Annex A: Proposed Control of Short-Chain Chlorinated Paraffins (SCCP) in Singapore

Introduction

In July 2017, the National Environment Agency (NEA) of Singapore notified the WTO TBT Committee of its intention to control polychlorinated naphthalenes (PCN) and trichlorfon as Hazardous Substances (HS) under the Environmental Protection and Management Act (EPMA) and EPM (Hazardous Substances) Regulations, and to phase-out the production, import, export and use of PCN by May 2018. Following further consultation with industry, NEA is planning to control short-chain chlorinated paraffins (SCCP) as Hazardous Substances (HS) under the Environmental Protection and Management Act (EPMA) and EPM (Hazardous Substances) Regulations, and to phase out the production, import, export and use of SCCP in Singapore. The control of PCN, trichlorfon and SCCP is now planned to take effect by June 2018.

Short-Chain Chlorinated Paraffins (SCCP)

- The Stockholm Convention on Persistent Organic Pollutants (POPs) is a global treaty to protect human health and the environment from POPs. POPs are chemicals that can remain intact in the environment for long period of time, can be widely distributed geographically, accumulate in the fatty tissues of humans and wildlife, and have harmful impacts on human health or the environment.
- 3 SCCP (C_{10} C_{13} chloroalkanes) is a POP, which is used as a component in lubricants for metal working applications, and as a fire retardant/plasticiser in paints, sealant, rubber and polymers. According to reports published on the Stockholm Convention website, the global production of SCCP is decreasing. These reports, as well as publications from developed countries, also mention that there are commercially available alternatives to SCCP.
- 4 At the 8th Meeting of the Conference of Parties of the Stockholm Convention (COP-8) in 2017, SCCP was listed in Annex A (with specific exemptions shown in Table 1 below) of the Convention. For chemicals listed in Annex A of the Convention, Parties would have to take measures to prohibit the production, import, export and use of the chemicals.

Table 1: Listing of SCCP in Annex A of the Stockholm Convention

Chemical	Activity	Specific Exemptions
Short-chain chlorinated paraffins (Alkanes, C ₁₀₋₁₃ , chloro): straight-chain chlorinated hydrocarbons with chain lengths ranging from C ₁₀ to C ₁₃ and a content of chlorine greater than 48 per cent by weight For example, the substances with the	Activity Production Use	As allowed for the Parties listed in the Register of specific exemptions • Additives in the production of transmission belts in the natural and synthetic rubber industry • Spare parts for rubber conveyor belts in the mining and forestry industries • Leather industry, in particular fatliquoring in leather • Lubricant additives, in particular for automobile engines, electric generators, wind power facilities, drilling in oil and gas exploration and petroleum refining to produce diesel oil • Tubes for outdoor decoration bulbs • Waterproofing and fire-retardant paints • Adhesives
following CAS numbers may contain short-chain chlorinated paraffins: CAS No. 85535-84-8	• 1 • \ • \	
CAS No. 68920-70-7 CAS No. 71011-12-6		 Metal processing Secondary plasticizers in flexible polyvinyl chloride, except in toys and children's products
CAS No. 85536-22-7 CAS No. 85681-73-8		except in toys and crimulen's products
CAS No. 108171-26-2		

- 5 The Rotterdam Convention on the Prior Informed Consent (PIC) Procedure for Certain Hazardous Chemicals and Pesticides in International Trade is a global treaty to promote shared responsibility and cooperative efforts among Parties in the international trade of certain hazardous chemicals in order to protect human health and the environment.
- At the 8th Meeting of the Conference of Parties of the Rotterdam Convention (COP-8) in 2017, SCCP was also listed in Annex III of the Convention. Chemicals listed in Annex III are subjected to the PIC procedure which involves formally obtaining the decisions of importing Parties on whether they wish to receive future shipments of the chemical of concern and ensuring that exporting Parties comply with the decisions of importing Parties.

Proposed Regulatory Control in Singapore

- 7 In line with the obligation to phase out the production, import, export and use of SCCP, and in view of global indications on the availability of alternatives for SCCP, the domestic control measures for SCCP are being reviewed.
- 8 NEA plans to gazette the control of SCCP under the EPMA and EPM (HS) Regulations by December 2017. Importers, manufacturers and distributors of SCCP and products containing SCCP will have 6 months from the date of gazette to comply with the control. With effect from June 2018, the production, import, export and use of SCCP and products containing SCCP in Singapore will not be allowed.