

 **Öko-Institut e.V.** • P.O. Box 50 02 40 • D-79028 Freiburg, Germany

Stakeholders for
“Hazardous Substances in Electrical & Electronic Equipment”

Freiburg, 17 December 2007

Dear Madam, dear Sir,

The Öko-Institut e.V. has been assigned with the study on hazardous substances in electrical and electronic equipment, not regulated by the RoHS Directive. The study shall provide necessary technical support to the EU Commission services for fulfilling RoHS Article 6. This article calls on the Commission to review the list of restricted substances on the basis of scientific facts and taking the precautionary principle into account. During the review, particular attention shall be paid to the impact on the environment, and on human health of other hazardous substances and materials used in electrical and electronic equipment. The Commission shall examine the feasibility of replacing such substances and materials and shall present proposals to the European Parliament and to the Council in order to extend the scope of Article 4 of the RoHS Directive, as appropriate.

As one task, an inventory of other hazardous substances (not regulated by RoHS) used in electrical and electronic equipment (EEE) will be set up. Hazardous substances are those substances that meet the criteria for classification as dangerous in accordance with Directive 67/548/EEC or the criteria for PBT / vPvB or for evidence of endocrine disruption). In order to set up this inventory, manufacturers and suppliers of electrical and electronic components are asked to specify the hazardous substances that are contained in typical components / subgroups of EEE, and to quantify their concentration ranges.

As relevant stakeholder you are herewith receiving a questionnaire asking you to specify which hazardous substances are contained in the electrical and electronic components that your company manufactures / supplies.

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Stakeholder-Questionnaire: Short Instructions

The questionnaire consists of three documents:

The list “Component structure of electrical and electronic equipment” specifies typical components on basis of Umbrella Specs published by the German Electrical and Electronic Manufacturers Association (ZVEI).

This list is not exhaustive. In some of the listed components Families, Further groups / Subgroups / Typical components need to be defined / differentiated. All stakeholders are very welcome to complete the list by defining further groups/subgroups/typical components or to adapt the defined groups/subgroups/typical components according to their needs.

The actual questionnaire is set up in form of Word table: In the document “Composition of EEE components”, please specify which hazardous substances are contained in the electrical and electronic components that your company manufactures or purchases (in accordance with the before mentioned list).

Please use one table for each electrical/electronic component. Please “save as”, giving the document a significant new name. This way, you will be able to multiply the template as often as needed.

If your company, however, does have a different material declaration system or if it is easier for you to use a different format than the proposed table, please feel free to send us your information on component composition in your company specific form. Any input from your side helping us to set up an inventory of hazardous substances in electrical and electronic equipment is highly appreciated.

Please specify the concentration or concentration range of the hazardous substance (HS) in electrical and electronic components (e.g. expressed as % or ppm), as well as the quantity of electrical and electronic components produced or used per year [e.g. expressed in kg or t per year] as well as the function of the hazardous substance in the component.

The third document, “ROHS_Hazard_Substance_List.xls, gives an overview on all hazardous substances meeting the criteria for classification as dangerous in accordance with Directive 67/548/EEC, also listing substances classified as persistent, bioaccumulative and toxic or very persistent and very toxic as well as substances with evidence on endocrine disruption.

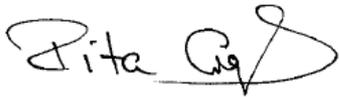
These substances should be considered as hazardous substances for the specification of the composition of your electrical and electronic components.

Your contribution to the set-up of the inventory of other hazardous substances in EEE and your participation in the subsequent discussion on policy options for identified candidate substances for an inclusion into RoHS is highly appreciated. Please feel free to forward this e-mail to other interested stakeholders.

All stakeholders are invited to send their input to the set-up of the inventory by 08.02.2008 by e-mail to hse-rohs@oeko.info.

Further information on the project can be found under <http://hse-rohs.oeko.info/>.

Thank you!



(Rita Groß – project manager)