

Von: Birkhofer [birkhofer@bit-plastics.de]

Gesendet: Mittwoch, 26. März 2008 15:53

An: hse-rohs@oeko.info

Betreff: Antimony trioxide

Dear Ms Gross,

We are writing to raise BiT AG's concern as to the inclusion of antimony trioxide and antimony compounds in general to the list of high priority hazardous substances to be considered for inclusion in the EU RoHS Directive.

BiT AG uses antimony trioxide and antimony compounds to manufacture flame retardant plastic-pellets for use in the electric and electronic industry.

Antimony trioxide has only recently been subject to an EU Risk Assessment. The conclusions from the final draft of the risk assessment report clearly indicate that it does not meet the criteria for high priority substances. Antimony compounds will be subject to further scrutiny under REACH, but as of now many antimony compounds are not even classified as hazardous.

We strongly support the response to the consultation from the International Antimony Association and would request that this be taken into account.

Sincerely Yours,

Mit freundlichen Grüßen

Lothar E. Birkhofer

Anschrift:

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