

European Polystyrene Insulation Foams statement on HBCD Risk Management

The European polystyrene industry has a profound interest in HBCD risk management since foam polystyrene (PS) insulation boards represent 90% of HBCD use in Europe.

In May 2010, the POP TF discussed the draft Track B report on HBCD as prepared by Norway. At the forthcoming meeting of the Working Group on Strategies and Review (WGSR) the POP TF conclusions and risk management strategy for HBCD will be discussed.

Should the WGSR consider that a listing of HBCD is appropriate, we request a time-limited exemption for the use of HBCD in polystyrene insulation foams in line with the conclusion of the POP TF that a time-limited exemption might be needed for HBCD use in the PS insulation foams industry, until a suitable alternative is made available and the subsequent market transition is completed. In this context, Industry also intends to apply for REACH Authorisation for the use of HBCD in Polystyrene foams applications in Europe.

The European PS insulation foams industry (PlasticsEurope, EXIBA and EUMEPS) would like to highlight for the consideration of the WGSR some of the key issues that lead to this request.

Fire Safety: HBCD is a unique and essential flame retardant needed to protect PS insulation foams from fire risks and to comply with compulsory fire safety requirements in the large majority of the EU, EFTA Member States^[2], and Canada. Flame-retarded PS insulation foams are in high demand to meet fire safety and the environmental requirements of energy efficiency and CO₂ reduction.

Emissions Control: Emissions are controlled during the HBCD production process. In Europe HBCD producers and PS foams manufacturers have executed voluntary emissions control programmes since 2006, which have demonstrated successful emissions reduction. The EU RAR 2008 showed that HBCD in PS foam does not pose any risk to consumers and PS foams are safe to use.

Alternatives: There is currently no commercially and technically feasible alternative to HBCD in EPS and XPS insulation foams, despite extensive research by the industry^[1]. The PS Foam industry is strongly committed to developing and switching to PS Foams with suitable alternative(s) to HBCD as soon as possible. After extensive research and development carried out by the flame retardant producers and PS Foam industry, 2 options are being considered by the PS insulation industry for scale-up on the basis of pilot plant testing. Industry is confident that a solution will be found, though there is considerable uncertainty on timing. Sufficient time is needed to bring a viable alternative to market for all grades and formulations, across the complex PS insulation foam market. Key issues in the current search for alternatives are as follows:

- Performance as flame retardant, which needs to meet existing stringent regulations in all 56 countries in the UNECE region
- Fit to produce foams without undermining the foam properties. In addition, once found and approved for fire safety and other regulatory requirements, an alternative will have to be transitioned throughout the complex PS insulation foam market.
- Consumer safety for the end product, which needs to be similar to HBCD in PS foams
- Environmental profile, which needs to be superior to HBCD
- Fit to produce foams without increasing safety risks for workers

Socio-Economic Assessment: The PS foams insulation sector is a major industry including many SMEs and currently representing 65,000 jobs in Europe and 1/3 of the European insulation building materials market. We fully support the conclusion of the POP TF that *cost assumptions need to be substantiated for example quantification of job losses, cost increases to consumers and other socio-economic impacts that have not been enumerated*^[3]. Indeed some members of the POP TF suggested that a listing of HBCD prior to a full assessment would be premature given the lack of adequate socio-economic assessment in the draft Track B report^[4]. In addition, the impact on the wider supply chain must be considered in order that a premature or uncontrolled phase-out of PS foam usage does not destabilise other styrene resin outlets. As indicated in the POP TF report, a reasonable timescale will be needed to manage such a transition.

^[2] "The relevance of hexabromocyclododecane for polystyrene EPS/XPS foams to meet fire safety requirements as construction products in Europe" Dr. Jürgen Troitzsch. This study is available upon request.

^[1] Paragraph 74 POP TF report

^[3] Paragraph 79 POP TF report

^[4] Paragraph 81 POP TF report