

# International Bromine Council

See attachment for comments.

Hazardous Waste and Toxics Reduction Program  
Washington State Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600  
SaferProductsWA@ecy.wa.gov

Dear Sir or Madam,

Brüssel, 24.01.2022

**RE: Draft Regulatory Determinations Report to the Legislature: Safer Products for Washington - Implementation Phase 3 (November 2021, Publication 21-04-047)**

We, The International Bromine Council, share your mission to make products safe for consumers. Our members Abermarle, ICL, Lanxess, and Tosoh produce brominated flame retardants, which make products safer and prevent fires. BSEF members have developed a broad range of BFRs to tackle these tasks. These BFRs are varied in structure and include large polymeric designs that are widely recognized by regulatory agencies to have some of the best hazard profiles. We offer to discuss with you our views regarding your proposed legislation in the best interest of consumers and based on our experience.

Brominated flame retardants are a versatile and diverse family of chemical additives designed to provide fire safety solutions for materials used in products where there is a need to make products safer to use. In some polymer systems BFRs are possibly the only commercially available solution. These additives are there for a reason: improving safety.

There are some 75 brominated flame retardants on the market. Their key attributes include:

- Excellent & effective performance
- Resource efficient – lower % mass of FR
- Reduced likelihood of ignition
- Functionality – ability to operate in the gas phase
- Reduced heat release
- Slower fire growth
- Applicability across a wide range of materials and polymer types.

One of the main concerns we face when discussing about the sustainability of brominated flame retardants, is recyclability and being ready for a circular economy. We address these issues and refer to the positive conclusion by the Sofies report on [Study-on-the-impact-of-Brominated-Flame-Retardants-BFRs-on-WEEE-plastics-recycling-by-Sofies-Nov-2020.pdf \(bsef.com\)](#)

We are offering to you a transparent and open contribution of our views on your initiative. We are convinced that our products effectively address flammability hazards. And we believe that our products should be judged on scientific grounds, on risk related to exposure, and being fairly treated regarding their benefits.

Again, we share common goals: we want to avoid regrettable substitution and we want to avoid that the worthy objective of making products safer could be distorted by false assumptions.

We are looking forward to hearing from you.

Sincerely,  
Michael Hack  
Secretary General

