

Development of Legislation and Other Instruments

To:
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Contribution to Stakeholder Consultation 2014-2 Input for
Substance review under the RoHS directive

2nd Area of Review: Substance Prioritisation

Questions:

1. Contact Information

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2. Area of activity (more than one is possible):

- RoHS enforcement;
- EU Member State Representative;

3. Please indicate which substance the information provided in this document con-cerns:

- Antimony trioxide
- Medium-chain chlorinated paraffins (MCCP)
- Nickel sulfamate (=Nickel bis sulfamidate)
- Nickel sulphate
- Cobalt metal
- Cobalt dichloride
- Tetrabromobisphenol A (TBBPA)
- Tris(2-chloroethyl)phosphate
- Diethyl phthalate (DEP)
- Cobalt sulfate
- Dibromoneopentyl-glycol

The use of chemical substances and mixtures in Sweden is registered in the Products Register. Manufacturers and importers are obliged to register products subject to chemicals control. Chemical products shall be notified to the Products Register by companies manufacturing, packaging, delivering or supplying them to Sweden. This applies if the annual volume is 100 kg or more. The company shall also, regardless of volume, report the activity to the Products Register.

url: <http://www.kemi.se/en/Start/The-Products-Register/>

Similar product registers are used in other Nordic countries. In addition SPIN is a database on the use of Substances in Products in the Nordic Countries. The database is based on data which is transferred from the national Product Registries of Norway, Sweden, Denmark and Finland . The database is financed by the Nordic Council of Ministers, Chemical group.

url: <http://195.215.202.233/DotNetNuke/default.aspx>

Neither the Products Register in Sweden nor the SPIN database contains information on the use of substances in articles.

Data from the Swedish Products Register and the SPIN database has been compiled when available for the substances in the current public consultation. Quantitative data from the Products Register in Sweden and the SPIN database shall be regarded as minimum quantities used, since substances in articles are not included and information is treated as confidential when the number of data points is below a certain limit.

Antimony trioxide (CAS-no 1309-64-4)

4. Applications in which substance is in use

a. Please provide information concerning products and applications in which the sub-substance indicated in Question 3 is in use.

Table 1. Data from the Swedish products register regarding product types and industry sectors where Antimony trioxide was used 2011.

Product types	Use, tonnes per year	Number of preparations
Flame retardants, fire protection additive	177.1	21
Raw material for plastics	48.4	51
Raw material for rubber products	21.3	45
Plastic Construction Materials	1.7	8

Industry sectors:	Use, tonnes per year	Number of preparations
Plastic manufacturing	162.2	69
Electro manufacturing industry	70.6	9
Export	30.3	31
Rubber and plastic products	24.7	45
Metal coating	11.3	26

Table 2. Data from the SPIN data base regarding industry sectors where Antimony trioxide was used 2011.

Sector \ Country	NACE code	SE	NO	DK	FI	Total
Manufacture of chemicals and chemical products	C20	13.0			56.7	69.7
Manufacture of rubber and plastic products	C22	191.0	227.6	3.9	64.9	487.4
Manufacture of other non-metallic mineral products	C23		3.6			3.6
Manufacture of fabricated metal products, except machinery and equipment	C25	10.0				10.0
Manufacture of computer, electronic and optical products				0.0		>0?
Manufacture of electrical equipment	C27 C26	71.0				71.0
Manufacture of other transport equipment	C30				0.1	0.1
Wholesale and retail trade and repair of motor vehicles and motorcycles	G45				25.0	25.0

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

Yes, but relevant data on used quantities is unclear. See previous question

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.

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.

Swedish data, See question 4a above.

Nordic data from the SPIN database in **Table 2** and Table 3:

Table 3. Total use of Antimony trioxide in the Nordic countries 2011 (Source: the SPIN database, accessed March 2014)

Country \ Year	SE	NO	DK	FI	Total
Used quantities, tonnes per year	323.0	267.6	4.5	118.0	713.1
Number of preparations	182	14	33	37	n.a.

Medium-chain chlorinated paraffins (MCCP) (CAS-no 85535-85-9)

4. Applications in which substance is in use

a. Please provide information concerning products and applications in which the sub-substance indicated in Question 3 is in use.

Table 4. Data from the Swedish products register regarding product types and industry sectors where MCCP was used 2011.

