

“Stakeholder Consultation on a Possible Restriction of Small Brominated Alkyl Alcohols under the RoHS Directive”

Background

BSEF is the global bromine producers’ association. We would like to respond to the “Stakeholder Consultation on a Possible Restriction of Small Brominated Alkyl Alcohols under the RoHS Directive” which is conducted by the Oeko-Institut e.V. and COWI AS on behalf of the Danish EPA.

Response

The objective of the consultation is to evaluate if the available data support a proposal for restriction of small brominated alkyl alcohol in the RoHS Directive. We are not aware that these substances, as far as they are produced at all, are used in E&E equipment.

In fact, a very similar, but narrower, consultation has been conducted in 2014 by the Oeko-Institute e.V. in the frame of the Review of Restricted Substances under ROHS¹. The report concluded that both Dibromo-neopentyl-glycol and 2,3-dibromo-1-propanol (Dibromo-propanol) are either not used in EEE² or are not used in the EU at all³.

BSEF Secretariat, Brussels

14 October 2016

About BSEF

BSEF is international bromine producers’ association. Established since 1997 we have been working to foster knowledge on the uses and benefits of bromine-based solutions for society and economy. We strongly believe in science and innovation. Through investments in research and development BSEF members create robust bromine-based technologies meeting the needs of society.

¹http://rohs.exemptions.oeko.info/fileadmin/user_upload/RoHS_Substance_Review/20140806_Substance_Review_revised_version_final_plus_Dossier.pdf

² “The information provided by stakeholders during the consultation further suggests that dibromo-neopentyl glycol is either not applied in EEE or applied in small amounts by manufacturers of supplied goods, thus requiring a more comprehensive supplier survey to allow a better quantification.”

³ “As 2,3-dibromo-1-propanol is not registered, it is understood not to be used in the EU or to be applied in low quantities; as further information was not obtained through stakeholders, the use volume cannot be concluded. Though it is used as a flame retardant, its application in the EEE sector is not known to the European Flame Retardant Association, which represents the leading organisations who manufacture, market or use flame retardants in Europe. On the other hand, the case of 2,3-dibromo-1-propanol suggests that it is not always clear which (brominated) flame retardant is used within the supply chain. The Test & Measurement Coalition states that an in-depth-survey of the supply chain, including SME custom part suppliers, would be required to determine exposure and whether substitution would impact safety or other qualifications (e.g. for flame-retarded uses such as epoxy internal to power supplies).”