

# Study to support the review of the list of restricted substances and to assess a new exemption request under RoHS 2

Pack 15 – 1st Stakeholder meeting

Presentation updated on 18.04.2018 in relation to schedule changes

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# Agenda

**1** Study Tasks

**2** Study Schedule

**3** Detailed approach for Part 1: Substance Review

For tasks 1-3 (Presentation of sub-tasks, approach, stages for stakeholder feedback; and discussion)

**4** Any other business

# Study Tasks

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## Part 1: Substance Restriction

- Task 1: Substance methodology update
- Task 2: Assessment of 7 substances
- Task 3: Substance inventory - Quantitative usage data, prioritization

## Part 2: Exemption Evaluation

- Task 4: Exemption evaluation methodology update
- Task 5: Evaluation of 1 exemption

# Study Tasks: Project team and roles

Carl-Otto Gensch – Project leader

Yifaat Baron – Project management

- Task leaders:
  - Yifaat Baron – task 1, task 4, task 5
  - Katja Moch – task 2
  - Otmar Deubzer – substance inventory generation in task 1, task 3
- Additional staff:
  - Markus Blepp
  - Christian Clemm

# Study Schedule

			Months																			
Part	Task	Detail	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	
Part 1: Substance restriction	Task 1	Update the existing methodology to identify and assess substances for possible restriction																				
		Stakeholder meeting			M																	
		Stakeholder consultation					SC															
	Task 2	Assess substances with a view to their possible future restriction (7 substances)																				
		Stakeholder consultation				SC			SC													
		Stakeholder meeting			M									M								
	Task 3	Determination of the quantitative usage data for substances used in EEE																				
		Stakeholder meeting			M																	
		Stakeholder consultation								SC				SC								
Part 2: Exemption evaluation	Task 4	Exemption methodology																				
		Stakeholder consultation								SC												
	Task 5	Exemption assessment																				
		Stakeholder consultation												SC								
		Stakeholder consultation											M				M					

# Study Schedule:

## Planned stakeholder consultations (Task 6)

Currently planned targeted stakeholder consultations (tasks, possible dates and required duration:

- 1<sup>st</sup> Stakeholder consultation, expected April-June 2018
  - Task 2: Collection of first data for 7 substances (focus on use)
- 2<sup>nd</sup> Stakeholder consultation, expected May-July. 2018
  - Task 1: Review of updated substance review methodology, collection of data for substance inventory
- 3<sup>rd</sup> Stakeholder consultation, expected July-Sept. 2018
  - Task 2: Review of draft dossiers;
  - Task 3: Collection of usage data for substance inventory;
  - Task 4: Review of exemption evaluation methodology;
- 4<sup>th</sup> Stakeholder consultation, expected Oct-Dec. 2018
  - Task 3: Collection of usage data for prioritized substances;
  - Task 5: Exemption under evaluation

# Study Schedule: Planned Stakeholder Meetings

Currently planned meetings (task, participants, possible timing, location):

- Stakeholder meeting 1 – Task 1: Presentation of approach for tasks 1-3 (revised methodology for substance identification, prioritization and assessment) 27 March 2018. Participants based on substance working group.
- Stakeholder meeting 2 – Task 2: Meeting on the draft dossiers of the seven substances to be assessed in detail, expected November 2018 in Brussels. Up to 50 participants based on substance working group and further stakeholders.
- Stakeholder meeting 3 – Task 5: Expected winter 2018/19 (pre/post SC), location TBD. Up to 20 participants based on applicant + involved stakeholders.

# Methodology Task 1: Substance methodology update

## Approach

### Sub-tasks:

- Review of detailed substance assessment methodology
  - Update of the manual methodology
  - Stakeholder meeting
  - Possible revision of manual methodology
  - Stakeholder consultation
  - Generation of substance inventory
  - Preparation of updated draft methodology
  - Possible revision in light of experience of application of revised methodology and finalisation
- The generation of the substance inventory is specified under task 3 for convenience



# Methodology Task 1: Substance methodology update

## Approach (1)

Approach:

In general the approach differentiates between three main stages.

