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Bromine in plastic consumer products – evidence for the widespread recycling of electronic waste

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38 **Abstract**

39 A range of plastic consumer products and components thereof have been analysed by
40 x-ray fluorescence (XRF) spectrometry in a low density mode for Br as a surrogate
41 for brominated flame retardant (BFR) content. Bromine was detected in about 42% of
42 267 analyses performed on electronic (and electrical) samples and 18% of 789
43 analyses performed on non-electronic samples, with respective concentrations ranging
44 from 1.8 to 171,000 $\mu\text{g g}^{-1}$ and 2.6 to 28,500 $\mu\text{g g}^{-1}$. Amongst the electronic items, the
45 highest concentrations of Br were encountered in relatively small appliances, many of
46 which predated 2005 (e.g. a fan heater, boiler thermostat and smoke detector, and
47 various rechargers, light bulb collars and printed circuit boards), and usually in
48 association with Sb, a component of antimony oxide flame retardant synergists, and
49 Pb, a heavy metal additive and contaminant. Amongst the non-electronic samples, Br
50 concentrations were highest in items of jewelry, a coffee stirrer, a child's puzzle, a
51 picture frame, and various clothes hangers, Christmas decorations and thermos cup
52 lids, and were often associated with the presence of Sb and Pb. These observations,
53 coupled with the presence of Br at concentrations below those required for flame-
54 retardancy in a wider range of electronic and non-electronic items, are consistent with
55 the widespread recycling of electronic plastic waste. That most Br-contaminated items
56 were black suggests the current and recent demand for black plastics in particular is
57 met, at least partially, through this route. Given many Br-contaminated items would

58 evade the attention of the end-user and recycler, their disposal by conventional
59 municipal means affords a course of BFR entry into the environment and, for food-
60 contact items, a means of exposure to humans.

61

62 **Keywords:** XRF; bromine; consumer products; electronic waste; recycling

63 **1. Introduction**

64 Plastic is the dominant component of waste electrical and electronic equipment
65 (WEEE) and, having superior mechanical and thermal properties to plastics used in
66 most other applications, is attractive for recycling. However, because a significant
67 fraction of WEEE plastics contain brominated flame retardants (BFRs), there are
68 constraints on how such materials are disposed of or reprocessed (Tange and
69 Slijkhuis, 2009; Buekens and Yang, 2014). According to the 2001 Stockholm
70 Convention and its various amendments, waste containing persistent organic
71 pollutants (POPs) should be eliminated from the recycling stream and not
72 intentionally diluted with compliant materials to prevent the reappearance of restricted
73 chemicals in new products and minimise potential for release in to the environment
74 (UNEP, 2011). BFRs classified accordingly include hexabromocyclododecane
75 (HBCDD), hexabromobiphenyl, and the commercial polybrominated diphenyl ethers
76 (PBDEs), penta-BDE and octa-BDE.

77

78 The discrimination between restricted and non-restricted BFRs in WEEE plastics by,
79 for example, solvent extraction and gas chromatography, is timely and costly.
80 Moreover, the number and variety of BFRs that have been employed in plastics means
81 that many compounds may evade detection (Morf et al., 2005). The European
82 Committee for Electrical Standardization (CENELEC) therefore stipulates that, in
83 practice, waste containing (total) Br concentrations in excess of $2000 \mu\text{g g}^{-1}$ by weight
84 should be removed and destroyed or depolluted (Stenmarck et al., 2017). Dismantling
85 and subsequent sorting by polymer type and Br content is, nevertheless, labour-
86 intensive, and many countries, including the US and EU, have elected to bale WEEE

87 and ship it to China, India or Nigeria to be recycled or disposed of (Ni et al., 2013;
88 Obaje, 2013; Haarman, 2016).
89
90 Despite attempts to ‘close the loop’ on harmful BFRs, they have recently been
91 detected in a variety of consumer products that do not require flame retardancy or at
92 concentrations insufficient to provide fire protection, including children’s toys (Ionas
93 et al., 2015), kitchen utensils (Samsonok and Puype, 2013), beaded garlands (Miller et
94 al., 2016) and flooring products (Vojta et al., 2017). Thus, in many cases, recycled
95 plastics from WEEE appear to have been used, in whole or in part, to manufacture
96 contemporary electrical and non-electrical products that may not themselves be
97 compliant.

