

# DIGITALEUROPE's Comments on the DIBP, DBP, BBP and DEHP Phthalates Restriction Proposal

Brussels, 1 September 2016

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DIGITALEUROPE, the association representing the digital technology industry in Europe, welcomes the opportunity to comment on the submitted REACH restriction proposal prepared by ECHA for the four phthalates - Diisobutyl phthalate (DIBP), Dibutyl phthalate (DBP), Benzyl butyl phthalate (BBP), Bis(2-ethylhexyl) phthalate (DEHP), open to consultation until December 15th 2016.

The proposal as put forward by ECHA and Denmark raises one major concern for the members of DIGITALEUROPE. As you will be aware, under RoHS (2011/65/EU as amended by 2015/863/EU) the same four phthalates will be individually restricted with a threshold of 0.1 wt% each, at homogeneous material level as defined under RoHS.

In order to avoid any inconsistencies with sector specific regulations, in the "Information note on the restriction report" the relevant European Commission services (DG GROW and DG ENV) have already indicated that they requested the RAC and the SEAC to exclude EEE, in line with the Commission's Common Understanding between RoHS and REACH. **As such, we request a derogation for electronics (EEE) covered by RoHS from the scope of this REACH restriction proposal for the four phthalates.**

In addition, we request that the REACH restriction would apply to the phthalate substances individually as opposed the combined use thereof. Keeping the phthalates separate similar to the other regulations allows for the simplest implementation by industry as well as authorities.

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For more information please contact:

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## ABOUT DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies.

DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 62 corporate members and 37 national trade associations from across Europe. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

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