



The British Plastics Federation Ltd (BPF) represents companies that manufacture flexible polyurethane foam products intended for industrial and consumer use.

For several years we have monitored the activities of the various Marine Conventions, and OSPAR in particular. We support in principle, their recommendation for reducing to zero the discharge to the marine environment of “man-made chemicals” by 2020.

The OSPAR ‘List of Substances of Possible Concern’ was last revised in August 2006. This will be regularly revised, as new information becomes available on persistence, toxicity and bioaccumulation. OSPAR actively encourages anyone with information on substances to supply it to the authorities in the lead country.

BPF believes it is important that the chemical producers cooperate in the OSPAR process by providing high quality data to demonstrate that any risk created by a substance to the marine environment is acceptable and therefore avoid its inclusion in the main OSPAR priority list. One area of concern to OSPAR was the use of bromine-based fire retardants. BPF members do not use the brominated fire retardants known as PBDEs, PBBs, penta-BDE, hexabromocyclododecane and tetrabromobisphenol in the manufacture of flexible PU foam.

As users of chemicals, BPF member companies are committed to providing safe products that are manufactured in compliance with UK environmental and occupational health legislation. They fully comply with - and often exceed - legal requirements to label their products and provide information on composition. BPF is committed to science-based risk assessment, wherever possible on a case-by-case basis. To this end we provide all relevant information to the UK Competent Authority whenever they carry out risk assessments under the EU Existing Substances Regulation or other UK procedures such as HSE’s Advisory committee on Toxic Substances (workplace) or DEFRA’s Advisory Committee on Hazardous Substances (environment). We do not believe it is helpful to pre-judge the outcome of these thorough and open risk management processes.

BPF is also an active member of the European Association of Flexible Polyurethane Foam Blocks Manufacturers (EUROPUR) and was the lead organisation on a EUROPUR research project to examine the volatile organic compounds arising from flexible polyurethane foam mattresses, published in April 2004. A quantitative risk assessment was carried out on each of the volatiles and no evidence of any human health risk was identified from the “worst case” exposure model employed. The results of the research work were published in the peer-reviewed journal “Cellular Polymers”. This is again an example of BPF’s commitment to provide safe consumer products.