Product types	Use, tonnes per year	Number of preparations
Sealants	34.4	30
Coolants and lubricants for metal forming	27.6	6
Sealants, putty	18.8	9
Lubricants	2.4	5

Industry sectors:	Use, tonnes per year	Number of preparations
Export	47.2	35
Construction sector	44.8	35
Retail sales, except of motor vehicles	8.6	9
Wholesale (chemical products)	6.5	10
Machinery sector	3.5	6

Table 5. Data from the SPIN data base regarding industry sectors where MCCP was used 2011.

Sector	Country	NACE code	SE	NO	DK	FI	Total
Manufacture of chemicals and chemical products		C20	5.0				5.0
Manufacture of rubber and plastic products		C22	7.0			x	>7.0
Manufacture of other non-metallic mineral products		C23				x	>0
Manufacture of basic metals		C24	1.0				1.0
Manufacture of fabricated metal products, except machinery and equipment		C25	2.0	1.2	13.5	15.1	31.8
Manufacture of machinery and equipment n.e.c.		C28	3.0		2.7	x	>5.7
Manufacture of other transport equipment		C30				x	>0
Repair and installation of machinery and equipment		C33		0.1	2.1		2.2
Construction of buildings		F41	13.0	3.1	2.5	20.8	39.4
Civil engineering		F42	13.0		3.4		16.4
Specialised construction activities		F43	13.0	14.4	11.6	13.0	52.0
Wholesale and retail trade and repair of motor vehicles and motorcycles		G45	0.0	0.1	1.5	x	>1.6
Wholesale trade, except of motor vehicles and motorcycles		G46	6.0				6.0
Retail trade, except of motor vehicles and motorcycles		G47	8.0	16.9		x	>24.9
Undifferentiated goods- and services-producing activities of private households for own use		T98			2.2		2.2

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

No, the use of MCCP in EEE cannot be confirmed from the reported uses in the SPIN database or the Swedish Products register.

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.

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.

Swedish data, See question 4a above.

Nordic data from the SPIN database in **Table 5** and **Table 6**:

Table 6. Total use of **MCCP** in the Nordic countries **2011** (Source: the SPIN database, accessed March 2014)

Country Year	SE	NO	DK	FI	Total
Used quantities, tonnes per year	78.0	135.7	42.8	180.7	437.2
Number of preparations	124	55	90	39	n.a.

Nickel sulfamate (CAS-no 13770-89-3)

4. Applications in which substance is in use

a. Please provide information concerning products and applications in which the sub-substance indicated in Question 3 is in use.

Table 7. Data from the Swedish products register regarding product types and industry sectors where Nickel sulfamate was used 2011.

Product types	Use, tonnes per year	Number of preparations
Electroplating products	7.4	5

Industry sectors:	Use, tonnes per year	Number of preparations
Metal coating	4.7	5
Export	3.5	3

Table 8. Data from the SPIN data base regarding industry sectors where Nickel sulfamate was used 2011.

Sector Country	NACE code	SE	NO	DK	FI	Total
Manufacture of fabricated metal products, except machinery and equipment	C25	4.0			x	>4.0
Manufacture of computer, electronic and optical products	C26				x	>0

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

Yes, but relevant data on used quantities is unclear. See previous question

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.

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.

Swedish data, See question 4a above.

Nordic data from the SPIN database in **Table 9**:

Table 9. Total use of **Nickel sulfamate** in the Nordic countries **2011** (Source: the SPIN database, accessed March 2014)

Country	SE	NO	DK	FI	Total
Year					
Used quantities, tonnes per year	4.0	-	-	confidential	>4.0
Number of preparations	10				n.a.

Nickel sulphate (CAS-no 7786-81-4)

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.

Total quantity in the Swedish Products register: 926.9 ton.

Table 10. Data from the Swedish products register regarding product types and industry sectors where Nickel sulphate was used 2011.

Product types	Use, tonnes per year	Number of preparations
Metal surface treatment products	21.3	6
Electroplating products	8.8	13

Industry sectors:	Use, tonnes per year	Number of preparations
Export	875.5	16
Metal coating	44.7	32
Manufacture of fabricated metal products	6.7	3

Table 11. Data from the SPIN data base regarding industry sectors where Nickel sulphate was used 2011.

