

Forwarded by Gary Wood/CHO/SPG/PARKER on 01/15/2007 08:52 AM -----

Steve Hynes/CHO/SPG/PARKER

08/10/2006 02:29 PM

Rick:

I'd like you to take a look at a product RoHS issue that we need to address at Chomerics.

Some background information:

We have four products which contain a DecaBDE fire retardant material. We began stating back in November 2005 that these products were RoHS compliant due to the EU exemption for DecaBDE in polymeric application. An RoHS report for one of these products is included in the attached document package.

A few customers have tested these products and their analytical lab is providing a summary report stating..... the product(s) are not RoHS compliant due to the presence of OctaBDE and NonaBDE at concentrations greater than 1000 ppm. An email trail ending with a 7-26-06 email from Ron Luk to Steve Hynes is attached in the document package. A good example of the feedback we are seeing on this issue.

Chemtura, our supplier of the DecaBDE, has provided an RoHS compliance report for their product. A copy of their statement is included in the attached document package. In speaking with their compliance people they have informed me that commercial DecaBDE typical contains 97-98% Deca and 2-3% Octa and NonaBDE.

Chemtura's position is that the EU exemption was issued for commercial DecaBDE and therefore covers the OctaBDE and NonaBDE reaction products. With the usual level of detail provided by the EU, there is no mention of such a position in the exemption. Chemtura and the other manufacturers of DecaBDE stand by this position and believe it will prevail when the EU is forced to deal with this issue.

To try and address this issue for our customers and distributors, I have drafted a "product report" which tries to briefly summarize Chomerics' and Chemtura's position with regard to the DecaBDE exemption. I would like to include this addendum with the RoHS report for each of these four products. A copy of the "Product Report" is included in the document package.

Our RoHS reports are posted on the Chomerics web site so they will be available for anyone and everyone to review, reference, etc. Could you look over the language and approach I have taken. Any comments, recommendations to change, modify, etc. ?

THXS for the help. Who said RoHS issues would die out after the July 1 deadline?



DecaBDE document package.pdf

Steve