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**Sent:** Friday, October 17, 2008 11:18 AM

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**Subject:** IPC's Concerns

Dear Commissioners

IPC — Association Connecting Electronics Industries is pleased by reports (*ENDS Europe* Daily on October 15th) that the European Commission's DG Environment does not intend to add any additional substance to the list of substances restricted under RoHS. We are also pleased by the report that the proposal will recommend the alignment of the RoHS Directive with the REACH Directive on Chemicals.

We are however, concerned that DG Environment has reportedly drafted a list of additional substances for priority assessment under RoHS. In particular we are concerned by the inclusion on that list of tetrabromobisphenol(a) (TBBPA). TBBPA is used in over two-thirds of the world's electrical and electronic (E&E) appliances. The main application of TBBPA is as a reactive flame retardant in laminates for printed circuit boards. As discussed in our attached white paper on the revision of the substances restricted in RoHS, a ban of TBBPA as reactive component to produce flame retarded epoxy systems will have a tremendous impact on the electronic industry in Europe.

TBBPA has already undergone a comprehensive EU Risk Assessment and therefore will not be subject to authorization under REACH. The recommendation for priority review of TBBPA under RoHS is seemingly incompatible with the desired REACH alignment and risks undermining the EU's emerging chemicals policy and law. We urge the commission to reconsider the inclusion of TBBPA in its list of "priority review" substances under RoHS.

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