

Source: E-Mail Hans Mattaar to Milos Milunov from 20.04.2018

Dear Mr. Milunov,

On behalf of ECCA I would like to thank you for being included in the survey on waste-related issues in Annexes IV and V of Regulation 850/2004.

We have conducted an investigation among our members, and we can now provide you with an answer for the vast majority of our members. Because the overall answer is, as expected, 100% "negative" (which is a positive sign) and in order to ensure a maximum response to your request, we have taken the liberty to simply summarise the questions rather than ask member companies to work through the very detailed questionnaire.

Out of the substances covered by your survey, only dicofol is of interest to the member companies of ECCA. We have listed all other substances involved in the survey:

- o Decabromodiphenylether (decaBDE),
- o short-chain chlorinated paraffins (SCCPs),
- o Hexachlorobutadiene (HCBD),
- o Pentadecafluorooctanoic acid (PFOA, perfluorooctanoic acid) and its salts and PFOA-related compounds,
- o Perfluorohexanoic acid (PFHxS) and its salts and PFHxS-related compounds,
- o Hexabromocyclododecane (HBCD),
- o Polychlorinated Biphenyls (PCB),
- o Polychlorinated dibenzo-p-dioxins, and
- o dibenzofurans (PCDD/PCDF)

to our members, and received no indication that any of those were of concern to their current or past business (all our members are manufacturers of pesticides).

We can now confirm for 16 companies out of the total of 20 ECCA member companies:

- Agria S.A., 75-83 Dimitar Manov Str., 1408 Sofia, Bulgaria,
- Arysta LifeScience Europe SARL, Tour Montparnasse, 33 Avenue du Maine, 75015 Paris, France
- Barclay Chemicals Manufacturing Ltd, Damastown Way, Damastown Industrial Park, Mulhuddart, Dublin 15, Ireland

- Ciech S.A., ul. Wspólna 62, 00-684 Warsaw, Poland
- Diachem S.p.A., Via Mozzanica, 9/11, 24043 Caravaggio (BG) – ITALY
- Excel Crop Care Limited, 184/87 S.V. Road, Jogeshwari West, Mumbai - 400102, India
- Farma-chem S.A., Industrial Area of Sindos 570 22, Thessaloniki - Greece
- Finchimica S.p.A. Via Lazio, 13, 25025 Manerbio (BS) Italy
- Galenika-Fitofarmacija A.D., Batajnicketi drum bb, Zemun, Belgrade, 11080, Serbia
- Globachem NV, Brustem industriepark, Lichtenberglaan 2019, B-3800 Sint-Truiden, Belgium
- Helm AG, Nordkanalstrasse 28, D-20097 Hamburg, Germany
- Indofil Industries (Netherlands) B.V. Piet Heinkade 55, 1019 GM, Amsterdam, the Netherlands
- LAINCO, S.A., Polígono Industrial Can Jardí, Bizet Avenue, 8-12, 08191 RUBÍ (Barcelona) Spain
- Rotam Agrochemical Europe Ltd., Hamilton House, Mabledon Place, London WC1H 9BB, UK
- Tradecorp., Sapec Agro Business, Alameda dos Oceanos, lote 1.06.1.1, 1990-207 Lisboa, Portugal.
- UPL Europe Ltd, The Centre, 1st Floor, Birchwood Park, Warrington, Cheshire, WA3 6YN, UK

that:

- o they hold no stockpile of products containing dicofol,
- o they hold no chemical waste containing dicofol, and
- o they do not manufacture, import or export any products containing dicofol.

We hope that this information contributes to your survey, and we remain of course available for any further information.

With kind regards,

Hans Mattaar

Technical Director

p: +32 2 2315 704 m: +31 611 929 009

a: c/o Pappas & Associates, Attorneys at Law

Rue Stevin 51; B-1000 Brussels; Belgium

w: ecca-org.eu e: technical.director@ecca-org.eu