#### THE INTERNATIONAL CADMIUM ASSOCIATION

**MONTHLY REGULATORY UPDATE**

**May 28, 2011**[[1]](#footnote-1)

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**FEDERAL ISSUES**

**CAA ISSUES**

**EPA Proposes NESHAP For EGUs, Including Emission Limitations For Cadmium**

On May 3, 2011, EPA issued a proposed rule that would establish NESHAP from coal- and oil-fired EGUs under CAA Section 112(d) and would revise the NSPSs for fossil fuel-fired EGUs under CAA Section 111(b). According to EPA, the proposed NESHAP would protect air quality and promote public health by reducing emissions of the HAPs listed in CAA Section112(b). The proposed emission limitations include limits for **cadmium**. In addition, the proposed amendments to the NSPS are in response to a voluntary remand of a final rule. EPA also proposed several minor amendments, technical clarifications, and corrections to existing NSPS provisions for fossil fuel-fired EGUs and large and small industrial-commercial-institutional steam generating units. The proposed rule includes the following statement regarding **cadmium**:

Breathing air with lower levels of **Cd** over long periods of time (for years) results in a build-up of **Cd** in the kidney, and if sufficiently high, may result in kidney disease. Lung cancer has been found in some studies of workers exposed to **Cd** in the air and studies of rats that inhaled **Cd**. DHHS has determined that **Cd** and **Cd** **compounds** are known human carcinogens. IARC has determined that **Cd** is carcinogenic to humans. EPA has determined that **Cd** is a probable human carcinogen.

Comments are due **July 5, 2011**.

**EPA Proposes Stronger Air Toxics Emissions Standards For Secondary Lead Smelters**

EPA proposed on May 19, 2011, amendments to the NESHAP for secondary lead smelting to address the results of the residual risk and technology review that EPA is required to conduct under the CAA. The proposed amendments include revisions to the stack emissions limits for lead; revisions to the fugitive dust emissions control requirements; the addition of total hydrocarbons emissions limits for reverberatory, electric, and rotary furnaces; the addition of emissions limits and work practice requirements for dioxins and furans; and the modification and addition of testing and monitoring and related notification, recordkeeping, and reporting requirements. According to the notice, the HAPs in process emissions are primarily composed of metals, including **cadmium**. The summary of conclusions states:

In summary, we conclude that, based on our lead NAAQS analysis, the risks due to lead emissions under the MACT standard for this source category are unacceptable. Based on the inhalation risk assessment, we conclude that cancer risks associated with MACT-allowable emissions from this source category are unacceptable, primarily due to arsenic emissions from stacks, and to a lesser extent **cadmium** emissions. The cancer risks associated with actual emissions from this source category were determined to be acceptable, but will be investigated further in the ample margin of safety analysis because the risks are greater than 1-in-1 million, primarily due to fugitive emissions of arsenic and **cadmium**.

According to EPA, regarding arsenic and **cadmium** emissions, it did not identify any feasible control options beyond what it is requiring in the proposed standards for fugitive emissions sources. EPA states that “[n]evertheless, we are soliciting comments and information regarding additional fugitive control measures, work practices that may be available and their feasibility in further reducing fugitive emissions of metal HAP, or additional monitoring that may be warranted to ensure adequate control of fugitive emissions.” Although the proposed rule is not subject to EO 13045 (Protection of Children from Environmental Health Risks and Safety Risks) because it is not economically significant, EPA “does believe there is a disproportionate risk to children due to current emissions of lead from this source category.” EPA invites the public “to submit comments or identify peer-reviewed studies and data that assess effects of early life exposure to lead, arsenic, or **cadmium**.” Comments are due **July 5, 2011**. If anyone contacts EPA by **May 31, 2011**, requesting to speak at a public hearing, EPA will hold a public hearing on **June 3, 2011**.

