

## Comments on the draft Risk Management Evaluation of c-OctaBDE

- Given latest available conclusions it is no longer relevant to include any consideration to list all octa and nona BDE isomers using the precautionary principle of Art.8(7a) of the Convention. Any issue of this kind should be deferred for future consideration as long as new scientific data are available.
- For reasons of consistency with the listing of c-PentaBDE, the text of the Risk Management Evaluation of c-OctaBDE should specify which isomers are listed as POPs.

The Bromine Science and Environmental Forum (BSEF, [www.bsef.com](http://www.bsef.com)) is submitting the comments attached on the draft Risk Management Evaluation for commercial Octabromodiphenyl ether (OctaBDE) (CAS No. 32536–52–0).

BSEF represents three major global suppliers of bromine and brominated chemicals. One or more of these companies have made and/or distributed these two brominated products which are currently being evaluated as candidates for possible addition as POP substances to the Stockholm Convention. These substances are “legacy” products and none of these substances have been made and/or imported in the US for any commercial uses since December 31, 2004.

The draft Risk Management Evaluation raises two major areas of concern for BSEF.

### 1) Consideration of octa and nona-BDEs

The draft Risk Management Evaluation refers to the conclusion of the Risk Profile of c-OctaBDE stating that “The increasing evidence related to debromination of Octa and Nona BDE into BDEs with POPs properties and considering that under Article 8, paragraph 7(a) of the Convention states that the lack of full scientific certainty shall not prevent a proposal from proceeding, it is concluded that the Octa and NonaBDE components of the commercial octabromodiphenyl ether are likely, as a result of LRET, to lead to significant adverse human health and/or environmental effects, such that global action is warranted. “

Given that

- since the adoption of the Risk Profile at the third meeting of the Persistent Organic Pollutants Review Committee in November 2007, the Background document for POPRC Members and Observers on Reductive Debromination of Bromo-aromatics’ by Professor Ian Rae was distributed in April 2008;
- this paper states that “The extent to which different PBDEs can be degraded under various conditions, the role of metabolism in addressing the bioaccumulation potential, and the identity of all lower congeners that may be produced, is an active research field” and therefore latest scientific data do not indicate the need of including the environmental and health relevance of de-bromination;
- none of those congeners have been considered as having POP characteristics at earlier stages of the nomination process until POPRC2;

BSEF believes that it is not relevant to include this conclusion in the current stage. If concluded necessary, the POP characteristics of the isomers of Octa and Nona BDEs must be first addressed in a Risk Profile. Since new scientific data continues to be developed and assessed, it seems necessary to either amend the Risk Profile or drop Octa and NonaBDE from consideration as POPs.

### 2) Listing options

The draft Risk Management Evaluation suggests that for reasons of better practicality specific congeners rather than the commercial product should be listed in Annex A of the Convention. Every BDE congener family contains several individual isomers. BSEF agrees with the approach of listing specific congeners POP characteristics as long as the specific isomers are defined in the text. Besides, this would be consistent with the listing options decided for c-PentaBDE. Therefore BSEF would like to request to be specified in the text of the Risk Management Evaluation which isomers should be used as markers for enforcement purposes.