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De: 周政懋

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

Sujet: About DBDPE

Réponse attendue: Non

Confidentialité: Normale

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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](#))– May 14, 2022: [Prohibition of Certain Toxic Substances Regulations, 2022](#).

Dear Minister Guilbeault:

China Association of Flame Retardant Materials (CAFRM) extends sincere greetings to you!

CAFRM is the first and the sole industry association founded in 2014 by flame retardant producers and flame retarded material producers in China. It has 50 members now whose major downstream customers are E&E producers in China and around the world. Their E&E products are widely seen in the Canadian market.

It was learned that your ministry issued in May *Prohibition of Certain Toxic Substances Regulations 2022* with DBDPE listed. For this, we would like to share with you some comments.

1. The technology to replace DBDPE is not well proven and it takes quite a long time to finish such a replacement. Usually a circle of 2 or 3 years is expected for an E&E component to use an alternative to DBDPE from material formulation development to downstream users' confirmation to the market's stable feedback. The more components to use alternatives, the longer it takes. Also, if product manufacturers are forced to use alternatives not well proven, it will undermine fireproof performance of the products and jeopardize consumers' life and property. Further, it needs to be considered whether the alternatives are strictly assessed in hazard.

2. DBDPE is different from DecaBDE. A major reason why DBDPE is listed as a hazardous substance is that DecaBDE is used as a surrogate for DBDPE in hazardous assessment, and this is problematic. US National Academies of Sciences (NAS) released a study report in 2019, holding that OFRs used in consumer products cannot be made hazardous assessment as a single group; instead they should be sorted into 14 subgroups based on chemical structure, physicochemical properties, and predicted biologic activity. It is noteworthy that in the study, NAS grouped DBDPE and DecaBDE into separate subclasses.

3. Currently there is no precedent in the world to control DBDPE particularly. The evaluation on DBDPE is pending under EU REACH. It is better to have further assessment on DBDPE, not only hazardous assessment, but also assessment over replacement feasibility and industry impacts.

Based upon the facts and arguments set out above we ask the Minister to appoint a Board of Review to “inquire into the nature and extent of danger” posed by DBDPE.

Should there be any questions, please do not hesitate to contact us.

Regards,

Mr. Zhou Zhengmao

Secretary General

[China Association of Flame Retardant Materials \(CAFRM\)](#)

Email address: zhouzhengmao@126.com