

RE⁴view

The Electrical and Electronic Equipment Environmental Review

July 2006 Issue 28

Editor: Rebecca Guildford

European Requirements

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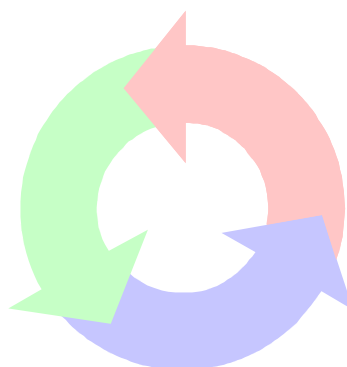
Supplement: China



Editorial

The date that so many people have been working towards for years has finally arrived ... 1 July 2006 has come and gone. Were you ready?

You'll hopefully notice the supplement in this issue, with so much information being released from China regarding their "RoHS" legislation; we thought that it was best to put it in a supplement then make you wait another 2 months!



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WEEE Directive

UK WEEE action plan unveiled

At the end of March 2006 the UK ministry published plans that outline the implementation of the WEEE Directive. The publication comes after a three month review and months after the system should have started operating. The main points from the review are:

- Producers and compliance schemes will need to register with the appropriate Environment Agency annually and provide data on sales for the previous year to calculate market share
- The compliance period will be the calendar year
- Producers and compliance schemes will need to finance the collection, recovery and recycling of WEEE from designated collection facilities
- At the end of a compliance period, the environment agencies can calculate producers and compliance schemes obligations. Some will have met or exceeded these whereas others may have not reached the level of obligation
- Where producers and compliance schemes either fail to meet their obligations or exceed their obligations, they will be able use the "central exchange" to buy and sell "surplus evidence"
- Waste disposal authorities who are unable to find producers or schemes to collect WEEE will arrange for disposal and sell "evidence" to the "central exchange"
- Compliance schemes must offer to meet members requirements for B2C and B2B WEEE. They must also offer reasonable terms to SMEs
- The UK Government favours a mandatory visible fee.

REPIC, the not-for-profit recycling body set up by 53 of the UK's leading electrical goods manufacturers, responded firmly. Chief Executive Dr Phil Morton commented:

"To implement such a far-reaching and ambitious directive was always going to be an enormous challenge for Government and industry. But some serious issues such as allocation of responsibility for WEEE waste and proper access to civic amenity and other designated collection facilities remain unresolved. REPIC will continue to cooperate fully with the Government and all other stakeholders and hopes that any delay is used to renew full consultation with all parties. We must ensure that a fair and equitable implementation safeguards the environment as well as the interests of manufacturers, retailers and consumers."

However, the published plans indicate that the government don't expect and are not looking for consensus, implying that the basic framework is now fixed. It can be of no surprise that the UK government is rushing this issue, it already being late. The UK is one of the last EU member states still to transpose the WEEE directive into national law, let alone implement it."

http://www.dti.gov.uk/sustainability/weee/WEEE_policy_review_conclusions.pdf

<http://www.repic.co.uk/NewsStory.asp>

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WEEE marking standard - update

EN 50419, the standard defining in detail the requirements for the marking of WEEE with a crossed out wheeled bin symbol, has been amended. There are only minor changes from the February 2005 version. The only ones of any substance are:

- The minimum height for the whole symbol (crossed out bin plus the bar beneath) must be at least 7 mm. This was implicit before but has now been explicitly stated
- Changes to the location marking requirements. Previously the standard allowed the mark to be applied to alternative places (a "flag" on the fixed supply cord and the instructions/warranty certificate) where the marking could not be applied. If this was not possible the marking was to be on the packaging. This text has been replaced with the requirement that:
- The marking on the product shall be visible
- If necessary the marking can be under a cover (i.e. possibly not visible until then). For portable products this cover should be removable without the aid of a tool (unless safety/other regulations requires otherwise). When this might be "necessary" is not explained, but an example might be where it would adversely affect the performance of the product.
- If the marking cannot be put on the product because of size or function then it should be printed on the instructions, warranty and packaging. Again "cannot" is not defined, but might include situations where the product is too small or where it would wear off.

