COMMENTS ON THE DRAFT RISK PROFILE PREPARED IN ACCORDANCE TO ANNEX E TO THE STOCKHOLM CONVENTION ON PERSISTENT ORGANIC POLLUTANTS

Substance name: Dechlorane Plus and its syn-isomer and anti-isomer
CAS number:
EC number:

The substance has been proposed for its inclusion in the Stockholm Convention on persistent organic pollutants

Start date of the consultation: 19/02/2020
End date of the consultation: 15/04/2020

Disclaimer: Comments provided during consultation are made available in this document as submitted by the commenting parties. It was in the commenting parties own responsibility to ensure that their comments do not contain confidential information. The table does not contain any confidential information.

Comment number	Date/type/Org.	Comments
1	Date: 2020/04/01 14:38 Type: Individual	Comment: Regarding published toxicity findings, the reference list of your 'Draft risk profile' is missing 2 of 15 toxicity findings my search found in PubMed: - Potential genotoxicity and risk assessment of a chlorinated flame retardant, Dechlorane Plus. Dou J, Jin Y, Li Y, Wu B, Li M. Chemosphere. 2015 Sep;135:462-6. doi: 10.1016/j.chemosphere.2014.12.066. Epub 2015 Jan 10. PMID: 25585867 - Oral repeat dose and reproductive toxicity of the chlorinated flame retardant Dechlorane Plus. Brock WJ, Schroeder RE, McKnight CA, VanSteenhouse JL, Nyberg JM. Int J Toxicol. 2010 Dec;29(6):582-93. doi: 10.1177/1091581810384154. Epub 2010 Oct 19. PMID: 20959615. The latter is a high dose and apparently industry sponsored study--irrelevant for not testing relevant dose. The former findings aquatic genotoxicity from 300 ug/L, generally lower than what your summary shows (but I didn't check closely).

		More important, my search used Mesh (medical subject headings), and my experience in using just the common name of a chemical with the same toxicity key words returns a few additional toxicity findings that using Mesh does not. Doing so here returns 2x as many potential tox findings to screen (162, vs. 87 using Mesh). Why don't you screen them to see which are actual toxicity findings? Use: "Dechlorane Plus" AND (effect* OR hazard* OR risk* OR toxic* OR safet*)
2	Date: 2020/03/02 16:53 Type: Individual	Comment: Occidental Chemical no longer manufactures Dech Plus. On 12-December-2017, Occidental Chemical Belgium BVBA submitted a "Cease manufacture or import" notification using REACH-IT. The substance was as follows: EC Name: 1,6,7,8,9,14,15,16,17,17,18,18-Dodecachloropentacyclo[12.2.1.16,9.02,13.05,10] octadeca-7,15-diene CAS Number: 13560-89-9 Trade Name: Dechlorane Plus TM (Dech Plus) The REACH-IT reference number for the notification is 01-2119978271-33-0000. Item 4. on Page 3 of the Draft risk profile should be corrected to indicate that Occidental Chemical no longer manufactures Dech Plus and Occidental Chemical Belgium BVBA no longer imports Dech Plus. Item 28 (Section 2.1.1) on Page 37 of the Draft risk profile should also be corrected to indicate that Occidental Chemical no longer manufactures Dech Plus and Occidental Chemical Belgium BVBA no longer imports Dech Plus.