

25 April 2017
IPEN Intervention on Deca BDE
Given by Joe DiGangi

Thank you, Mr. President.

DecaBDE has polluted electronics industry workers, consumers, food, and communities around the world including Arctic Indigenous communities. IPEN strongly supports the POPs Review Committee recommendation to list DecaBDE in Annex A of the treaty. However, the details of the listing are very important — and by this, I mean loopholes that allow continued production and use.

We would like to make three points on the listing:

- 1) The EU auto industry proposed the exemption for auto industry spare parts. This exemption is not justified. The wording of the proposal is vague and could include as many as 800 parts. The industry admits it does not need an exemption for new parts. The auto industry should use retrofitting and generic spare parts that do not contain DecaBDE.
- 2) The proposed auto industry exemption has a large potential impact on developing countries that receive older vehicles. POPRC Decision POPRC-12/4 states, "that the increasing waste burden in developing countries from older vehicles that continue to be serviced with spare parts that contain DecaBDE is a concern."

Developing countries should not have to deal with an increased DecaBDE waste burden simply because the EU auto industry does not want to substitute spare parts for ones that do not contain DecaBDE.

3) COP8 should resist any proposal to create a recycling exemption for materials containing DecaBDE. This would essentially legalize ewaste dumping as "recycling". In addition, the POPRC examined the impact of this type of exemption for COP5 and recommended against it, urging governments to, "eliminate brominated diphenyl ethers from the recycling streams as swiftly as possible." The Committee noted that recycling materials containing POPs "will inevitably result in wider human and environmental contamination" and "loss of the long-term credibility of recycling." A recent IPEN survey of plastic children's products from 26 countries found OctaBDE and DecaBDE in 90% of them. Toxic chemicals found in e-waste should not be "recycled" into children's toys

The presence of DecaBDE in ewaste makes it one of the most relevant substances for developing and transition countries that the treaty has addressed. The COP8 decision should not increase burdens through loopholes that permit continued production and use or dumping via recycling.

Thank you for consideration of our views.