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## **JBCE comments on a draft risk profile for UV-328**

Japan Business Council in Europe (JBCE) welcomes the feedback opportunity regarding a draft risk profile for UV-328. As a cross-sector association with member companies operating in different industries and stages in the supply chain, JBCE would like to address the following.

We will comment not on the individual substance UV-328, but on whether the modelling tools and ideas of long-range transport potential of the polymer resins can be used for other polymer additives. There are various types of polymer resins which have each use, shape, chemical and physical characteristics, etc., and some resins are used indoors but other resins are used outdoors, easily deteriorated or hard to deteriorate, disposable or recycled, etc. There are various polymer resins depending on the purpose.

We use different polymer additives for depending on the application, shape, resin type, and physical characteristics of the target polymer resins. Therefore, it is unlikely that the transport modelling for polymer resin including UV-328 can directly apply to the other polymer additives, and we should discuss it in detail individually.

In addition, this attempt that the mobility of a certain substance is estimated by the transport modelling of the target polymer resins is new and interesting. And in case that UV-328 is decided to be in POPs, UV-328 must be replaced by other alternative substance.

However, we must look at the fact that these alternative substances do not estimated their mobility by transport modelling of the target material which support these alternatives.

If a certain alternative substance is used in a coating of wooden products, or metal products, do not we have to consider the transport modelling of wood or metal products to estimate the mobility of this alternative substance?

When discussing mobility of a certain substance which is transported by a certain mass transfer such as polymer resins, we think we should take into account that the mobility of alternative substance and its mass transfer.

Incorporating a modelling only of polymer resins by considering only the fact that polymer resins have highlighted these days is an insufficient and biased assessment when considering the human safety from concern of chemical substances including its alternative substances. Therefore, we believe that the transport modelling of polymer resins should not be taken into consideration unless modellings of other mediators can be performed.

We also believe that polymer additives other than UV-328 should not be regulated based on assessments and speculations "at least unless they are detected at concentrations that actually affect human safety".

JBCE and its member support to promote for human health and environment in a realistic manner and on the basis of profound evaluation, and are willing to contribute to bring these ideas forward together with the European Institutions and other interested stakeholders.

## **ABOUT JBCE**

Founded in 1999, the Japan Business Council in Europe (JBCE) is a leading European organization representing the interests of about 90 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, textiles and glass products.

For more information: <https://www.jbce.org> / E-mail: [info@jbce.org](mailto:info@jbce.org)  
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