

# Exemption Request Form

Date of submission: 2021/03 /02

## 1. Name and contact details

### 1) Name and contact details of applicant:

Company: Lucky Forests Corporation Ltd.

Tel.: +886-3-4311666

Name: Ingrid Chou

E-Mail: [ingrid@luckyforests.com](mailto:ingrid@luckyforests.com)

Function: TVS - Zener Diode

Address:

Yongping Plant : No. 2, Lane 549,

Yongping Rd., Yangmei City, Taoyuan  
County 326, Taiwan, (R.O.C.)

Meishi Plant : No. 40 - 42, 46 Lane  
578, Sec. 2, Meishi Rd., Yangmei City,  
Taoyuan County 326, Taiwan (R.O.C.)

### 2) Name and contact details of responsible person for this application (if different from above):

Same as above

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## 2. Reason for application:

Please indicate where relevant:

Request for new exemption in:

Request for amendment of existing exemption in

Request for extension of existing exemption in

Request for deletion of existing exemption in:

Provision of information referring to an existing specific exemption in:

Annex III

Annex IV

No. of exemption in Annex III or IV where applicable: 7(a) ; 7(c)-I

Proposed or existing wording: existing wording

Lead in high melting temperature type solders (i.e. lead- based alloys containing 85 %  
by weight or more lead) and Electrical and electronic components containing lead in a  
glass

Duration where applicable: \_\_\_\_\_

Other: \_\_\_\_\_

### 3. Summary of the exemption request / revocation request

Lucky Forests Corporation Ltd. was continues to connect with the supplier every season ,and request as below :

1. 7(a) request : request the solder wafer and solder paste' s supplier to provide that could instead of high Pb content for TVS \ Zener Diode assembly solder process, for Lucky Forests Corporation Ltd to try the assembly' solder process.

2. 7(c)-I request : request the glass powder' s supplier to provide that could instead of high Pb glass powder for TVS \ Zener Diode FAB process , for Lucky Forests Corporation Ltd to try the glass process.

But the supplier still couldn't provide the new material and we also couldn't found the another supplier that didn't have the Pb content in the market , so Lucky Forests Corporation Ltd. need the extension exemption for 7(a) and 7(c)-I request.

### 4. Technical description of the exemption request / revocation request

#### (A) Description of the concerned application:

1. To which EEE is the exemption request/information relevant?

Name of applications or products: TVS \ Zener Diode

a. List of relevant categories: (mark more than one where applicable)

Possibly 1-11 depending on EEE manufacturer using electronic components as part of there assembly.

- |                            |  |
|----------------------------|--|
| <input type="checkbox"/> 1 | <input type="checkbox"/> 7             |
| <input type="checkbox"/> 2 | <input type="checkbox"/> 8             |
| <input type="checkbox"/> 3 | <input type="checkbox"/> 9             |
| <input type="checkbox"/> 4 | <input type="checkbox"/> 10            |
| <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 11 |
| <input type="checkbox"/> 6 |  |

b. Please specify if application is in use in other categories to which the exemption request does not refer: just use Lead in high melting temperature type solders , Electrical and electronic components containing lead in a glass

c. Please specify for equipment of category 8 and 9:

The requested exemption will be applied in

monitoring and control instruments in industry

in-vitro diagnostics

other medical devices or other monitoring and control instruments than those in industry

2. Which of the six substances is in use in the application/product?

(Indicate more than one where applicable)

- Pb       Cd       Hg       Cr-VI       PBB       PBDE

3. Function of the substance: Soldering and prevent the electric property -  
attenuation

4. Content of substance in homogeneous material (%weight): 92.5 %

5. Amount of substance entering the EU market annually through application for which the exemption is requested: \_\_\_\_\_

Please supply information and calculations to support stated figure.