Sector \ Country	NACE code	SE	NO	DK	FI	Total
Manufacture of fabricated metal products, except machinery and equipment	C25	50.0			12.1	62.1
Manufacture of computer, electronic and optical products	C26			2.0	10.8	12.8

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

Yes, see previous question

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.

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.

Swedish data, See question 4a above.

Nordic data from the SPIN database in **Table 11** and

Table 12:

Table 12. Total use of Nickel sulphate in the Nordic countries 2011 (Source: the SPIN database, accessed March 2014)

Year \ Country	SE	NO	DK	FI	Total
Used quantities, tonnes per year	50.0	confidential	2.5	1583.8	1636.3
Number of preparations	40		12	29	n.a.

Cobalt metal (CAS-no 7440-48-4)

4. Applications in which substance is in use**a. Please provide information concerning products and applications in which the sub-substance indicated in Question 3 is in use.**

Table 13. Data from the Swedish products register regarding product types and industry sectors where Cobalt metal was used 2011.

Product types	Use, tonnes per year	Number of preparations
Raw materials for metal production	347.4	114

Industry sectors:	Use, tonnes per year	Number of preparations
Fabricated Metal Products Industry	308.2	112
Export	29.6	3
Metal coating	1.5	4

Table 14. Data from the SPIN data base regarding industry sectors where Cobalt metal was used 2011.

Sector	Country	NACE code	SE	NO	DK	FI	Total
Manufacture of chemicals and chemical products		C20				8775.6	8 775.6
Manufacture of basic metals		C24		1394.1		16599.1	17 993.2
Manufacture of fabricated metal products, except machinery and equipment		C25	319.0			0.4	319.4
Manufacture of machinery and equipment n.e.c.		C28				17551.2	17 551.2
Manufacture of other transport equipment		C30		0.0			

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

The use of Cobalt metal in EEE cannot be confirmed from the reported uses in the SPIN database or the Swedish Products register, but cannot be excluded either.

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.

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.

Swedish data, See question 4a above.

Nordic data from the SPIN database in **Table 14** and **Table 15**:

Table 15. Total use of **Cobalt metal** in the Nordic countries **2008-2011** (Source: the SPIN database, accessed March 2014)

Year \ Country	SE	NO	DK	FI	Total
Used quantities, tonnes per year					
2011	332.0	1394.1	0.7	25 375.1	27 101.9
2010	290.0	3296.2	0.6	6623.1	10 209.9
2009	173.0	3537.8	0.6	6125.1	9 836.5
2008	327.0	3455.2	0.7	5611.7	9 394.6
Number of preparations					
2011	129	18	13	34	n.a.
2010	139	23	17	39	n.a.
2009	143	19	17	40	n.a.
2008	147	21	15	29	n.a.

Cobalt dichloride (CAS-no 7646-79-9)

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.

Total quantity regarding use of Cobalt dichloride 2011 in the Swedish products register: 7.7 tonnes.

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

No, the use of Cobalt dichloride in EEE cannot be confirmed from the information given in the SPIN database or the Swedish Products register.

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.

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.

Swedish data, See question 4a above.

Nordic data from the SPIN database in **Table 16**:

Table 16. Total use of **Cobalt dichloride** in the Nordic countries **2011** (Source: the SPIN database, accessed March 2014)

Country	SE	NO	DK	FI	Total
Year					
Used quantities, tonnes per year	0.0*		confidential	confidential	>0
Number of preparations	6				n.a.

Cobalt sulfate (CAS-no 10124-43-3)

4. Applications in which substance is in use

a. Please provide information concerning products and applications in which the sub-stance indicated in Question 3 is in use.

Total quantity regarding use of Cobalt sulfate 2011 in the Swedish products register: 2.9 tonnes.

Table 17. Data from the SPIN data base regarding industry sectors where Cobalt sulfate was used 2011.

Country	NACE code	SE	NO	DK	FI	Total
Sector						
Manufacture of fabricated metal products, except machinery and equipment	C25	0.0			0.1	0.1

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

No, the use of Cobalt sulfate in EEE cannot be confirmed from the reported uses in the SPIN database or the Swedish Products register.

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.

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.

Swedish data, See question 4a above.

