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De: 李伟 (采购部)

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À: [Interdiction / Prohibition \(ECCC\)](#)

Sujet: Notice of Objection to Canada RM Proposal for DBDPE and PBDEs - KINGFA

Confidentialité: Normale

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July 13, 2022

The Honourable Steven Guilbeault

Minister of the Environment

c/o Christina Paradiso

Executive Director Chemicals Management, Environmental Protection Branch

Department of the Environment

351 Saint-Joseph Boulevard, Gatineau, Quebec K1A 0H3

Email: ec.interdiction-prohibition.ec@ec.gc.ca

Re: Notice of Objection and Request for Board of Review in relation to proposed regulations prohibiting the manufacture, use, sale and import of decabromodiphenyl ethane (DBDPE, CAS Registry Number 84852-53-9) and polybrominated diphenyl ethers (PBDEs) while providing exemptions to the prohibitions, *Canada Gazette*, Part I, Volume 156, Number 20 – May 14, 2022: Prohibition of Certain Toxic Substances Regulations, 2022.

Dear Minister Guilbeault:

Our company writes to express our formal objection to the above-referenced regulatory proposal. Our company KINGFA Group, is a globally preeminent supplier of advanced materials. Headquartered in Guangzhou Science City, Kingfa owns 48 subsidiaries, our R&D and production bases are established in overseas regions including South Asia, North America, and Europe. The products of Kingfa mainly rely on independent innovation and development, covering seven categories with independent intellectual property rights including modified plastics, eco-friendly high-performance recycled plastics, fully

biodegradable plastics, specialty engineering plastics, carbon fiber and composite materials, light hydrocarbon and hydrogen energy, medical and healthcare polymer materials.

ALBEMARLE, the world leading bromine specialties supplier, supplied us over decades for variety of brominated flame retardants, especially the Saytex 8010(DBDPE). DBDPE is a very important additive for KINGFA and our downstream customers to meet the flame retardant requirements. Without DBDPE, plenty of our products will be forced to go through the new formulation development process with alternative solutions. In some certain applications, even no replacement available to reach the same physical property or efficiency. Also, our downstream customers will invest a lot of resource for the new materials qualification. Meanwhile, we may face the challenge of security of supply, that will lead to the huge business lost.

As provided for by section 332(2) of CEPA 1999, our company is filing this Notice of Objection and respectfully request that a Board of Review be established, pursuant to section 333 of CEPA 1999, to "inquire into the nature and extent of danger" posed by DBDPE and PBDEs for the reasons set out below.

Sincerely,

Li Wei

Procurement Manager

KINGFA SCI. &TECH. CO., LTD.

Thanks & Best Regards!

李伟Kevin 采购部 集团添加剂高级采购主管

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