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## **EBFRIP comments on ChemSec's brochure "Electronics Without Brominated Flame Retardants and PVC"**

The claims made today by the environmental NGO ChemSec are nothing new. As EBFRIP stated back in November last year (see attached position paper)<sup>1</sup>, "public policy and legislation should not be based on commercial strategies of the few and instead should ensure a high level of environmental and health protection, underpinned by scientific evidence". EBFRIP questions the basis for rewarding through regulation the shift by some electronics companies to use unnamed alternative chemicals. It seems that ChemSec is basing its lobbying on the actions of a few electronics manufacturers because it lacks the scientific justification for such action, and fears that this is a last chance before a recast RoHS encompasses clear scientific criteria.

From a methodology standpoint, it should be noted that the ChemSec study is based on marketing announcements on electronic websites. The implications of these commitments are of course different than a requirement by law such as the one proposed under RoHS. Most companies indeed state that their 2014 commitments will be respected if technically and economically viable alternative are available at that time, in sufficient quantities.

Also from the ChemSec study, it appears that a very large number of the E&EE listed currently contain BFRs or PVC - those listed in bright green. This is the majority of the cases, except for some product groups where the technology has changed significantly such as in mobile phones. In these applications, the miniaturization need has led to use of materials that are non-flammable but very expensive. This can only be justified in applications where miniaturisation is a significant marketing argument (MP3 players, photo cameras, mobile phones, PDA...).

While ChemSec seems to base its survey on the policies and intentions by 2014 of 28 electronics companies, market data (SRI Consulting, 2008)<sup>2</sup> demonstrate that the impact of a ban on all halogenated flame retardants (chlorinated and brominated), such as suggested by Rapporteur Jill Evans in her draft preliminary report on the RoHS directive recast, would be significant. Though the European flame retardants market has a specific distribution amongst the technologies, compared to the global market, a regulatory ban would affect up to 50% of the European market in terms of value, including brominated, chlorinated, chlorinated organophosphates and their usual synergists antimony oxides and melamine. At a global scale, this would affect up to 70% of the market in terms of value, according to 2007 figures. In short, a ban on halogenated flame retardants would severely limit the electronic industry's choice of both flame retardants and plastics.

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<sup>1</sup>[EBFRIP initial reaction to the draft report on the RoHS Directive proposal by Rapporteur Jill Evans \(24 November 2009\)](#)

<sup>2</sup> Fink, Hajduk, Yang and Mori - Flame Retardants market analysis - Specialty Chemicals - SRI Consulting - December 2008.