

## China RoHS – Different than EU RoHS

We've all heard of China RoHS but do we really know what it is and how it affects our industry?

This issue has been a hot topic at the NEDA Components Roundtable meetings. These gatherings provide member companies opportunities to voice concerns, hear what other companies are doing and formulate industry positions on a variety of topics. Through the efforts of the Components Roundtable, NEDA has collected various documents pertinent to the new regulations: (available at the NEDA website)

- The China RoHS Regulations
- The Electronic Information Product (EIP) List
- Labeling Requirement Standard
- Maximum Concentration Value
- Test Methods
- Packaging Standards
- Frequently Asked Questions

## China RoHS

China RoHS or “Measures for the Administration of the Control of Pollution by Electronic Information Products” is the effort by China to control hazardous substances in Electronic Information Products (EIP). The first phase of this initiative requires the identification and marking of those EIP's that include 6 identified substances (see table below). The second phase restricts the use of these substances.

Phase I (Labeling) became effective March 1, 2007

- Declarations and labels on EIPs
- Packaging labeling requirements

Phase II (Control) includes

- Published product catalog
- Catalog products must comply with hazardous substance ban
- Catalog products are subject to the China Compulsory Certification (CCC)
- The Catalog is expected to be published in late 2007

## Labeling

We are now in the “labeling” phase. The course of action is to identify whether your part is included as an EIP. In general, if your EIP is not expressly in the list, it is not subject to China RoHS.

Products that meet one of the following requirements are not subject to China RoHS labeling;

- Components made prior to March 1, 2007
- Components to be exported out of China
- Components imported for assembly into products to be exported from China.

As of March 1, 2007 any product subject to China RoHS must comply with China labeling requirements. Requirements for labeling include two logos and a disclosure table.

Green Logo

- The 6 substances are not contained in the product
- They are contained in levels that don't exceed the Minimum
- “E” means the product is environmentally friendly



Concentration Value (MCV)



### Orange Logo

- One or more of the 6 substances are present above the Minimum Concentration Value (MCV)
- The number is the Environmental Protection Use Period (EPUP) – the years during which toxic and hazardous substances will continue to be environmentally safe.

### Disclosure Table

- Used if the Orange Logo is used
- Table uses X and O to indicate substance inclusion
- X means the substance is present above the MCV
- O means the substance is not present or present below the MCV
- Table must be in Chinese.

**Table 1 Marking Styles for Names and Contents of Toxic or Hazardous Substances or Elements**

Part Name	Toxic or hazardous Substances and Elements					
	Lead (Pb)	Mercury (Hg)	Cadmium (Cd)	Hexavalent Chromium (Cr (VI))	Polybrominated biphenyls (PBB)	Polybrominated diphenyl ethers (PBDE)
O: Indicates that this toxic or hazardous substance contained in all of the homogeneous materials for this part is below the limit requirement in SJ/T11363-2006. X: Indicates that this toxic or hazardous substance contained in at least one of the homogeneous materials used for this part is above the limit requirement in SJ/T11363-2006. (Enterprises may further provide in this box technical explanation for marking “X” based on their actual conditions.)						

Although many of our products seem to be exempt from the labeling requirements, our customers may have to label their products. As such, the information included in the table may have to accompany the part for inclusion in the customer’s labeling.

China has also included requirements for marking packaging materials. This standard stipulates the types, names, sizes and colors of marks for recyclable, reusable packaging and packaging that is renewable for utilization.

There are several differences between the China environmental directives and its European counterpart:

- Products affected by the regulations differ
- Exemptions similar to EU do not exist
- A marking standard has identified labels and marks
- The laws differ with respect to responsibilities
- To prove compliance, material testing by Chinese labs will be required
- China has a 2 phase process

NEDA will continue to keep you apprised on the progress of these directives and monitor other governmental regulations being proposed throughout the world. Better yet, send your company representative to future Components Roundtable meetings to participate in the discussion, get up-to-date information and chart the industry’s course of action. For further information, contact Barney Martin: [bmartin@nedassoc.org](mailto:bmartin@nedassoc.org).