



Calling on decision-makers to abide by due processes.

17 October 2008

REACHforLIFE comments on Axel Singhofen Presentation

REACHforLIFE would like to thank Mr Singhofen for attending its launch event on 10 September. We valued his presence and his many comments which helped to generate a full and frank debate. Nevertheless, the REACHforLIFE campaign feels that it should respond to some of the comments he made during his presentation.

We would like to reiterate that the objective of the REACHforLIFE campaign is not to debate deca-BDE. Rather, REACHforLIFE aims to highlight that EU **decision making** often fails to take into account the conclusions of the EU's Scientific Risk Assessments.

In the case of deca-BDE, the [Risk Assessment Conclusions](#) of May 2004 did indeed state the need for further information and/or testing. However, it must be reiterated that **no risk reduction measures were proposed by the risk assessment on the use of deca-BDE.**

REACHforLIFE acknowledges that alternatives to deca-BDE exist, but questions why an alternative is necessary for a substance which has not been subject to any risk reduction measures by the official EU Risk Assessment. Indeed, we stand by our assertion that banning such a substance is not a sound approach to chemicals management and could negatively impact consumer safety.

In summary, banning well-researched chemicals and thereby forcing industry to switch to alternatives, for which nowhere near the same amount of information is available, appears neither consistent nor conducive to sound chemicals policy.

In 2005 the European Commission adopted a [Commission Decision](#) to exempt deca-BDE from the original ban proposal, introduced in 2003. This clearly demonstrates that the Commission recognised that a ban on deca-BDE was neither necessary nor desired, thus going against Mr Singhofen's assertion that all EU institutions support a ban. Furthermore, the opinions of the CSTE and SCHER committees that he cited were set aside and not adopted by the Commission.

Mr Singhofen also omitted to mention that the European Court of Justice annulled the exemption granted to deca-BDE in electronic and electrical equipment on **procedural grounds only** – it did not query the scientific rationale for the exemption itself.

REACHforLIFE does not want to run the risk of being sidetracked by individual examples that move away from the bigger picture. Hence, it would like to reiterate that there is a broader issue at stake as supported by the 22 signatories (at the time of writing) who have signed the [REACHforLIFE petition](#).

If you require any further information please contact pressoffice@reachforlife.eu.