These changes provide a certain measure of clarity and realistic flexibility to the marking requirements.

BS EN 50419:2005 has now been withdrawn and replaced by BS EN 50419:2006

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RoHS Directive

IPC 1752 materials declaration bug fix

IPC which has developed the IPC 1752-1/-2 materials declaration forms to assist with RoHS compliance has recently uncovered a bug in the original version of the pdf (Adobe Acrobat format). According to IPC, the bug prevents use of the form after the 1 June 2006 when using the form in Acrobat Reader (Acrobat Professional works ok). IPC has fixed this problem and published a new version of the form, 1.0.2 which can be downloaded from http://members.ipc.org/committee/drafts/1752-1-2_ver_1.02.zip.

For users of the existing form a temporary work around is either to change the system clock of your computer to an earlier date so that the data may be used and saved as appropriate or to use Adobe Professional which is not affected by this problem.

IPC is working on a tool to fix the problem permanently for users of version 1.0 and 1.01 and it is hoped will be available within a few weeks. This will be published on their website at <http://www.ipc.org/IPC-175x>

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RoHS Exemption Status - Comprehensive Update

There is considerable uncertainty and discussions concerning which exemptions have been granted under RoHS, what exemptions have been rejected and what are still pending. This article brings together all current information in a comprehensive summary.

The exemption procedure is an open ended process prescribed by RoHS under Article 5. Requests must be submitted to the European Commission, which is obliged to submit any requests to an open stakeholder consultation. These are published periodically on http://ec.europa.eu/environment/waste/weee_index.htm

The exemption request and any inputs from the consultation are considered against the validity criteria give in Article 5.1(b) - normally with assistance from a third party technical organisation (currently the Öko Institut). The Commission then presents proposals to the Technical Adaptation Committee (TAC) for vote. Those exemptions which are passed are published in the Official Journal of the European Union.

Note that WEEE categories 8 and 9 (medical and monitoring and control equipment) are currently out of scope but are subject to a review being carried out by ERA for the EC. For the latest on exemptions being requested should these categories be brought within the scope of RoHS see http://ec.europa.eu/environment/waste/pdf/era_presentation.pdf

Exemptions formally approved and published

No.	Description
1.	Mercury in compact fluorescent lamps not exceeding 5 mg per lamp.
2.	Mercury in straight fluorescent lamps for general purposes not exceeding: — halophosphate 10 mg — triphosphate with normal lifetime 5 mg — triphosphate with long lifetime 8 mg.
3.	Mercury in straight fluorescent lamps for special purposes.
4.	Mercury in other lamps not specifically mentioned in this Annex.

