

JBCE comment on 1st Stakeholder Consultation – Questionnaire for beryllium and its compounds

Contact details

Organization: Japan Business Council in Europe

Tel.: +32-2-286.53.30

Name: Shinya Sasaki

E-Mail: sasaki@jbce.org, info@jbce.org

Function: Secretariat

Address: Rue de la Loi 82, 1040 Brussels

Dear Oeko-Institut and Fraunhofer IZM,

15 June 2018

JBCE would like to highlight you that beryllium and its compounds have been assessed in the previous review in 2014 and not classified as High Priority of the restricted substance. We believe that the most of the questions have been already answered by Beryllium Science & Technology Association (BeST) during the previous review in 2014.

In addition, the fact that beryllium has been classified a Critical Raw Material (CRM) in the EU, tells the difficulties to find alternatives and substitutions. Therefore, the socio economic impact of a possible restriction under RoHS should be considered the impact as CRM.

[About JBCE]

Created in 1999, the **Japan Business Council in Europe (JBCE)** is a leading European organization representing the interests of over 80 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, railway, textiles and glass products. Building a new era of cooperation between the European Union (EU) and Japan is the core of our activities. www.jbce.org