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On behalf of Silicones Europe, a sector group of the European Chemical Industry Council (Cefic), I am reaching out to bring your attention to an issue that we believe might have a significant impact on UPM-Kymmene and your sector more broadly.

On 14 June 2023, the European Commission confirmed its intention to nominate the critical silicone monomers Octamethylcyclotetrasiloxane (D4), Decamethylcyclopentasiloxane (D5) and Dodecamethylcyclohexasiloxane (D6) under the UN Stockholm Convention on Persistent Organic Pollutants.

The Stockholm Convention has the objective of eliminating the manufacture and use of substances listed therein. D4, D5 and D6 are critical monomer intermediates, mainly used to produce silicone polymers, which have essential applications in many key sectors including yours. In the pulp and paper sector, silicone polymers are used, for example, in antifoam and defoamer solutions, ensuring high performance thanks to their unique properties such as thermal stability and anti-adhesion. A POP nomination would impact the availability of silicone polymers, essential components of many of the products you sell, and therefore represents a serious risk for your company.

We understand that the goal pursued by the European Commission is to ban the direct use of D4, D5 and D6 in personal care products, which account for less than 2% of the total applications and are already regulated via targeted restrictions under the EU REACH Regulation. On the other hand, a POP nomination would seriously endanger the production of silicone polymers, representing over 98% of the uses of these substances. The Stockholm Convention is a disproportionate regulatory tool, which would have an unjustified impact on critical global value chains. We believe such a decision should be made on both a sound scientific basis and socio-economic understanding of the impact on the European economy, which currently is not justified.

We are currently advocating towards the European Commission to avoid a POP nomination to maintain a continued use of D4, D5 and D6 in polymer production. We believe that it is important to build a broad coalition of support from industry stakeholders. Therefore, we are asking you to join us in our advocacy efforts. There are a number of ways that you can help, for example by contacting the European Commission and your national authorities to express your concerns about the proposed POP nomination, providing information about the importance of silicone polymers (and thus D4, D5 and D6) to your business, your industry and to the European economy.

The European Commission has not carried out thorough assessments that would be essential before initiating such a measure, and is dangerously overlooking the potential consequences of a POP nomination. For this reason an impact assessment is being carried out by an independent consultant of the potential impacts, and we would welcome any relevant information you could provide. Hence, we would be delighted to further discuss with you how to coordinate efforts to ensure that silicones keep bringing value to UPM-Kymmene and driving innovation in the pulp and paper sector.

We look forward to hearing back from you and thank you in advance for the crucial support you will offer.



Yours sincerely,

On behalf of Silicones Europe

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