

The need for time-limited exemptions for HBCD in expanded and extruded polystyrene insulation foams

– European HBCD Industry Working Group Statement for UNEP Stockholm Convention COP6 Side-Event on the work of the POP Review Committee –

Hello, my name is Stephen Long, I work for INEOS Styrenics and I am here today on behalf of the European HBCD Industry Working Group, which represents HBCD producers and users in the polystyrene insulation foam sector, the major application of HBCD in Europe.

I would like to start by saying that the European HBCD Industry Working Group welcomes the thorough evaluation of HBCD by the POP Review Committee and appreciates the level of cooperation with industry. We have been actively engaged in the discussions regarding the potential listing of HBCD throughout the review process and development of the recommendation for listing.

Polystyrene foams represent a unique class of insulation materials designed to save and conserve energy in construction and building and improve quality of living. Thermal insulation has been identified as one of the most cost effective means of improving energy efficiency and mitigating greenhouse gas emissions. The legislative requirements for near zero energy buildings is driving a growth in demand for cost efficient products for renovation of existing building stock and appropriate insulation of new buildings. Identification of the most suitable insulation product depends on the application itself and geography. Different countries have different traditions and requirements for building. Flat roofs, pitched roofs, floors, internal or external walls, cavity walls, frost protection or perimeter boards all have different insulation needs. The choice of material depends on the mechanical and physical demands for the application, as well as the need to meet building codes and regulations specific to the country and region, including those for fire safety. Preferences are also based on the ease of handling, recycling of waste, longevity, resistance to mould growth, resistance to insect and/or animal damage and of course cost. The choice is not easy; materials are designed for application and are not directly comparable or interchangeable. Architects, suppliers and builders need and benefit from a wide variety of materials. This is proven by the stable but high variety of products on the market.

Despite its light weight, polystyrene foam has exceptional compressive strength, block rigidity, water resistance and constant properties providing long-term insulation solutions adapted to every situation. It is not surprising that over 50 years the versatility, cost effectiveness, ease of use and safe handling has ensured that polystyrene insulation foams are found in some form in nearly every building in Europe.

The European HBCD Industry Working Group supports the recommendation by the POP RC to list HBCD in Annex A of the Stockholm Convention for elimination, with exemptions for the production and use of HBCD in polystyrene insulation foams.

As an industry we are committed to substituting HBCD but we need these time-limited exemptions for a number of reasons:



European HBCD Industry Working Group

Avenue E. van Nieuwenhuysse 4 B - 1160 Brussels Belgium

Tel: +32 2 676 72 05 Fax: +32 2 676 7432 Email jmi@cefic.be

- 1) A dedicated programme has carried out a thorough investigation to evaluate alternatives for use in polystyrene insulation foams since 2003. This programme has identified two potential, more sustainable, alternatives and one of these is at the early stages of commercialisation. Full capacity will take time to come on stream. Hence, there is still a clear and vital need for HBCD use in insulation foams for a limited time period until a proven supply of such an alternative is available in sufficient commercial quantities.
- 2) In addition, for the downstream industry, time is also needed for the polystyrene insulation foams to be fully qualified and re-certified to enable the completion of a smooth market transition for the building and construction sector.
- 3) In Europe, polystyrene insulation represents up to 1/3 of the insulation building materials market - playing an important role in developing energy efficient buildings and thereby significantly contributing to the EU's commitments to tackle climate change and increase resource efficiency. Polystyrene insulation foams sold in Europe are legally required to meet national fire safety regulations and insurance requirements, as well as local and national fire services requirements. In a number of countries and applications this necessitates the use of a flame retardant. In polystyrene foams flame retardants are an important contribution to fire safety. HBCD, effective at very low quantities as a drop-in additive, is the industry standard for flame retarded EPS and XPS, ensuring increased fire safety without losing thermal insulation quality of the foams. The use of HBCD in this context is also important for the safe storage and transportation of polystyrene foams. Continuity of supply and properties as we transition from HBCD to an FR alternative is important to maintain these standards.

Therefore, we support the POP RC recommendation to list HBCD under the Stockholm Convention for elimination with time limited exemptions for the production and use of HBCD in polystyrene foams, to enable this smooth market transition to a more sustainable alternative.

Looking ahead, and as highlighted during discussion within the POP Review Committee, the question of end of life of polystyrene insulation foams containing HBCD will be a key point. A number of End of Life options are available for polystyrene insulation foams and it is clear that a range of options will be needed to account for differences in infrastructure globally. However, for Europe the HBCD Industry Working Group believes that incineration with energy recovery is the most appropriate treatment. We also believe that re-use and closed loop recycling for insulation foams within construction are valid options. I, and colleagues also present, would welcome the opportunity to discuss our position on this issue further with you during the course of this COP meeting.

In closing, I would like to emphasise that the HBCD Industry Working Group welcomes the work done by the POP Review Committee on HBCD and its recommendation for listing the substance in Annex A with vital time limited exemptions for the production and use of HBCD in polystyrene insulation foams to allow the market transition to a more sustainable alternative.

I am happy to take any questions.

– *Statement Ends* –



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