**EPA Denies In Part And Grants In Part Petitions To Reconsider Revised Portland Cement Manufacturing NESHAP And NSPS**

On May 17, 2011, EPA published a *Federal Register* notice announcing that it denied in part and granted in part the petitions to reconsider the final revised NESHAP for the Portland Cement Industry and the NSPS for Portland Cement Plants issued under CAA Sections 112(d) and 111(b), respectively. EPA denied all requests that it issue an administrative stay of the NESHAP and NSPS. Under the September 9, 2010, final rule, measurement of PM is used as a surrogate for metals, including arsenic, **cadmium**, beryllium, and lead. The May 17, 2011, notice does not mention **cadmium**.

**EPA Delays Effective Dates Of Boiler And Incinerator Rules**

On May 18, 2011, EPA published a *Federal Register* notice delaying the effective dates for the March 21, 2011, final rules entitled “National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters” and “Standards of Performance for New Sources and Emission Guidelines for Existing Sources: Commercial and Industrial Solid Waste Incineration Units.” According to the notice, EPA is delaying the effective dates under the authority of the APA “until the proceedings for judicial review of these rules are completed or the EPA completes its reconsideration of the rules, whichever is earlier.” The CISWI rule established emission limits for nine pollutants, including **cadmium**. EPA states it received petitions from a number of interested parties seeking reconsideration of both rules. The petitions identify specific issues for reconsideration, and EPA “intends to initiate a reconsideration process for both rules.” EPA will issue a notice of proposed reconsideration of each rule that identifies the specific issue or issues raised in the petitions on which it is granting reconsideration. EPA notes that members of the public may wish to submit additional data and information to inform EPA’s proposed reconsideration, and EPA will consider any additional information submitted by **July 15, 2011**.

A number of lawsuits have been filed in the U.S. Court of Appeals for the District of Columbia Circuit challenging these rules, as well as EPA’s March 21, 2011, final rules concerning emissions standards for area source industrial, commercial, and institutional boilers and emissions standards for SSI. The deadline for filing the lawsuits was May 20, 2011.

**TSCA ISSUES**

**EPA Suspends Next IUR Reporting Period**

On May 11, 2011, EPA amended the TSCA Section 8(a) IUR regulations by suspending the next IUR submission period, which would otherwise run from **June 1, 2011**, to **September 30, 2011**. The IUR requires manufacturers, including importers, of certain chemical substances included on the TSCA Inventory to report current data on the manufacturing, processing, and use of the chemical substances. On August 13, 2010, EPA published a proposed rule that would modify the IUR regulations. The May 11, 2011, *Federal Register* notice states that EPA is suspending the next submission period “to allow additional time to finalize the proposed modifications to the IUR regulations, and to avoid finalizing changes to the reporting requirements in the midst of the **2011** submission period. EPA expects to finalize, in the near future, changes to the IUR reporting requirements which will supersede this action.”

**STATE ISSUES**

***California***

**Legislation Would Prohibit Reusable Bags Containing Cadmium In “Toxic Amounts”**

There is no new publicly available information to report regarding A.B. 298, which would prohibit manufacturers from selling or distributing reusable bags that contain lead, **cadmium**, or any other heavy metal in toxic amounts “as defined by applicable state and federal standards and regulations for packaging or reusable bags.”

***Florida***

**House And Senate Bills Concerning Cadmium In Children’s Products Die In Subcommittee And Committee**

On May 7, 2011, H.B. 111 died in the Business and Consumer Affairs Subcommittee, and S.B. 272 died in the Commerce and Tourism Committee. The bills would prohibit the use or application of **cadmium** in excess of 75 ppm on any item of children’s jewelry, toy, or child care article sold in Florida. Child is defined as an individual seven years old or younger.

***Hawaii***

**House And Senate Bills Introduced Concerning Cadmium In Children’s Products**

There is no new publicly available information to report regarding H.B. 722 and S.B. 916, which would prohibit the sale, manufacture, and distribution in Hawaii of children’s products that contain **cadmium** in an amount more than .004 percent by weight. The prohibition would take effect on **July 1, 2013**. More information is available in our February 28, 2011, Update.

