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Conc: RoHS Directive - High Priority Hazardous Substances – stakeholders Consultation

Dear Sir,

EURIMA is the European Insulation Manufacturers Associations representing and defending the interest of the European mineral wool (glass wool, stone wool and slag wool) manufacturers throughout Europe.

We are contacting you in the frame of the stakeholder consultation on a list of high priority hazardous substances linked to the RoHS Directive and more specifically on the entry 27 on page 5 of your website document (i.e. Synthetic vitreous fibres (glass fibres/ mineral wool/ -refractory ceramic fibre (RCFs) RCF: Carc. Cat. 2; Thermal insulation materials in domestic electrical appliances).

The European Directive *97/69/EC of 5 December 1997 adapting to technical progress for the 23rd time Council Directive 67/548/EEC on the approximation of the laws, regulations and administrative provisions relating to the classification, packaging and labelling of dangerous substances* clearly indicates that mineral wool fibres are not classified as carcinogenic category 2. Mineral wool fibres produced under the "Note Q"¹ criteria are exonerated for any classifications if they can fulfil one of those 4 criteria. This is certified by EUCEB (European Certification Board – www.euceb.org) which is a voluntary initiative by the mineral wool industry. It is an independent certification authority that guarantees

¹ Note Q:

The classification as a carcinogen need not apply if it can be shown that the substance fulfils one of the following conditions:

- a short-term biopersistence test by inhalation has shown that the fibres longer than 20 µm have a weighted half life less than 10 days, or
- a short-term biopersistence test by intratracheal instillation has shown that the fibres longer than 20 µm have a weighted half life less than 40 days, or
- an appropriate intra-peritoneal test has shown no evidence of excess carcinogenicity, or
- absence of relevant pathogenicity or neoplastic changes in a suitable long term inhalation test.

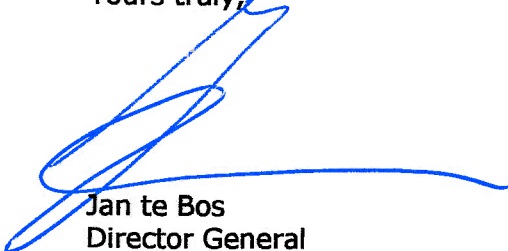
products meeting the exoneration criteria for classification as a carcinogen (Note Q) of the Directive 97/69/EC. The mission of EUCEB is that all the fibres produced by its members comply with note Q of Directive 97/69/EC. To ensure that fibres comply with the exoneration criteria, all tests and supervision procedures are carried out by independent, expert qualified institutions.

So, we ask you to remove glass fibre/mineral wool from your list of high priority hazardous substances linked to the RoHS Directive

We take also the opportunity to officially request you to be added to your stakeholder consultation list.

We are of course at your entire disposal for any additional clarification.

Yours truly,



Jan te Bos
Director General