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Freiburg, 28 February 2008

Dear Madam, dear Sir,

Within the scope of the "Study on Hazardous Substances in Electrical and Electronic Equipment (EEE), not Regulated by the RoHS Directive" Öko-Institut set up an inventory of hazardous substances used in EEE. The inventory is based on declarations provided by suppliers and manufacturers of EEE, existing studies, XRF-analyses and other information.

We grouped the hazardous substances in classes of different priority: Substances classified as CMR, PBT / vPvB or endocrine disruptors were allocated the highest priority just as a number of other substances whose use in EEE and other consumer products is intensively discussed (see Table I of the attached document; Table II specifies the brominated flame retardants listed in Table I). Substances or groups of substances that are already regulated by existing legislation were removed and listed separately (see Table III in the attached document). Other substances in EEE that are classified as dangerous according to Annex I of Directive 67/548, but do not meet the criteria for CMR, PBT / vPvB substances or endocrine disruptors, were assigned a lower priority and grouped in a separate class. The list of those low priority substances is not further evaluated in the present project, but will be presented in the final report as part of the complete inventory of hazardous substances in EEE.

The resulting list of high priority substances (table I) comprises approximately 46 substances/ groups of substances. Limited information have been provided so far on the question in which specific components the hazardous substances are contained, neither have their quantities or concentration ranges been specified adequately.

All stakeholders are invited to provide additional information and to comment on the selected high priority substances listed in Table I of the attached document. In particular, the following points are of interest:

1. Are there other substances that should be included in the present list of hazardous substances in EEE?
2. In which specific components (e.g. in transistors, capacitors, resistors, printed circuit boards, etc.) are the listed hazardous substances contained, including their concentration ranges?
3. Are there risk/exposure assessments available for the listed hazardous substances beyond the EU Risk Assessment Reports?
4. Information on possible substitutes / alternatives for the listed hazardous substances in EEE? Advantages and disadvantages of substitutes?

Öko-Institut is currently examining the risks for environment and human health arising from the use of the hazardous substances in EEE.

In this context possible substitutes and their advantages and disadvantages will be discussed, too.

By evaluating available risk assessments, a limited number of hazardous substances may be identified that have major impacts on and risks for environment and human health. The precautionary principle will also be taken into account. Thus, the existing list of high priority substances (see attached table I) may be reduced to a limited number of hazardous substances that constitute significant health and environmental risks. These substances could be potential candidates for an inclusion into RoHS. For each of the potential candidate substances policy options will be recommended in the draft final report that will be published by mid of April.

Your comments on the list of identified hazardous substances in EEE are highly appreciated. Please feel free to forward this e-mail to other interested stakeholders.

All stakeholders are invited to send their input by 28 March 2008 per e-mail to hse-rohs@oeko.info.

Kind regards,

Carl-Otto Gensch

(Sustainable Products & Material Flows)