

# Brominated Flame Retardants in electrical & electronic equipment

## BSEF Asia Forum 2020

### Policy and Regulatory Landscape

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The International  
Bromine Council

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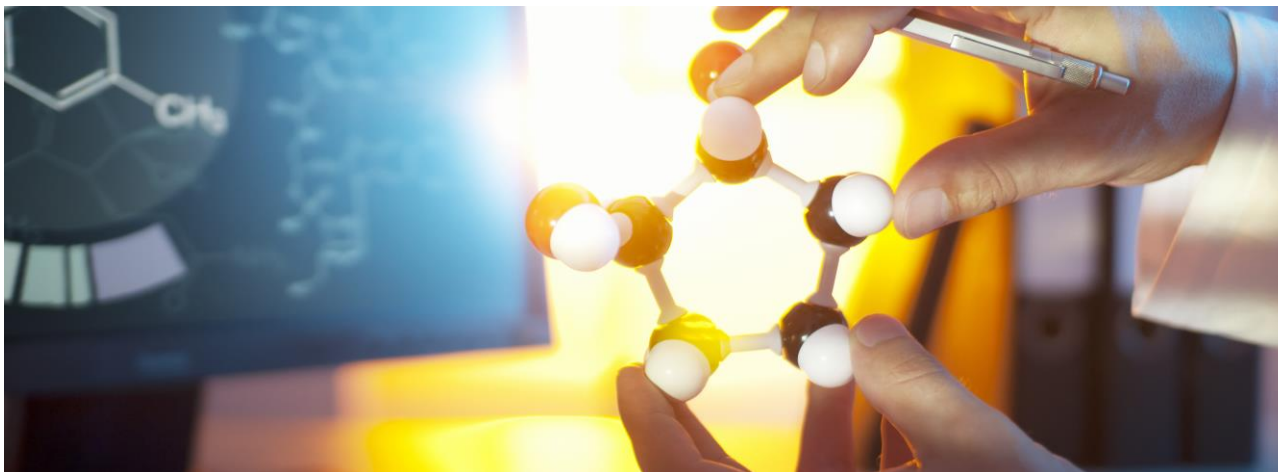


## Europe

- EU Ecodesign Regulation – HFR ban
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- REACH evaluations

## Americas

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# EU Ecodesign Regulation – HFR ban in Casings



## Background

- In 2019, the Commission published a regulation on ecodesign which included a ban on HFRs for use in enclosures and stands of e-displays, as it was claimed HFRs are hindering recycling

## Current Situation

- BSEF filed an application for annulment of the regulation/ban in February 2020
- Ruling expected in 1<sup>st</sup> half of 2021
- BSEF is confident of a successful outcome and expects the ban will be removed
- Commission proposing introduction of a tolerance threshold of 0.1% for Bromine and Chlorine - allegedly to bring ban into line with REACH/RoHS
- BSEF rejects this - REACH/RoHS restrict substances not elements - and have made views known to Commission



# RoHS assessment of TBBPA



- The 2018 review of substances (including TBBPA) put forward by the Commission for review for possible restriction under RoHS is now completed
- BSEF and other industry members offered extensive input into the development of the assessment of TBBPA over the past 3 years
- BSEF also held bi-lateral discussions with the European Commission to express concerns at the quality of the assessment by the consultants and its ambiguous recommendations
- The final report from Commission consultants Oeko Institut is expected to be published soon
- **BSEF is not expecting to see any proposal from the European Commission to restrict TBBPA in 2020**



## REACH evaluations - TBBPA

- Lead registrant was requested to perform a few studies to address the concerns raised during the evaluation (PBT and ED)
- The results of the studies are due in January 2021 (revised registration dossier CSR)
- Studies are expected to be completed on time
- When submitted, the evaluating MS (Denmark) and ECHA will review the new information during 2021





## REACH evaluations - EBP

- The final studies related to the evaluation of EBP by the European Chemicals Agency under REACH are being drafted
- They will be submitted to the rapporteur member state (Sweden who have taken over the valuation from the UK) by the end of 2020
- Further studies may be needed and have been proposed by the lead registrant for the substance, Albemarle
- The preliminary view from the lead registrant, based on the studies, is that it does not meet the PBT or vPvB criteria
- Pending a discussion with the lead registrant and ECHA, it is difficult to determine when a conclusion might be reached in the evaluation

# Canada assessment - EBP



- In May 2019, Canada concluded that EBP poses a risk of harm to the environment
- This may lead to prohibiting the manufacture, import, use, sale and offer for sale of EBP, as well as products and manufactured items containing it
- Industry value chains impacted engaging with Canadian government at official and political level to seek mitigation of proposed restrictions
- The North American Flame Retardant Alliance are also continuing to challenge the scientific validity of the proposed restrictions with support from the value chain (automotive and aviation industry)
- **Preferred outcome is to seek a re-evaluation of the substance given new studies not originally considered.**



# TSCA risk assessment – TBBPA



- The U.S. Environmental Protection Agency published the final scope document & list of responsible parties on September 4th. All conditions of use are being evaluated for TBBPA, but the risk assessment has not yet started.
- The American Chemistry Council has formed a risk evaluation consortia for TBBPA and will submit past research to inform the risk evaluation
- Draft risk evaluation expected to be published by December 2021 and final risk evaluation expected to be published by December 2022





# TSCA risk assessment – HBCD



- The U.S. Environmental Protection Agency issued in September 2020 the final risk evaluation on HBCD.
- Risks were identified for a few conditions for use, including for workers (assuming constructions/demolition workers do not use respirators)
- Risk management will be developed during 2021 – information can be submitted

## The International Bromine Council

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Thank you for your attention!

Further information:

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Any questions?



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