CECAPI Document Reference: GS640a

Questionnaire for Substance Prioritisation

Compilation and review of quantitative information concerning the various substances on the prioritised shortlist

Directive 2002/95/EC[1] (RoHS 1) on the restriction of the use of certain hazardous substances in electrical and electronic equipment (EEE) regulates the use of a number of hazardous substances in electrical and electronic equipment. The Commission launched the recast of RoHS in 2008. RoHS 2 (Directive 2011/65/EC[2]) was adopted in June 2011 and had to be transposed by the Member States by 2 January 2013 at the latest. Annex II of the Directive lists the substances which are restricted for use in EEE, as well as the maximum concentration value tolerated by weight in homogeneous materials. At present (February 2014) the list specifies six substances: lead, mercury, cadmium, hexavalent Chromium polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE).

RoHS 2 sets the rules for amending the list of restricted substances in Article 6(1). A review and amendment of Annex II is to be considered by the Commission before 22 July 2014, and periodically thereafter.

In preparation of the 2014 review, a first study was launched by the Austrian Umweltbundesamt GmbH[3] in 2012 and is expected to be concluded shortly. Among the preliminary outcomes of this study are a draft methodology for the identification, prioritisation (pre-assessment) and assessment of potentially relevant chemical substances in EEE. The consultants also applied this methodology and produced an inventory of substances, from which a 21 entry priority substance list was derived.

The objective of this consultation and the review process is to collect and to evaluate information and evidence to establish the application in which these substances are in use in general and in EEE, as well as the range of quantities in which they are applied.

The following questions have been formulated to gather more information in this regard. Input provided shall be used to further substantiate the priorities for preparing a RoHS substance assessment for the substances in question.

If you would like to contribute to the stakeholder consultation, please answer the following questions. You may also use the excel document provided on the consultation page for this purpose. Please be aware that the questions are relevant for all substances listed above, and provide information for substances of relevance to your area of work.

In case parts of your contribution are confidential, please clearly mark relevant text excerpts or better yet, provide your contribution in two versions (public /confidential).

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[1] OJ L 37, 13.2.2003.

[2] http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32011L0065:EN:NOT.

[3] For more information please use this link.

RE: Study for the Review of the List of Restricted Substances under RoHS2 Reference: ENV.C.2/ETU/2012/0021

Questions:

1. **Contact Information**
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2. **Area of activity (more than one is possible):**
   - Ξ **Industry;**
   - □ Retail/distribution;
   - □ Rent/repair business;
   - Ξ□ **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) and
- □ Medium-chain chlorinated paraffins (MCCP)
- Ξ□ **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.

* These substances have been reviewed by the Austrian Umweltbundesamt. If you would like to submit further information concerning the quantity usage aspects of these substances, please see the information compiled by the Austrian Umweltbundesamt referred to on the consultation page (link).

** A substance review is being prepared for this substance; please use this questionnaire for DIBP, only if you do not intend to submit further input concerning the draft substance assessment dossier. For this purpose, please refer to this link.

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.
Electrical installation equipment and more specifically "cable management systems" intended to contain and possibly protect the cables: conduit systems, trunking systems and cable tray.

b. In your answer please specify if application is relevant to EEE products and applications or not.
Most of "cable management products" identified in above "a" are not in the scope of RoHS Directive but products are indirectly concerned by RoHS.

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.

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.

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.

A possible conclusion considering that PVC is a hazardous substance can be challenged.
For example, the Öko-Institut "Study on Hazardous Substances in Electrical and Electronic Equipment, Not Regulated by RoHS Directive" clearly states in its Final Report dated 17 October 2008 that "PVC itself is not classified as

dangerous according to Directive 67/548/EEC." and identifies issues on additives.
Additives rather than PVC itself should therefore be investigated.

About CECAPI:

CECAPI, the European coordinating Committee representing the National Associations of Manufacturers of Electrical Installation Equipment within member states of the European Union.

It is a broad-based group that represents nine national associations that comprise more than 450 manufacturers in Austria, Belgium, France, Germany, Italy, Portugal, Spain, Switzerland and the United Kingdom.

Members of national associations represented by CECAPI include small, medium and large companies that in total *employ in the order of 60,000 people directly in Europe, and have a combined turnover in the order of €10 billion.*