***Illinois***

**Senate Passes Legislation Concerning Coal Combustion Waste**

On May 17, 2011, the Senate passed H.B. 3620, which the House passed on April 6, 2011. H.B. 3620, which concerns the storage or disposal of coal combustion waste that is reused as structural fill at a site or facility, if that waste is fully encapsulated, was sent back to the House for concurrence with the Senate amendment. The bill would define “fully encapsulated” as “encased or enclosed in such a way as to prevent the leaching of coal combustion residual constituents, including, but not limited to, antimony, arsenic, barium, beryllium, **cadmium**, chromium, lead, mercury, nickel, selenium, silver, and thallium, in trace amounts or otherwise.”

***Kentucky***

**House Bill Would Restrict Cadmium In Children’s Articles**

There is no new publicly available information to report regarding H.B. 443, which would prohibit the manufacture, sale, offer for sale, or distribution of any children’s product that contains **cadmium** at more than .004 percent by weight. More information is available in our February 28, 2011, Update.

***Maine***

**Senate Indefinitely Postpones Bill Introduced To Ensure Children’s Products Are Free Of Cadmium**

On May 26, 2011, the Senate indefinitely postponed in non-concurrence L.D. 492, which is intended to ensure that children’s products are free of **cadmium**. The bill would prohibit the manufacture, sale, distribution, or offer for sale or distribution of a children’s product containing **cadmium** at more than .004 percent by weight beginning **July 1, 2013**.

**No Further Action Will Be Taken On Bill Amending Process For Prioritizing Toxic Chemicals**

On May 11, 2011, L.D. 1185, which would amend the process for prioritizing toxic chemicals in children’s products, was placed in the legislative files, and no further action will be taken. Under the bill, the MDEP, with input from the MDHHS and MCDC, would publish a list of chemicals that are candidates for designation as priority chemicals. The initial list would include at least 10 and no more than 50 chemicals. More information is available in our March 28, 2011, Update.

***Maryland***

**Governor Signs Bill That Would Prohibit Cadmium In Children’s Jewelry**

On May 19, 2011, Governor Martin O’Malley (D) signed H.B. 145, which would prohibit a person, on or after **July 1, 2012**, from manufacturing, selling, offering for sale, or distributing children’s jewelry that contains **cadmium** at more than .0075 percent by weight. The bill was amended to define children’s jewelry as any jewelry designed or intended to be worn or used by a child under the age of 13 years rather than 12 years.

***Massachusetts***

**Salem Closes Athletic Fields After Detecting Elevated Levels Of Metals, Including Cadmium**

After soil tests done for a construction project detected elevated levels of lead and **cadmium**, Salem closed the lower two athletic fields at McGrath Park. Tighe & Bond Engineering performed the tests on fill material found on the park’s upper and lower fields. The fill was discovered when the city was testing for bedrock in preparing for some potential improvements at the park. While city officials said the potential exposure is low and that the level at which the metals are present does not pose an immediate risk to human health, they said they decided to close the fields as a precautionary step to allow for additional analysis. Salem’s May 2, 2011, press release is available at <http://files.leagueathletics.com/Images/Club/2877/McGrath%20Park%20Lower%20Fields%20Closure%20Press%20Release.pdf>.

**Bill Would Prohibit Cadmium In Children’s Jewelry**

There is no new publicly available information to report regarding S.B. 1074, which would prohibit any person from manufacturing, knowingly selling, offering for sale, distributing for sale, or distributing for use children’s jewelry containing **cadmium** in any paint or surface coating or accessible substrate that exceeds 75 ppm. The bill would define child as an individual who is six years of age or younger, and children’s jewelry as jewelry that is primarily designed, marketed, and intended for use by a child. The bill would apply to products that are manufactured after **December 31, 2011**.

