

Questionnaire for Substance Prioritisation

2nd area of review - Substance prioritisation: Compile and review quantitative information concerning the various substances on the prioritised shortlist

Questions

1. Contact Information

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

- Industry;
- Retail/distribution;
- Rent/repair business;
- Industry/business association;
- RoHS enforcement;
- RoHS analysis;
- Environmental NGO;
- Consumer NGO;
- Institute/consultancy;
- EU Member State Representative;
- International agency / organisation;
- Other - Please specify: _____

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

- Di-(2-ethylhexyl)phthalate (DEHP)
- Di-n-butyl phthalate (DBP)
- Butyl benzyl phthalate (BBP)
- Diisobutyl phthalate (DiBP)
- Tris(2-chloroethyl)phosphate
- Hexabromocyclododecane (HBCDD)
- 2,3-dibromo-1-propanol
- Dibromoneopentyl-glycol5
- Antimony trioxide
- Diethyl phthalate (DEP)
- Tetrabromobisphenol A (TBBPA)
- Medium-chain chlorinated paraffins (MCCP)

- Poly Vinyl chloride (PVC)
- Beryllium metal
- Beryllium oxide (BeO)
- Nickel sulphate
- Nickel sulfamate (=Nickel bis sulfamidate)
- Indium phosphide
- Di-arsenic pentoxide; (i.e. Arsenic pentoxide; Arsenic oxide)
- Di-arsenic trioxide (i.e. Arsenic trioxide)
- Cobalt dichloride
- Cobalt sulfate
- Cobalt metal
- Nonylphenol

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.

According to the JBCE following substances are not contained in EEE:

- 2,3-dibromo-1-propanol and Dibromoneopentyl-glycol listed as “highest priority”
- Diethyl phthalate (DEP) listed as “second highest priority”
- Beryllium oxide, Nickel sulfate and Nickel sulfamate listed as “fourth highest priority”
- Cobalt dichloride listed as “fifth highest priority”
- Nonylphenol listed as “sixth highest priority”

Therefore it should be reconsidered whether these substances need to be further assessed under RoHS..

- 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.

To substitute parts/materials completely, each of the material suppliers, parts manufacturers and manufacturers of finished products must have technical processes for reviewing and developing substitution, testing its quality and reliability, and acquiring certification on applicable standards such as on flame retardancy or on safety as necessary.

Therefore any timeline for restriction should carefully consider the transition time needed.

5. Quantities ranges in which the substance is in use 物質使用量の範囲

- 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.

The accurate numerical value is unidentified, but the Japanese industry recognizes that Antimony trioxide, Tetrabromobisphenol A and Polyvinylchloride (PVC) are largely used. The reason is that these substances have many useful applications 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.

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.

Based on the methodology it is not clear to the JBCE on which basis DEP has been included:

- The substance is not used in EEE
- The substance does not fulfill the criteria for substances used in EEE which are hazardous (Step I 2a)
- No specific reference was found that DEP causes concern during WEEE management

Please note with regard to the above that the JBCE was not able to identify the relevant KEMI report from which information may have been drawn.

- 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.

Substance restriction must be strictly managed through the manufacturing process. To ensure proper control substances should be clearly identifiable. The JBCE therefore strongly supports the identification of substances by CAS number and sees this as the most effective method for substance control in all current and future cases.