

## IPEN Intervention on Brominated Flame Retardant (BFR) Recycling 26 April, 2011

Thank you Mr. Chair

Two years ago when COP4 listed PentaBDE and OctaBDE, IPEN expressed serious concerns over the recycling exemption which, we suggested, would inevitably result in continuing exposure to these substances. The current POPRC recommendations support our concern since the overall objective is to “...*eliminate brominated diphenyl ethers from the recycling streams as swiftly as possible.*”

The reasons for the POPRC concern include the consequential dispersal of POPs into many products from which ultimate recovery for disposal would be practically impossible together with the loss of the long-term credibility of recycling as customers recognise that recycled products are allowed to contain hazardous wastes now banned from new production.

IPEN supports the POPRC recommendations which include:

- Immediately stopping the export of these materials except for the purpose of environmentally sound disposal
- Rapidly implementing effective screening and separation techniques to separate materials containing the substances before recycling proceeds
- Promoting and facilitating public awareness-raising on the potential harm of materials containing polybrominated diphenyl ethers currently in use

One of the most important findings of the POPRC evaluation was that this is essentially a problem of developed countries.

IPEN decided to investigate these issues and yesterday we released our results.

In short, we analysed recycled foam carpet padding from 3 developed countries, having screened padding from developing countries in which we found no POPs.

From the developed countries we found PentaBDE or OctaBDE in 23 out of 26 samples (88%)

About half of the samples exceeded provisional low POPs content (based on the new EU low POPs content limits for the relevant congeners).

Since this product is widely used in homes, hotels, and offices, consumers will quite reasonably understand the results as the Stockholm Convention allowing hazardous POPs waste into their living rooms.

We have heard some delegates complain about the POPRC recommendations as being unworkable. However, we believe that developed countries have sufficient infrastructure and resources to implement the POPRC recommendations. This is an issue of compliance with Convention goals, not workability.

In addition, these substances resemble PCBs in structure and effect and we do not believe that any Party would suggest that PCBs should be recycled into consumer products – especially those on which babies crawl and toddlers play.

We urge Parties to adopt the recommendations of the Convention expert committee and end the recycling of materials containing POPs. The practice clearly undermines Article 6, damages the integrity of the Convention and needs to be urgently addressed by this meeting.

Thank you for consideration of our views.