

7<sup>th</sup> October 2009

### **EBFRIP statement on call to phase out substances in electronics**

A recent environmental NGO call for the EU RoHS Directive to phase-out brominated and chlorinated substances in electronics contradicts EU scientific risk assessments, and seeks to bypass the EU legislation for regulating chemical substances (REACH).

Since the introduction of the RoHS Directive, REACH has been adopted as the most extensive legislation globally to regulate chemicals and to minimize their impact on the environment and human health. EBFRIP member companies are currently preparing dossiers on individual brominated substances for REACH registration. EBFRIP fully accepts science-based decisions under REACH, including the proposal to list the brominated flame retardant HBCD as a Substance of Very High Concern under Annex XIV to the REACH Regulation.

Brominated flame retardants remain the most effective flame retardants for use in electronic equipment, and as such make a valuable contribution to fire safety. Their use results in hundreds of lives saved and reduced numbers of burn injuries.

The European Commission has recognized that the RoHS Directive lacks a methodology for listing substances for restriction under RoHS and as such, has recommended alignment with the REACH process in its proposal. <sup>i</sup>

Industry needs a non-discriminatory regulatory framework for chemicals. REACH provides such a framework and the RoHS recast should reflect this as well.

The recyclability of brominated flame retardants has been demonstrated in independent scientific studies, as has the compatibility of recovering energy through incinerating electronic waste containing brominated flame retardants. The issue of dioxin and furan generation has also been studied and it was demonstrated that the levels formed were not increased due to combustion of flame retarded plastics. <sup>ii</sup> In fact EBFRIP is one of the chemical industry organizations that has undertaken studies to assess the compatibility of waste containing our substances with different end-of-life options.

EBFRIP is of the opinion that E&E waste should be managed properly. The RoHS Directive is neither an effective nor proportional tool to solve this problem. Enforcement of existing rules on collection, reuse & recycling should be improved in order to achieve this goal. As such a proposal to restrict whole families of chemical substances without due reference to their risks, as envisaged by REACH, is unjustifiable.

-ENDS -

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<sup>i</sup> COM(2008) 809 final. Proposal for a Directive of the European Parliament and of the Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS)

<sup>ii</sup> Analysis of different plastic samples for the 8 Polybrominated Dibenzofuran (PBDF) and Dibenzo(p)dioxin (PBDD) congeners specified in the German Chemicals Banning Ordinance”, Dr. St. Hamm, Gesellschaft für Arbeitsplatz- und Umwelt-analytik, January 04, 2001