

# EICTA

European | Information Systems  
Industry | Communication Technologies  
Association | Consumer Electronics

# RoHS Compliance Process

## EICTA's view

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## EICTA

**EICTA is the voice of the Information and Communications Technology and Consumer Electronics Industry in Europe**

### **Facts and figures**

**EICTA combines 51 major multinational companies and 32 national associations from 24 European countries. In all, EICTA represents more than 10,000 companies all over Europe with more than 2 million employees and EUR 200 billion in revenues.**

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# Status

*Member States shall ensure that, from 1 July 2006, new electrical and electronic equipment put on the market does not contain lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB) or polybrominated diphenyl ethers (PBDE). National measures restricting or prohibiting the use of these substances in electrical and electronic equipment which were adopted in line with Community legislation before the adoption of this Directive may be maintained until 1 July 2006.*

→ No specifications about the RoHS compliance process/market surveillance are made.

## Goal

Define a practical, harmonized, and cost-effective approach for a RoHS Compliance Process that ensures conformance to the Directive and is not overly burdensome for either the Member States or Industry.

# Product-related environmental legislation in Europe

## 1. Principles of existing market access in the EU

- Guarantee of the free movement of electronic and electrical products within the EU;
- No third party verifications;
- No declarations are required in order to place a product onto the EU market.

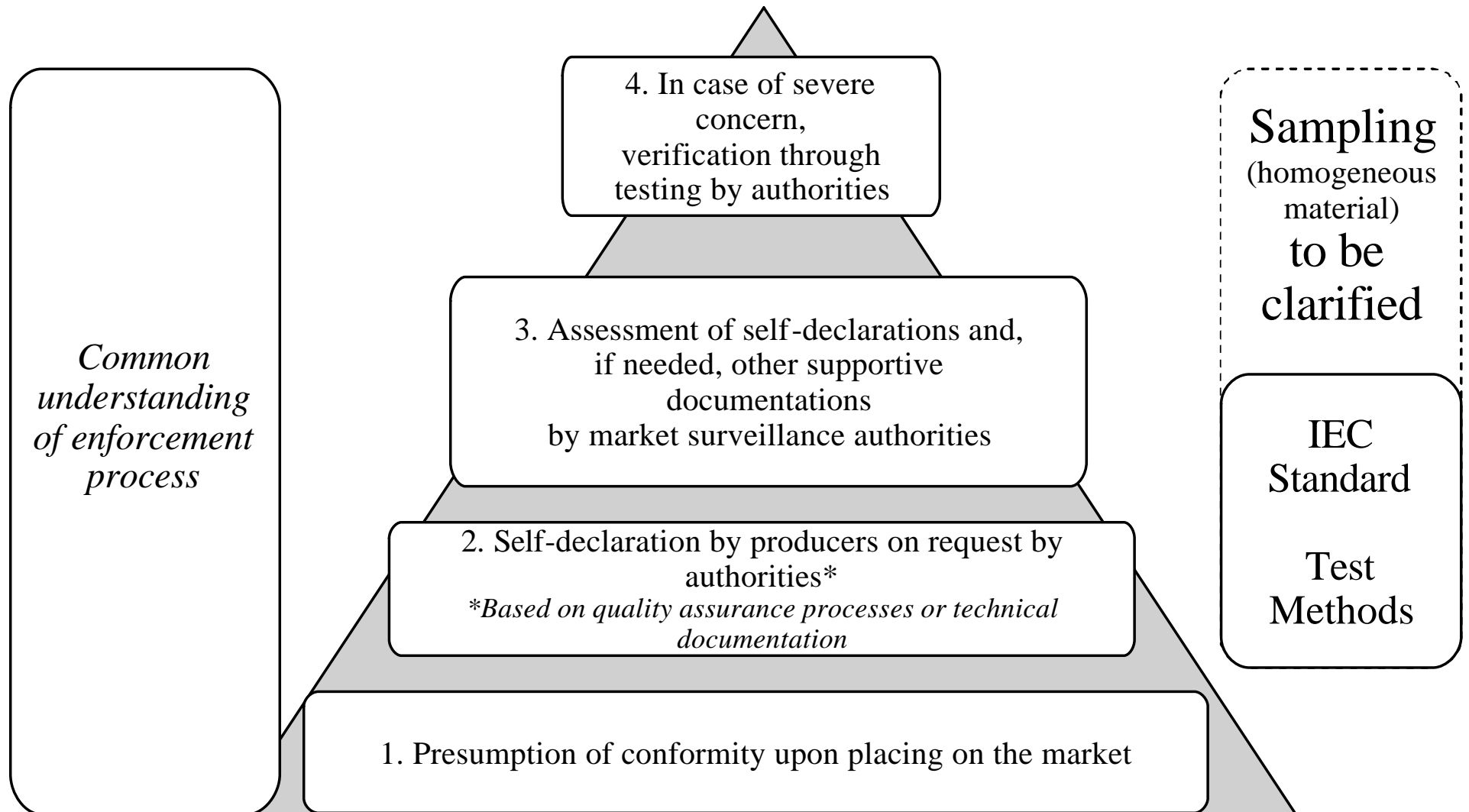
## 2. Principles of enforcement practise in the EU

- Based on ad hoc checks by national market surveillance authorities in coordination with other EU countries (efficient market surveillance to fight free-riders - i.e. non compliant products put on the market).
- Transparent and predictable process is of utmost importance.

