JBCE comment on 1st Stakeholder Consultation – Questionnaire for beryllium and its compounds

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Dear Oeko-Institut and Fraunhofer IZM,

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JBCE would like to highlight you that beryllium and its compounds have been assessed in the previous review in 2014 and not classified as High Priority of the restricted substance. We believe that the most of the questions have been already answered by Beryllium Science & Technology Association (BeST) during the previous review in 2014.

In addition, the fact that beryllium has been classified a Critical Raw Material (CRM) in the EU, tells the difficulties to find alternatives and substitutions. Therefore, the socio economic impact of a possible restriction under RoHS should be considered the impact as CRM.

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