

ASUA Products, S.A.
Ctra. Sangróniz, 20
E – 48150 Sondica (Vizcaya)
Spain

Mrs. Rita Gross
Öko Institut
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2. Send by e-mail to hse-rohs@oeko.info by 28 march 2008

Dear Ms Gross,

We are writing to raise [ASUA Products, S.A.]’s concern as to the inclusion of antimony trioxide and antimony compounds in general to the list of high priority hazardous substances to be considered for inclusion in the EU RoHS Directive.

ASUA Products, S.A. uses antimony trioxide and antimony compounds to manufacture **PVC stabilizers**.

Antimony trioxide has only recently been subject to an EU Risk Assessment. The conclusions from the final draft of the risk assessment report clearly indicate that it does not meet the criteria for high priority substances. Antimony compounds will be subject to further scrutiny under REACH, but as of now many antimony compounds are not even classified as hazardous.

We strongly support the response to the consultation from the International Antimony Association and would request that this be taken into account.

Yours,

María Josefa Tapia Gonzalez
Purchasing & Logistic