

14 February 2013

Dear Sir, Madame,

Re: 1st Stakeholder Consultation on RoHS Methodology

Following the adoption of the RoHS II Directive in 2011, the Commission has now started the process to develop a methodology for future substance restrictions as outlined in Article 6 of Directive 2011/65/EC.

Cefic (European Chemical Industry Council), **Plastics Europe**, **Euro Chlor** and **ECVM** (European Council of Vinyl Manufacturers) have been closely following the RoHS developments until the adoption of the final text of the Directive which called for a science based approach when assessing substances.

We believe that the Austrian Environmental Agency should first and foremost develop a methodology with clear scientific criteria consistent with REACH and should invite all relevant stakeholders to contribute to its development prior to the submission of specific substances.

We therefore advise the Commission to give priority to the development of a methodology to ensure an efficient identification of substances based on science and consistent with REACH. We would be pleased to discuss our proposals with you.

Yours sincerely,



Jean Claude Lahaut
Secretary General of Cefic

Annex: "Request for consistency between RoHS and REACH" – 14 February 2013