Von: Andrews Steve (Mr SP) BR1 [Steven.Andrews@berr.gsi.gov.uk]
Gesendet: Freitag, 28. März 2008 11:27
An: hse-rohs@oeko.info
Cc: Redwin Paul (Mr PA) BR2; Healer Steven (Mr S) BR1; Smith Chris (Mr CJE) DIUS NWML; Madalina.Caprusu@ec.europa.eu; michail.papadoyannakis@ec.europa.eu; Swift Pesheya (Miss PS) TI
Betreff: Re: Hazardous substances in EEE not regulated by RoHS

Wichtigkeit: Hoch

Dear Ms Goss

Further to the email and attachments that I sent you yesterday afternoon, please find below some additional comments put together by my colleague in another part of the Department who has responsibilities for general issues that will have an impact on the ICT sector.

I would be grateful if these could also be taken into account as part of your study for the Commission.

Many thanks & best wishes

Steven Andrews

-----Original Message-----
From: Redwin Paul (Mr PA) BR2
To: Andrews Steve (Mr SP) BR1
CC: Healer Steven (Mr S) BR1; Swift Pesheya (Miss PS) TI
Sent: Thu Mar 27 17:03:53 2008
Subject: FW: Hazardous substances in EEE not regulated by RoHS

Steve,

As agreed I provide EITSU comments (as part of a combined UK Government response) on the Oko Institute consultation on the additional RoHS hazardous substances list, generally we are in agreement with the attached earlier ERA response. However, we have the following additional comments we would like to make:

CAS nr. 7440-38-2 - Arsenic/ arsenic compounds - There are no credible alternative substitutes to arsenic semiconductor manufacture.

CAS nr. 1303-00-0 - Gallium Arsenide - There appears to be an absence of conclusive evidence that Gallium Arsenide is carcinogenic to humans. More evidence would be needed for the substance to be included in the list. There is also the issue of no qualative substitutes being available for the substance, with Silicon being the only limited alternative. With Silicon there are draw backs as it uses more power and is much slower than Gallium Arsenide in the use of very high frequency communication devices like mobile phones, where it is used extensively on switches on these devices. There will be substantial cost to stakeholders currently using Gallium Arsenide if the substance remains on the finalised list, especially with regard to mobile phone manufacturers and more importantly their component suppliers.

Liquid Crystals (ID Nr.16) - The extent of the hazard of liquid crystals has not yet been determined and needs more research. However, it is believed that most liquid crystal materials used in EEE are non-hazardous.

CAS nr. 1336-36-3 - PCBs - Isn't PCBs already controlled by item 27 of Annex XVII of REACH?

CAS nr. 7782-49-2 - Selenium - Currently there is no alternative substitute for selenium.

CAS nr. 7440-48-4 - Cobalt - Cobalt is non-carcinogenic too humans. It is also a substitute substance for

Chrome 6 which is.

There is also a number of the 46 additional substances listed that would be better dealt under REACH than RoHS as these substances are used for other purposes other than EEE, or they are already covered under REACH, so to include them in RoHS would be placing duplicate requirements on business stakeholders. The main ones being:

* Tetrabromo bisphenol A
* Bisphenol A (Isopropylidendiphenol)
* Hexabromocyclododecane (HBCDD)
* Nickel
* Nonylphenol
* Perfluorooctane
* PCBs
* PCTs
* Tributyl Tin Compounds (TBT)
* Tripenyl Tin Compounds (TPT)
* Tributyl Tin Oxide (TBTO)
* Dinickel trioxide
* 4'4- methylenedi-o-toluidine
* Nickel dihydroxide
* Nickel sulphate
* 2-ethylhexhl acrylate

Grateful if you would include the above comments to the BERR response to the Oko Institute consultation.

Happy to discuss,

Paul
EITSU
X1847