Nordic data from the SPIN database in **Table 18**:

Table 18. Total use of **Cobalt sulfate** in the Nordic countries **2011** (Source: the SPIN database, accessed March 2014)

Year \ Country	SE	NO	DK	FI	Total
Used quantities, tonnes per year	3.0	confidential	0.0	4328.0	4 331.0
Number of preparations	9		4	13	n.a.

Tetrabromobisphenol A (TBBPA, CAS-no 79-94-7)

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.

Total quantity regarding use of TBBPA 2011 in the Swedish products register: 39.7 tonnes.

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

No, the use of TBBPA in EEE cannot be confirmed from the information given in the SPIN database or the Swedish Products register.

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.

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.

Swedish data, See question 4a above.

Nordic data from the SPIN database in Table 19

Table 19. Total use of **TBBPA** in the Nordic countries **2011** (Source: the SPIN database, accessed March 2014)

Year \ Country	SE	NO	DK	FI	Total
Used quantities, tonnes per year	42.0		2.0	confidential	44.0
Number of preparations	13		4		n.a.

Tris(2-chloroethyl)phosphate (CAS-no 115-96-8)

4. Applications in which substance is in use

a. Please provide information concerning products and applications in which the sub-substance indicated in Question 3 is in use.

Total quantity regarding use of Tris(2-chloroethyl)phosphate 2011 in the Swedish products register: 0.1 tonnes.

Table 20. Data from the SPIN data base regarding industry sectors where Tris(2-chloroethyl)phosphate was used **2010**.

Sector \ Country	NACE code	SE	NO	DK	FI	Total
Manufacture of rubber and plastic products	C22	7.0				7.0

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

No, the use of Tris(2-chloroethyl)phosphate in EEE cannot be confirmed from the reported uses in the SPIN database or the Swedish Products register.

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.

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.

Swedish data, See question 4a above.

Nordic data from the SPIN database in **Table 20**, **Table 21** and **Table 22** :

Table 21. Total use of **Tris(2-chloroethyl)phosphate** in the Nordic countries **2011**
(Source: the SPIN database, accessed March 2014)

Year \ Country	SE	NO	DK	FI	Total
Used quantities, tonnes per year	0.0	71.4	confidential	0.0	71.4
Number of preparations	3	5		10	n.a.

Table 22. Total use of **Tris(2-chloroethyl)phosphate** in the Nordic countries **2010**
(Source: the SPIN database, accessed March 2014)

Year \ Country	SE	NO	DK	FI	Total
Used quantities, tonnes per year	7.0	65.2	0.1	146.9	219.2
Number of preparations	6	4	5	10	n.a.

Diethyl phthalate (DEP, CAS-no 84-66-2)

4. Applications in which substance is in use

a. Please provide information concerning products and applications in which the sub-stance indicated in Question 3 is in use.

Total quantity regarding the use of DEP 2011 in the Swedish products register: 20.7 tonnes.

Table 23. Data from the Swedish products register regarding product types and industry sectors where DEP was used 2011.

Product types	Use, tonnes per year	Number of preparations
Solvents	0.4	11
Odor preventing products	0.1	8
Disinfectants and other biocidal products	0.1	7

Industry sectors:	Use, tonnes per year	Number of preparations
Export	7.8	20
Perfume and toiletry industry	0.6	13
Sales, maintenance and repair establishments for motor vehicles	0.1	4

Table 24. Data from the SPIN data base regarding industry sectors where DEP was used 2011.

Sector \ Country	NACE code	SE	NO	DK	FI	Total
Manufacture of chemicals and chemical products	C20	6.0		0.1		6.1
Wholesale trade, except of motor vehicles and motorcycles	G46	1.0	0.1			1.1
Human health activities	Q86			0.4		0.4

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

No, the use of DEP in EEE cannot be confirmed from the reported uses in the SPIN database or the Swedish Products register.

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.

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.

Swedish data, See question 4a above.

Nordic data from the SPIN database in **Table 24** and **Table 25**:

Table 25. Total use of **DEP** in the Nordic countries **2011** (Source: the SPIN database, accessed March 2014)

Year \ Country	SE	NO	DK	FI	Total
Used quantities, tonnes per year	12.0	0.5	10.8	1.4	24.7
Number of preparations	76	75	174	9	n.a.

Dibromoneopentyl-glycol (CAS-no 3296-90-0)

The substance is used in the Nordic countries but only confidential data are available.