

## Craig Hillman

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**From:** IPCmail [IPCmail@ipc.org]  
**Sent:** Wednesday, May 14, 2008 10:43 AM  
**To:** IPCmail  
**Subject:** IPC Members Help Needed to Stop RoHS Expansion

Dear IPC members:

The Öko Institute was retained by the EU Commission to study the *inclusion of additional substance restrictions in the RoHS Directive*. One of the substances identified is Tetrabromobisphenol A (TBBPA), the flame retardant used to protect more than 80 percent of printed circuit boards and found to be safe by a comprehensive European Union Risk Assessment. In addition to TBBPA, the Institute suggests banning Hexabromocyclododecanes (HBCDD), several phthalate plasticizers, and all organic compounds containing chlorine and bromine.

The Institute held a workshop on 6 May to review and discuss the [draft report](#) (overviewed in <http://files.ipc.org/RoHSOkoPPT.ppt>). *The draft report relies upon biased and flawed methodology*, which is discussed further below. Despite our substantial technical expertise and obvious interest as the representative of significant stakeholders in any RoHS expansion, IPC was denied permission to attend this meeting. The Institute staff actually suggested that only “scientific experts were invited” to the workshop and that the meeting room was at capacity. We are very concerned that the Institute did not make a serious effort to involve all stakeholders.

IPC believes the potential expansion of RoHS is of vital importance to the electronics industry. While we have already sent a [letter](#) to the commission alerting them to the circumstances under which the Institute’s report was prepared, we do not believe this is enough. *We therefore plan to schedule a meeting in Brussels on 18 June 2008 to include all interested stakeholders. We plan to invite the EU commissioners and staff to this meeting so they can directly hear your concerns regarding the potential expansion of RoHS. This meeting will only be successful if we gather a substantial number of technical experts from our member companies who can explain to commission staff the issues concerning the Institute’s incomplete and flawed report.*

So that we can plan for an adequate sized facility, please let us know by *Tuesday, 20 May* if we can expect you or another member of your company to attend and participate in this important meeting or if you would like to otherwise support this effort. *Please use this [link](#) to respond. Please feel free to forward this notice to anyone you feel should attend this meeting.*

If you have any questions, please contact Fern Abrams at +1 703-522-0225 or by e-mail at [fabrams@ipc.org](mailto:fabrams@ipc.org).

### Background Information on the Öko Report

The [Öko Institut report](#) proposes adding the following substances to the list of those prohibited under RoHS:

- Tetrabromobisphenol A (TBBPA) — reactive use of TBBPA might be exempted, but this would be only a temporary exemption that would be reviewed every four years.

- Hexabromocyclododecane (HBCDD)
- Bis (2-ethylhexyl) phthalate (DEHP)
- Butylbenzylphthalate (BBP)
- Dibutylphthalate (DBP)
- Medium-chained chlorinated paraffins (MCCP) (Alkanes, C14-17, chloro)
- Short-chained chlorinated paraffins (SCCP) (Alkanes, C10-13, chloro)
- Nonylphenol/Nonylphenol ethoxylates
- Organochlorine and organobromine compounds

The report details data collection methods (Chapter 1); selection criteria (Chapter 2); a discussion of the substances recommended for prohibition under RoHS (Chapters 3 and 4), possible substitutes (Chapter 5), and policy options (Chapter 6).

### ***Concerns about the report and its methodology***

Instead of limiting themselves to the criteria provided by the EU Commission, the Öko Institute created new criteria and categories for inclusion, including observance in the environment and concerns about combustion. Without the creation of these additional criteria, TBBPA and the catch-all chlorinated and brominated organic compounds, which do not meet the report's criteria of substances of high concern, might not have been included. The selection of substances based on the criterion of being found in the environment is very broad and did not follow a scientific approach. If applied consistently, this approach would result in the listing of thousands of substances simply because they can be detected in the environment.

There is a complete lack of scientific evidence supporting this broad category of chlorinated and brominated organic compounds other than references to concerns about incomplete combustion. In addition to the technical hurdles posed by the elimination of this broad category of substances, testing for all chlorinated and brominated organics would be prohibitively expensive for both manufacturers and authorities.

Substitution of plasticizers and the possibility to ban PVC is also proposed, with only two phosphate plasticizers discussed as possible substitutes in the report.

The Institute also ignored the ongoing objectives of unifying European Chemicals regulation through REACH because of their concern that there was a need for a more focused legislation on electronic and electrical equipment. There is significant concern among industry that the ongoing expansion of RoHS will be largely inconsistent with the implementation of REACH, which is meant to be an overarching policy.

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