98
99 In a recent article, we demonstrated the ubiquity of Sb amongst polymeric consumer
100 products by means of a portable Niton x-ray fluorescence (XRF) spectrometer
101 configured in a low density mode and with thickness correction (Turner and Filella,
102 2017). The metalloid was often encountered with similar or greater concentrations of
103 Br in both electrical-electronic goods or components and non-electronic products,
104 indicative of the presence of BFRs in association with oxides of Sb as flame retardant
105 synergists. Here, we employ XRF spectrometry to determine total Br among a wider
106 range of plastic consumer products as a proxy for evaluating the abundance and
107 distribution of BFRs in the indoor setting. The approach has been validated by
108 independent analytical methods and with customized, polymeric standards containing
109 specific BFRs (Guzzonato et al., 2016), and is gaining increasing application in the
110 WEEE recycling industry as a practical solution to accurately and rapidly monitor for

111 material compliance with limit concentrations (Löw, 2014; Gallen et al., 2014;
112 Aldrian et al., 2015).

113

114 **2. Materials and methods**

115 *2.1. Material access, collection and categorisation*

116 A total of 1000 items and fixtures ('samples') of moulded hard and soft plastic
117 construction (i.e. excluding foams, paints, rubbers, waxes and textiles) were accessed
118 or sourced from domestic dwellings in Plymouth, offices and the nursery on the
119 Plymouth University campus, a local primary school, a number of nationwide
120 hardware stores and supermarkets, and a variety of local establishments serving fast
121 and/or takeaway food and beverages.

122

123 Depending on their location and principal use, samples or distinct components thereof
124 were categorised as electronic (encompassing both electronic and electrical items) and
125 non-electronic. The former category embraces all items dependent on electric currents
126 or electromagnetic fields in order to work, and includes small and large household
127 appliances, IT equipment, lighting, toys and tools. The latter, broader category was
128 further sub-categorised as food-hygiene (food packaging, drinks bottles, cutlery,
129 flasks, lunch boxes, cosmetics, medicines), construction-storage (plumbing, worktops,
130 fixtures, flooring, frames, cans, cases, hangers), tools-office (stationery, DIY,
131 adhesive taping, book covers, noticeboards), leisure (toys, games, sports gear,
132 hobbies, crafts, Christmas decorations, trophies) or clothing-accessories (raincoats,
133 jewellery, straps, rucksacks, shoes, spectacles, hairbrushes, buttons). For each sample,
134 and where evident, the place of manufacture and type of plastic were recorded, along
135 with the colour of the area(s) to be measured (sometimes revealed below a layer of

136 paint); electronic products were also categorised as historic or non-historic according
137 to the original WEEE Directive relating to collection, recycling and recovery targets
138 for electrical goods (European Parliament and of the Council, 2003). While the
139 surface or casing of most samples was investigated, some end-of-life electronic goods
140 were dismantled and interior components analysed separately.

141

142 *2.2. XRF analysis*

143 Samples were analysed by energy-dispersive field-portable-XRF using a Niton XL3t
144 950 He GOLDD+ that was employed either in situ and handheld or in the laboratory
145 and housed in a 4000 cm³ Thermo Scientific accessory stand. The Niton XL3t
146 employs a miniature x-ray tube that operates at up to 50 kV of high voltage and 200
147 µA of current as the source of sample excitation, and is fitted with a geometrically
148 optimised large area silicon drift detector to detect characteristic x-rays from the
149 sample. The instrument was operated in a ‘plastics’ mode through a standardless,
150 fundamental parameters-based alpha coefficient correction model that is capable of
151 simultaneously compensating for a wide variety of geometric and fluorescent effects.
152 Because plastics are composed of light elements that are weak absorbers and
153 relatively strong scatterers of x-rays, a thickness correction algorithm down to 50 µm
154 that employs a compensation for mass absorption based on Compton scattering was
155 also applied. Although a suite of elements may be determined in this mode, the
156 present study focuses on Br as an indicator of BFR content, as well as Sb as a measure
157 of the retardant synergistic content, Cl for the discrimination of PVC- and non-PVC-
158 based materials, and Pb as a hazardous heavy metal that is often encountered as an
159 additive or contaminant in WEEE and consumer plastics (Wäger et al., 2012).

