

Dear Sir, Dear Madam,

From: Karl Coopmans R&D Manager Campine NV Belgium

I am writing to you on behalf of Campine NV Belgium in the context of the ongoing Öko Institute consultation regarding the revision of the exemptions to the EU RoHS directive.

I would like to confirm that Deca-BDE is within our product portfolio an important raw material used in a lot of flame retardant masterbatch formulations.

As you know, the flame retardant Deca-bromo-diphenyl ether benefits, since 15 October 2005, from an exemption from the RoHS directive since 15 October 2005, and we would like to stress the importance of keeping that exemption in the frame of the ongoing revision of the RoHS directive.

This exemption has been awarded following the good conclusions of the finalized EU risk assessment conducted by the European Commission and the Competent Authorities of the Member States between 1995 and 2005. These conclusions have been reviewed during the last meeting of the Competent Authorities in December 2007, where no need for further risk reduction measures has been identified.

We strongly believe that this recent update, confirming the quality of the scientific data available and the absence of risk related to the use of DecaBDE in polymeric applications, should justify the conservation of the existing exemption for DecaBDE.

In this view, we would like to raise the following points:

Deca-BDE is the flame retardant with most scientific data available

The EU risk assessment of Deca-BDE, which has been regularly updated since 2004 by the UK Rapporteur to take into account new science, has looked into over 1100 studies on Deca-BDE. The new environmental and human health data support the conclusions of the EU risk assessment adopted in 2004.

Deca-BDE's EU risk assessment recent review was concluded with no need for any restrictions for Deca-BDE's use

Meeting in Lisbon on 11 December 2007, the Competent Authorities responsible for the EU's existing chemicals policy confirmed the updated Risk Assessment Report conclusions of no significant risk and no need for restrictions, agreed that the Commission should proceed to formal publication of the Risk Assessment Report by June 2008.

Deca-BDE has a positive impact on consumer safety as it enables a wide variety of materials to meet a high fire safety standards

Deca-BDE makes a tremendous contribution to society in terms of fire safety. Using Deca-BDE in the manufacture of electronic equipment prevents deaths and injuries from fires by reducing the chances of materials igniting and lowering the rate of combustion. Flame retardants are not only important in the home, but also ensure the fire safety of many public places, automotive, aviation and others.

Industry is working with EU Authorities to regularly monitor Deca-BDE levels in the environment and works since 2005 on controlling industrial emissions in Europe

In 2004, industry committed with the relevant EU authorities, to initiate a 10 year independent biomonitoring and environmental programs. Results of these programs are published and regularly reviewed by the EU Authorities.

A voluntary programme (VECAP^{TM1}) was initiated in 2005 to control and reduce industrial emissions in partnership with Deca-BDE user industries in Europe. In 2007, 82% of Deca-BDE used in the EU plastics industry is covered by VECAPTM. Emissions to the environment and water have been reduced². The program is set for 10 years and will provide the first time a clear data on Deca-BDE in the environment. This program is already following the REACH principles which request to engage downstream users in emissions control.

The EU risk assessment under the Existing Substances Regulation 793/93 of Deca-BDE has concluded that there is no significant environmental, health or consumer safety risk

On 26 May 2004, the European Union Competent Authorities closed, after 10 years of research, the scientific assessment of commercial Deca-BDE concluding no significant risk for the environment or human health and therefore no additional risk reduction measures were necessary beyond those already being applied.

Considering these elements, we hereby request the existing exemption from the RoHS directive requirements for the substance DecaBDE to be conserved in the future update of the RoHS directive and of its exemptions.

Yours truly

Karl Coopmans
R&D Manager

¹ Voluntary Emissions Control Action Program. See further information at <http://www.vecap.info>

² See 2nd VECAP annual progress report at http://www.bsef.com/newsmanager/uploads/vecap_2007_annual_progress_report.pdf