

## **JBCE Response to the 3<sup>rd</sup> Stakeholder Meeting and the 4th Stakeholder Consultation of the Study “Review of the List of restricted Substances under RoHS 2”**

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The Japan Business Council in Europe (JBCE), representing companies of Japanese parentage operating in Europe, welcomes the methodology manual for the identification and assessment of substances for a potential restrictions under RoHS 2 as finalized by the Austrian Environment Agency “Umweltbundesamt” (UBA).

The JBCE appreciates that the waste relevance is recognized in the methodology as an important criterion in prioritizing substances for detailed assessment. The JBCE believes the methodology as such properly supports the relevance of the RoHS legislation by giving appropriate consideration to the problems arising with substances during EEE waste management operations.

The JBCE values the Commission’s proposal to develop a “Guidance on the periodical reviews of Annex II RoHS 2”. Such a document shall provide more clarity and predictability for the industry on future processes and timelines.

The JBCE therefore fully supports the Commission’s intention of establishing a dedicated working group of key stakeholders to ensure a robust and consistent approach throughout future substance reviews.

In relation to the draft dossiers on HBCDD, DEHP, BBP and DBP the JBCE would like to make the following comments:

1. In order to ensure more detailed and up-to-date information regarding WEEE management practices the JBCE would like to advise the consultants to reach out to European waste collection organisations and recyclers.
2. Nevertheless, the JBCE would like to bring a risk assessment report on DEHP to the consultant’s attention. This report was issued by the National Institute of Advanced Industrial Science and Technology (AIST) in Japan and can be downloaded from [http://unit.aist.go.jp/riss/crm/mainmenu/e\\_1-5.html](http://unit.aist.go.jp/riss/crm/mainmenu/e_1-5.html)
3. An assessment of alternatives to a given substance should, given its importance, also consider the waste relevance criteria of the alternatives and not limit itself only to their hazardous properties.