

## Stakeholder consultation held in the course of “Study to support the review of the list of restricted substances and to assess a new exemption request under RoHS 2 (Pack 15)”

### Consultation Guidance on the updating of the pre-prioritized RoHS substance inventory

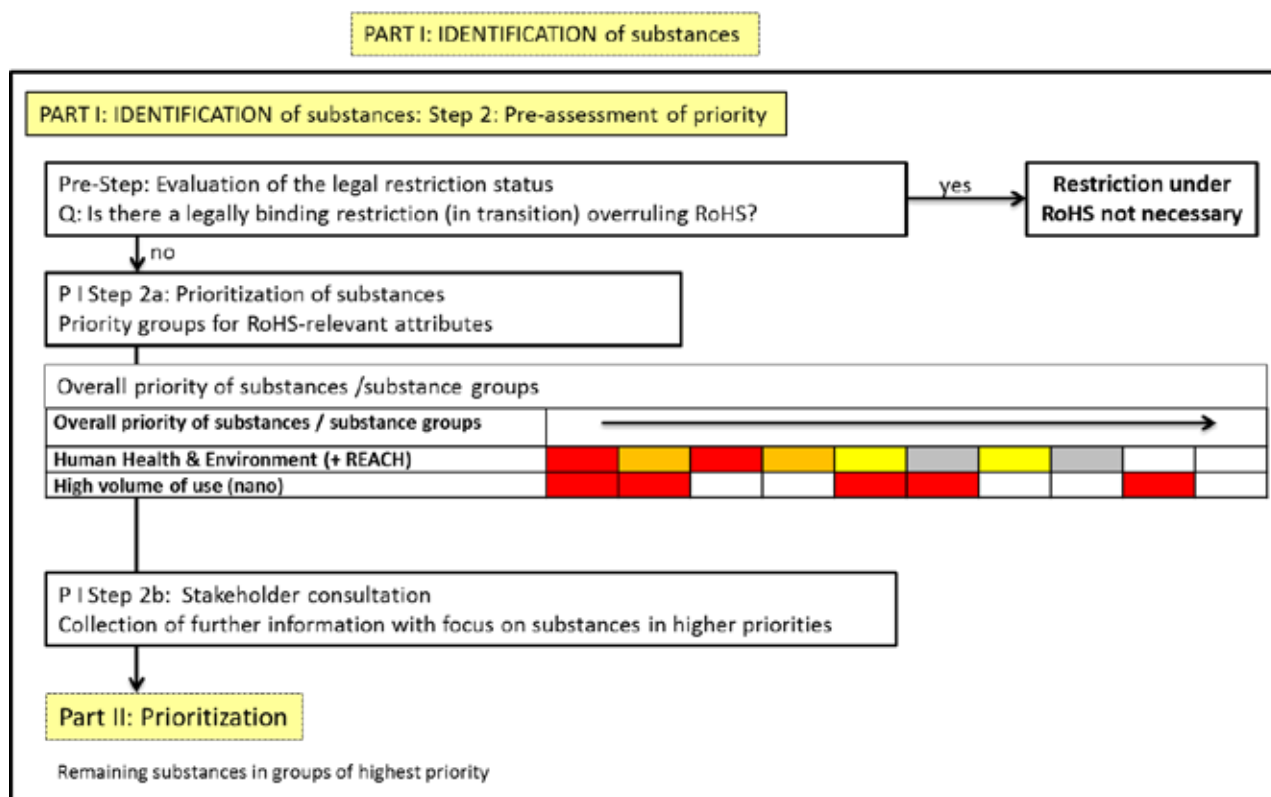
#### Abbreviations and Definition

EEE	Electrical and electronic equipment
RoHS	Directive 2011/65/EU on the restriction of certain hazardous substances

#### Background

The Oeko-Institut and Fraunhofer IZM have been appointed within a framework contract<sup>1</sup> to technically assist in a “Study to support the review of the list of restricted substances and to assess a new exemption request under RoHS 2 (Pack 15)”. This guidance has been prepared in relation to the consultation on the updating of the RoHS substance inventory.

**Figure 1: Workflow of priority pre-assessment of identified substances (the arrow displays decreasing priority)**



<sup>1</sup> The contract is implemented through Framework Contract No. FWC ENV.A.2/FRA/2015/0008 of 27/03/

Following the pre-assessment, the substances in the lowest priority group are kept in the database but are not to be explicitly listed in the inventory. Substances in the highest priorities are highlighted in the Excel file (**Group I** is highlighted in bold and red colour). Following this stakeholder consultation and after having taken into account information provided in the course of the consultation, the substances in the highest priority group shall be subjected to the prioritisation according to Part II of the methodology document **Fehler! Textmarke nicht definiert..**

Therefore, stakeholders are requested to provide additional information, with the aim of either:

- § Providing evidence that a substance in the highest priorities should have a lower priority based on new evidence related to, e.g. a lower volume of use or no use in EEE;
- § Providing evidence that a substance in a lower priority group should have a higher priority, based on new evidence related to, e.g. a high volume of use in EEE.

The list of pre-prioritised substances has been prepared using spreadsheet software. This guidance document aims at clarifying how to specify information on the use of substances in EEE in the Excel sheet provided for this purpose.

Further details and a link to the Excel file for providing information to the pre-prioritized inventory is available following this link: <http://rohs.exemptions.oeko.info/index.php?id=339>

## Guiding steps

Please take note of the following in relation to how to use the Excel format to provide your input.

1. For each substance you are familiar with, please check the general information already specified and add information as to whether:
  - a. the substance has additive or reactive uses in EEE (column G)
  - b. the presence of the substances in EEE is plausible / not plausible (column H), including, if available, information as to the use of the substance in EEE
  - c. the substance may be used as a substitute for another prioritised substance, or as a substitute for substances already restricted (e.g. under RoHS, REACH, POPs, etc.), soon to be restricted (transition) or that shall possibly be restricted (recommended for restriction) (column I).
2. Please provide information on the estimated volumes of use of substances in EEE in the EU, in tonnes per annum, using the pre-defined tonnage bands (0-1 t/a; 1-10 t/a; etc.) (columns N-U).
3. Please provide information on whether a substance is used as a nanomaterial in EEE (column V).
4. Please provide information on whether evidence exists that a substance has known impacts related to RoHS Article 6(1) criteria: The substance
  - a. could have a negative impact during EEE waste management operations, including on the possibilities for preparing for the reuse of waste EEE or for recycling of materials from waste EEE;
  - b. could give rise, given its uses, to uncontrolled or diffuse release into the environment of the substance, or could give rise to hazardous residues, or transformation or degradation products through the preparation for reuse, recycling or other treatment of materials from waste EEE under current operational conditions;

- c. could lead to unacceptable exposure of workers involved in the waste EEE collection or treatment processes.

**Please note that answers to these questions are to be published as part of the available information relevant for the stakeholder consultation to be carried out as part of the revision of the manual. If your answers contain confidential information, please provide a version that can be made public along with a confidential version, in which proprietary information is clearly marked.**