



Ökoinstitut
Hse-rohs@oeko.info
Att: Rita Gross

March 27, 2008

***Ökoinstitut consultation on RoHS substance inventory in the context of its study
"Hazardous substances in EEE not regulated by RoHS"***

Elcoteq received a request to comment the above mentioned Ökoinstitut consultation from Technology Industries of Finland, Ms Carina Wiik, on March 7, 2008. We do appreciate the thoroughness and professional manner in which this issue has been dealt with in the study as well as the opportunity to present our views.

The inventory has been carefully examined from our perspective, including discussions with our European factories, legal department as well as the environmental specialists. Based on these considerations we would like communicate to you the following:

In general terms Elcoteq quite strongly supports the long-term coherent development of the European chemical legislation with main emphasis on REACH Regulation (EC 1907/ 2006). In other words, before adding any new substances to the scope of RoHS it should be evaluated what kind of implications the total implementation of REACH Regulation will give rise to. REACH will in all cases mainly cover the health, safety and environmental issues of all the chemicals used in Europe.

Of the 46 substances mentioned in the study, the most critical from our point of view is N:o 46, Rosin; colophony, since it is widely defined to be used in several of our customer products. Other substances which might, should their use be restricted, cause difficulties to our production are N:o 13, Formaldehyde, N:o 21 PVC and N:o 33, Petrolatum. Also, we do not support including any other substances to the list.

We hope these comments will be useful to you. In case you need any additional information, kindly contact Elcoteq Global Environmental Manager, Ms. Aila Valkila, aila.valkila@elcoteq.com.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Minna Aila".

Minna Aila
Director, Corporate Responsibility and Corporate Relations
Elcoteq SE