

Brussels, 31th March 2008

Ms Stephanie Zangl
Öko-Institut e.V.
Merzhauser Str. 173
79100 Freiburg
Germany

RE: ELC submission to RoHS exemptions review

Dear Ms Zangl,

Hereby we would like to submit the European Lamp Companies Federation (ELC) contribution to the stakeholder consultation on adaptation to scientific and technical progress under Directive 2002/95/EC of the European Parliament and of the Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment for the purpose of a possible amendment of the Annex.

Our submission includes comments concerning the following exemptions: 1, 2, 3, 4, 5, 6, 7, 9a, 14, 15, 16, 17, 18, 19, 23, 24 and 26 (each exemption is attached in a separate file).

With kind regards,



Gerald Strickland
Secretary General

ELC submission to RoHS exemption #23

#	Question	Exemption #23
		"Lead in finishes of fine pitch components other than connectors with a pitch of 0.65 mm or less with NiFe lead frames and lead in finishes of fine pitch components other than connectors with a pitch of 0.65 mm or less with copper lead frames"
1.	Was has changed since the last evaluation in 2006? Are the above mentioned arguments still valid?	Arguments are still valid as far as lamp manufacturers are concerned. Affected components are needed by lamp manufacturers for ballasts/control gears or other electronic equipment.
2.	Has a phase out of the use of lead in finishes of fine pitch components others than connectors with a pitch of 0.65 mm or less with copper lead-frames taken place? If not, until when is it technically feasible?	Lamp manufacturers are not aware of lead-free alternatives to this technology. If technical/functional specifications are met, lamp manufacturers are able to use such alternatives.
3.	The exemption was recommended to expire in 2008 assuming that production capacities for gold-based finishes would be available as a safe alternative for fine pitch components with tin-based finishes. Please explain the status of availability for such components.	Component manufacturers have to answer to this question.
4.	Please justify why the exemption should be continued/withdrawn with respect to the above mentioned arguments, or any other arguments and evidence supporting your statement.	Lamp industry is using components, which need this exemption for lead. Alternatives with different technology but same function are not available.
5.	What experiences exist with tin-based or other lead-free and RoHS-compliant finishes on fine pitch or other components (with and/or without mitigation techniques applied)?	No experience due to missing availability.
6.	Please explain the status of an internationally accepted whisker test.	Component manufacturers have to answer to this question.
7.	Please explain the latest status of whisker research and tests on NiFe leadframes and the status of qualification of tin-based finishes for fine pitch applications.	Component manufacturers have to answer to this question.
8.	Please explain the latest status of whisker research and tests on copper lead-frames (whisker mitigation techniques etc.) and the status of qualification of tin-based finishes for fine pitch applications.	Component manufacturers have to answer to this question.
9.	In case an exemption is still required, please provide a roadmap with activities, milestones and timelines towards the replacement of lead in these applications	Component manufacturers have to answer to this question. Lamp manufacturers are not aware of lead-free alternatives to this technology. If technical/functional specifications are met, lamp manufacturers are able to use such alternatives.