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**United Nations  
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Geneva, 19–23 November 2007

Item 9 (a) of the provisional agenda\*

**Consideration of draft risk profiles on: octabromodiphenyl ether**

**Comments and responses relating to the draft risk profile on  
commercial octabromodiphenyl ether**

**Note by the Secretariat**

The draft risk profile on commercial octabromodiphenyl ether prepared during the intersessional period by the working group established by the Committee for this purpose is set out in document UNEP/POPS/POPRC.3/14. The annex to the present note contains a table listing the comments received in accordance with the standard workplan for the preparation of a draft risk profile and responses to those comments by the working group. The annex was prepared by the working group and has not been formally edited.

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\* UNEP/POPS/POPRC.3/1/Rev.1.

## Annex

## Comments and responses relating to the draft risk profile on commercial octabromodiphenyl ether

Minor grammatical or spelling changes have been made without acknowledgment. Only substantial comments are listed.

Section of Draft	Source of Comment	Comment	Response
Generic	USA	The decision for the risk profile for c-OctaBCE must be based solely on c-octa because the substance was the subject of the POPRC Annex D decision, not the individual components of c-octa.	To be discussed at the POPRC in coherence with the decision for c-PentaBDE
Generic	Ian Rae (Australia)	To mention that debromination is an active research field	Included in the Executive Summary and the Synthesis of Information
Several	Switzerland	Editorial comments, references and suggestions for improve the clarity	The proposals have been included in the revised version
Several	BSEF	Editorial comments	Several editorial comments have been accepted
Executive summary	BSEF	Since the specific BDEs are not all identified and studied, we could also speculate that some of the degradation products are less toxic.	Only those more toxic are of concern.
<i>Executive summary and CONCLUDING STATEMENT</i>	BSEF	the concluding statement seems to go too far beyond where the evidence actually exists	The evidence for hexa and hepta is clear, and the new scientific results indicates more and more the relevance of debromination of octa and nona particularly in biota The concluding statement in based under Article 8, paragraph 7(a) of the Convention
2.2.1 Persistence	BSEF	work is based on unrealistic conditions to achieve any evidence of degradation of DecaBDE: Gerecke et al., ran their study for 238 days, whereas the retention time in a full scale anaerobic digester would be only around 20 days	The original paper has been reviewed. Independently of the relevance for digesters the degradation under relevant anaerobic conditions is clearly demonstrated
2.2.2.2 Bioaccumulation and biomagnification from food exposures. 2.3.7 Humans	BSEF	To mention the specific PBDE's congener	Additional information has been included whenever possible
2.2.2.2 Bioaccumulation and biomagnification from food exposures	BSEF	Remove sentence related to decaBDE	The sentence is relevant
2.4.1.4. Mammals and Birds	BSEF	The EU's position regarding the methodology of Viberg and Eriksson for assessment of potential neurotoxicity is clearly explained in the EU Risk Assessments of c-PentaBDE, c-OctaBDE and DecaBDE. The work is of unknown relevance to humans or animals exposed	There is new information, and the concern related to these effects has been expressed by the EU Scientific Committee on Health and Environmental Risks:

Section of Draft	Source of Comment	Comment	Response
		to these substances and are not adequate for risk assessment purposes. It would be better to remove this from the list and address these endpoints including the EU's own view found in the Risk Assessment.	EU_SCHER (2005). Scientific Committee on Health and Environmental Risks 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 meeting of 18 March 2005.
2.4.2. Monitoring data on effects	BSEF	Unless there is specific information that certain families are in some way interacting with PBDEs to change the magnitude or types of effects, it is unnecessary to point to specific families of compounds. Otherwise what is the basis for naming one family but not another (e.g. PAH's, lead, mercury, etc) ???	There are obvious reasons for mentioning explicitly chemically related families
<i>3 SYNTHESIS OF THE INFORMATION</i>	BSEF	Petrol and wood both are a fire hazard, but that doesn't make them equivalent. Similarly if there are different modes of action and differences in potency between PBDEs and PCBs, it does not support a conclusion that they have equivalent hazards. This document does not seem to have any information other than what is mentioned here regarding this issue. If this is intended to serve as support for declaring components of c-OctaBDE as POPs, then it requires better supporting information or should be removed.	This is an active research field and the sentence is relevant as indicates opportunities for addressing gaps within this complex risk profile