# EICTA Proposal: General Principles for the Enforcement Process

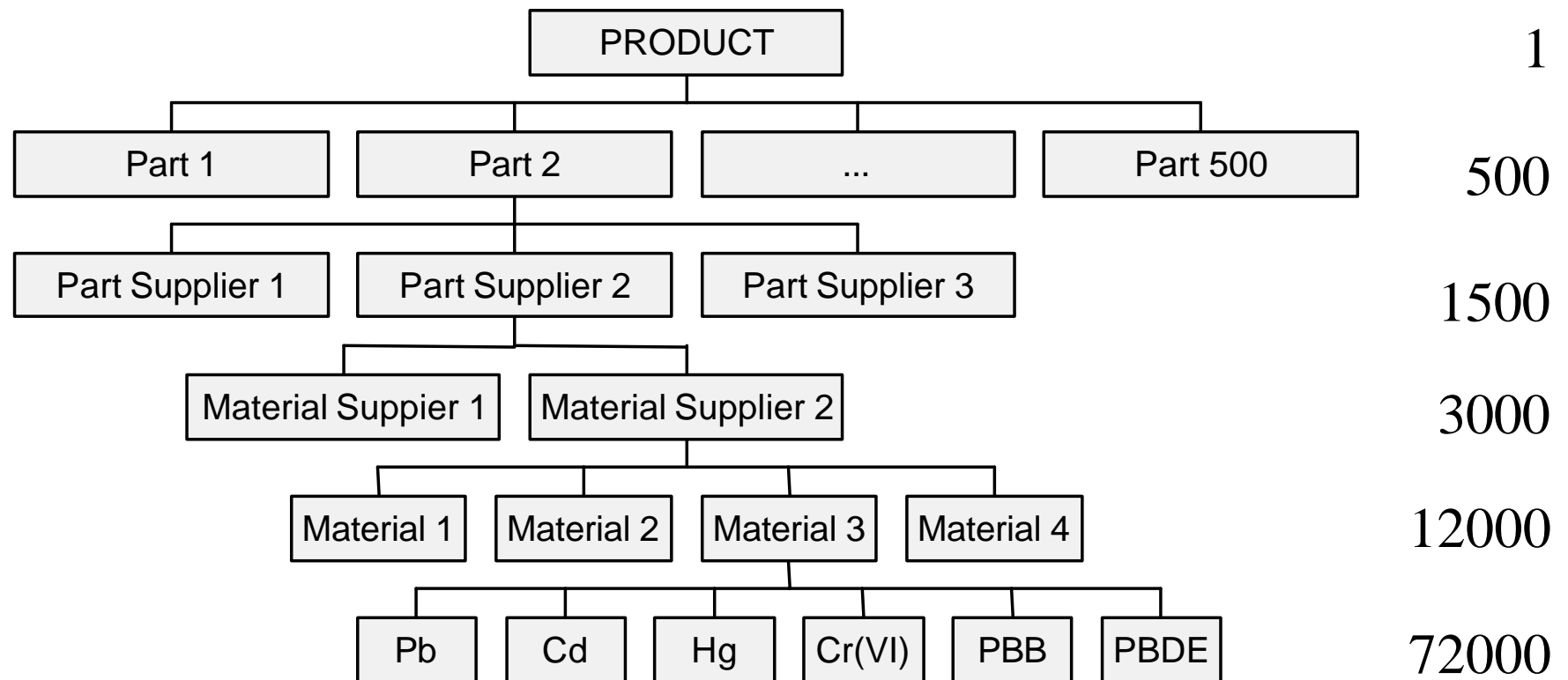
- To ensure compliance, **producers**
  - can use various approaches (see later slide) based on quality assurance processes and/or technical documentation, that ensure that non-compliant materials do not enter the manufacturing process.
- To verify compliance, **market surveillance authorities**
  - should verify that the producer has adequate control processes by evaluating control documentation (based on quality assurance process and/or technical documentation).
  - If such processes do not exist or severe concern exists, then testing of specific part(s), or material(s) should be carried out by market surveillance authorities.