**Bill Would Designate Cadmium As A Priority Chemical Substance**

There is no new publicly available information regarding H.B. 1136, which would establish safer alternatives to toxic chemicals. Upon enactment, **cadmium**, trichloroethylene, and nonylphenol ethoxylates would be designated as priority chemical substances. The bill would require the promotion of safer alternatives to priority chemical substances. Similar legislation (S.B. 397) is before the Senate.

***New Jersey***

**Bills Introduced To Prohibit The Sale Of Children’s Products Containing Cadmium**

There is no new publicly available information to report regarding A.B. 2259 and S.B. 1636, which would prohibit the sale of certain children’s products containing lead, mercury, or **cadmium**. Under the bills, no person shall sell, offer for sale, distribute, import, or manufacture any children’s product intended for use by a child under the age of six years containing, composed of, or made with lead, mercury, or **cadmium**. The bills would take effect on the first day of the seventh month following enactment. More information is available in our March 28, 2011, Update.

***New York***

**Bills Would Ban Cadmium-Added Novelty Consumer Products**

On May 9, 2011, the Assembly passed A.B. 1158, which would ban the sale or distribution free of charge of any **cadmium**-added novelty consumer product beginning **June 1, 2013**. “**Cadmium**-added novelty consumer product” means a product intended mainly for personal use or adornment that contains **cadmium** in an amount equal to or greater than .0075 percent by weight, including but not limited to jewelry, toys, and ornaments. The bill was delivered to the Senate where it was referred to the Committee on Environmental Conservation. A.B. 1158 is identical to S.B. 2729, which was also referred to the Committee on Environmental Legislation.

**Bills Would Designate Cadmium As Priority Chemical**

On May 10, 2011, A.B. 3141 was referred to the Assembly Committee on Codes. The bill, which is identical to S.B. 1526, would designate several chemicals, including **cadmium**, as priority chemicals. Two years after the effective date of the bills, the distribution, sale, or offer for sale of an item of children’s apparel or a children’s novelty product containing a priority chemical would be prohibited.

**Bill Would Direct Commissioner Of Health To Establish Standards For Cadmium In Children’s Jewelry**

There is no new publicly available information to report regarding A.B. 5548, which, in the absence of a federal standard, would require the Commissioner of Health to establish the maximum quantity of **cadmium** in children’s jewelry. Children would be defined as children aged 12 years and younger, and children’s jewelry would be defined as jewelry that is made for, marketed for, used by, or marketed to children. More information is available in our March 28, 2011, Update.

**Bill Would Regulate Cadmium In Children’s Jewelry**

There is no new publicly available information to report regarding S.B. 4055 and A.B. 6758, which would prohibit heavy metals in paint or surface coatings of children’s jewelry, and regulate **cadmium** in children’s jewelry. Child would be defined as a person who is six and one-half years of age or younger, and children’s jewelry would be defined as jewelry designed or intended primarily for use by a child. More information is available in our March 28, 2011, Update.

**Bills Introduced To Regulate Toys Contaminated With Toxic Substances**

There is no new publicly available information to report regarding A.B. 5711 and S.B. 2443, which would prohibit the import, manufacture, sale, or distribution of a toy or other article that is contaminated with any toxic substance. A toy would be contaminated with a toxic substance if it meets certain conditions, including is coated with soluble compounds of **cadmium**. More information is available in our March 28, 2011, Update.

**Bill Would Prohibit Child Care Centers From Using Toxic Toys**

There is no new publicly available information regarding A.B. 6363, which would prohibit every child day care, child day care provider, child day care center, group family day care home, school-age child care, or family day care home from using or having for use toxic toys. Toxic toys would include those coated with soluble compounds of **cadmium**. More information is available in our March 28, 2011, Update.

**Bill Would Limit Use Of Cadmium In Brake Friction Material**

There is no new publicly available information regarding S.B. 1356, which would limit the use of certain substances, including **cadmium**, in brake friction material. More information is available in our March 28, 2011, Update.

**Bills Prohibit Cadmium In Children’s Products**

There is no new publicly available information regarding A.B. 3678, which would prohibit the use of **cadmium** in children’s products, including toys, children’s jewelry, or another article, other than clothing, primarily intended for use by a child under 12 years of age. More information is available in our February 28, 2011, Update.

