

To be sent by e-mail to hse-rohs@oeko.info by 28 march 2008

Dear Sir, Dear Madam,

I am writing to you on behalf of Hexion Specialty Chemicals Barbastro, S.A. in the context of the ongoing Öko Institute consultation regarding the substances to be potentially added to the RoHS Directive.

The flame retardant Tetrabromobisphenol-A (TBBPA), which is for the moment included in your draft high priority list, does not meet any of the criteria outlined in the Commission tender. In fact, TBBPA is not a PBT, not a CMR, not a vBvP neither an endocrine disruptor.

We are adamant that TBBPA should not be added to the revision of the RoHS Directive as the EU has just finalised an 8-year Risk Assessment to evaluate its effects on human health and the environment. Subsequently the Risk Reduction Strategy did not foresee any legislative restriction. TBBPA is therefore approved for use by the EU for all its applications and it will subsequently go through REACH registration. The results of the Risk Assessment were confirmed by the SCHER committee of the European Commission,

TBBPA is used as a reactive component in the production of printed circuits boards (mainly of FR4 laminates) and, being integrated into the polymer of the board, it does no longer exists as such. .

For the additive use of TBBPA in E&E plastics casings, a low environmental risk was identified in one production plant in Europe only. After reviewing all possible EU legislative measures the rapporteur and the Commission recommended IPPC as the most effective and proportionate measure to address the risk identified.

Yours sincerely,



Veronique Steukers - Chair