# EICTA proposal for the RoHS compliance process



# Why quality assurance system based control approach?

Example: Number of Certificates for a product with 500 parts



→ No technical documentation for each substance in each homogeneous material in each part should be required!

# Quality assurance system based RoHS Process Control

A producer must ensure its suppliers have control processes in place that DO NOT allow non-compliant material to enter the manufacturing process.

## Control Process

- Material specifications
- Material documentation
- Material tracking
- Material testing (as required)
- Manufacturing process



“Clean”  
Materials  
In



“Clean”  
Product  
Out

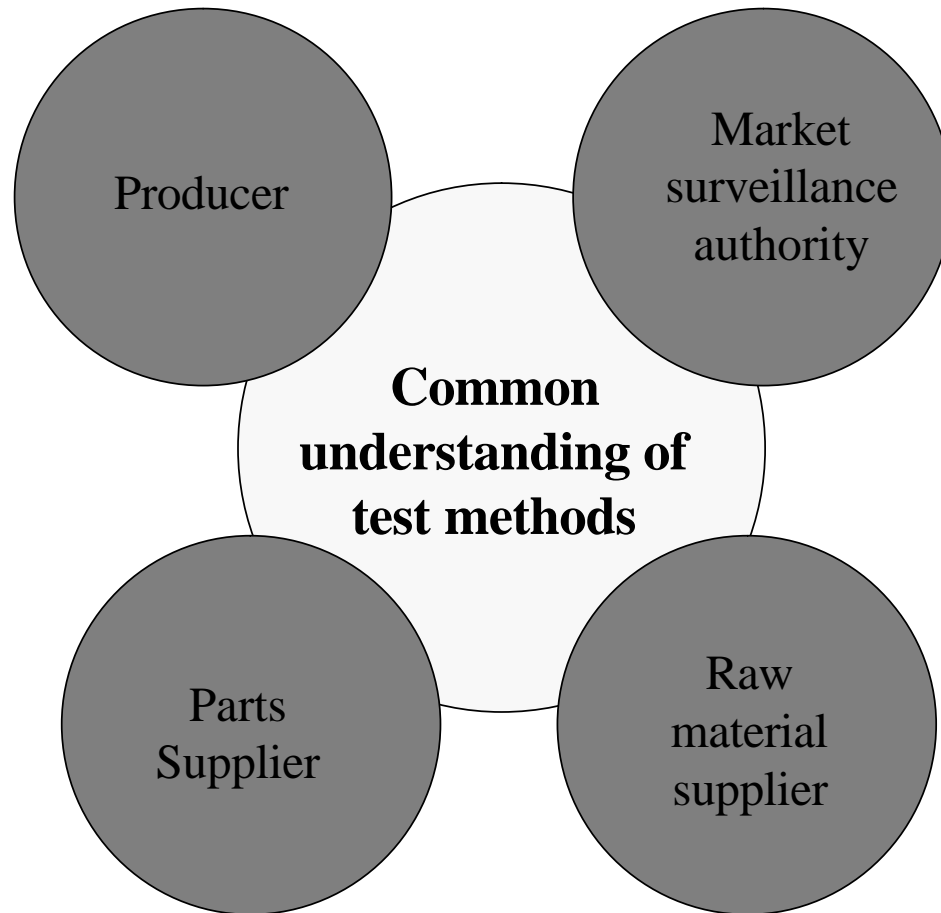


Suitable tool to ensure and demonstrate compliance without going into detailed technical documentation

# EICTA proposal for control documentation

	<u>Quality Assurance System</u> (producer describes process)	<b>AND /OR</b>	<u>Technical Documentation</u> (producer provides technical documentation)
<u>Producer</u> <b>1</b> Product level	<p>Contracts with suppliers setting requirements</p> <p>“Clean” Product</p> <p>Random testing of incoming parts and end products</p> <p style="text-align: center;">Supplier Commitment</p>		<p><b>Producer’s ‘declaration of compliance’</b></p> <p>Due to number of certificates only workable on request for <u>selected parts</u></p>
<u>Part supplier</u> <b>2</b> Parts level	<p>Contracts with suppliers setting requirements</p> <p>“Clean” Process</p> <p>Random testing of incoming materials and finished parts</p> <p style="text-align: center;">Supplier Commitment</p>		<p><b>Component supplier’s ‘declaration of compliance’</b></p> <p>Based on data for raw materials used for the parts in question</p>
<u>Raw material supplier</u> <b>3</b> Materials level	<p>Measurement data for materials</p> <p>“Clean” Raw Material</p>		<p><b>Raw material supplier’s ‘declaration of compliance’</b></p> <p>Based on raw material data</p>

# Market Surveillance Testing – Harmonized Approach needed



In order to be able to perform testing at final products there has to be agreement on testing requirements (international standards like IEC would be preferred).

Testing methods need to be practical for final products and parts (reasonable sampling methods).

