

the Cobalt Development Institute

Response to Questionnaire on Substance Prioritisation under RoHS2 (Review of Directive 2011/65/EU)

Further comments on cobalt metal, cobalt sulphate and cobalt dichloride

provided to Oeko Institut through Public Consultation (7 February to 4 April 2014) regarding the questionnaire on substance prioritisation for RoHS2

The Cobalt Development Institute has responded to the questions in the Excel® table provided for the consultation for each cobalt substance (cobalt metal, cobalt dichloride and cobalt sulphate) (Attachment 1).

1. Volumes and Uses

In EEE uses, cobalt and cobalt compounds are used in semi-conductors, component lead frames, contacts and connectors, printed circuit boards, processors and chipsets, and hard-disk drives. However, the CDI has not to date collected sufficient data on EEE uses both in terms of the list and description of the uses, and in terms of volumes to provide details in this consultation. It is not known to the CDI yet which and how much of each of the three cobalt substances (Co metal, Co sulphate and Co dichloride) are used in each of these applications.

The total annual volumes manufactured and/or imported in the EU have been declared for the purpose of REACH for cobalt sulphate and cobalt dichloride. These volumes represent all uses of these two substances, and we know that the vast majority (>90% of the total volume) of both Co sulphate and Co dichloride are used as an intermediate for the production of chemicals. It is therefore expected that specific EEE uses would represent only a small fraction of this volume, with the exception of batteries (which are not covered by RoSH2).

For example, cobalt's corrosion resistance and hardness properties are used to provide safety-critical functions, in particular in security components in the automotive industry (e.g. cobalt-gold plated components in electronic circuits). These uses fall under the surface treatment category, the total volume of which already represent a small fraction of the total volume of cobalt sulphate or cobalt dichloride in the surface treatment sector (~5% for each substance). Consequently, it is expected that even smaller volumes of the cobalt sulphate or cobalt dichloride would be used in EEE.

2. Methodology for prioritisation:

a. Waste relevance criterion:

The CDI has very limited information on the EEE waste management of cobalt substances in general and would be interested to understand on which basis (e.g. assumptions or hard data) the waste relevance criteria was applied as per criterion described in article 6(1)b of the RoSH Directive. If this is based on hard data, we would be interested to understand whether there was information on each of the three specific cobalt compounds proposed for prioritisation in EEE waste.

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b. REACH-RoHS ‘harmonisation’:

The ‘Methodology for Identification and Assessment of Substance for Inclusion in the List of Restricted Substances (Annex II) under RoHS2 Directive’ published by Oeko Institut in January 2014 (Ref. ENV.C.2/ETU/2012/0021) states in its introduction that ‘Another objective of the recast of the RoHS Directive is to harmonise RoHS with other pieces of EU legislation such as chemicals legislation, in particular the [...] REACH Regulation [...] and provisions related to the management of WEE [etc...]’.

The CDI welcomes this objective of regulatory coherence which should ensure that the technical elements can enable the ‘read across’ the two directives. In this context, the CDI expresses its supports to the joint Eurometaux-CEFIC-Orgalime position that supports the Commission’s initiative to develop a Common Understanding on the implementation of the REACH Regulation and the RoSH2 Directive 2011/65/EU.¹

¹ Comments on CARACAL Working Document: ‘Reach Directive 2011/65/EU (RoHS)- A Common Understanding’, joint CEFIC-Orgalime-Eurometaux paper, 7 February 2014.