In the first a general update of the methodology shall be performed on the basis of the existing AUBA manual.

As a second stage the update manual shall serve as the methodological basis for performing an update of the substance inventory and a prioritization of its substances as well as for performing an in-depth assessment of seven pre-determined substances ((TOR).

Finally, a final update of the methodology shall be considered in light of the experience with its application and possible aspects identified as still needing formulization.

# Methodology Task 1: Substance methodology update

## Approach (2)

- Review of detailed substance assessment methodology
  - The proposed Austrian Umweltbundesamt methodology is the basis for revision and can be observed as 3 main parts for revision:
    - Introduction and annexes providing the context for the manual and additional data of relevance (background, aspects of Article 6, relation to REACH, sources used, Nano-materials, WEEE, etc.)
    - Part I and II, related to the identification of substances for the inventory and their pre-assessment.
    - Part III related to the detailed assessment of substances.
  - Additional sources shall be consulted to consider possible aspects for revision: the methodology used in the Oeko 2008 substance review, protocols and previous work of the RoHS Substance Review Expert Group, parallel policy processes of relevance (circular economy, nano. SVHC in recycled materials, etc.)

# Methodology Task 1: Substance methodology update

## Approach (3)

- Update of the manual methodology on the basis of the initial review
- Stakeholder meeting to present general project approach
- Possible revision of revised manual methodology
- Stakeholder consultation on proposed revised methodology and collection of first data for the assessment of the seven substances;
- Preparation of updated draft methodology in relation to inputs provided by stakeholders – expected to be sent to COM towards 8<sup>th</sup> month
- Possible revision in light of comments from COM and experience of application of revised methodologies (inventory generation, inventory prioritization and substance assessment) and finalization

# Methodology Task 1: Substance methodology update

## Schedule

- The task is planned between January 2018 and September 2018 and could extend a few further months depending on need for revision after first application of methodologies;
- Input from stakeholders shall be requested during:
  - 1<sup>st</sup> Stakeholder meeting (27.3.2018)
  - 2<sup>nd</sup> Stakeholder consultation planned to begin mid-May 2018;
- Possible direct consultation with various stakeholders;
- Additional revisions could derive from
  - The finalization of the project on SVHC in recycled materials, would certain aspects be of relevance for the substance review process;
  - The experience with methodologies in task 2 and task 3 in cases of possible shortcomings, experience with “special cases”.

# Methodology Task 2: Assessment of 7 substances

## Sub-tasks

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- Collection and compilation of initial data from available sources;
- Stakeholder consultation for collecting quantity usage data;
- Collection and review of additional data and stakeholder data;
- Compilation of initial dossiers;
- Stakeholder consultation on dossiers;
- Update and completion of dossiers;
- Stakeholder meeting on dossiers and recommendations;
- Finalization of dossiers;

# Methodology Task 2: Assessment of 7 substances: Substances to be assessed

As specified in TOR:

- Diantimony trioxide
- Tetrabromobisphenol A (TBBP-A)
- Indium phosphide (InP)
- Medium chain chlorinated paraffins (MCCPs) - Alkanes, 14-17, chloro
- Beryllium and its compounds
- Nickel sulphate and nickel sulfamate
- Cobalt dichloride and cobalt sulphate

# Methodology Task 2: Assessment of 7 substances: Initial dossier structure

AUBA proposed dossier structure (basis for update in task 1):

- 1) Identification, classification and labelling, legal status and use restrictions;
- 2) Use in electrical and electronic equipment
- 3) Human health hazard profile
- 4) Environmental hazard profile
- 5) Waste management of electrical and electronic equipment
- 6) Exposure estimation during WEEE treatment
- 7) Impact and risk evaluation
- 8) Alternatives
- 9) Description of socio-economic impacts
- 10) Rationale for inclusion of the substance in annex ii of RoHS
- 11) References