# Conclusions

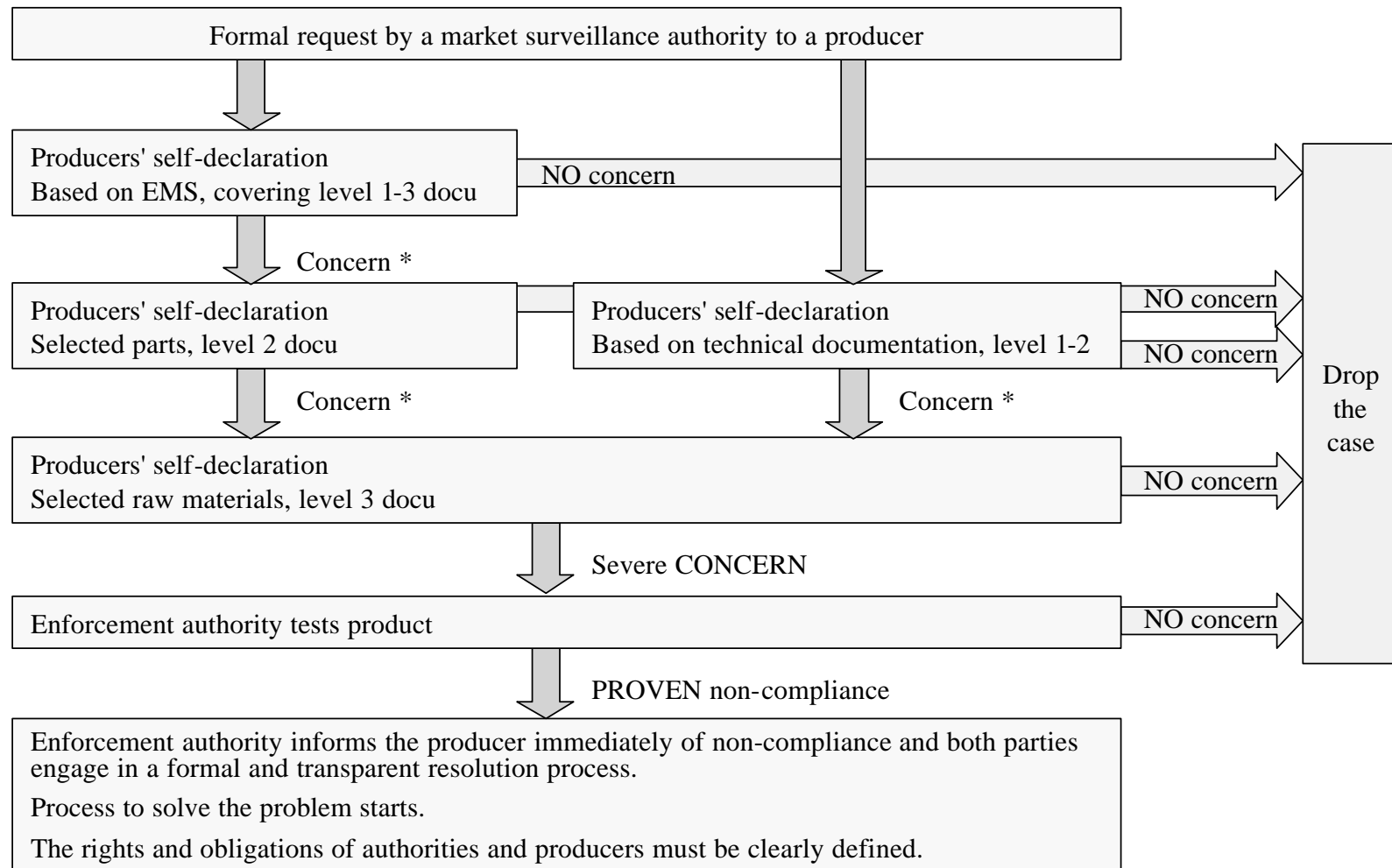
A practical approach for a RoHS Compliance Process that ensures conformance to the Directive and is not overly burdensome for either the Member States and Industry is needed:

- Guarantee the free movement of electronic and electrical products within the EU (harmonized national implementation)
- No third party verifications.
- Not require a declaration in order to place a product onto the EU market.
- Have producers show conformance with 'self-declaration of compliance'.
- Consistent enforcement across the EU - Cooperation between member states and industry on the enforcement system is essential.
- Work towards a common understanding of test methods.
- Ensure common understanding of practical sampling methods.

# BACKUP

# Producers' self-declaration

## Demonstrating conformance within enforcement process



\* Formal request by a market surveillance authority to a producer to provide further clarifications (*level 2/3 documentation as needed*)  
Level of documentation may vary depending if the request is for a general verification of compliance or a specific concern regarding a potential compliance issue.

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