160

161 In practice, sample thickness was determined through the flattest or smoothest
162 (measurement) surface using 300 mm Allendale digital callipers, and to increase the
163 effective depth and flatness of thin or hollow samples analysed in the accessory stand,
164 items were cut (with scissors, pliers or a blade), folded or layered. The corrective
165 algorithm was employed for all samples whose measured thickness was less than 20
166 mm, while an estimated value was applied to objects and components whose interiors
167 were inaccessible or that were fixed to or components of walls, floors, windows,
168 doors and appliances.

169

170 In the laboratory, samples were placed on the stainless steel base plate of the
171 accessory stand with the measurement surface above the XRF detector window or, for
172 samples smaller than the 10 mm window diameter, on to a SpectraCertified Mylar
173 polyester 3.6 μm film that was carefully suspended above. On closing the stand
174 shield, measurements with appropriate thickness correction and collimation (3 mm or
175 8 mm beam width) were activated through the laptop. Specifically, an initial, ~ 2-
176 second matrix evaluation based on the measurement of characteristic chlorine peaks
177 (and defining PVC as $\text{Cl} > 15\%$ by weight) was succeeded by counting periods
178 equally distributed between a low energy range (20 kV and 100 μA) and main energy
179 range (50 kV and 40 μA). A 45-second counting period was normally adopted, but
180 periods of up to 200-seconds were employed for thinner, less attenuating materials.
181 Spectra were quantified by fundamental parameter coefficients to yield elemental
182 concentrations on a dry weight basis (in $\mu\text{g g}^{-1}$) and with a measurement counting
183 error of 2σ (95% confidence) that were downloaded to the laptop via Niton data
184 transfer (NDT) software. For quality control purposes, plastic reference discs supplied
185 by the manufacturer and certified for $495 \pm 20 \mu\text{g g}^{-1}$ Br and $1002 \pm 40 \mu\text{g g}^{-1}$ Pb in

186 polyethylene (PN 180-554, batch SN PE-071-N), $96 \pm 10 \mu\text{g g}^{-1}$ Sb and $150 \pm 12 \mu\text{g g}^{-1}$
187 Pb in polyethylene (PN 180-619, LOT#T-81), and $996 \pm 50 \mu\text{g g}^{-1}$ Br and $1025 \pm 51 \mu\text{g}$
188 g^{-1} Sb in PVC (SN PVC-4C80, cal set #16) were analysed at the beginning and end of
189 each 1-4 h sample measurement session.

190

191 For measurements of permanent fixtures or items too large to be contained within the
192 accessory stand, the XRF was employed handheld using the trigger mechanism and
193 touch-screen control panel. Here, the nose of the instrument was pressed firmly
194 against the measurement surface, ensuring that the detector window was completely
195 covered and that there was sufficient shielding and/or distance behind. Where
196 feasible, and for extra protection to the operator from back-scattered radiation, a
197 Thermo Scientific tungsten-PVC backscatter collar shield was clipped on to the nose.
198 As above, reference discs were analysed at the beginning and end of each
199 measurement session but while placed on a suitably solid and attenuating surface.

200

201 Precision and homogeneity were evaluated in the accessory stand by repeat
202 measurements of selected samples positioned at the same location and at different
203 locations above the detector window, while the effects of geometry were assessed by
204 tilting regularly shaped samples at different angles (up to about 15°) with respect to
205 the plane of the steel base plate. The efficacy of the thickness correction algorithm
206 was evaluated by analysing, with and without correction, sections cut from the flat,
207 smooth surface of a plastic electrical casing that were incrementally stacked from
208 about 1 to 10 mm.

