupt company is obviously not able to fulfill the decree, while the liquidator can't be obliged to remove the waste.

According to a 2015 laboratory analysis, the waste samples contained various HCHs up to 10-30% (mainly gamma, alpha and beta) and lower amounts of DDT (47 mg/kg). The HCH concentration of the liquid covering the waste - what possibly leaked to the groundwater - was 4140 µg/l.

We believe that the current situation and the inaction by the authorities are in breach of the rules of the Stockholm Convention.

As according to the Stockholm and Basel Conventions:

- HCHs and DDT are listed under the Stockholm Convention as POP waste, if any waste contains them above 50 ppm.
- Article 6. of the Stockholm Convention says: 1. In order to ensure that stockpiles consisting of or containing chemicals listed either in Annex A or Annex B and wastes, including products and articles upon becoming wastes, consisting of, containing or contaminated with a chemical listed in Annex A, B or C, are managed in a manner protective of human health and the environment, each Party shall:
  - (c) Manage stockpiles, as appropriate, in a safe, efficient and environmentally sound manner. Stockpiles of chemicals listed either in Annex A or Annex B, after they are no longer allowed to be used according to any specific exemption specified in Annex A or any specific exemption or acceptable purpose specified in Annex B, except stockpiles which are allowed to be exported according to paragraph 2 of Article 3, shall be deemed to be waste and shall be managed in accordance with subparagraph (d);
  - (d) Take appropriate measures so that such wastes, including products and articles upon becoming wastes, are:

- (i) Handled, collected, transported and stored in an environmentally sound manner;
- (ii) Disposed of in such a way that the persistent organic pollutant content is destroyed or irreversibly transformed so that they do not exhibit the characteristics of persistent organic pollutants or otherwise disposed of in an environmentally sound manner when destruction or irreversible transformation does not represent the environmentally preferable option or the persistent organic pollutant content is low, taking into account international rules, standards, and guidelines, including those that may be developed pursuant to paragraph 2, and relevant global and regional regimes governing the management of hazardous wastes;

Greenpeace Hungary would like to ask you to investigate the situation and evaluate what would be the task of the competent authorities in such a case and what would be the solution in line with the Convention. We fear that without your intervention the HCH waste could stay in the ruined basement for further decades.

Sincerely yours,



Gergely Simon  
toxic expert  
Greenpeace Hungary