

31 January 2008

Mrs. Rita Gross
Öko Institute
Postfach 50 02 40
79028 Freiburg

Dear Mrs Gross,

I am writing to you on behalf of EBFRIP – The European Brominated Flame Retardant Industry Panel - in the context of the upcoming EU revision of the RoHS Directive.

We understand that the Öko Institute is at the moment conducting a study on potential new substances to be added to the RoHS Directive. In this context, we believe there is no reason for the potential listing of the brominated flame retardant TBBPA. TBBPA has undergone an EU risk assessment under Regulation 793/93/EC and an EU Risk Reduction Strategy.

In the context of the EU Risk Assessment of TBBPA, EU Member State experts have concluded that TBBPA presents no risk to human health. They have also agreed that there is no risk to the environment when TBBPA is used as a reactive component in the production of printed circuits boards. For one other use of TBBPA, as an additive flame retardant in EEE plastics casings, a low environmental risk was identified in one production plant in Europe only. No risk was identified for the other production plants or in end use articles (EEE products).

After reviewing all possible EU legislative measures, including the RoHS Directive, the rapporteur and the Commission recommended IPPC as the most effective and proportionate measure to address the risk identified. There was a consensus on this measure at the 23 October RRS meeting.

Based on the above, we request the Öko Institute not to select TBBPA in the draft interim report that should be published mid-February. We would also welcome the possibility of meeting you to discuss this in further detail.

Yours sincerely,



Veronique Steukers
Chair

Note : EBFRIP is working on a Voluntary Emissions Control Action Programme (VECAP). To date, 100% of TBBPA additive customers in Europe have signed up to the VECAP and have already started reducing their emissions.

For the Second Annual VECAP Report, please see: http://www.bsef.com/product_stew/