209

210 *2.3. FTIR analysis*

211 For selected samples ($n = 40$), based on the XRF results and where plastic type was
212 not indicated, component polymers were determined by Fourier transform infra-red
213 (FTIR) spectroscopy using a Bruker ALPHA Platinum attenuated total reflection
214 QuickSnap A220/D-01 spectrometer. Fragments were sliced from each sample using a
215 stainless steel scalpel and clamped down on to the ATR diamond crystal before
216 measurements, consisting of 16 scans in the range 4000 to 400 cm^{-1} and at a
217 resolution of 4 cm^{-1} , were activated via Bruker OPUS spectroscopic software.
218 Subsequent polymer identification involved a comparison of sample transmittance
219 spectra with libraries of reference spectra.

220

221 **3. Results**

222 *3.1. Sample categorisation and characteristics*

223 The number and categorisation of the XRF measurements is shown in Table 1. Thus,
224 a total of 1056 analyses were performed on 1000 different samples, with multiple
225 measurements being performed on samples with distinctive components that could not
226 be separated (e.g. laptop casing, screen frame and keyboard; thermos flask handle, rim
227 and lid; the different coloured parts of various toys). In the electronic product
228 category 267 analyses were performed, with the majority of samples or components
229 (88%) being neutrally coloured (i.e. black, grey or white) and 16 being constructed of
230 PVC. Samples that were labelled indicated a roughly equal split between pre- and
231 post-WEEE Directive implementation (i.e. 2005) and a majority that was
232 manufactured in east Asia (principally China, but also Taiwan and Thailand); some
233 older items were marked as being “assembled” in Hong Kong or manufactured in the
234 UK. Analyses of non-electronic items revealed a higher proportion of PVC-based
235 materials in each sub-category with the exception of food-hygiene items, and a greater

236 percentage of non-neutral colours amongst the samples (and >50% in the food-
237 hygiene and leisure sub-categories); where indicated, most products were
238 manufactured in China, with a small proportion (< 10%) originating from the EU
239 (UK, Germany, Denmark and Austria).

240

241 *3.2. Elemental analyses*

242 Detection limits for Br (as 3σ) varied according to sample thickness and presence of
243 additional elements but within the operating conditions employed ranged from about 2
244 to $10 \mu\text{g g}^{-1}$; detection limits for Sb and Pb ranged from about 60 to $120 \mu\text{g g}^{-1}$ and 5
245 to $10 \mu\text{g g}^{-1}$, respectively. Regular analysis of the Niton reference discs revealed
246 elemental concentrations that were within 10% of certified values, while the precision
247 of measurements (of reference discs and a number of electronic and non-electronic
248 samples) was always better than 5%. Stacking offcuts of the same plastic casing to
249 between about 1 and 10 mm, or the thickness range encompassing more than 90% of
250 all samples, yielded results that were consistent when the thickness correction
251 algorithm was applied but that differed by around 15% (Br and Pb) or 30% (Sb) when
252 the algorithm was not factored in. Variations in sample geometry up to an angle of
253 about 15° revealed no measurable impact on Br, Sb or Pb concentrations, and multiple
254 spatial measurements of various surfaces indicated an homogeneous dispersion of all
255 elements within the polymeric matrix.

256

257 Also shown in Table 1 are the categorisation and chemical characteristics of the
258 samples and components analysed. Thus, under the operating conditions described, Br
259 was detected in about 24% of all analyses performed, and among the categories,
260 detection ranged from about 12% for food-contact items to 42% for electronic

261 products. Within all categories, the number of Br-positive samples was greater in
 262 neutrally-coloured items; more specifically, on both a number and percentage basis,
 263 Br detection was greatest in black plastics. Overall, Sb was encountered in 185
 264 analyses of which 106 were Br-positive and Pb was detected in 164 cases of which 88
 265 were Br-positive, with the three elements co-existing in 46 cases. Antimony and Pb
 266 were most frequently detected in electronic samples and, while association of either or
 267 both elements with Br was most frequent amongst electronic items on a number basis,
 268 Pb was more frequently associated with the halogen on a percentage basis among the
 269 food-hygiene items. Co-associations of Br with Sb and/or Pb were most commonly
 270 encountered in electronic items that were neutrally coloured and in non-electronic
 271 samples that were black.

