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Comments on the European Chemicals Bureau review on alternatives to Deca-BDE

The European Chemicals Bureau (ECB) has recently made public a report reviewing the production processes and assessing the availability of potential alternatives to Deca-BDE used in electronic and electrical equipment¹.

EBFRIP recognises that “substitutes do exist on the market for Deca-BDE for the proposed applications (...) and have been so for some years”², as mentioned in the ECB report. It would point out that, as the ECB report emphasises, “key data and information gaps in comprehensive risk assessments and hazard classification still exist” for the vast majority of the identified potential alternatives to Deca-BDE and that “it is not possible at this time to determine with any certainty if the negative environmental, health and/or consumer safety impacts caused by substitution are likely to outweigh the environmental, health and/or consumer safety benefits”³.

The scientific justification underpinning the exemption of the polymeric applications of Deca-BDE from the EU RoHS Directive⁴ has once again being reviewed to take into consideration new science on Deca-BDE. The EU technical experts⁵ have confirmed the conclusions of the Deca-BDE EU risk assessment, which do not identify any environmental or health risk.

On this basis, EBFRIP highlights that Deca-BDE is currently the sole flame retardant for which over 1,000 scientific studies have been reviewed and for which no risk has been identified. In addition, with the introduction of the VECAP program for brominated flame retardants, Deca-BDE is now far better controlled through the manufacturing supply chain than any alternatives⁶.

¹ « Review on production processes of decabromodiphenyl ether (DecaBDE) used in polymeric applications in electrical and electronic equipment, and assessment of the availability of potential alternatives to DecaBDE”. European Chemicals Bureau, January 2007

² Executive summary, ECB report

³ Idem.

⁴ European Commission Decision 717/2005/EC http://europa.eu.int/eur-lex/lex/LexUriServ/site/en/oj/2005/l_271/l_27120051015en00480050.pdf

⁵ TC-NES meeting of 12-14 June 2007

⁶ Second Annual Progress Report on the Voluntary Emissions Control Action Programme for brominated flame retardants (VECAP): http://www.bsef.com/newsmanager/uploads/vecap_2007_annual_progress_report.pdf