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RE: Study on Hazardous Substances in Electrical and Electronic Equipment (EEE), not Regulated by the RoHS Directive

Japan Copper and Brass Association (JCBA) supports the objectives of the European Commission in working to identify hazardous substances that have major impacts on and risks for the environment and human health, and that may constitute significant health and environmental risks. JCBA would like to submit its comments in response to the above referenced consultation on substances in Electrical and Electronic Equipment not regulated by the RoHS Directive.

JCBA represents approximately sixty (60) Japanese wrought copper and copper alloy manufacturers serving a global client base across a range of industry sectors including the electronic and automotive sectors. JCBA's members report that Copper beryllium (CuBe) alloy is used as conducting spring material in a range of applications including electronic connectors, IC sockets, switches, relays, and micro motors. Concentrations of beryllium in CuBe alloys in these applications range from 0.2 to 2 wt% beryllium.

The physical properties (Refer to Fig. 1.) of CuBe alloys which combine high tensile strength and electrical conductivity, not found amongst other alloys e.g. brass, phosphorus bronze, titanium copper make it ideally suited to electronics applications and difficult to substitute. Additionally, CuBe provides superior performance in terms of formability and fatigue resistance as well as ease of surface treatment contributing to its significance for electronics applications.

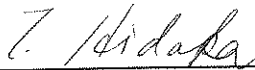
CuBe alloys have already contributed to the advancement of electronics components by supporting miniaturization, weight reduction, power saving, and extending the lifespan of products. JCBA considers that the continued advancement of electronic products including mobile phones, digital cameras etc will increase demand for CuBe alloys. Restrictions on the use of CuBe alloys may potentially have a negative impact on the development of new electronics products.

CuBe alloy is recyclable and is recovered through existing recycling processes. JCBA's market assessment indicates that the volume of CuBe alloys shipped globally is approximately 10,000 tons a year with global copper consumption estimated to be 20 million tons per year. During

recycling process where CuBe alloys are recycled with other copper containing materials, there is significant dilution of CuBe alloys to the extent that JCBA considers it to be non-detectable.

JCBA understands that current practice is for CuBe alloy in waste of electric and electronic equipments to be recycled with other copper and copper alloys. JCBA is not aware of any cases where CuBe alloys have been identified as the source of significant health or environmental risks from these operations.

Sincerely,



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Toshinobu Hidaka

Executive Director

Japan Copper and Brass Association