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Exemption to the rule !

指令中的豁免 !

- Being an exempt manufacturer may sound like a relief!
- Best Practices for Exempt Manufacturers in a Lead-Free World !
- 能够成为被豁免的制造商听起来简直就是解脱!
- 被豁免的制造商在无铅世界里的最佳实践!

For those manufacturers exempt from RoHS and similar legislation, maneuvering through a lead-free world is as challenging as if the exemption didn't exist at all.

For those navigating a business landscape that includes the Restriction of Hazardous Substances Directive (RoHS) and other lead-free regulations, being an exempt manufacturer may sound like a relief.

But for those companies whose product categories fall within the scope of the RoHS directive - which includes medical, military, industrial monitoring and control, automotive and telecommunications products - finding items such as tin-lead terminated parts in a lead-free world is just as much work.

"We're publicly committed to using lead-free products, and we're investigating lead-free products," said Greg Henshall, Ph.D., global engineering services at Palo Alto, Calif.-based Hewlett-Packard (HP). "But some high-end products are still lead-based."

During "Best Practices for Exempt Manufacturers in a Lead-Free World" on Thursday, April 3, during the 2008 IPC Printed Circuits Expo, APEX and the Designers Summit in Las Vegas, members from exempt manufacturers discussed how they balance reliability with availability.

"Risk management is the overriding factor in transitioning to lead-free for automotive customers," explained Richard Parker, lead technologist for Troy, Mich.-based Delphi Corp., which supplies mobile electronics and transportation systems. "New programs have been more easily transitioned in."

Parker explained that a vehicle's harsh environment makes it tough on electronics. "Automotive reliability requirements are tough," he said. "Product reliability requirements are too long, anywhere between three to 10 years." Parker cited a narrower process window in soldering environments, warranty issues, component availability and lack of field data for harsh environment products as reasons for the slow conversion to lead-free.

"Someone has to pay," he added. "There is a cost involved."

At Rockwell Collins, similar challenges are at work. Dave Hillman, metallurgical engineer for the Cedar Rapids, Iowa-based communication and aviation electronics manufacturer, said issues such as significant use life play a major factor. "Those B-52s are still up in the air," he said of the subsonic jet introduced in 1955. "For our products to have a 20- to 30-year use is not uncommon."

Henshall explained that ball grid arrays present the largest challenge for HP, as lead-free components can't necessarily withstand the high temperatures needed to sustain boards that can overheat. It's a task, he said, that the information technology corporation is ready to meet. "HP plans to transition complex business products to lead-free," Henshall said. "But there are challenges to be expected, such as service logistics and increased warranty costs."

To meet its industry's concerns head on, Hillman said, the AIA-AMC-GEIA Lead-Free Electronics in Aerospace Working Group was formed in 2004. Made up of the Aerospace Industries Association, Avionics Maintenance Conference and the Government Engineering and Information Technology Association, the group has about 90 attendees and 10 active task groups. The group works on those issues that are unique to aerospace and military, and are within control. "The group puts together a series of best-practice guidelines to support lead-free electronics," Hillman explained.

The group, he said, concluded that lead-free soldering is possible, but noted that it must be "conducted in a measured, controlled and methodical manner."

For Delphi, transitioning from lead to tin for the termination finish on components has begun and is slated to continue beyond 2015, unless legislation forces the switch sooner. Parker said his OEM component database must track the finish and processing temperature capability. "Error-proofing the entire flow is important," he said.

In end, Parker said, you just can't leave anything to chance, and the transition is not a simple matter. "Test everything," he advised. "Don't assume you can just switch solders."

Source: www.emsnow.com

2.

Government reveals plans for WEEE consumer campaign !

政府透露了WEEE指令消费者运动的计划!

- To increase consumer awareness of waste electronics and electrical equipment recycling!
- The figure of UK is well above the EU WEEE Directive's target!



- 增加消费者的废旧电子电气设备循环处理意识!
- 英国的调查数据远远超过欧盟WEEE指令的目标!

The government has announced that it will make a big push this summer to increase consumer awareness of waste electronics and electrical equipment recycling to help boost the WEEE recycling rate.

Initial figures for the six months to December 31 2007 suggest that the UK is achieving a collection rate in the region of six kilogrammes per head of population, a figure that is well above the EU WEEE Directive's target for four kilograms (see letsrecycle.com story).

Speaking at the Recycling and Waste Forum 2008 in Birmingham, Tony Pedrotti, the director of sustainable development at the Department for Business Enterprise and Regulatory Reform (BERR), revealed that the government was aiming to increase the collection rate to 10 kilogrammes per head by the end of the year.

"While six kilogrammes is a good start, its not good enough, we can do a lot better," he said, indicating that a conscious effort had been made not to increase consumer awareness of WEEE recycling until the collection and treatment network was in place.

"We're planning to do a big consumer-facing campaign in the summer of this year," he explained.

Commenting on the general success of the first bout of WEEE reporting, Mr Pedrotti issued a positive assessment, stating that "we genuinely do believe that the components of the system are in place".

He took issue with concerns that have been expressed by producer compliance schemes over swings in WEEE data published by the Environment Agency and amended deadlines for the submission of figures by schemes (see letsrecycle.com story).

He said: "PCs, you have a job to do, make sure your evidence is there on the system; and the same goes for approved authorised treatment facilities."

And, referring to the April 30 deadline for the submission of evidence, he added: "There are no excuses for it not being on within that deadline, if it isn't we will want to know why not."

Data

Some delegates told letsrecycle.com that they were still concerned at data uncertainties and the working out of figures between the Settlement Centre, the Environment Agency and approved authorised treatment facilities.

The issue was raised in a presentation from Biffa recycling manager Phil Conran, who heads up Biffa's producer compliance scheme Transform. Mr Conran reiterated his opinion that data uncertainties were making the situation difficult for PCS.

"All this revolves around data," he explained. "Data inconsistencies can make it very hard to do planning around a timeline. There is confusion over the interpretation of data requirements and there's been a lot of difficulty in getting data onto the Settlement Centre that all parties agree with."

Consultation

Earlier this week the European Union launched a consultation on a potential review of the WEEE Directive (see letsrecycle.com story), and Mr Petrotti indicated that the government would be encouraging industry opinions in formulating its own response. He urged companies to "play an active role".

A warning was also issued to producers by one of the key agencies involved in the enforcement of the WEEE regulations in the UK.

Adrian Harding, a policy advisor at the Environment Agency, explained that the Agencies were working through lists of thousands of companies who might have responsibilities under the WEEE regulations, with 4,000 contacted so far.

He said: "We are actively tracking down producers that should be registered but aren't, and beginning to conclude that they haven't made a conscious effort to do so."

Retailers

Awareness among retailers is also a pressing issue, according to Richard Barnish, the membership services manager for Valpak, who run the UK's only distributor takeback scheme for electronics and electrical equipment retailers.

He explained that a survey undertaken by his organisation had revealed that "there is a good awareness among specialist electrical retailers but not among small companies".

And he also echoed Mr Pedrotti's concerns over consumer awareness, explaining that: "Retailers' general view was that among consumers there was little or no awareness of WEEE recycling.

"The general opinion was that a national campaign is needed," he added. "When we do run a national campaign we need to think about what motivates consumers to recycle."

Source: www.letsrecycle.com