

Hexabromocyclododecane — Comments of Environmental Defense

(Submitted via Internet 6/23/02)

Environmental Defense appreciates this opportunity to submit comments on the Test Plan for Hexabromocyclododecane (CAS# 3194-55-6).

The Test Plan submitted for hexabromocyclododecane (HBCD) by the American Chemistry Council's Brominated Flame Retardant Industry Panel (BFRIP) is both thorough and well written. Because HBCD is a halogenated hydrocarbon used in consumer products, it has been the subject of appreciable study. The Test Plan is unusually thorough and a number of the studies have been published in the open literature.

Review of studies of HBCD indicate that it is extremely resistant to environmental degradation and thus has considerable potential for accumulation in the environment. However, it appears to be unlikely to be released from most of the products in which it is used and, if it should enter into the environment, available data indicate it would be largely sequestered in sediments and soil. Available data also indicate that should HBCD be released into water it has very low toxicity to fish and invertebrates. Available data indicate HBCD is neither a mutagen nor a carcinogen, nor have other mammalian health effects been reported.

Our review of the Test Plan submitted for HBCD indicates that all required SIDS elements are addressed and the studies described are adequate. Many studies were conducted recently and under GLP. Therefore, we concur in the sponsor's conclusion that no additional work is needed on this compound.

Thank you for this opportunity to comment.

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