

Subject: Stakeholder Consultation on the Directive 2002/95/EC on the restriction of the use of certain hazardous substances in electrical and electronic equipment

Comments of Assoplast, Association of Plastics Manufacturers in Italy

1. In general, no restriction nor ban of any substance should be regulated if not supported beforehand by specific risk assessments which eventually prove their danger for the environment and human health. It is always necessary to judge scientifically each case individually and take eventual decisions only after the conclusion of these studies.
2. Consumer safety is fundamental and requested by national international laws. Therefore, electric and electronical (E&E) equipment must fulfill very stringent standards for safety and fire protection; this, to avoid endangering users through the occurrence of a fire or to largely limit any such danger. Plastics, therefore, have to be flame retarded and suitable to comply with all the requirements needed in their use, also at very reduced thickness (see UL-94 V0 rating). The cheaper and safer way to achieve it is, so far, the use specific brominated flame retardants. Nowadays many brominated flame retardants, that can be used in electric and electronic equipment, exist. Among these, Deca-BDE is one of the most used.
3. Deca-BDE has undergone a risk assessment which was concluded on 26th May 2004, after 10 years of data collection and severe scientific analysis. The conclusions of the risk assessment is that no danger to environment nor human health can be ascertained with respect to the use of this flame retardant. For this reason, the current restriction on the use of Deca-BDE must be exempted. This request is in line also with the Directive 2003/11/EC amending for the 24th time Council Directive 76/769/EEC relating to restrictions on the marketing and use of certain dangerous substances and preparations (pentabromodiphenyl ether and

octabromodiphenyl ether). In addition Deca-BDE now has been deeply investigated and rated safe while for some alternatives no studies have been yet carried out .

4. As soon as the RoHs Directive is amended, the European Commission should procede with the amendments of all the regulations that, nowadays, are aimed at reducing or banning the use of Deca-BDE.

Milan, 5th July 2004