

JBCE comment on 1st Stakeholder Consultation – Questionnaire for tetrabromobisphenol A – TBBP-A (CAS 79-94-7)

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Dear Oeko-Institut and Fraunhofer IZM,

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JBCE would like to highlight you that based on the knowledge and information available to us the usage of TBBP-A in great part is as reactive frame retardant which is covalently bound in the polymer and becomes a constituent of the base material. This is stated in the report *“Study for the Review of the List of Restricted Substances under RoHS 2 Analysis of Impacts from a Possible Restriction of Several New Substances under RoHS 2”* wrote by Oeko-Institut e.V. in 2014 (Refer to page 30).

In addition, if the questionnaire calls for better quality of information on these substances as homogeneous level required by RoHS directive, at shortest 180 days such as consultations for RAC/SEAC under REACH is appropriate for the period of consultation.

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