

June 2, 2016

XPSA Statement on EPA's Proposal to Add HBCD to the Toxic Release Inventory

On June 2, the U.S. Environmental Protection Agency proposed adding the flame retardant HBCD (hexabromocyclododecane) to the Toxic Release Inventory (TRI). HBCD is commonly used in XPS foam insulation in order to meet building and fire safety codes and standards necessary to protect life and property.

The proposal, if enacted in its current form, would require companies to report any environmental releases of HBCD, any on-site waste management and any transfers to off-site waste disposal facilities (as specified under the TRI regulation) if they manufacture, import or use HBCD in an amount exceeding 100 pounds per year. This proposal is based solely on the hazard properties of HBCD and does not consider whether there is an actual health or environmental risk from manufacture, import or any of the current uses of HBCD. Studies that have considered human exposure to HBCD (from all possible sources) have concluded that exposure to HBCD is low and poses little if any risk. This is also the conclusion reached by international agencies:

- The European Commission in 2008: "There is at present no need for... risk reduction measures.... This conclusion applies to all [exposure] scenarios for consumers and for humans exposed via the environment."
- The government of Australia in 2010: "Exposure to HBCD from [all] sources appear to be low and hence low risk is expected."
- Environment Canada in 2011 "Based on the available information, it is concluded that HBCD is not entering the environment in a quantity or concentration or under conditions that constitute ... a danger in Canada to human life or health."

The EPA TRI proposal would require emission and disposal reporting, but does not otherwise restrict the manufacture or use of HBCD. EPA will not determine if and when the TRI proposal goes into effect until after it has reviewed and responded to comments on the proposal.