

CHLORINATED PARAFFINS

REGULATORY UPDATE

June 22, 1998

This Regulatory Update was prepared by the Chlorinated Paraffins Industry Association¹ (CPIA) to keep processors and users of chlorinated paraffins informed of the latest regulatory developments pertaining to chlorinated paraffins.

Introduction

The following is an update of the regulatory developments regarding chlorinated paraffins in the United States, Canada, Europe and the United Nations/Economic Commission for Europe.

United States

There have been no new significant regulatory developments in the United States. The CPIA is monitoring a proceeding by the Consumer Product Safety Commission (CPSC) designed to mandate the use of fire retardants, including chlorinated paraffins, in upholstered furniture and fabrics.

Canada

Canada has not made any final decisions regarding the listing of short-chain chlorinated paraffins (SCCPs) as a Track 1 substance. In May 1997, Canada proposed to include SCCPs as a Track 1 substance under its Toxic Substances Management Policy. The CPIA has raised significant technical objections to the Canadian proposal based on a lack of evidence that SCCPs have been found in the Canadian environment at levels that could be toxic to aquatic species. The CPIA is a member of the Environment Canada Issue Table on Chlorinated Paraffins and as such closely monitors and provides technical information into the Canadian deliberation process. The CPIA is also actively reviewing reports of new analytical methods for measuring chlorinated paraffins in the environment.

Europe

In August 1997, the European Union issued the final draft of its risk assessment on short-chain chlorinated paraffins. As part of that process, a panel of Specialized Experts was convened to review animal toxicology studies; they concluded that the carcinogenic responses observed in laboratory animals for SCCPs were not relevant to man with the possible exception of the kidney effects. Studies are now underway to assess the significance of these kidney effects.

¹ The Chlorinated Paraffins Industry Association (CPIA) is a trade association of the North American producers of chlorinated paraffins. The members of CPIA are: Dover Chemical Corporation; Ferro Corporation, Petroleum Additives; Occidental Chemical Corporation; and, Pioneer Americas, Inc.

The EU has underway a similar risk assessment on mid-chain chlorinated paraffins as part of its general review of existing chemicals. No new findings or significant impacts are anticipated.

The CPIA is also closely monitoring a new draft EU Directive addressing waste from electrical and electronic equipment given chlorinated paraffins' use in electrical components. While this initiative is not focused on chlorinated paraffins, the broad use of the term "halogenated flame retardants" in the Directive has triggered CPIA interests.

United Nations/Economic Commission for Europe

In February, 1998, the UN Economic Commission for Europe (UN/ECE), of which the U.S. is a member, decided not to include short-chain chlorinated paraffins (SCCPs) in its initial list of persistent organic pollutants (POPs). The U.S. Government and the CP producing industry argued against the inclusion of SCCPs on the POPs list given the lack of evidence that SCCPs are persistent in the environment and capable of long-range transport.

Website

The CPIA anticipates the availability of its web site shortly. The web site address will be www.regnet.com/cpia. The CPIA will use its web site as a means of distributing these periodic Updates.

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