6. Name of material/component: TVS - Zener Diode

7. Environmental Assessment: \_\_\_\_\_

LCA:  Yes

No

**(B) In which material and/or component is the RoHS-regulated substance used, for which you request the exemption or its revocation? What is the function of this material or component?**

Request : Solder and Electrical and electronic components containing lead in a glass

**(C) What are the particular characteristics and functions of the RoHS-regulated substance that require its use in this material or component?**

Soldering and prevent the electric property attenuation

**5. Information on Possible preparation for reuse or recycling of waste from EEE and on provisions for appropriate treatment of waste**

**1) Please indicate if a closed loop system exist for EEE waste of application exists and provide information of its characteristics (method of collection to ensure closed loop, method of treatment, etc.)**

Lead in high melting temperature type solders

**2) Please indicate where relevant:**

Article is collected and sent without dismantling for recycling

Article is collected and completely refurbished for reuse

- Article is collected and dismantled:
- The following parts are refurbished for use as spare parts: \_\_\_\_\_
  - The following parts are subsequently recycled: \_\_\_\_\_
- Article cannot be recycled and is therefore:
- Sent for energy return
  - Landfilled

**3) Please provide information concerning the amount (weight) of RoHS substance present in EEE waste accumulates per annum:**

- In articles which are refurbished \_\_\_\_\_
- In articles which are recycled \_\_\_\_\_
- In articles which are sent for energy return \_\_\_\_\_
- In articles which are landfilled \_\_\_\_\_

**6. Analysis of possible alternative substances**

**(A) Please provide information if possible alternative applications or alternatives for use of RoHS substances in application exist. Please elaborate analysis on a life-cycle basis, including where available information about independent research, peer-review studies development activities undertaken**

No

**(B) Please provide information and data to establish reliability of possible substitutes of application and of RoHS materials in application**

N/A

**7. Proposed actions to develop possible substitutes**

**(A) Please provide information if actions have been taken to develop further possible alternatives for the application or alternatives for RoHS substances in the application.**

No

**(B) Please elaborate what stages are necessary for establishment of possible substitute and respective timeframe needed for completion of such stages.**

N/A

## 8. Justification according to Article 5(1)(a):

### (A) Links to REACH: (substance + substitute)

1) Do any of the following provisions apply to the application described under (A) and (C)?

- Authorisation
  - SVHC
  - Candidate list
  - Proposal inclusion Annex XIV
  - Annex XIV
- Restriction
  - Annex XVII
  - Registry of intentions

Registration

2) Provide REACH-relevant information received through the supply chain.

Name of document: N/A

### (B) Elimination/substitution:

1. Can the substance named under 4.(A)1 be eliminated?

- Yes. Consequences? \_\_\_\_\_
- No. Justification:

2. Can the substance named under 4.(A)1 be substituted?

- Yes.
  - Design changes:
  - Other materials:
  - Other substance:

No.

Justification: \_\_\_\_\_

3. Give details on the reliability of substitutes (technical data + information): N/A

4. Describe environmental assessment of substance from 4.(A)1 and possible substitutes with regard to

- 1) Environmental impacts: N/A
- 2) Health impacts: N/A
- 3) Consumer safety impacts: N/A

⇒ Do impacts of substitution outweigh benefits thereof?

Please provide third-party verified assessment on this: N/A

**(C) Availability of substitutes:**

- a) Describe supply sources for substitutes: No
- b) Have you encountered problems with the availability? Describe: Yes
- c) Do you consider the price of the substitute to be a problem for the availability?  
 Yes       No
- d) What conditions need to be fulfilled to ensure the availability? Maintain yield and product features

**(D) Socio-economic impact of substitution:**

- ⇒ What kind of economic effects do you consider related to substitution?
  - Increase in direct production costs
  - Increase in fixed costs
  - Increase in overhead
  - Possible social impacts within the EU
  - Possible social impacts external to the EU
  - Other: \_\_\_\_\_
- ⇒ Provide sufficient evidence (third-party verified) to support your statement: N/A

**9. Other relevant information**

**Please provide additional relevant information to further establish the necessity of your request:**

For now, although we continued to actively cooperate with the solder paste , solder wafer and glass powder 's suppliers, there are still not a clear material development and technological production breakthrough release for alternative materials

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**10. Information that should be regarded as proprietary**

**Please state clearly whether any of the above information should be regarded to as proprietary information. If so, please provide verifiable justification:**

No.

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