***North Carolina***

**Bill Would Regulate CCR Constituents, Including Cadmium**

There is no new publicly available information to report regarding H.B. 722, which is an omnibus act regarding coal-based energy. The bill would define “fully encapsulated” to mean encased or enclosed in such a way as to prevent the leaching of CCR constituents, including **cadmium**, in trace amounts or otherwise.

***Oregon***

**ODEQ Proposes Changes To NPDES General Permits**

ODEQ has proposed changes to two NPDES general permits: the 1200-COLS permit for facilities in Portland’s Columbia Slough Watershed and the 1200-Z permit for the rest of Oregon. The proposed changes would:

* Significantly lower benchmarks for copper, lead, and zinc;
* Mandate monitoring for polycyclic aromatic hydrocarbons, **cadmium**, chromium, and nickel to determine if they are present in industrial stormwater;
* Increase sampling to include samples during the first rain event after September 1;
* Require that certain industries not consistently reaching benchmarks hire a professional engineer or certified engineering geologist to design a stormwater plan and identify best available technologies to reduce pollutants; and
* Adopt EPA benchmarks for specific sectors, such as metal fabricators, which would have to monitor for nitrates, aluminum, and iron.

ODEQ will hold public hearings on **June 9**, **June 10**, **June 13**, and **June 14, 2011**. Comments on the proposed permit language are due **June 16, 2011**. More information is available at <http://www.deq.state.or.us/news/publicnotices/uploaded/110510_341_1200pubnotice.pdf>.

**Senate Approves Bill Concerning Brake Friction Material**

On May 4, 2011, the Senate passed S.B. 945, which would phase out the sale of brake pads using copper, asbestiform, **cadmium**, chromium, mercury, and lead. **Cadmium** and **its compounds** would be prohibited in an amount exceeding 0.01 percent by weight. The prohibition would take effect **July 1, 2014**, except for the prohibition for copper would take effect **January 1, 2021**. The bill was referred to the House General Government and Consumer Protection Committee.

***South Dakota***

**Bill Would Prohibit Use Of Cadmium In Certain Products**

There is no new publicly available information to report regarding H.B. 1254, which would prohibit the use of **cadmium** at more than 0.004 percent by weight in children’s products. The ban would take effect on **July 1, 2012**. More information is available in our February 28, 2011, Update.

***Tennessee***

**Bills Would Ban Cadmium In Children’s Products**

There is no new publicly available information to report regarding H.B. 189 and S.B. 244, which would prohibit the manufacture, sale, offer for sale, or distribution of children’s products that contain **cadmium** at more than .004 percent by weight, beginning **July 1, 2013**. More information is available in our February 28, 2011, Update.

***Washington***

**WDE Revises Children’s Safe Products Rule And Reopens Public Comment**

In a May 4, 2011, e-mail, WDE announced that, in response to comments received during the first public comment period, it made a number of changes to the initial proposed rule. According to WDE, the changes were significant enough to warrant another opportunity for public comment. Under the Rule, a manufacturer must notify WDE if a chemical on the CHCC list is present in a children’s product component. **Cadmium** and **cadmium compounds** are on the proposed rule’s list of CHCCs. Key topics changed include:

* Increasing the number of categories and reporting ranges;
* Distinguishing between intentionally added chemicals and contaminants;
* Lowering the reporting trigger for intentionally added chemicals from 40 ppm to the practical quantization limit;
* Raising the reporting trigger for contaminants from 40 ppm to 100 ppm (0.01 percent);
* Exempting reporting for contaminants where the manufacturer maintains a manufacturing control system which ensures the concentration of any contaminant is minimized;
* Adding six phthalates compounds to the CHCC list; and
* Clarifying the scope of products covered by the rule.

WDE will hold a public hearing on **June 8, 2011**. Comments are due **June 15, 2011**. More information is available at <http://www.ecy.wa.gov/programs/swfa/rules/ruleChildSafe.html>.

