



REPUBLIC OF CROATIA

MINISTRY OF ENVIRONMENTAL
AND NATURE PROTECTION

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Zagreb, 23 January 2014

Secretariat of the Stockholm Convention
Att.: Jim Willis, Executive Secretary
International Environmental House 1
11-13, Chemin des Anémones
CH-1219 Châtelaine-Geneva
Switzerland

SUBJECT: Information requests in follow up to the decisions taken by the Persistent Organic Pollutants Review Committee at its ninth meeting

Dear Mr. Willis,

With regard to the information requests in follow up to the decisions taken by the Persistent Organic Pollutants Review Committee (POPs Review Committee) at its ninth meeting held in Rome 14 to 18 October 2013, the Republic of Croatia would like to deliver the following information.

Regarding the fulfilment of the information specified in Form-1 for pentachlorophenol and its salts and esters (Annex F of the Convention) and additional information specified in Form-2 for decabromodiphenyl ether (commercial mixture, c-decaBDE) relevant to Annex E of Convention, we could deliver information about quantity and hazard classification.

Legal persons, importers and producers had the obligation to declare the quantity of all chemicals which were produced, placed on the market or used in the Croatian territory per year, if classified as dangerous: very toxic (T+), toxic (T), harmful (Xn), corrosive (C) and irritant (Xi) (with exception in case of irritant chemicals – the usage was not reported).

Placing on the market and usage of pentachlorophenol and its salts and esters (CAS No. 87-86-5) are regulated by the Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards Annex XVII. According to the Regulation, pentachlorophenol shall not be placed on the market, used as a substance and as a constituent in the substances, or in mixtures, in a concentration equal to or greater than 0,1% by weight.

Before 1 July 2013, pentachlorophenol in a concentration equal to or greater than 0,1 % by weight was restricted by the List of forbidden and/or restricted chemicals (OG No. 93/2010). Since the accession of the Republic of Croatia to the EU on 1 July 2013, the List has not been valid anymore and the REACH Regulation directly applies in the Republic of Croatia.

According to the Croatian Institute for Toxicology and Antidoping data base and other authorised institutions, there is no data on production, placement on the market or use of pentachlorophenol and its salts and esters in a period from 2007 to 2011.

Decabromodiphenyl ether (CAS No. 1163-19-5) is a chemical which has no official classification. In accordance with Sigma-Aldrich, as pure chemical Decabromodiphenyl ether is classified as harmful with Xn; R: 20/21/22.

The chemical is not restricted or banned in the Republic of Croatia.

If this chemical is present in mixture in concentration $\geq 25\%$ the mixture could be classified as harmful (Regulation on classification, labeling and packaging of hazardous chemicals, OG 23/2008, Annex VIII.). If the mixture is classified as harmful, legal persons are obliged to declare its production, import and use to the Croatian Institute for Toxicology and Antidoping.

If this chemical is present in mixture/s in concentration $< 25\%$, the mixture could not be classified as harmful. In that case, legal persons had a choice of marking the product as harmful and in that case they did not have the obligation to declare it.

According to the Croatian Institute for Toxicology and Antidoping data base and other authorised institutions, there is no data on production, placement on the market or use of decabromodiphenyl ether in a period from 2007 to 2011.

Monitoring of those two chemicals in the environment is not established, and we could not provide data on releases, such as discharges, losses and emissions.

Furthermore, due to request in Form-3 regarding the information on alternative use of perfluorooctane sulfonic acid, its salts, perfluorooctane sulfonyl fluoride and their related chemicals (PFOS), in accordance with performed preliminary research which was provided by authorised institutions, there is no data on the use of PFOS prior to its restriction by the Convention and on new alternatives.

The Republic of Croatia plans to continue with the research and collection of more information regarding new POPs.

Regarding the request for further information that could be useful for upgrade risk profile and move short chain chlorinated paraffins to the Annex F, the Republic of Croatia does not have any new information to add.

In accordance with the Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards Annex XVII, alkanes, C10-C13, chloro (shortchain chlorinated paraffins) (SCCPs) EC No 287-476-5, CAS No 85535-84-8 shall not be placed on the market, or used as substances, or as constituents of other substances or in mixtures in concentrations greater than 1 % by weight, where the substance or mixture is intended for metalworking or fat liquoring of leather.

Also, we would like to inform you that Republic of Croatia is Party of the Long -range Transboundary Air Pollution Convention and 1998 Protocol on Persistent Organic Pollutants (since 2007).

On 18 December 2009, Parties to the Protocol on POPs adopted decisions 2009/1, 2009/2 and 2009/3 to amend the Protocol to include seven new substances, one of them is/are short-chain chlorinated paraffins (not yet in force).

New text amendments to the Protocol adopted on 18 December 2009 regarding short-chain chlorinated paraffin's, is as follows:

Annex I- Substances scheduled for elimination

Short-chain chlorinated paraffin's: Implementation requirements; production; none, except for production for the uses specified in annex II, use; none, except for production for the uses specified in annex II.

Short-chain chlorinated paraffins means chlorinated alkanes with a carbon chain length of 10 to 13 carbon atoms and degree of of clorination of more than 48 % by weight.

Annex II-Substances scheduled for restrictions on use

Short-chain chlorinated paraffins: Implementation requirements; (a) Fire retardants in rubber used in conveyer belts in the mining industry; (b) Fire retardants in dam sealants. Parties should take action to eliminate these uses once suitable alternatives are available. No later than 2015 and every four years thereafter, each Party that uses these substances shall report on progress to the Executive Body. Based on these reports, these restricted uses shall be reassessed.

Yours sincerely,

ASSISTANT MINISTER
M. Sc. Marija Ščulac Domac

