

CHLORINATED PARAFFINS

REGULATORY UPDATE

April 2000

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 a brief update on the regulatory status of chlorinated paraffins in the United States, Canada and Europe. Where applicable the report distinguishes between short-chain chlorinated paraffins (SCCP, C₁₁₋₁₃), mid-chain chlorinated paraffins (MCCP, C₁₄₋₁₇) and long-chain chlorinated paraffins (LCCP, C₁₈₊).

United States

There have been no new developments regarding chlorinated paraffins in the United States. Moreover, CPIA is unaware of any actions by US regulatory agencies that could impact the continued use of chlorinated paraffins.

Canada

There have been no new official developments in Canada. CPIA is continuing to encourage Environment Canada to adopt a Life Cycle Management Program approach to address any concerns regarding the use of SCCPs. Environment Canada will likely soon reinstate their previously established Issue Table on Chlorinated Paraffins. CPIA will remain an active player and encourages ILMA, and its key Canadian members, to participate in this environmental review and management program.

CPIA is working cooperatively with key Canadian researchers to investigate the accuracy of reports on the presence of trace concentrations of chlorinated paraffins in remote regions.

Europe

SCCPs - The European Union (EU) is at the end of a long process of conducting a full risk assessment and risk reduction strategy on SCCPs under the EU Existing Substances Regulation. Based on a series of conservative assumptions, the assessment concluded that “a risk to aquatic organisms exists arising from the local emission of short-chain length

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.

chlorinated paraffins from metal working applications.” As a result, the EU is considering restrictions on the use of SCCPs in metalworking and leather treatment.

In November 1999, a meeting to review risk management options for SCCPs was sponsored by the Organization for Economic Cooperation and Development (OECD) in Geneva, Switzerland. Many governments were represented including the US, Canada, Germany, UK, and Japan as was CPIA and representatives of European producers. The US EPA and CPIA presented a consistent message and emphasized the significant differences in the exposure assumptions and the risk characterizations between the EU and the US. CPIA explained that pollution control management options exist for SCCPs for the majority of use scenarios, which are adequate to protect the aquatic environment.

The difference in outcomes between the US and EU assessments for SCCPs reflects a fundamental difference in philosophy and procedures relating to chemical regulations. The EU is guided by a “precautionary principle,” which provides for the application of conservative assumptions about exposure and risk in the absence of definitive scientific information.

MCCPs – Mid-chain chlorinated paraffins are now being evaluated under the EU Existing Substances Regulation. In early 2000, the UK released a “Risk Assessment of Alkanes 14–17 Chloro” and an accompanying “SIDS Initial Risk Assessment Report” (SIAR) which was reviewed at a mid-March 2000 SIDS Initial Assessment Meeting (SIAM) by OECD members gathered in Tokyo, Japan. The final EU assessment of MCCPs is expected to be completed in mid-2001.

The draft assessment report on MCCPs made reference to results from studies in *Daphnia* that were inconsistent with previous results reported on other aquatic species. Based on these findings, CPIA is sponsoring a battery of studies to better understand the *Daphnia* test results.

For additional information, please contact: Mr. Robert J. Fensterheim
Executive Director
Chlorinated Paraffins Industry Association
1250 Connecticut Avenue, NW, Suite 700
Washington, DC 20036
Phone: (202) 637-9040
Fax: (202) 637-9178
E-mail: bobf@regnet.com