

Questionnaire for Substance Prioritisation

**1st area of review - DIBP: Prepare a substance assessment of Diisobutylphthalat (DIBP),
based on the Assessment Dossier template proposed
by the Austrian Umweltbundesamt GmbH**

Questions

1. Contact Information

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2. Area of activity (more than one is possible):

- ☐ Industry;
- ☐ Retail/distribution;
- ☐ Rent/repair business;
- ☒ Industry/business association;
- ☐ RoHS enforcement;
- ☐ RoHS analysis;
- ☐ Environmental NGO;
- ☐ Consumer NGO;
- ☐ Institute/consultancy;
- ☐ EU Member State Representative;
- ☐ International agency / organisation;
- ☐ Other - Please specify: _____

3. Please indicate to which chapter of the Dossier the information provided in this document is of interest:

- ☒ General information
- ☐ Legal status and restrictions of use
- ☐ Uses in applications in EEE and in general
- ☒ Waste management of products containing the substance (EEE and general)
- ☒ Human health aspects
- ☒ Environmental health aspects
- ☒ Alternatives (substance and technological substitutes)
- ☒ Socio-economic on manufactures of the substance and further down the supply chain

4. Applications in which DIBP is in use

- a. Please provide information concerning products and applications in which DIBP is in use, or used in conjunction with other substances such as PVC and similar polymers.
- b. In your answer please specify if application is relevant to EEE products and applications or not.
- c. From the available information reviewed so far, it seems that the use of DIBP in EEE is uncommon in comparison with other plasticisers and more specifically other phthalates.
 - i. Do you support this view?

Yes.

- ii. If so, can this be explained by current tendencies to prefer the use of other phthalates (or other plasticisers) in the various applications?

The JBCE believes that the observations on the use of phthalates as described in the “Committee for Risk Assessment (RAC) Opinion on an Annex XV dossier proposing restrictions on four phthalates (ECHA/RAC/RES-O-0000001412-86-07/F)” is also valid in the EEE sector with a preference for other phthalates over DIBP as well as an overall decline in the use of phthalates.

<http://echa.europa.eu/documents/10162/77cf7d29-ba63-4901-aded-59cf75536e06>

- iii. If other phthalates currently in use in EEE applications (such as DEHP, BBP and DBP) were to be restricted for use by the RoHS Directive, would DIBP be considered as a substance in some of these applications?

5. Quantities ranges in which DIBP is in use

- a. Please provide information as to the ranges of quantities in which DIBP is applied in general and in the EEE sector.
- b. If substitution has begun or is expected to begin shortly, please estimate how the trend of use is expected to change over the coming years.

6. Alternatives and possible substitutes for DIBP

- a. Where the substitution of DIBP is already underway in the various applications, please elaborate which chemical or technological alternatives may be relevant for this purpose.
- b. Please provide data and information as to the costs of substitution relevant for various applications. If relevant, please estimate how this may impact the industry sector active in the manufacture of the various applications (manufacturers, suppliers, etc.) as well as other actors (retailers, consumers, etc.).
- c. If relevant, please elaborate on areas where substitution is difficult. In this regard please explain what efforts have been made and provide information and test results to support why

substitution is not feasible at this time.

7. Further information and comments

a. The substance assessment dossier made available on the consultation page has been prepared as a summary of the publicly available information reviewed so far. If relevant, please provide further information in this regard.

- To our knowledge DIBP is currently not used and will have no possible use in EEE. Accordingly, the JBCE believe there may be no need to regulate DIBP under RoHS.
- Please note that the reason for proposing the restriction of DIBP is "toxic to reproduction", however, the data on reproductive toxicity of the possible alternatives listed in Section 7 are not appropriately referenced. More specifically, there is no data for AES, and the reliability of the data is uncertain about ATBC and COMGHA.

b. Please provide further information and documents that you believe to have additional relevance for this review, as well as references where relevant to support your statements.

United states National Library of Medicine, Hazardous Substances Data Bank (HSDB),
<http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB>