

Consultation Guidance on the updating of the RoHS substance inventory

Abbreviations and Definitions

EEE	Electrical and electronic equipment
RoHS	Directive 2011/65/EU on the restriction of certain hazardous substances

Background

The Oeko-Institut and Fraunhofer IZM have been appointed within a framework contract¹ to technically assist in a “Study to support the review of the list of restricted substances and to assess a new exemption request under RoHS 2 (Pack 15)”.

This guidance has been prepared in relation to the consultation on the updating of the RoHS substance inventory. The inventory of substances of relevance for EEE, generated by AUBA (2013)² has been used to develop a first list of substances to be used for collecting information on the current use of substances in EEE. Various sources were consulted to review the list in relation to additional substances used in EEE. The list was extended in relation to substances specified in the database of the IEC62474 standard for “Material Declaration for Products of and for the Electrotechnical Industry”³.

The list has been prepared using an excel format that allows the specification of information in relation to the substances on the list and their use in EEE. This guidance aims at clarifying how to specify information on the use of substances in EEE in the excel sheet provided for this purpose.

Further details and a link to the excel format for providing information to the inventory revision is available under: <http://rohs.exemptions.oeko.info/index.php?id=304>.

Guiding steps

Please take note the following in relation to how to use the excel format to provide your input.

1. For each substance you are familiar with, please check the general information already specified and add information as to whether:
 - a. The substance is considered to be a member of a group of substances (please specify definition where relevant) (column D);

¹ The contract is implemented through Framework Contract No. FWC ENV.A.2/FRA/2015/0008 of 27/03/2015, led by Oeko-Institut e.V.

² See AUBA (2013) inventory under: http://www.umweltbundesamt.at/fileadmin/site/umwelthemen/abfall/ROHS/finalresults/Annex3_EEE-substance-inventory.xls

³ For further information on the IEC 62474 “Material Declaration for Products of and for the Electrotechnical Industry” standard and data base, see: <http://std.iec.ch/iec62474>

- b. The substance has additive uses in EEE applications (column H);
 - c. The substance has reactive uses in EEE applications (column I);
2. If you can provide a general estimation as to the volume of use of the substance in EEE placed on the Union market, please provide an estimation by specifying one of the fields related to the annual range of use in tonnes per annum. This data will be considered public (non-confidential);
3. If you can provide a specific estimation in relation to the use of your company (supplier, OEM) please specify the range of use of the substance in your EEE related manufacture. This data will only be used anonymously (no link to your company will be mentioned). It shall be aggregated with other data and/or used to inform a minimum value range (i.e. “use volume is known to be in the range of at least 10-100t/a”);
4. If according to your knowledge the substance is not used at present in EEE, please specify “phased-out” in relation to that substance;
5. If you do not know whether the substance is used in EEE, please specify “no knowledge of use” in relation to that substance.
6. If you are aware that the substance is used among others as a nano-material in EEE applications, please specify this in the relevant field.
7. If you are aware of further substances that are used in EEE (for example in new innovations), please add the substance at the end of the list (where the option is given to add additional substances) along with:
 - a. its general specifications (CAS; EC; Name, Source, Uses in EEE); and
 - b. the additionally requested information in the relevant fields (Group, Additive; Reactive; Nano-materials; Volumes of use).

Please note that answers to these questions are to be published as part of the available information relevant for the stakeholder consultation to be carried out as part of the revision of the manual. If your answers contain confidential information, please provide a version that can be made public along with a confidential version, in which proprietary information is clearly marked.