

**UNITED KINGDOM COMMENTS ON DECABROMODIPHENYL ETHER -  
ADDITIONAL INFORMATION FOR THE FURTHER DEFINING OF SOME  
CRITICAL SPARE PARTS IN THE AUTOMOTIVE AND AEROSPACE  
INDUSTRIES AND ON THE USE IN TEXTILES IN DEVELOPING COUNTRIES  
(APRIL 2016)**

**The UK wishes to thank the Secretariat for the opportunity to comment on this document. We have the following comments:**

This flame retardant has been used historically in the Aerospace and Defence industries however due to concerns over its environmental impact it has been largely supplanted in newer Aerospace industry products. Deca-BDE is still present in a range of parts in older aircraft requiring certification testing for fire safety and is consequently still used in components and spare parts. Product types affected include a range of polymer and textile items such as emergency slides, life vests, cables, carpets, interior panels and structural composites as well as seats.

In almost all cases alternatives are available and suitable for substitution, however in many cases the alternatives have yet to be qualified.

Fire safety is a significant issue in aviation, in particular for crash safety reasons. A change to a flame retardant is a major event and requires a re-certification of the change, often involving repeat flame resistance testing of each product type in accordance with standard airworthiness testing procedures.

The amount of deca-BDE used in current aerospace industry manufacturing is estimated to be less than 20 tonnes per annum globally, and is continuing to decline as newer products are introduced. Parts used in the maintenance and repair of older products continue to be produced and used on the principle of like for like replacement. The logistics in terms of cost and time required to re-certify a change of flame retardant is substantial and we believe presents a disproportionate impact on our industry, should this requirement be mandated.

Additionally the early removal of products from ageing aircraft places a significant burden on the waste stream, introducing a considerable quantity of chemical over a short period of time, possibly in places less well equipped than the UK in terms of dealing with the recycling of this chemical.

Whilst the UK, therefore, supports a restriction for future use of deca-BDE in new aircraft types, we feel that a derogation for older product types be allowed, similar to that proposed for a parallel REACH Restriction.

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