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EBFRIP comments on the Danish EPA reports regarding alternatives to Deca-BDE

The Danish Environmental Protection Agency has recently published on its website two reports on the potential alternatives to Deca-BDE in electrical and electronic equipment¹, as part of the case brought by Denmark before the European Court of Justice against the European Commission's Decision² in 2005 exempting the polymeric applications of Deca-BDE from the EU RoHS Directive.

Although EBFRIP does not wish to pre-empt the final decision by the European Court of Justice expected towards the end of 2007, it would like to provide a few comments on these reports.

The European risk assessment of Deca-BDE did not identify a risk to the environment or health and, as result, the exemption from the RoHS Directive was adopted. While EBFRIP recognises that alternatives to commercial Deca-BDE do exist, as mentioned in the report, it would point out that none has gone through as thorough a risk assessment as Deca-BDE. EBFRIP would also add that since no risk was identified by Deca-BDE's risk assessment, it is in any event likely to have less impact than potential alternatives which have not gone through the same or a similar process and which are consequently not proven to be better than Deca-BDE for the environment or health. In addition, with the introduction of the VECAP³ program for Deca-BDE, not only has Deca-BDE no risk identified but it is now far better controlled through the manufacturing supply chain than any alternatives.

EBFRIP notes with interest that at the time of the EU's Risk Assessment of Deca-BDE, the Danish EPA continuously requested further scientific studies on Deca-BDE to analyse its potential impact on the environment and health. It seems, however, not to have required the same level of scientific scrutiny before suggesting that the alternatives listed in its reports are as safe as Deca-BDE.

¹ - Danish EPA (2006) Danish Environmental Protection Agency. Health and Environmental Assessment of Alternatives to Deca-BDE in Electrical and Electronic Equipment, July 2006.

- Danish EPA (2006) Danish Environmental Protection Agency. Deca-BDE and Alternatives in Electrical and Electronic Equipment. Carsten Lassen and Sven Havelund, COWI A/S, Denmark Andre Leisewits, Oeko-Recherche GmbH, Germany, Peter Maxson, Concorde East/West Sprl, Belgium, August 2006.

² http://europa.eu.int/eur-lex/lex/LexUriServ/site/en/oj/2005/l_271/l_27120051015en00480050.pdf

³ Voluntary Emissions Control Action Programme, more information at: <http://www.vecap.info>