

Ms. Rita Gross
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28 March 2008

Dear Ms Gross,

I am writing to you regarding the Öko-Institut study on hazardous substances in EEE not regulated by RoHS, and in particular your current stakeholder consultation on the draft list of 46 substances recently published.

The attached table contains technical comments on the substances, prepared by member groups of Cefic, ECVM and PlasticsEurope, representing materials producers. The table also contains input from a number of trade associations and companies from the EEE manufacturing industry.

To the best of our knowledge, a number of the substances included in your questionnaire are already covered by EU legislation, for example substance ID Nos. 19, 20, 22, 23, 26, 27, 28, 29, 34, 37 and 44. In addition a number of substances are not used in the EEE sector at all (for example substance ID Nos. 33 and 45), or are used only in a very limited way (for example 8, 9, 10, 11, 15, 35 and 40). Other substances will no longer be produced, such as ID No. 24, and others may be used as intermediates in production processes, but will not be present in the final products, such as ID No. 26.

Due to the particularly short timeline for this stakeholder consultation, we cannot guarantee that the information is comprehensive or accurate in every detail. However we remain at your disposal to answer any outstanding questions.

Yours sincerely,



Phil Hope
Manager, Plastic Additives

cc: Grant Lawrence, DG Environment, Director Water, Chemicals & Cohesion
Klaus Kogler, DG Environment, Head of Unit, Sustainable Production & Consumption
Astrid Schomaker, DG Environment, Head of Unit, Chemicals
Michail Georgios Papadoyannakis, DG Environment, RoHS Desk Officer
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