

EBFRIP comments on European Parliament Impact Assessment on RoHS

EBFRIP takes note of the Impact Assessment published by the European Parliament in April, assessing the environmental and economic impact of banning additional substances under the RoHS Directive¹. The report looks at the feasibility of substitution of some substances which the Rapporteur proposes to ban under RoHS, and concludes that "it is not possible to derive definitive conclusions (for all the substances to be restricted under the proposals) from this analysis". The report also indicates that "the environmental benefit of the substitution to halogen-free flame retardants is ambiguous", and reaffirms the European Commission's conclusion that there is insufficient data to justify new bans.

EBFRIP is surprised that the European Parliament Impact Assessment was conducted without consulting the brominated flame retardant industry. Regarding TBBPA, the report does not include any reference to the EU's own risk assessment, but instead makes inaccurate references to the health impacts of TBBPA. An EU Risk Assessment finalised in 2008² concluded that TBBPA is approved for use in the EU in all its applications, including its main application in electrical and electronic products. In addition, a recent review commissioned by BSEF³ and conducted by an independent academic⁴ indicates that "the information on the toxicity and environmental concentrations of TBBPA published between 2002 and February 2010 does not change the EU Risk Assessment conclusions".

In our opinion, the flawed nature of this Impact Assessment underlines the need to adopt a clear science based methodology for further substance restrictions under RoHS. EBFRIP is encouraged that this view is reflected in a range of amendments submitted by MEPs from different political groups.

¹ [Impact Assessment of certain European Parliament amendments on the Commission Recasting Proposal on RoHS, April 2010](#)

² <http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2008:152:0011:0020:EN:PDF>

³ [Bromine Science and Environmental Forum](#)

⁴ [Professor Dekant's report: Risk Assessment of TBBPA – Updating the EU-Risk Assessment Reports](#)