

INFORMATION LETTER TO SUPPLIERS ON REGULATORY ADVICE ON TDCP

Certain chlorinated organophosphate flame retardants are coming under increasing regulatory scrutiny as suspected carcinogens in Europe and the United States.

In Europe, TCEP (Tris(2-chloroethyl) phosphate; CAS 115-96-8) is effectively banned, being placed on the Annex XIV Authorisation list and not having any applications to continue its use.

TDCP (Tris[2-chloro-1-(chloromethyl)ethyl] phosphate; CAS 13674-87-8) has restrictions for handling for pregnant women and young children and exposure limits for workers. Denmark has also proposed an Annex XVII Restriction for children's products that will impact car seats.

In the US a prohibition for children's products already exists for TDCP in California, New York, Vermont and Maryland and similar prohibition proposals are underway for Illinois, Connecticut, North Carolina, Maine, Massachusetts and Washington.

TDCP is used extensively in polyurethane foams and backing materials in the automotive industry, particularly in seats and instrument panel applications.

In Europe only two suppliers have registered the use of TDCP for possible use in automotive applications.

In 2011 one of these two suppliers announced a voluntary programme to withdraw the supply of TDCP, in light of the hazards classification and the increasing regulatory actions.

Substitute products that are suitable for current applications are widely available.

In light of the regulatory pressures and the information provided by suppliers, the substance experts in the ACEA Materials and Substance Working Group (ACEA M&S WG) expect that this substance will be subject to further regulation that will affect our industry. We anticipate that the availability of flame retardants based on this substance will be curtailed, so automotive uses should be carefully evaluated.
