Brussels, 31 March 2014

Nickel Institute's response to the stakeholders' consultation on "Study for the review of the list of restricted substances under RoHS 2 – Analysis of impacts from a possible ban of several new substances under RoHS 2"

Questions:

1. Contact Information

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2. Area of activity:

Industry/business association

3. Please indicate which substance the information provided in this document concerns:

Nickel sulphate
Nickel sulfamate (=Nickel bis sulfamidate)

4. Applications in which substance is in use

> ***a. Please provide information concerning products and applications in which the substance indicated in Question 3 is in use.***
> ***b. In your answer please specify if application is relevant to EEE products and applications or not.***
> ***c. Please elaborate if substitution of the substance indicated in Question 3 is already underway in some of these applications, and where relevant elaborate which chemical or technological alternatives may be relevant for this purpose.***

Nickel sulphate and Nickel sulfamate are exclusively used in industrial processes during production of parts for electrical and electronic equipment. Those nickel salts are converted into metallic nickel in surface treatment (i.e. plating) during a galvanization process. They do not occur in electronic and electrical equipment, neither during use nor during end of life. Therefore they neither come into contact with consumers nor with players involved into the collection and recycling of waste electrical and electronic equipment.

Therefore, Nickel sulphate and Nickel sulfamate should not be included in the list of priority substances for future review cycles of the RoHS2 Directive.

Similarly, they should have also not been included in the Inventory of substances present in EEE and hence should have not been subject to the prioritization scoring exercise performed by the Austrian EPA.

As stated in the "Methodology Manual for the Identification and Assessment of Substances for Inclusion in the List of Restricted Substances under the RoHS2" (January 2014, page 17) developed by the Austrian *EPA*:

"*Chemicals which are used in the production but are not contained in the final EEE shall be removed* […]".

5. Quantities ranges in which the substance is in use
a. Please provide information as to the ranges of quantities in which the substance indicated in Question 3 is applied in general and in the EEE sector.
b. If substitution has begun or is expected to begin shortly, please estimate how the trend of use is expected to change over the coming years.

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6. Further information and comments
a. The substance profiles made available on the consultation page have been prepared as a summary of the publicly available information reviewed so far. If relevant, please provide further information in this regard.
b. Please provide further information and documents that you believe to have additional relevance for this review, as well as references where relevant to support your statements.

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We thank you in advance for taking our response into consideration.

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