

Von: Chuck McDowell [chuckm@meyersound.com]

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An: hse-rohs@oeko.info

Cc: Dean Marshall; fernabrams@ipc.org

Betreff: EU proposal - 46 new possible banned substances

Dear Öko-Institut e.V.,

Can you include these comments from Meyer Sound in your EU proposal - 46 new possible banned substances review?

Meyer Sound has given a quick review to the list and found that may take as long as two years to determine if the 46 items can be found in our 20,000 parts supplied by 3,000 vendors. The time required represents an excessive burden on our business to know the chemical composition of every item we purchase from multiple vendors. Our understanding is the EU has a new "REACH" directive that will safe guard the people of the EU from the chemicals listed. Meyer Sound as a manufacture support the theory behind reach that as a downstream user our suppliers will disclose need information.

Meyer Sound staff is unsure of the criteria used to generate the list of 46 substances. For example, gallium arsenide maybe used in semiconductor we purchase, and is in all the cell phones used by employees. If we could better understand the criteria for defining a proposed banned substance, we could be more proactive in looking for a alternate substance.

Lastly, a quick review by our engineering staff reveals we do use the following substances on your inquire list in very small amounts.

Besides (13) formaldehyde which is used to produce glues used in the manufacture of particleboard, plywood, veneers, No. (7) Bisphenol A: It might be very possibly present in our Epoxy adhesives used for glued joints in some drivers, Polycarbonate horns, etc. For example, some of epoxy MSDSs list Epoxy Resin (CAS 25068-38-6) as a material ingredient. Actually, epoxy resin is a final product of Bisphenol A and epichlorohydrin. There is a high possibility that Bisphenol A still exists in some of epoxy glues. We have identified three adhesive compounds that all have this Epoxy Resin. Possibly, it could be true in two more, and some other epoxy glues we are in use now. No. (46) Rosin is contained in four solders types used.

Also, the substance numbers (18), (19), (32), and (40) might be possibly present in some of the components used in our products.

I wish to stress that Meyer Sound states our support for using the Reach Directive for hazardous materials as it correctly requires the maker of items like epoxy adhesives to inform us the user.

Thank you for taking the time to read our comments,

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