

March 28<sup>th</sup> 2008

Öko-Institut  
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RE: Öko-Institut Inventory of Potentially Hazardous Substances in Electrical and Electronic Equipment, “Study on Hazardous Substances in Electrical and Electronic Equipment (EEE), not Regulated by the RoHS Directive”

AIM an international solder manufacture having some concerns about the limitations of elements as they relate to solder. Specific elements have been targeted on this most recent revision that are mandatory enhancement for lead free solder. To mention a few they are antimony, nickel and cobalt that all are listed and limits set below standard addition levels in solder. I has been studied that when alloyed with tin these elements do not leach out or cause the same issues as the pure metal. Additionally it is odd that a metal such as silver is not listed. Silver is a marine/biocide that has much more global impact than does the metallic forms of the above listed. Additionally silver in solder can have a negative effect on performance in certain applications and has been replaced with copper and the above listed Sb, Ni, or Co as grain refiners.

If the set limits of these elements is implemented it can cause potential limiting manufacturing practices as well as potential reliability issues in some electronics. We would like you to reconsider these limits as they are not realistic limits to set as they related to additives in lead-free solder.

Regards  
Karl Seelig  
AIM  
VP of Technology