

Brussels, 31<sup>th</sup> 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 #24

#	Question	<b>Exemption #24</b>
		“Lead in solders for the soldering to machined through hole discoidal and planar array ceramic multilayer capacitors”
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 24 put on the EU market annually.	Component manufacturers have to answer to this question.
2.	Please indicate the status of lead-free solder use or other RoHS-compliant alternatives for this application and explain the efforts to achieve RoHS compliance. Please present reasons for or against the continuation of this exemption.	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.
3.	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.
4.	Was has changed since the last evaluation in 2006?	Component manufacturers have to answer to this question.