

JBCE comment on 1st Stakeholder Consultation – Questionnaire for nickel sulphate (CAS 7786-81-4; EC 232-104-9) and nickel sulfamate (CAS 13770-89-3; EC 237-396-1)

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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 neither “nickel sulphate” nor “nickel sulphate” are found in EEE because they are used as “Intermediate chemicals”. This is also described 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 47).

4.12.4 Summary

The EEE specific uses of nickel salts nickel sulphate and nickel bis(sulfamidate)/nickel sulfamate are in metal surface treatment (nickel electroplating, nickel electroforming and nickel electroless technologies). Within these plating processes, as stakeholders explain, nickel salts have intermediate uses, which means that they are converted and not present in the final product as such.

Therefore, JBCE understand that neither “nickel sulphate” nor “nickel sulphate” are the substances to be restricted under RoHS directive.



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