

CONTENTS – WECF submission – ECHA consultation on Annex XV Dossier for Deca-BDE
Filled in: October 19th 2012
Confirmation by ECHA

General comments :

In a decision of the European Court of Justice of April 1st 2008 ruled that Deca-BDE should not be considered as a candidate for exemption to restriction use under the so-called "RoHS" EU regulation. Deca-bDE had been subject to RoHS due to its properties and potential hazards. The move towards a broader restriction of use of Deca-BDE in the EU, through its classification as SVHC under the REACH regulation is therefore a logical step which is in line with previous developments concerning the potential hazards for health and the environment of Deca-BDE.

Part I : Justification

WECF would like to underline the need to take into account the issue of debromination of highly-brominated BDEs to POP-BDEs in the current Annex XV dossier screening. This topic has been at the heart of 6th meeting of POPs Review Committee back in October 2010. According to the experts analysis shared during this meeting, Deca-BDE by far the largest PBDE stock and its production worldwide still continues (C-mixture of DecaBDE estimations range between 1,100,000 and 1,250,000 tonnes), the debromination of decaBDE and formation of POP-BDE is of crucial importance. Accordingly, it should be taken into consideration that the more mobile and highly toxic POP-BDE congeners resulting of debromination process of Deca-BDE in birds, fish, mammals, sediments, landfills, soil-plant or by microbial degradation will probably have a longer time frame in environmental settings to bio-accumulate (quoted in "Debromination of highly brominated PBDEs to POP-BDEs", Roland weber, POPs Environmental Consulting, Germany).

Part II : Information on Use, Exposure, Alternatives and Risks

Deca-BDE in consumer articles:

Toys:

Exposure to Deca-BDE is especially problematic when occurring in utero as well as during early childhood. According to a February 2012 report released by Health Canada, exposure to Deca-BDE of infants and children may occur through hard plastic toys manufactured treated with the flame retardant (source: Chen et al., 2009). Moreover, in this report, exposure of children aged from 6 months to 4 years through mouthing of hard plastic toys is estimated twice as high as exposure from soil dust for the same age group.

Textile articles:

Since many different end uses of Deca-BDE in textiles are indicated in table 15 of Annex XV report, it is clear that textiles must be consider a significant source of exposure to Deca-BDE which may be found in the general environment of the child, whether in domestic or public environments. Even if not used in products in direct contact with the skin, Deca-BDE may be used especially in upholstery, making it a prominent indoor air pollutant.

Source: Draft Human Health State of the Science Report on Decabromodiphenyl Ether (decaBDE), Health Canada, February 2012, http://www.ec.gc.ca/ese-ees/92D49BA9-4B11-4C56-BDB0-9A725C5F688E/DecaBDE_EN.pdf

Food:

In a report released on September 2012, the French Agency for Food, Environmental, Occupational Health and Safety reminds that food, especially fish, dairy products, sandwiches and margarine, are among the main sources of human exposure to PBDEs, including Deca-BDE.

The listing of Deca-BDE under the Candidate List to SVHC classification would trigger the application of the right to information of the consumer regarding the presence of SVHC candidates in consumer products and could therefore improve the information of said consumer.

Source: Avis de l'ANSES relatif aux analyses de retardateurs de flammes bromés à mettre en œuvre dans le cadre des prochains plans de surveillance, september 2012, www.anses.fr