No.	Description
5.	Lead in glass of cathode ray tubes, electronic components and fluorescent tubes.
6.	Lead as an alloying element in steel containing up to 0,35 % lead by weight, aluminium containing up to 0,4 % lead by weight and as a copper alloy containing up to 4 % lead by weight.
7.	<ul style="list-style-type: none"> — lead in high melting temperature type solders (i.e. lead based alloys containing 85 % by weight or more lead) — lead in solders for servers, storage and storage array systems, network infrastructure equipment for switching, signalling, transmission as well as network management for telecommunications — lead in electronic ceramic parts (e.g. piezoelectric devices).
8.	Cadmium and its compounds in electrical contacts and cadmium plating except for applications banned under Directive 91/338/EEC (1) amending Directive 76/769/EEC (2) relating to restrictions on the marketing and use of certain dangerous substances and preparations.
9.	Hexavalent chromium as an anti-corrosion of the carbon steel cooling system in absorption refrigerators.
9a	DecaBDE in polymeric applications
9b	Lead in lead-bronze bearing shells and bushes
11.	Lead used in compliant pin connector systems.
12.	Lead as a coating material for the thermal conduction module c-ring.
13.	Lead and cadmium in optical and filter glass.
14.	Lead in solders consisting of more than two elements for the connection between the pins and the package of microprocessors with a lead content of more than 80% and less than 85% by weight.
15.	Lead in solders to complete a viable electrical connection between semiconductor die and carrier within integrated circuit Flip Chip packages.
16	Lead in linear incandescent lamps with silicate coated tubes.
17	Lead halide as radiant agent in High Intensity Discharge (HID) lamps used for professional reprography applications.
18	Lead as activator in the fluorescent powder (1% lead by weight or less) of discharge lamps when used as sun tanning lamps containing phosphors such as BSP ($\text{BaSi}_2\text{O}_5:\text{Pb}$) as well as when used as speciality lamps for diazo-printing reprography, lithography, insect traps, photochemical and curing processes containing phosphors such as SMS ($(\text{Sr},\text{Ba})_2\text{MgSi}_2\text{O}_7:\text{Pb}$).
19	Lead with PbBiSn-Hg and PbInSn-Hg in specific compositions as main amalgam and with PbSn-Hg as auxiliary amalgam in very compact Energy Saving Lams (ESL).
20	Lead oxide in glass used for bonding front and rear substrates of flat fluorescent lamps used for Liquid Crystal Displays (LCD).

Note that all exemptions are required to be reviewed every four years. The next review is scheduled for 2010.

These exemptions have all been published and can be found at the following links:

- Original exemptions in Annex to the RoHS Directive (2002/95/EC) >>
• <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32002L0095:EN:HTML>
- Amendment 1 (2005/717/EC) >>
• <http://europa.eu.int/eur-lex/lex/LexUriServ/LexUriServ.do?uri=CELEX:32005D0717:EN:HTML>
- Amendment 2 (2005/747/EC) >>
• <http://europa.eu.int/eur-lex/lex/LexUriServ/LexUriServ.do?uri=CELEX:32005D0747:EN:HTML>
- Amendment 3 (2006/310/EC) >>
• <http://europa.eu.int/eur-lex/lex/LexUriServ/LexUriServ.do?uri=CELEX:32006D0310:EN:HTML>

Exemptions rejected or withdrawn

Batch/Req.*	Description
1/4	Light bulbs (filament lamps).
1/8	Optical transceivers for industrial applications.
1/12	Safety equipment for fire and rescue services.

* Batch/request no.

Exemptions "in limbo"

The following exemption requests were considered at the TAC but were not taken forward for vote because it was not thought they would be passed. On this basis it is probable that these exemptions are effectively rejected.

Batch/Req.	Description
2/20	Lead in solder and hexavalent chromium in surface treatment, in parts recovered from production printers and copying equipment, sold, rented or leased or otherwise returned from professional users other than private households, originally put on the market before 1 July 2006, and reused for the same purpose within the original manufacturer's closed loop system until 1 July 2011. In this context a closed loop system means a system whereby the equipment remains the property of the manufacturer or, is subject to other contractual arrangements and is returned to the manufacturer either when the contract expires or at end of life.

Exemptions requested but still pending

There has been a considerable lack of clarity regarding when and which exemption requests will be considered. The next scheduled TAC meeting is at the end of June. It is understood that new exemptions based on some of the following will be voted on:

- 2/1
- 2/5
- 2/10

- 2/16, 3,19 and 5./23 together
- 2/17, 3/16, 4/6 and 5/6 together.
-

It is therefore probable that many requests below will remain unresolved.

