



STATE OF ISRAEL  
MINISTRY OF INDUSTRY, TRADE & LABOR  
SENIOR DEPUTY DIRECTOR GENERAL  
DIRECTOR OF THE FOREIGN TRADE ADMINISTRATION

**Öko-Institut e.V.**  
Germany

26 March, 2008

Dear Sir/Madam,

The Government of Israel would like to raise its concerns regarding the draft report of the study on additional substances to be added to the RoHS Directive. Israel opposes the inclusion of all Brominated Flame Retardants as substances under the RoHS Directive, in particular the flame retardant Tetrabromobisphenol A (TBBPA).

We are aware of the legitimate concerns regarding the protection of human health and the environment. However, it is our belief that the proposed recommendation should be based on the risk assessments carried out by the EU for this purpose.

The Brominated Flame Retardants listed in the draft report does not meet the European Commission scientific criteria and will be assessed by REACH regulation which has been put in place for this purpose. Moreover, most of the Brominated Flame Retardants that are listed are rarely used in electric and electronic equipment.

Specifically on the issue of TBBPA, the EU risk assessments which constitute available scientific information indicate that TBBPA present no risk to human health. It has also concluded that there is no risk to the environment when TBBPA is used as a reactive component in the production of printed circuits boards for E&E appliances. TBBPA is therefore approved for use by the EU for all its applications and it will subsequently go through REACH registration.

Therefore, we see the inclusion of TBBPA as well as all the other Brominated Flame Retardants under the RoHS Directive as unjustified and as an unnecessary obstacle to trade.

Yours Sincerely,

Boaz Hirsch.