272

273 Table 1: Chemical characteristics, colour distribution and number of XRF analyses
 274 performed within each sample category. Shown in parentheses are the numbers of Br-
 275 positive results.

	electronic	food-hygiene	clothing-accessories	office-tools	storage-construction	leisure	total
no. analyses	267 (113)	172 (20)	78 (22)	118 (25)	130 (28)	291 (45)	1056 (253)
PVC	16 (3)	2 (0)	9 (0)	17 (3)	25 (6)	23 (0)	92 (12)
black	96 (54)	59 (13)	34 (17)	55 (18)	42 (19)	57 (28)	339 (149)
grey	65 (12)	1 (0)	9 (1)	7 (1)	17 (2)	12 (3)	111 (19)
white	73 (30)	15 (0)	4 (0)	9 (1)	30 (3)	15 (1)	146 (35)
other colours	33 (17)	97 (7)	31 (4)	47 (5)	41 (4)	207 (13)	460 (50)
Sb	76 (57)	19 (4)	14 (5)	17 (6)	24 (15)	35 (19)	185 (106)
Pb	59 (32)	11 (9)	14 (4)	24 (10)	24 (15)	32 (18)	164 (88)

276

277

278 A summary of the concentrations of Br amongst the different sample types is shown
 279 in Table 2. Concentrations spanned at least three orders of magnitude for each
 280 category and, overall, ranged from a few $\mu\text{g g}^{-1}$ to over 170,000 $\mu\text{g g}^{-1}$ (or 17% by
 281 weight). In the electronic category, concentrations exceeded 100,000 $\mu\text{g g}^{-1}$ in the

282 plastic casings of seven items (two plugs, two chargers, a fan heater, the DVD cover
 283 of a workstation hard drive and a DSL filter), only one of which was manufactured
 284 post-WEEE Directive. Concentrations between 10,000 $\mu\text{g g}^{-1}$ and 100,000 $\mu\text{g g}^{-1}$ were
 285 encountered in a higher proportion of small electrical items or components that had
 286 been manufactured post-WEEE Directive, including a number of printed circuit
 287 boards and remote controls, the collars of energy-saving lightbulbs, various
 288 components of several computer mouses and a smoke detector. Among the electronic
 289 goods, decreasing Br concentration was accompanied by a distinctive shift in the
 290 coloration of the plastic casing. Thus, of the 15 products ranked highest in terms of Br
 291 concentration, 10 were white and one was black, while of the 15 products ranked
 292 lowest, one was white and 10 were black.

293

294 Table 2: Distribution and summary statistics for Br concentrations (in $\mu\text{g g}^{-1}$) amongst
 295 the different sample categories.

	no. detected	10^0 - 10^1	10^1 - 10^2	10^2 - 10^3	10^3 - 10^4	10^4 - 10^5	$>10^5$	min.	max.	median
electronic	113	10	24	28	29	15	7	1.8	171,000	607
food-hygiene	20	6	8	5	1	0	0	2.6	3150	24
clothing-accessories	22	3	9	8	1	1	0	3.3	28,500	77
office-tools	25	6	14	3	2	0	0	4.1	1921	26
storage-construction	28	0	4	19	5	0	0	19	9410	244
leisure	45	7	18	10	8	3	0	3.5	14,500	75

296

297

298 Regarding non-electrical items, the highest concentrations ($> 10,000 \mu\text{g g}^{-1}$) were
 299 encountered in the stick-shaped beads of a necklace, the painted beads of two
 300 Christmas garlands and the main body of a child's puzzle from a Christmas cracker;
 301 concentrations above $1000 \mu\text{g g}^{-1}$ were found in a variety of samples from each sub-
 302 category that included a disposable coffee stirrer, the plastic decorations on a pair of
 303 earrings, various clothes hangers, a segment of sink piping, a picture frame and the

304 piping of a foot pump. Among the Br-positive non-electrical items ($n = 140$), 95 were
305 black and only five were white, while FTIR analysis of a range of products revealed a
306 variety of polymers, including Nylon, polyethylene and polypropylene, but a majority
307 that was styrenic-based and consistent with the composition of most electronic goods
308 analysed or indicated.