Btch/ Req.*	Description
2/1	Lead in tin whisker resistant coatings for fine pitch applications.
2/2	Lead bound in glass, crystal glass, lead crystal or full lead crystal in general.
2/3	Chromium (also in oxidation state (VI)) and Cadmium as colouring batch addition each form up to a content of 2 % in glass, crystal glass, lead crystal or full lead crystal used as decorative and / or functional part of electric or electronic equipment.
2/4	Solders containing lead and/or cadmium for specific applications.
2/5	Hexavalent chromium (CrVI) passivation coatings.
2/6	Lead in lead oxide glass plasma display panels.
2/7	Lead in connectors, flexible printed circuits, flexible flat cables.
2/8	Lead oxide in lead glass, bonding materials of magnetic heads and magnetic heads.
2/9	Cadmium as doping material in Avalanche PhotoDiodes (APDs) for the optical fiber communication systems.
2/10	Lead in optical isolators.
2/11	Lead in sheath heater of Microwaves.
2/12	Cadmium pigments except for applications banned under Directive 91/338/EEC amending Directive 76/769/EEC relating to the restriction on the marketing and use of certain substances.
2/16	Mercury free flat panel lamp.
2/17	Special purposes Black Light Blue (BLB) lamps, containing lead in the glass envelope.
2/18	Low melting point alloys containing lead.
2/19	Galvanised steel containing up to 0.35% lead by weight and aluminium with an unintended lead content up to 0.4% lead by weight in electrical and electronic equipment.
2/21	Cadmium sulphide photocells.
3/2	Mercury in switches.
3/3	Special ICs having tin-lead solder plating on leads used in professional equipment.
3/4	Specific modular units including tin-lead solder being used in special professional equipment.
3/5	Solders containing lead and /or cadmium for specific applications where local temperature is higher than 150 deg C and which need to work properly more than 500 hours.

Btch/ Req.*	Description
3/6	Lead in solder for printed circuit boards for emergency lighting products.
3/7	Hexavalent chromium (Cr-VI) in chromate conversion coatings as surface treatment.
3/8	Lead in gas sensors.
3/10	Cadmium in opto-electronic components.
3/11	Non-consumer mechanical power transmission systems including speed reducers and mechanical couplings which rely on electrical/electronic components for safe control and operation.
3/12	Electrical and electronic components contained in heating ventilating and air conditioning building systems, commercial refrigeration systems and transport refrigeration systems.
3/13	Cadmium-bearing copper alloys.
3/14	Electrical/electronic components contained mobile and stationary air compressors and vacuum systems, compressed air contaminant removal systems and pneumatic contractor's air tools.
3/15	<p>Electrical/electronic equipment that are:</p> <ul style="list-style-type: none"> – used in transport -aviation, aerospace, road, maritime, rail – installed in to the fabric of buildings – elevators, escalators, moving walks, dumb waiters, and heating, cooling and ventilation systems, and fire and security systems – used in the energy generation and transmission – used in mining and mineral processing – used for non-consumer mechanical power transmission systems – industrial process pumps and compressors – used in industrial refrigeration – used in military applications.
3/16	Lead alloys as electrical/mechanical solder for transducers used in high-powered professional and commercial loudspeakers.
3/17	Cadmium oxide.
3/18	Solder tin of the thermo fuse with a defined low melting point.
3/19	Lead in lead oxide glass used in plasma display panel (PDP).
3/20	Lead in solder on small PCB and tinned legs of primary components.
3/21	Use of the not lead free component NEC V25 in the Memor 2000.
3/22	Lead used in shielding of radiation for Non Medical X-ray equipment.
3/23	Lead based solders sealed or captured within heat-shrinkable components and devices.
4/1	On-Semi MCR265-10 SCR.

