

The stakeholder consultation

“Study for the review of the list of restricted substances and to assess a new exemption request under Directive 2011/65/EU (RoHS 2) – Pack 15”

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Contact details

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JBCE welcomes the proposed conclusion with regard to the assessment new substances under the Pack 15 and would like to input especially on the following substances, to which we have submitted comments to the first consultation closed on 15 June 2018.

- Beryllium and its compounds
- Cobalt dichloride and Cobalt sulphate
- Nickel sulphate and Nickel sulfamate

JBCE strongly supports the conclusion of the above 3 substances, which do not recommend inclusion to ANNEX II of RoHS2. We agree and appreciate that the report stated that the following substances do not remain in the final product.

- Cobalt dichloride and Cobalt sulphate
- Nickel sulphate and Nickel sulfamate

We also support the report clearly stated that the possible substitution of Beryllium has negative issues in the case of the application of X-ray window related to the Category 8 products. In addition, we would also like to add the same X-ray window application used for the Category 9 products, such as X-ray analytical measurement equipment which requires the reliable measurement result, to the application which negative issues may happen by substitution. We also endorse the high technical importance of copper beryllium alloys (CuBe2) in EEE.



ABOUT JBCE

Founded in 1999, the Japan Business Council in Europe (JBCE) is a leading European organisation representing the interests of over 80 multinational companies of Japanese parentage active in Europe.

Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, railway, textiles and glass products.

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