**MISCELLANEOUS ISSUES**

**IRIS Assessment**

There is no new publicly available information to report regarding the detailed tracking report for **cadmium** (qualitative and quantitative), which includes the following information:

| **Activity/Event** | **Start Date** | **End Date** |
| --- | --- | --- |
| **1. Draft Development** | TBD | TBD |
| **2. Agency Review** | TBD | TBD |
| **3. Interagency Review** | TBD | TBD |
| **4. External Peer Review** | TBD | TBD |
| **5. Final Assessment/Posting** | TBD | TBD |

**House Committee Holds Markup On Bill To Revise CPSIA**

On May 25-26, 2011, the House Energy and Commerce Committee held a markup of the Enhancing CPSC Authority and Discretion Act of 2011 (H.R. 1939), which would revise CPSIA and allow CPSC greater authority and flexibility to regulate based on risk. According to the background memorandum on the bill, it is intended to reduce the regulatory burdens created by CPSIA where possible to do so without harming consumers; enhance CPSC’s ability to investigate complaints and to prioritize based on risk; and improve the utility and accuracy of information in the CPSC’s public database. More information is available at <http://energycommerce.house.gov/news/PRArticle.aspx?NewsID=8642>.

**House Bill Includes Findings Regarding Cadmium In Vieques, Puerto Rico**

There is no new publicly available information to report regarding the Vieques Recovery and Development Act of 2011 (H.R. 1645), which would construct a specialty hospital and toxins research center on the island of Vieques, Puerto Rico, and would provide individual compensation to certain residents. More information is available in our April 28, 2011, Update.

**INTERNATIONAL ISSUES**

**Environmental Defence Calls On Health Canada To Regulate Heavy Metals In Makeup**

On May 16, 2011, Environmental Defence released a report entitled *Heavy Metal Hazard: The Health Risks of Hidden Heavy Metals in Face Makeup*, which reports the results of 49 makeup items tested for heavy metals, including **cadmium**. According to the report, **cadmium** was detected in 51 percent of the items, and the highest levels of arsenic (70 ppm), **cadmium** (3 ppm), and lead (110 ppm) were all found in lip glosses, “something which could be ingested.” According to Environmental Defence, while the products tested largely met Health Canada’s draft guidelines for some metal impurity levels it believes are “technically avoidable” by manufacturers, Canada “should improve the guidelines on impurities in cosmetics so they better reflect what is truly feasible, then adopt them without delay.” A spokesperson for Health Canada stated: “These metals are naturally present in the environment, and therefore it is almost impossible to completely eliminate them from cosmetic products.” The report is available at <http://environmentaldefence.ca/sites/default/files/report_files/HeavyMetalHazard%20FINAL.pdf>.

**EU Amends REACH Annex XVII To Include Additional Restrictions On Cadmium**

On May 21, 2011, the EC amended REACH Annex XVII to prohibit the use of **cadmium** in articles made from PVC, jewelry, and brazing fillers. According to the May 21, 2011, *Official Journal of the EU* notice, “[t]he prohibition of the use of **cadmium** should be extended to all articles made from PVC in order to comply with the objective of combating cadmium pollution.” The amendment establishes a higher limit value for **cadmium** in recovered PVC used in the manufacture of certain construction products, and requires that products made from recovered PVC be labeled as such. The notice states that, due to the prohibition of **cadmium** in new PVC, the content of **cadmium** in construction products manufactured from recovered PVC should diminish, and the limit value should be reviewed by **December 31, 2017**. The restrictions will apply beginning **January 10, 2012**. The notice is available at <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:134:0002:0005:EN:PDF>. The EU’s May 20, 2011, press release is available at <http://europa.eu/rapid/pressReleasesAction.do?reference=IP/11/620&format=HTML&aged=0&language=EN&guiLanguage=en>.

