

6 July 2004

Ms. Karine Pellaumail
Friends of the Earth
26-28 Underwood Street
LONDON
N1 7JQ
UK

Dear Madam,

I am writing to you concerning your report "Shop till you drop – survey of retailers and risky chemicals 2003-2004" published in last May. EBFRIIP regrets the inaccuracy and outdated information published in this report regarding brominated flame retardants and the confusion it could cause to both retailers and consumers. We would like to submit the following information to address specific points raised:

- Persistency of flame retardants is an important and necessary factor for fire safety; it ensures a product can meet high fire safety standards during its life cycle without a decrease in fire protection over the lifetime. We recognise the need to improve handling of stable chemicals and therefore welcome the recent support of the EU Member States for the voluntary action proposed by industry so as to ensure improved control of emissions of the brominated flame retardant Deca-BDE
- Levels in European breast milk have been falling for some years. A follow-up study to the one quoted in your report demonstrate this clearly¹. Even more, this study only found Penta-BDE, which is banned in the EU from August 2004
- Findings in human blood have been scientifically peer reviewed and have shown that levels found are well below any possible concern for human health². In addition, the levels of Deca-BDE in blood have been assessed by the EU Risk Assessment, which is now completed and did not find any risks related to the levels found
- Deca-BDE findings in the Arctic are in the order of +/- 0.000000005 grams per gram of sample, levels that certainly do not pose any environmental or health risks. This substance has "a very low potential to reach remote areas"³ and even the authors of those studies have themselves recognised that the levels found are "low"

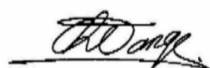
As has been stated recently by Prof. Dr. Martin van den Berg, of Utrecht University, in response to a recent blood testing for chemicals undertaken by Greenpeace-The Netherlands, "from the moment that the primitive human being discovered fire, the chance exists of the intake of harmful substances"⁴. Were the mere presence of a chemical to be a criterion for not using it, then this would call into question much of what society takes for granted, from the capability to provide fire prevention to the ability to move from place A to place B. This is why the principle of regulating on the basis of a chemical's level of risk is so important. In this way can economic development and technological progress be aligned with a high level of environmental and human health protection.

After 10 years of scientific analysis and more than 100 studies, EU Member States recently decided to complete a scientific assessment of Deca-BDE⁵ with the conclusion that there is no identified risk to child or adult health nor to the environment. Considering that Deca-BDE is by far the most studied flame retardant and that it has been approved for use in the EU, it is regrettable that the presence of extremely low and risk-free levels of Deca-BDE in the environment is being used to question the use of a chemical which makes a major contribution to fire safety, saving hundreds of lives every year.

To try to force product manufacturers to move away from using any brominated flame retardant is not itself without its impact on environmental and human health. Either manufacturers will use less tested alternatives or they will reduce their levels of product fire safety.

EBFRIP is committed to dialogue with all interested stakeholders in order to provide them with the most updated information on BFR products. You can also have access to the latest information on brominated flame retardants through our websites, <http://www.ebfrip.org> or <http://www.bsef.org>. I hope that this letter is informative and would welcome the opportunity to discuss this further.

Yours sincerely,



Lein Tange
Chairman

¹ Polybrominated diphenyl ethers in breast milk from Uppsala County, Sweden Y. Lind, P.O. Darnerud, S. Atuma, M. Aune, W. Becker, R. Bjerselius, S. Cnattingius, A. Glynn. ScienceDirect October 2003, pp 186-194

² Reviews by the Institute of Occupational Medicina and Prof. Dr. Martin van den Berg, Head Toxicology Division of the University of Utrecht. Reviews available at <http://www.bsef.org>

³ Wania, Frank, Dugani, Chandrasagar B. 2003: "Assessing the long-range transport potential of polybrominated polybrominated diphenyl ethers: a comparison of four multimedia models". *Environmental Toxicology and Chemistry*: Vol. 22, No. 6, pp. 1252–1261.

⁴ De Volkskrant, 10 April 2004

⁵ EU Competent Authorities meeting of 26 May 2004, Ireland. Press coverage of the meeting from ENDS Daily and Chemical Week can be found on the BSEF website <http://www.bsef.org>