309

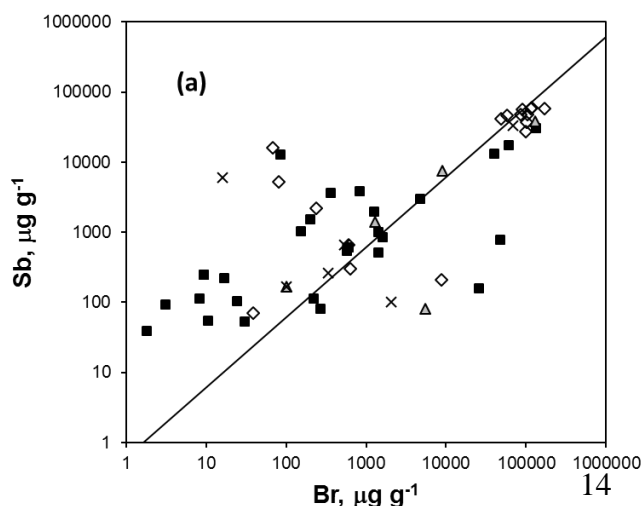
310 In Figure 1, the concentrations of Sb are plotted against the concentrations of Br,
311 where both elements were detected, for electronic and non-electronic samples or
312 components that are discriminated according to colour. Also shown is the line
313 defining the optimum mass ratio of Sb to Br in commercial plastics amended with
314 both BFRs and oxides of Sb as a synergist (Sb:Br = 0.61; Papazoglou, 2004).

315 Regarding electronic items (Figure 1a), there was a significant ($\alpha = 0.05$) correlation
316 between the two elements overall with an association that was strongest amongst
317 samples that were grey-coloured, while data that were close to the line of slope 0.61
318 were largely represented by small appliances or components that contained
319 concentrations of Br above $50,000 \mu\text{g g}^{-1}$. For the non-electronic items (Figure 1b),

320 relationships between Sb and Br were neither significant overall nor on a colour basis,
321 but there was a greater number and proportion of data across a broader concentration
322 range that were close to the line of slope 0.61.

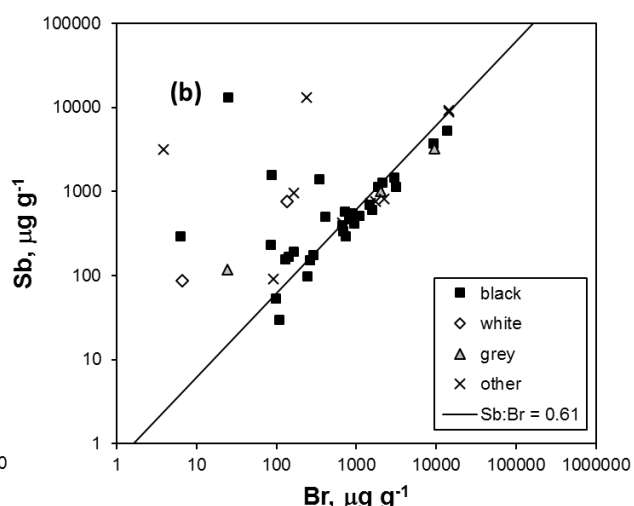
323

324 (a)