Btch/ Req.*	Description
4/2	Components NEC V55.
4/3	The use of lead in solder applications for electronic components of musical instruments having an average lifespan in excess of 10 years.
4/4	Lead solder alloy in Surge protective devices (SPDs).
4/5	Inventory of Special ICs having tin-lead solder on/in leads/balls, used in specialist/professional equipment.
4/6	Lead alloys as electrical/mechanical solder for transducers used in high-powered professional and commercial loudspeakers.
4/7	Solder containing lead for applications where the local temperature exceeds 150C and reliable operation for a minimum of 30,000 hours is required.
4/8	Tin-lead solder in the manufacture of professional audio equipment.
4/9	Specific modular units including tin-lead solder being used in special professional equipment.
4/10	Lead in electronic vacuum tubes.
4/11	Lead in aluminium used in gas valves for domestic cooking appliances.
4/12	"8. Cadmium and its compounds in electrical contacts except for applications of one-shot operation function such as thermal links and cadmium plating except for the applications banned under Directive 91/338/EEC amending Directive 76/769/EEC relating to the restriction on the marketing and use of certain dangerous substances and preparations."
4/13	Lead in solder of parts recovered from gaming/amusement machines put on the market before 1/07/06 and reused for the same purpose within a manufacturer's closed loop until July 2014.
4/14	Lead in solders in components and assemblies used in non-consumer products, provided that: - such components and assemblies were purchased or are subject to a proven last-time buy contract placed before 1 July 2006. And such components and assemblies are used in models of EEE that were already available on the market before 1 July 2006.
4/15	"8. Cadmium plating as defined in Directive 91/338/EEC except for applications banned under Directive 91/338/EEC amending Directive 76/769/EEC relating to restrictions on the marketing and use of certain dangerous substances and preparations."
5/1	Cadmium and cadmium oxide in thick film pastes used on beryllium oxide substrates until 1 January, 2008.
5/2	Gaskets of butyl rubber material vulcanised with chinondioxim and lead tetraoxide, for use in Aluminium Electrolytic Capacitors.
5/3	Sharp LQ104X2LX11 (formerly Fujitsu FLC26XGC6R-01).
5/4	Quartz Crystal Resonator and in Fine Pitch Electronics Systems used in the Swiss Watch Industry.
5/5	Cadmium in opto- electronic components.

Btch/ Req.*	Description
5/6	Transducers used in professional loudspeaker systems, using tin-lead solder.
5/7	Tin-lead solder in the manufacture of professional audio equipment.
5/8	Components used in the manufacture of the Hog1000, Hog500, Event416, Event408, ESP2-24 and ESP2-48 lighting control consoles.
5/9	Specific modular units, including tin-lead solder, being used in special professional equipment.
5/10	Inventory of special ICS having tin-lead solder on/in leads/balls, used in specialist/professional equipment.
5/11	Cadmium Mercury Telluride.
5/12	Lead contained in Babbit lined bearings.
5/13	Cadmium alloys as electrical/mechanical solder joints to electrical conductors located directly on the voice coil in transducers used in high-powered loudspeakers.
5/14	Thermal cut-off with a fusible element that contains lead (and possibly cadmium, mercury and hexavalent chromium) for applications where normal operating temperature exceeds 140C and reliable, predictable, operation for a minimum of 30,000 hours is required.
5/15	Mercury free flat panel lamp.
5/16	Electronic equipment where the reliability, durability and longevity of the equipment is paramount.
5/17	Semi Red Brass C84400, 81-3-7-9 or a similar Brass material. Used on radio frequency line sections.
5/18	Lead is used as an alloy to the copper in 6 to 8% by weight. Needed for casting and machinability characteristics.
5/19	Lead in solders for electronic equipments used for the monitoring, the protection and the safety of people in healthcare, telecare and emergency calls domains in professional and private sectors.
5/20	FPGA devices manufactured by Xilinx (XC5202-6VQ100C, XC4003E-3VQ100C and XC4013E-3PQ240C) containing lead solder (Pb) used in the plating of the device terminations.
5/21	Lead oxide in seal frit used for making window assemblies for argon and krypton laser tubes.
5/22	Smart card readers (product: GemSelf700-MS2, GCR700-3ZS, Vodafone D2, GCR760 and GemSelf750 SV).
5/23	Use of mercury in Babcock's DC plasma displays and use of Lead Oxide (PbO) in Babcock's DC plasma displays frit seal.

