EUROPEAN LAMP COMPANIES FEDERATION

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

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ELC submission to RoHS exemption #14

#	Question	**Exemption #14**
		Lead in solders consisting of more than two elements for the connection between the pins and the package of microprocessors with a lead content of more than 80 % and less than 85 % by weight
1	Please state the amount of lead used per application, the lead content in the homogeneous material, the annual production volume as well as the number of applications related to exemption 14 put on the EU market annually.	Relevant components are used for some certain control gears. Mainly in use is die attach material with 80-85% lead (AgSnPb). Detailed information has to be given by manufacturers producing these microprocessors.
2	Please explain the status of lead-free material use in this application (Where is substitution feasible? Where is substitution in progress? Where has research resulted in an unfeasibility of substitution? …).	Detailed information has to be given by manufacturers producing these microprocessors.
3	The previous evaluation in 2004 stated that design changes would make this exemption obsolete by 2010. The exemption should therefore be limited to 31 December 2009. Is such a phase out still possible until the end of 2009? If the exemption is needed beyond 2009, please justify and provide a detailed roadmap with activities, milestones and timelines towards the replacement of lead in this application. Name an expiry date that you think is technologically feasible for industry.	Detailed information has to be given by manufacturers producing these microprocessors. There are no specific requirements going beyond other electronic manufacturers. If lead-free alternatives are available, lamp manufacturers are able to use them.