

WEELABEX Organisation - OFFICIAL STATEMENT	
Issue ID:	2020_003
Issue Category:	De-pollution
Issue Name:	Analysis to determine brominated flame retardants in plastics
Issue Description:	<p>The CLC/TS 50625-3-1 defines that compliance with the de-pollution requirements related to the brominated flame retardants in plastics can be proven by an analysis result confirming the total bromine concentration is below 2000 ppm.</p> <p>However, the REGULATION (EU) 2019/1021 defines a limit value for the restricted brominated flame retardants “polybrominated diphenyl ethers (PBDEs)” as:</p> <ul style="list-style-type: none"> - 1000 mg/kg (valid until 9 June 2023); - 500 mg/kg (valid from 10 June 2023); - 350 mg/kg (valid from 30 December 2025); - 200 mg/kg (valid from 30 December 2027), <p>What kind of analysis evidence during the WEELABEX audits shall be required to prove compliance with the de-pollution requirements related to brominated flame retardants in plastic fractions?</p>
WEELABEX Organisation Statement	<p>One of the following possible scenarios shall be implemented to prove compliance with the de-pollution requirements related to brominated flame retardants in plastic fractions:</p> <ul style="list-style-type: none"> ➤ SCENARIO 1) two laboratory analysis of a plastic sample (PREFERABLE SOLUTION): <ul style="list-style-type: none"> ○ one analysis for the TOTAL BROMINE concentration (limit value = 2000 ppm as per the CLC/TS 50625-3-1); ○ the second analysis for the RESTRICTED PBDEs (limit value as per the REGULATION (EU) 2019/1021): <ul style="list-style-type: none"> ▪ 1000 mg/kg (valid until 9 June 2023); ▪ 500 mg/kg (valid from 10 June 2023); ▪ 350 mg/kg (valid from 30 December 2025); ▪ 200 mg/kg (valid from 30 December 2027), ➤ SCENARIO 2) one laboratory analysis only for the RESTRICTED PBDEs: <ul style="list-style-type: none"> ○ if the result for RESTRICTED PBDEs is below the limit value (compliant with the REGULATION (EU) 2019/1021) than such result can be assumed to be compliant with the CLC/TS 50625-3-1 as well (as the CLC/TS 50625-3-1 is aiming to remove the restricted PBDEs where the total Bromine is an indicator). ➤ SCENARIO 3) one laboratory analysis only for the TOTAL BROMINE: <ul style="list-style-type: none"> ○ the WEELABEX organisation does not defined any new limit value, however, as there is only limited evidence that the 2000 ppm total Bromine limit value is still suitable to confirm compliance with the up-dated REGULATION (EU) 2019/1021, the following scenario shall be applied:

	<ul style="list-style-type: none"> ▪ if the result for total Bromine is below: <ul style="list-style-type: none"> ▪ 1000 ppm (until 9 June 2023); ▪ 500 ppm (from 10 June 2023); ▪ 350 ppm (from 30 December 2025); ▪ 200 ppm (from 30 December 2027), ▪ than such result can be assumed to be compliant with the REGULATION (EU) 2019/1021 as it can be assumed that the concentration of restricted PBDEs is below the fined limit value 1000/500/350/200 ppm as well; however, data confirming this statement shall be continuously collected; ▪ if the result for total Bromine is higher than 1000/500/350/200 ppm then an additional analysis of the restricted PBDEs shall be carried out to confirm (or not) compliance with the REGULATION (EU) 2019/1021. <p>○ NOTE: if there is a proven evidence in a country or region (based on sufficient analysis results) that a different value for the total Bromine can be used as a more suitable indicator confirming compliance with the REGULATION (EU) 2019/1021 then such value may be used instead of the mentioned 1000/500/350/200 ppm.</p>
Date of Issue / Date of revision:	10th June 2020 / 18th April 2023 (defrev_02)
Come into effect:	For each General and Surveillance audit
Status of the Statement:	Final Statement - defrev_02