



October 1, 2009

DSL Surveys Coordinator
Chemical Management Plan
Gatineau QC K1A 0H3

RE: Chemical Management Plan, Batch 10 Substances

I. Introduction

IPC – Association Connecting Electronics Industries® appreciates the opportunity to comment on Canada’s proposed elimination of Resin acids and Rosin acids, hydrogenated, esters with pentaerythritol (CAS# 64365-17-9); Rosin, hydrogenated (CAS# 65997-06-0); Resin acids and Rosin acids, hydrogenated, esters with glycerol (CAS# 65997-13-9); Resin acids and Rosin acids, hydrogenated, esters with triethylene glycol (CAS # 68648-53-3); and Resin acids and Rosin acids, fumarated, barium salts (CAS# 124751-15-1) under the Chemicals Management Program. IPC is concerned with all five aforementioned substances and therefore will refer to all substances collectively as Rosin throughout the following comments. IPC is gravely concerned with the Canadian Government’s recommendation to ban these five substances from any products manufactured or sold in Canada. In addition to IPC’s one hundred and twenty-three member companies manufacturing electronics in Canada, many of our members import a variety of electronic products into Canada. This ban would impact **all electronic products as well as any product which includes electronics and would make it difficult for electronics manufacturing to continue in Canada.**

Rosin is a key ingredient in soldering materials used in the manufacture of over seventy-five percent of electronics products, including sophisticated defense systems and telecommunication and transportation technologies. In the electronics industry, Rosin is used in liquid soldering fluxes, both in the flux medium of solder paste and in the flux core of solder wire, in which it provides the chemical and electrical properties needed for the efficient and reliable assembly of most electronic products. There are no suitable alternatives for Rosin and a ban would negatively affect the reliability and functionality of all electronic products manufactured or sold in Canada.

If the Canadian Government bans the use of Rosin, Canadian companies and consumers will be severely affected. To underscore the importance of the Canadian electronics industry, a September, 7, 2009, article in the Toronto Globe: *“Research in Motion’s rapidly expanding family of smart phones, for instance, is the fruit of billions of dollars in research spending in Canada over many years. In fact, according to Canadian Manufacturers & Exporters,*