

Position on the potential nomination of D4, D5 and D6 for inclusion in the Stockholm Convention as POPs substances

The industry association Deutsche Bauchemie welcomes and supports the European Commission's ambition to control the release of D4, D5 and D6 to the environment.

The European Commission intends to submit a proposal for a nomination of the cyclic siloxanes D4, D5 and D6 to Annex B of the United Nations Stockholm Convention on Persistent Organic Pollutants (POPs).

These cyclic siloxanes are essential building blocks for the production of silicone polymers. Sealants based on silicone polymers play a major role in the construction sector. Because of their durable, highly effective mechanical, optical and thermal properties they are widely used and difficult to substitute. As flexible connection joints between various materials in the building, they make an important contribution to the service life and quality of the entire building, but also ensure significant energy savings and thus support the goals set in the European Green Deal. It is therefore of utmost importance, that these silicone products remain available on the European single market.

Industrial downstream users (formulators) that provide silicone sealants, depend on the availability of high-quality silicone polymers in Europe as well as the legal authorisation to use those polymers in its products (mixtures).

For the construction chemicals sector, it remains unclear which consequences are to be expected, if the cyclic siloxanes D4, D5 and D6 are added to Annex B of the POP-Convention and whether there is a risk of a restriction in the availability or usage of silicone polymers as feedstock for silicone products. In our opinion, it must be ensured that D4, D5 and D6 continue to be available to manufacture silicone polymers in Europe under industrially controlled conditions and to use the resulting silicone polymers as starting materials for construction sealants. It is therefore essential, that a legal, technical, socio-economic and scientific assessment is in place, addressing any direct and indirect consequences that such a listing would have on silicone manufacturers and downstream users before submitting a proposal for nomination.

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As an industry association, Deutsche Bauchemie represents the entire construction chemicals industry in Germany. In 2019, the more than 130 member companies with around 32.000 employees generated sales of 8.5 billion euros. This corresponds to half of the European market volume and about a quarter of the world market. Under the umbrella of the German Chemical Industry Association (VCI), Deutsche Bauchemie has been representing the interests of its member companies for over 70 years, to the public, political actors, authorities, other industry sectors, science and the press.