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 #7

#	Question	**Exemption #7a**	**Exemption #7b**	**Exemption #7c**
		Lead in high melting temperature type solders (i.e. lead-based alloys containing 85 % by weight or more lead)	Lead in solders for servers, storage and storage array systems, network infrastructure equipment for switching, signalling, transmission as well as network management for telecommunications	Lead in electronic ceramic parts (e.g. piezoelectronic devices)"
1	Which types of solders (composition and melting points) are currently used in applications falling under this exemption? Specify what type of applications these solders are used in.	This question can only be answered by individual companies. ELC members are using electrical and electronical components e.g. in control gears, ballasts and other electronic equipment. These components are not developed and manufacturered by lamp industry. High melting temperature type solder is also used in special incandescent lamps and HID having high base temperature for contacting lead wire to base.		
2	Is the exemption still required for all of these applications? In which applications can the use of these leaded solders not yet be avoided? Please present a roadmap or similar evidence for the elimination of lead. If possible, please provide a roadmap with activities, milestones and timelines towards the replacement of lead in High Melting Point (HMP) solders used in these applications.	Exemption for application in above mentioned lamps needed. Lead free alternatives for affected components are not offered by component industry so far. Roadmap has to be given by component industry.		
3	What is the amount of lead per application, the lead content in the homogeneous material, the annual production volume as well as the number of applications related to exemption 7(a) put on the EU market annually.	Answer has to be given by component industry.		
4	What has changed compared to the last evaluation in 2004?	Answer has to be given by component industry.		
1	Please describe the current status of lead-free soldering in applications covered by exemption 7 (b).		Not applicable for lamp industry.	
2	Please explain whether and in which applications covered by exemption 7 (b) the exemption for lead-solders is still necessary, and in which applications it has become obsolete.		Not applicable for lamp industry.	
3	What is the amount of lead per application, the lead content in the homogeneous material, the annual production volume as well as the number of applications related to exemption 7(b) put on the EU market annually.		Not applicable for lamp industry.	
4	When can lead solders be substituted by lead-free solders or other RoHS-compliant materials or designs in specific applications? Please provide a roadmap or similar evidence with activities, milestones and timelines towards the replacement of lead in these applications.		Not applicable for lamp industry.	
5	Please propose a new wording limiting the current exemption to those applications where substitution is technically not feasible.		Not applicable for lamp industry.	
6	Assuming the current exemption will be given an expiry date, what date do you think is technologically feasible for industry?		Not applicable for lamp industry.	
1	What are the different applications of lead in electronic ceramic parts?			ELC member companies are using these componetns.
2	What is the amount of lead per application, the lead content in the homogeneous material, the annual production volume as well as the number of applications related to exemption 7(c) put on the EU market annually.			Answer has to be given by component industry
3	Please explain whether and how lead can be substituted in the different applications in ceramics.			Answer has to be given by component industry
4	Please provide a roadmap or similar evidence with activities, milestones and timelines towards the replacement of lead in these applications.			Answer has to be given by component industry
5	Do you consider thickfilm applications to be covered by the current wording of exemption 7(c)?			Answer has to be given by component industry