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SUBSTANCES SHOULD ONLY BE ADDED TO THE STOCKHOLM CONVENTION ON POPS IF MEETING THE SCIENTIFIC CRITERIA

While EBFRIIP fully supports any regulatory decision which is based on science, it does not believe that the defined science-based criteria are met for the two brominated flame retardants (BFRs) Penta-BDE and Octa-BDE to be included in the Stockholm Convention on Persistent Organics Pollutants (POPs) as recently proposed by the European Commission.

Only the substances that meet certain specific criteria can be listed under the Stockholm Convention on POPs. The approach to potentially add new substances to the Convention therefore needs to be scientific & consistent on the basis of these criteria.

On that basis, EBFRIIP would like to point out that there is no justification to propose the inclusion of Octa-BDE in the Stockholm Convention or the UNECE Protocol when setting the criteria against the properties of this product. The same seems to apply for the Penta-BDE proposed inclusion in the Stockholm Convention as recently proposed by the European Commission.

It is not because substances are restricted in the EU under the Marketing and use Directive 76/769, such as Penta-BDE and Octa-BDE, that they should be automatically listed under the Stockholm Convention. Rules & criteria have been set in order to objectively evaluate substances for inclusion under the Stockholm Convention– these rules should therefore be adhered to in order to check whether a substance should be included or not.

EBFRIP hopes that EU Member States will take into account the above information when examining the European Commission proposal.

For more information, please contact EBFRIIP secretariat