

Date : Wednesday, 02 April 2014
Product : Dibromoneopentyl-glycol EC no. 221-967-7
Subject : Feedback to the Öko-Institute "Questionnaire for Substance Prioritisation" under RoHS

Dear Mr/Mrs,

We wish to take this opportunity to comment on the survey for substance prioritisation under RoHS. ICL-IP is a global manufacturer of flame retardants and is an EFRA member (the European Flame Retardants Association, www.flameretardants.eu). EFRA has submitted comments on several other flame retardants already. ICL-IP is commenting separately on this product as we believe that we are the only manufacturer of this material for the European market. Below you will find the answers on the questions related to Dibromoneopentyl-glycol (DBNPG).

Question 4: Application 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.

DBNPG is used solely as a reactive flame retardant in construction, and is used for > 90% in Unsaturated Polyester used for UPE sheets in roofing.

- b) In your answer please specify if application is relevant to EEE products and applications or not

DBNPG is not used in EEE products

- 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.

This is not relevant, as no substitution is needed, not used in EEE

Question 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

Used in construction in the EU in the range of 100 to 1000 MT/year.

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.

Not relevant

Question 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.

Not relevant, DBNPG is not uses in EEE

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

Not relevant, DBNPG is not used in EEE

Below you will find also an amended Background Info Substance Table for DBNPG.

<p>Dibromo-neopentyl-glycol</p>	<p>3296-90-0</p>	<p>221-967-7</p>	<p>Use as reactive flame retardant intermediate in the manufacture of polymer resins. Sector of end use: - SU 12: Manufacture of plastics products, including compounding and conversion. - Article category related to subsequent</p>	<p>Not used in EEE</p>	<p>Not Relevant</p>	<p>Not Relevant</p>	<p>Total Tonnage Band: 100 - 1,000 tonnes per annum</p>	<p>Not used in EEE</p>
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			service life: AC 13: Plastic articles.					
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In addition see below the amended classification that ICL-IP applies for DBNPG based on all the data generated on the material. The classification from Oeko-institute is not correct according to our existing data.

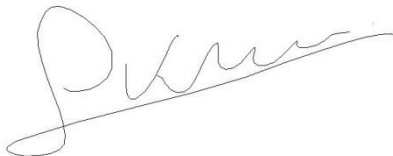
Annex 4 Priority List classification Oeko Institute

<i>Dibromo-neopentyl-glycol</i>	<i>3296-90-0</i>	<i>221-967-7</i>	not harmonised: <i>Muta. 1B, Carc. 1B; Eye Irrit. 2; STOT RE 2</i>	<i>Aquatic Chronic 4</i>
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Classification ICL-IP based on existing OECD/GLP studies, used for CLP classification

<i>Dibromo-neopentyl-glycol</i>	<i>3296-90-0</i>	<i>221-967-7</i>	<i>Carc. Cat. 2 H351 (In accordance with CLP 1272/2008) Carcinogen Cat.3 Xn; R40(In accordance with DSD 67/548/EEC</i>	<i>Not classified for environment</i>
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Sincerely yours,



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