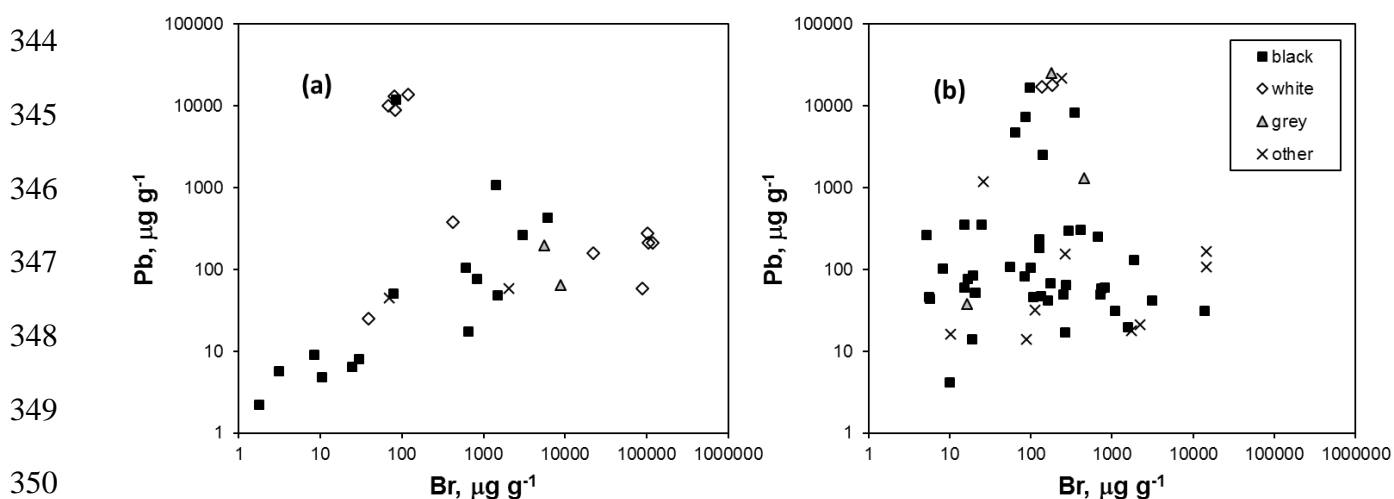
327

328



329 Figure 1: Concentrations of Sb versus concentrations of Br in (a) electronic and (b)
 330 non-electronic samples of different colour. The solid line represents the optimum
 331 mass ratio of Sb to Br in plastics amended with BFRs and synergistic Sb.
 332

333 Figure 2 shows the concentrations of the heavy metal, Pb, versus the concentrations of
 334 Br in electronic and non-electronic samples. Although concentrations were not
 335 significantly correlated overall or on a colour basis for either sample type, the data
 336 serve as a useful illustration of the frequent occurrence of Pb in items of a variety of
 337 colour and application and of both PVC and non-PVC construction. Bromine-positive
 338 samples with the highest Pb concentrations (above several thousand $\mu\text{g g}^{-1}$) included
 339 USB and wire casings, various plumbing accessories, a luggage tag, the casing of a
 340 tape measure, two coat hangers, a clothes button and an office ring binder.
 341 Significantly, the heavy metal was detected in nearly one half of all Br-positive
 342 samples from the food-hygiene category, with the highest concentrations of about 100
 343 $\mu\text{g g}^{-1}$ returned for a coffee jug plunger and the lid of a thermos cup.



351 Figure 2: Concentrations of Pb versus concentrations of Br in (a) electronic and (b)
 352 non-electronic samples of different colour.
 353

354 **4. Discussion**

355 This study has revealed the common occurrence of Br in plastic consumer products
356 and appliances and components thereof. Although an implicit assumption thus far is
357 that all Br-positive results returned by the XRF signify the presence of BFRs, it must
358 be borne in mind that Br is also used in the green, halogenated copper phthalocyanine
359 pigments, where typical Br concentrations in plastics are on the order of a few
360 hundred $\mu\text{g g}^{-1}$ (Ranta-Korpi et al., 2014; Turner, 2017). On this basis, the limited
361 number ($n = 8$) of green, non-electronic samples in the present study that contained
362 relatively low quantities of both Br and Cu (including a raincoat, the lid of a
363 confectionary tube, the handle of a sun lounger and a contemporary Lego block) can
364 be discounted as BFR-positive. We infer, therefore, that of the 267 analyses of
365 electronic samples and 789 analyses of non-electronic products, BFRs were detected
366 in 113 and 132 cases, respectively.

