



14<sup>th</sup> July 2005

## **Brominated Flame Retardants: Rising Levels of Concern**

Dear Health Minister,

In light of the recent controversial events surrounding the proposed decision by the European Commission to remove the ban on Deca-BDE, a brominated flame retardant, under the Restriction of Hazardous Substances Directive (RoHS). We urge you to speak out on the associated health disorders and to ensure that on July 18<sup>th</sup> under the Agricultural Council your country does not support the un-banning of Deca-BDE.

*"Flame retardants are all around us in health care settings. Intravenous pumps, hospital beds, waiting room chairs, and hospital privacy curtains all share the common need to be fire resistant. To meet fire safety standards, fire resistant chemicals, known as flame retardants, are added by manufacturers of health care products to slow or prevent fires. Unfortunately many of these flame retardants do not remain fixed in the product. Instead they slowly leak from the products into our air, dust, water, and environment and eventually they enter our food and bodies. A subset of these flame retardants, called brominated flame retardants (BFRs), are now the subject of intense scrutiny. Evidence shows they are likely to persist in our environment, bioaccumulate in the food chain and in our bodies, and cause adverse effects in our children."*

**'Brominated Flame Retardants: Rising Levels of Concern'** by Sarah Janssen, M.D., PHD, M.P.H. (which we have attached for your information), gives the latest overview of the worrying evidence about harm from Deca BDE. The evidence has indeed been confirmed by the European Commission DG SANCO Scientific Committee on Health and Environmental Risks (SCHER)<sup>1</sup> opinion of this March: *"Emissions of Deca BDE to the environment may constitute serious problems in the future. If formation of lower brominated, bioaccumulating substances take place this process can go on for a very long time and there are no possibilities to stop it. The previous scientific committee (CSTEE) said that the uncertainties in the fate of DeBDE warrant risk reduction measures. Today there is further evidence for degradation of this substance to potentially harmful compounds and SCHER also strongly recommends further risk reduction (conclusion iii)."* (own emphasis added)

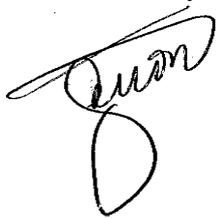
The additional risk assessment on the environmental impacts of Deca-BDE does not conclude that Deca-BDE causes no health concern - instead it highlighted some major health concerns:

<sup>1</sup> EUROPEAN COMMISSION HEALTH & CONSUMER PROTECTION DIRECTORATE-GENERAL Directorate C - Public Health and Risk Assessment C7 - Risk assessment SCIENTIFIC COMMITTEE ON HEALTH AND ENVIRONMENTAL RISKS SCHER Opinion on Update of the risk assessment of bis (pentabromophenyl) ether (decabromodiphenyl ether) Final Environmental Draft of May 2004 CAS Number: 1163-19-5 EINECS Number: 214-604-9 Adopted by the SCHER during the 4th plenary of 18 March 2005

- “Widespread occurrence of the substance in top predators (birds) including Arctic regions;
- potential neurotoxic effects and uptake of the substance by mammals in laboratory studies; and
- possible formation of more toxic and accumulative products such as lower brominated diphenyl ether congeners and brominated dibenzofurans in the environment.”<sup>2</sup>

The European Parliament voted for a resolution recently, calling on ‘Council to oppose the proposal, should the Commission not amend it by withdrawing the part on DecaBDE.’<sup>3</sup> We call upon you to uphold your commitments made under the Children’s Environment and Health Action Plan signed in Budapest last year: Regional Priority Goal IV: ‘We commit ourselves to reducing the risk of disease and disability arising from exposure to hazardous chemicals.... We will aim to reduce the proportion of children with birth defects, mental retardation and developmental disorders,’<sup>4</sup>

Yours Sincerely



Genon Jensen, Director EEN



Cestmir Hrdinka, European Director HCWH

### **Health Care Without Harm (HCWH)**

Health Care Without Harm is an international coalition of 443 organizations in 52 countries working to transform the health care industry so it is no longer a source of harm to people and the environment.

Address: Chlumova 17, 130 00 Praha 3, Czech Republic. Tel: 420 2 22 78 14 71 Fax: 420 2 22 78 28 08 e-mail: [cestmir.hrdinka@hcwh.org](mailto:cestmir.hrdinka@hcwh.org) [www.noharm.org](http://www.noharm.org)

### **European Public Health Alliance – Environment Network (EEN)**

EEN advocates protection of the environment as a means to improving the health and well being for European citizens. Launched in 2004, it brings together groups that want to ensure that health is at the centre of environment issues. Member groups include NGOs specialising in public health, environment-related health conditions and women’s environmental and health concerns and associations representing health care and environmental professionals.

Address: 39-41 rue d’Arlon, B1000 Brussels, Belgium Phone: +32 2 233 3875 Fax: +32 2 233 3875 E-mail [info@env-health.org](mailto:info@env-health.org) [www.env-health.org](http://www.env-health.org)

<sup>2</sup> Final draft R013\_0405\_env UPDATE OF THE RISK ASSESSMENT OF BIS(PENTABROMOPHENYL) ETHER (DECABROMODIPHENYL ETHER) CAS Number: 1163-19-5 EINECS Number: 214-604-9 Final Environmental Draft of May 2004. Rapporteur: United Kingdom Contact for the environmental section: Environment Agency, Chemicals Assessment Unit Isis House, Howbery Park, Wallingford, Oxfordshire, OX10 8BD, UK Fax: + 44 1491 828 556 E-mail: [ukesrenv@environment-agency.gov.uk](mailto:ukesrenv@environment-agency.gov.uk) NB this does not include Human Health Risk Assessment.

<sup>3</sup> P6\_TA-PROV(2005)0274, Hazardous substances in electrical and electronic equipment, European Parliament resolution on the proposal for a Council decision amending for the purposes of adapting to technical progress the Annex to Directive 2002/95/EC of the European Parliament and of the Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment (COM(2005)0241), 6 July 2005

<sup>4</sup> Fourth Ministerial Conference on Environment and Health Budapest, Hungary, 23 25 June 2004 Children s Environment and Health Action Plan for Europe EUR/04/5046267/7, 25 June 2004, ORIGINAL: English