The EC has defended the broad prohibition on the use of **cadmium** in articles made from PVC. According to an EC spokesperson, the restriction first appeared in June 1, 2010, in a draft EC regulation amending Annex XVII of REACH. The spokesperson stated that the EC “then received comments concerning different elements of the draft including the list of polymers,” and that “[s]ome of these comments indicated that the list was incomplete and should include three additional plastic materials, namely HDPE, ABS and PMMA.” The draft regulation was then presented at a June 15-17, 2010, meeting of the competent authorities for REACH “where industry representatives were present.” According to the spokesperson, “the draft and the comments received were discussed during the meeting and we indicated that we would consider the possibility of completing the list of plastic materials.” The spokesperson noted that “this restriction is based on the transition provisions in Article 137(1)a of the REACH Regulation. Therefore the provisions in Title VIII on specific public consultation procedures for proposed new restrictions were not applicable.”

**Hong Kong Test Results For Rice Dumplings Are Satisfactory**

On May 24, 2011, CFS announced the test results from a seasonal food surveillance project on rice dumplings. According to CFS, all 95 samples were satisfactory. CFS collected samples of rice dumplings of different types and flavors from over 60 restaurants, food factories, and other retail outlets for microbiological and chemical testing. The chemical analyses conducted included tests for coloring matters, preservatives, metallic contamination (such as arsenic, **cadmium**, and mercury), and pesticides. The microbiological tests covered pathogenic bacteria.

**Russia Seizes Cadmium-Tainted Peanuts From China**

According to a May 2011 press release, agricultural regulators in east Russia’s Transbaikal territory returned 180 tons of peanuts imported from China that contain **cadmium**. The cargo was confiscated at the Zabaikalsk railway crossing point on the Russian-Chinese border. The Moscow-based owner of the cargo, Rusprodimport, has already been notified of the measure.

\* \* \* \* \*

Unless otherwise noted, if you have questions about any item summarized above, please call or e-mail Lynn L. Bergeson at (202) 557-3801 or [lbergeson@lawbc.com](mailto:lbergeson@lawbc.com), or Carla N. Hutton at (202) 557-3809 or [chutton@lawbc.com](mailto:chutton@lawbc.com).

## ACRONYMS

**APA** -- Administrative Procedure Act

**CAA** -- Clean Air Act

**CCR** -- Coal Combustion Residual

**CFS** -- Centre for Food Safety

**CHCC** -- Chemicals of High Concern for Children List

**CISWI** -- Commercial and Industrial Solid Waste Incinerators

**CPSC** -- United States Consumer Product Safety Commission

**CPSIA** -- Consumer Product Safety Improvement Act of 2008

**EC** -- European Commission

**EGU** -- Electric Utility Steam Generating Unit

**EO** -- Executive Order

**EPA** -- United States Environmental Protection Agency

**EU** -- European Union

**HAP** -- Hazardous Air Pollutant

**ICdA** -- International Cadmium Association

**IRIS** -- Integrated Risk Information System

**IUR** -- Inventory Update Reporting

**MCDC** -- Maine Center for Disease Control and Prevention

**MDEP** -- Maine Department of Environmental Protection

**MDHHS** -- Maine Department of Health and Human Services

**NESHAP** -- National Emission Standard for Hazardous Air Pollutants

**NPDES** -- National Pollutant Discharge Elimination System

**NSPS** -- New Source Performance Standard

**ODEQ** -- Oregon Department of Environmental Quality

**PM** -- Particulate Matter

**ppm** -- Part Per Million

**PVC** -- Polyvinyl Chloride

**REACH** -- Registration, Evaluation, Authorization and Restriction of Chemicals

**SSI** -- Sewage Sludge Incinerators

**TBD** -- To Be Determined

**TSCA** -- Toxic Substances Control Act

**WDE** -- Washington Department of Ecology

1. This Update addresses significant federal, state, and international environmental and occupational safety and health regulatory issues and ongoing advocacy efforts pertinent to the ICdA member companies. A list of acronyms used in this Update is provided. [↑](#footnote-ref-1)