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New RoHS enforcement guidance published

After much speculation as to its contents, guidance on how RoHS enforcement authorities will seek to enforce the Directive was published in May 2006. The document has arisen from work driven by the UK Department of Trade and Industry to promote harmonisation across the Member States. This started in 2004 when the DTI commissioned ERA to look into possible approaches to compliance with the Directive. One aspect considered was the setting up of a networking activity between the 25 Member State enforcement bodies to promote harmonisation, increase the effectiveness of enforcement, share best practice and reduce costs.

This informal network was established around the end of 2005 and one of its first activities has been the development of guidelines on how RoHS will be enforced. It is important to appreciate that this document is for guidance only. Penalties under RoHS are the domain of Member States as are the exact protocols they will use to enforce the Directive.

The previous ERA work for the DTI and subsequent discussions at the EC Technical Adaptation Committee (TAC) has led to self declaration based on due diligence as being the agreed approach that producers should take to show compliance. What steps need to be taken to be diligent are not defined, but the new Enforcement Guidance is designed to help consistent enforcement which is in line with this approach. As such it should be very useful to both enforcers and producers in developing a common understanding of what is appropriate and promulgating this as best practice.

The guide addresses four key issues:

- underlying principles that *might* be used to guide RoHS enforcement
- types of documentation producers *might* be advised to keep
- ways in which national enforcement authorities *might* use such documentation to check for compliance
- ways in which sample preparation and analysis *might* be used to avoid inconsistent decisions between Member States.

Principles

- The guide promotes the concept of a consistently applied and common interpretation across Member States regarding scope.
- This is an essential requirement to avoid conflict under Article 95 of the European Treaty in the case, for example, where one product is considered to be in scope or out of scope in different States. This would be seen as a barrier to trade and is not acceptable. What is not defined is the mechanism whereby conflicts of interpretation will be resolved. Given that the WEEE Directive refers to the same category definitions (such as they are) but is not bound by Article 95, it is foreseeable that there may be a divergence and proliferation of different understandings of scope and category definitions across EU States which, thus, cannot be consistent with a single understanding that is required by RoHS. This is already happening.
- The guide promotes self declaration and the principle that products falling within scope are presumed to conform with the requirements of RoHS.

Enforcement Process

Two stages are envisaged:

- initial selection of products/categories for investigation
- a subsequent enforcement process.

Member States may choose to select a product/category for investigation for whatever reason, but the stated criteria which *could* be employed are:

- Intelligence based - e.g. market intelligence, notification of concern from external parties or other Member States
- Highest environmental impact - e.g. products known to contain materials of high concern, high volume and/or short life products, consumer products unlikely to be recycled
- Random selection.

The second stage of enforcement is illustrated by a compliance assessment flow chart for a product. It envisages initial targeted XRF testing by a few Member States, but thereafter the main focus is on the adequacy of documentation. In the event that this is found to be inadequate then subsequent testing of products or parts is foreseen.

Documentation of RoHS Compliance

Certain basic information is expected to be available; a RoHS enforcement contact in the organisation, company size, product range and rough sales levels, a description of the company's overall approach to compliance and an overview of what measures are in place, an overview of the quality system used to assure compliance. Beyond this, two possible documentation approaches are envisaged:

- Route A: System/process-based documentation
- Route B: Product/part-based documentation.
-

Route A is appropriate for an organisation that has an established compliance assurance system that covers both itself and its supply chain. Essential elements of this would include a formally defined system integrated within the companies quality and management systems, technical documentation that defines and supports this system and associated measures to ensure its operation (e.g. software systems and tools, procurement processes, training, audits, testing etc.) and evidence that this system is being followed (e.g. specific data on products and components).

Route B is focussed around data on specific products. Hence a sufficient system must be in place to ensure the capture of essential information such as definition of the compliance status of a product (e.g. in or out of scope, or in but covered by exemptions) materials declarations and associated data, validation of this data, audits, test reports. Evidence that procedures are being followed and materials declarations have been assessed appropriately will be required.

It is suggested that Route A may be more suitable for larger organisations and Route B for SMEs, but this should not be seen as a requirement.