367

368 Although it is difficult to assign a value for total Br concentration that provides
369 adequate flame-retardancy to plastics because of the diversity of BFRs and types of
370 polymer, Gallen et al. (2014) indicate a range of BFR content from about 5 to 10% by
371 weight, which is equivalent to a range of Br concentration from about 3 to 8%. On
372 this basis, retardancy from Br is most evident in historic (pre-WEEE Directive) and
373 relatively small appliances that are often white, and absent in most newer, non-
374 historic electronic products, regardless of their colour and size. This suggests that
375 BFRs are being phased out by manufacturers of electronic goods and replaced with
376 alternatives retardants based, for example, on phosphorus (Stapleton et al., 2009), or
377 with materials that are inherently more fire-resistant (Laoutid et al., 2009). The
378 occurrence of percentage concentrations of both Br and Sb in non-electronic products

379 that do not require flame-retardancy, however, like jewellery, Christmas decorations
380 and toys, some of which had been purchased within the past twelve months, suggests
381 that the plastic components of electronic products have been and/or are being used
382 directly as recyclate. Moreover, the presence of Br and Sb across a wide range of
383 electronic and non-electronic products at concentrations insufficient to provide flame-
384 retardancy suggests that heterogeneous contamination of the recyclate stream by
385 BFRs through the dilution of WEEE plastics is a widespread and pervasive issue cross
386 the sector. This assertion is supported by recent studies reporting the total Br content
387 in a range of consumer goods available in the US (Miller et al., 2016) and specific
388 BFRs in a smaller number of consumer products purchased in the EU (Samsonik and
389 Puype, 2013; Ionas et al., 2014; Leslie et al., 2016), Australia (Gallen et al., 2014) and
390 Japan (Kajiwara et al., 2011).

391

392 The findings of many of the latter, independent studies are also consistent with our
393 observations in that the majority of Br-contaminated consumer products are black in
394 colour, despite BFRs being intentionally added to electronic goods of a range of
395 (mainly neutral) colours. We surmise that this is related to the practical difficulties
396 and costs associated with recycling (non-electronic) consumer plastics pigmented with
397 carbon black. Specifically, while black materials account for 10-15% of all waste
398 plastic, it cannot be sorted optically by polymer type because of the effective
399 absorption of infra-red radiation by the pigment (Plastic Zero, 2014; Roh and Oh,
400 2016). With the consequent limited availability of recycled black plastic but a desire
401 and demand for the production and use of black-coloured items, manufacturers may
402 be deliberately or incidentally using black WEEE plastics, many of which contain

403 BFRs as well as Sb and Pb, as an alternative source of material for a range of
404 consumer products.

405

406 The presence of BFRs in recycled products that evade the attention of the end-user of
407 recycler, and in particular in food-contact items and small toys that are mouthable by
408 young children, compromises consumer safety. Moreover, the subsequent disposal of
409 contaminated (black) items via landfill or incineration affords a means of BFR (and
410 Sb and Pb) release into the environment (Kajiwara et al., 2014). Once mobilised into
411 air, water and soil, the persistence and lipophilicity of BFRs facilitates their
412 subsequent long-range transport and accumulation by wildlife (Ackerman et al., 2008;
413 Park et al., 2009). Furthermore, when thermally destroyed at temperatures typical of
414 municipal incinerators, BFRs can also act as precursors in the formation of highly
415 toxic polybrominated dibenzo-*p*-dioxins and dibenzofurans (Tang et al., 2014).

416

417 Ultimately, questions must be raised about the efficacy of both WEEE plastic
418 processing in countries like China (Ni et al., 2013) and the CENELEC criterion for
419 the destruction-depollution of waste based on exceedance of a Br concentration of
420 2000 $\mu\text{g g}^{-1}$ (Stenmarck et al., 2017). For example, is the screening and
421 characterisation of materials sufficiently robust and are any regulations enforced, and
422 is the CENELEC threshold itself conservative enough? In respect of the latter, we
423 note that some nations are now proposing a stricter limit of 800 $\mu\text{g g}^{-1}$ total Br (L6w,
424 2014), corresponding to a worst-case scenario that all BFRs present are PBDEs and at
425 a combined concentration of 1000 $\mu\text{g g}^{-1}$ (the Restriction of Hazardous Substances
426 limit value for PBDEs in new and recyclable electronic equipment; RoHS, 2006).

427 Until these issues are addressed, legacy BFRs, along with Sb and Pb, are predicted to

428 continue re-appearing in new consumer goods where they are neither intended nor
429 expected.

430

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434

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