

**UNECE CLRTAP 27th Executive Body
European HBCD Industry Working Group Statement**

Ahead of the decision regarding HBCD, due to be taken at the 27th meeting of the Executive Body (Item 6a of the provisional agenda), the European HBCD Industry Working Group would like to share the following points with all Parties. We are fully supportive of the open and constructive collaboration with industry in the UNECE LRTAP POPs process and are submitting this statement in advance, to contribute to transparent and fruitful discussions during next week's meeting.

Following the recommendations made during the 45th WGSR we are working to have the Arnot et al report "An evaluation of hexabromocyclododecane (HBCD) for Persistent Organic Pollutant (POP) properties and the potential for adverse effects in the Environment" peer reviewed as soon as possible. Jon Arnot and colleagues concluded that there is no evidence that significant adverse effects are likely to occur in organisms living in remote areas due to long range environmental transport of HBCD and that risk based evaluations do not support the classification of HBCD as a POP. In that respect, we believe it would be appropriate to keep Track A open in parallel with track B discussions, as is the case for another compound, in order to allow the parties to take into consideration this peer reviewed scientific report on HBCD.

With regards to the decision on the table today, the negative impact of the closure of Track A discussions is already being felt in the market. As you are all aware, HBCD is a live substance with an important role to play in the polystyrene insulation foams sector. Indeed it is vital; as the only available, effective and feasible means of meeting regulatory fire safety standards in both EPS and XPS polystyrene insulation foams.

HBCD provides a high degree of flame retardancy when used at very low concentrations. Given the current lack of alternatives, EPS and XPS foams would not meet these fire safety regulations and therefore would not be allowed in construction if HBCD were to be removed from the market.



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The polystyrene foam industry employs 65000 workers in Europe. There are 22 EPS production facilities, 56 XPS production facilities, and around 604 SMEs EPS converters in Europe, distributed across all countries to serve local needs optimally. It is critical that Parties strongly consider granting exemptions for the use of HBCD in polystyrene foams to ensure a transition. As an industry we are committed to developing an alternative to HBCD as soon as possible and to minimising emissions of HBCD into the environment. However, there are major challenges in developing a feasible alternative and none exist today. We call on all Parties to support our sector which is so necessary, particularly in light of the energy efficiency needed to meet the global climate challenge, by ensuring a proper transition time for replacement of HBCD in polystyrene insulation foams.

We also believe that a thorough review of all available science is needed and, again, request the Parties to keep Track A open, in parallel with track B discussions.

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