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International Chemicals Policy Coordinator
Directorate-General for Environment, Unit ENV.B.2. - Safe and Sustainable Chemicals
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Subject: Follow-up – Notification regarding a possible breach of the Stockholm Convention

Dear [REDACTED]
Dear [REDACTED],

On October 4th, 2022 Greenpeace Hungary (Greenpeace Magyarország Egyesület) [notified](#) the Secretariat of the Stockholm Convention and Mr. [REDACTED], International Chemicals Policy Coordinator at the European Commission DG Environment, Unit ENV.B.2. – Safe and Sustainable Chemicals, about a possible breach of the Stockholm Convention in Budapest, Hungary.

Previously, Greenpeace Hungary was 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 various sacks, covered partly by rainwater – the HCH saturated water is likely to leak into the groundwater.

Last year, the Municipality of Ferencváros, governing body of the district affected, ordered sampling and chemical analysis of the contamination at the above-mentioned basement, including the measurement of the liquid covering the cellar and the testing of the groundwater monitoring well near the site. The company performing the measurements Eurofins (Wessling Hungary Ltd.) took samples on 30th November, 2022. [The results](#) show that the solid mass present in the basement still contains very high concentrations of the HCH pesticide banned decades ago, although the measurements indicated lower levels of contamination than it was previously reported [in 2015](#).

According to the relevant [EU Regulation \(EC No 850/2004\) on POPs](#), a substance is considered a POP (persistent organic pollutant) waste if its total HCH concentration is above 50 mg/kg. In that case, the EU Regulation (Article 7 of the Regulation) requires that "waste consisting of, containing or contaminated by any substance listed in Annex IV shall be disposed of or recovered, without undue delay". The most recent measurements in the basement sludge referred to above show a total HCH value above 80 000 mg/kg, which obviously requires immediate action.

However, [in a letter to the Mayor of Ferencváros, Krisztina Baranyi](#) (dated 20th October, 2022), the Government Office of Pest County questioned the existence of hazardous waste at the basement and the risk of contamination. The authority stated that the water sample taken from the cellar is not considered hazardous waste. The solid material was not tested by the Government Office according to their letter, they only analyzed the water in the basement. The Government Office argues that the contamination does not come into contact with the groundwater and an expert opinion they cite says that the liquid in the cellar is not groundwater. This is contradicted by the fact that the concentration of pollutants in the basement has decreased compared to the values measured eight years ago, which indicates leakage. Furthermore, HCH was also present in the [sample taken from the groundwater monitoring well](#) next to the basement (above 9 microgram/liter according to the Ferencváros Municipality's investigation).

Please consider these data when investigating the case.

Budapest, 13. March 2023

Yours Sincerely,



Gergely Simon
toxic expert
Greenpeace Magyarország Egyesület

Documents:

- [November 2022 measurement](#) from the basement by the Ferencváros Municipality
- [November 2022 measurement](#) from the groundwater monitoring well by the Ferencváros Municipality
- [Letter to the Mayor of Ferencváros, Krisztina Baranyi](#), from the Pest Megyei Kormányhivatal (Government Office of Pest County)
- [2022 measurements by the authorities](#) (Pest Megyei Kormányhivatal)