Sampling and testing

Development of standards to support RoHS testing is still in the early stages. The guidance mentions the draft IEC 62321, but use of this standard is not obligatory and nor is it a panacea since it only addresses certain specific testing issues and does not, for example, grapple with the issue of sample selection and presentation for analysis. The guidance sees the use of other standards as they are developed. It also highlights the need for certified reference materials to ensure RoHS testing is carried out correctly. There is already evidence of poor or misleading data being generated, particularly using XRF applied inappropriately.

The guidance accepts that ED-XRF (energy dispersive x-ray fluorescence spectroscopy) is a widely adopted tool for screening, but points out its limitations and the need for more precise methods where the method cannot be applied meaningfully or a clear pass /fail result is not obtained. Very helpfully, the guidance promotes the principle that analysis should be targeted at "high concern" materials

(e.g. PVC in cable) and those materials which can easily be presented for analysis (this does not necessarily require any disassembly at all in some cases).

The distinction is also drawn between the definition of homogeneous material (to which the percentage maximum concentration value limits refer) and how analysis can be applied. While the homogeneous material definition talks about a material that can be mechanically disjointed, many analytical techniques are capable of analysing materials without needing to carry out this operation. Examples include small spot size ED-XRF systems, wavelength and energy dispersive x-ray analysis in a scanning electron microscope (SEM + EDX/WDX) and solvent extraction plus colorimetry for hexavalent chromium in coatings. RoHS does not require mechanical disjointing to be carried out for analysis (though this may be the best approach in some cases).

In some cases it may be impossible to analyse a material in situ or separate it for testing. In this case it is accepted that the sample should be treated as a homogeneous material for testing.

Penalties

Discussion of penalties and other enforcement measures is a notable gap in this document. ERA has tried to encourage a regime based on proportionality. It is one thing to take products off the market from a company which has been wilfully negligent, it is another to do this in the case of a company that has made strenuous efforts to comply but a small non-compliance is detected.

While this argument is widely recognised there is no recognition of this proportionality principle in the guidance. Some EU States do recognise this issue and fines will reflect the seriousness of the offence, but most States will require products be removed from the EU market if they are not RoHS compliant, irrespective of the amount of restricted substance involved.

Penalties (fines and prison) do vary very significantly between EU Member States, and the vigilance of enforcement bodies could also vary so that manufacturers based outside of the EU may choose to import their products in States where least scrutiny and the smallest penalties exist. This situation could have the effect of distorting the EU market, but one of the aims of the RoHS enforcement network is to ensure that a harmonised approach exists in all EU States as far as possible.

Harmonisation

The new guide is a significant step towards the harmonisation required under Article 95 and which is necessary to avoid a totally unnecessary burden being placed on industry (the cost of which will flow down to end users). However there is much work still to be done concerning many areas particularly harmonisation of interpretation of scope, a level playing field regarding enforcement practice, an established and accepted protocol for sampling and analysis, and consistent and proportionate application of penalties.

Guidance can be downloaded from the links section of <http://www.rohs.gov.uk/content.aspx?id=9>
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Forthcoming Events

- | | |
|---------------------------------|--|
| 28-30 June, 2006 | Global Harmonization Taskforce Conference, 2006
(harmonization in medical devices regulation)
Lubeck, Germany.
For information and programmes go to:
http://www.ghtf.org/conferences/conferences.htm |
| 19 September
2006 | Safe Design of New Products
Further details from Dawn Stamp of ERA Technology, Tel +44
(0)1372 367439 E-mail events@era.co.uk |
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RE⁴view is printed and published by ERA Technology Ltd, Cleeve Road, Leatherhead, Surrey KT22 7SA, UK. Editor: Rebecca Irons. ISSN 0965-7843. Tel +44 (0) 1372 367000 (swbd), Fax +44 (0) 1372 367009, Internet <http://www.era.co.uk/>. For editorial and subscription enquiries: Tel +44 (0) 1372 367486, Fax +44 (0) 1372 367009, E-mail re4view@era.co.uk.

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