# Methodology Task 2: Assessment of 7 substances

## Approach (1)

- Collection and compilation of initial data from available sources;
  - On the basis of the structure used in the 2014 substance prioritization a first basis for consultation shall be compiled/updated;
  - In parallel, information shall be collected for the preparation of the dossier. At this stage it is assumed that available information could already be compiled for the first 4 dossier chapters to save time later;
- Stakeholder consultation for collecting quantity usage data;
  - The initial data compiled on the basis of the 2014 structure shall be posted for consultation
  - Additional data shall be requested among others on:
    - additional applications in EEE and status of use in applications;
    - usage quantities (general/application specific for emissions and risk estimation);
    - existing alternatives and their applicability;
    - expected impacts of a future restriction (including socio-economic);



# Methodology Task 2: Assessment of 7 substances

## Approach (2)

- Collection and review of additional data and stakeholder data;
  - Where relevant, participants shall be requested additional data of clarifications in relation to their contributions;
  - Additional stakeholders (OEMs, supply chain, manufacturers of substitutes etc.) shall be consulted with directly to collect additional information;
  - Additional literature (publicly available sources) shall be consulted to collect further data;
- Compilation of initial dossiers;
  - Preparation according to dossier structure;
  - Recommendations shall generally not be formulated at this stage;

# Methodology Task 2: Assessment of 7 substances

## Approach (3)

- Stakeholder consultation on dossiers
  - Stakeholders shall be asked for additional data where data gaps exist, general comments;
- Update and completion of dossiers;
  - At this stage recommendations shall be added. In some cases a “double” recommendation could be formulated for consultation with stakeholders in the meeting;
- Stakeholder meeting on dossiers and recommendations;
  - Stakeholders shall have a last chance to comment on the dossiers and particularly on conclusions and recommendations.
- Finalization of dossiers;
  - In relation to stakeholder meetings discussions and possibly last data provided a finalization shall be performed;

# Methodology Task 2: Assessment of 7 substances Scheduling

- The task is planned between February 2018 and January 2019;
- Input from stakeholders shall be requested during:
- 1<sup>st</sup> Stakeholder consultation planned to begin mid-April 2018;
- Possible direct consultation with various stakeholders;
- 3<sup>rd</sup> Stakeholder consultation expected to begin in July/August 2018;
- Possible last clarifications with stakeholders;
- Stakeholder meeting planned for October 2018; stakeholders may be provided additional time to submit final comments;

## Methodology Task 3: Substance inventory - Quantitative usage data, prioritization

### Sub-tasks:

- Generate initial inventory based on revised task 1 method;
- Stakeholder consultation on above inventory;
- Pre-assessment
  - Narrow down substance inventory to most relevant substances
  - Initial prioritization of substances
- Collect quantitative usage data for top-priority substances
- Pre-prioritization.
- Stakeholder consultation on pre-prioritized substances;
- Final prioritization;

# Methodology Task 3: Approach (1)

## Initial substance inventory, preliminary prioritization

- Generate initial inventory based on revised task 1 method;
  - Consult various substance lists (see next slide):
    - Additional substances added/excluded since last review?
    - Changes of classifications, etc.?
  - Precaution: Review substance-relevant regulations separately (see next slide)
- Stakeholder consultation on initial substance inventory:
  - General comments
  - Include missing substances used in EEE
  - Exclude substances NOT used in EEE
- Revise initial substance inventory
- Pre-prioritize hazardous substances in EEE

# Methodology Task 3:

## Substance lists to be consulted

- REACH Community rolling action plan (CORAP)
- REACH list of registered substances;
- All stages of REACH authorization and restriction processes
- ChemSec SIN list;
- The Nordic Product Register (SPIN
- BOMcheck List of Restricted and Declarable Substances;
- IEC 62474 database ;
- ZVEI Umbrella Specifications;
- Industry lists of restricted and declarable substances;
- EUP/ERP-Studies (for further orientation only, as they have not been renewed in the past years).
- **Additional lists of relevance?**

## Methodology Task 3: Legislation to be consulted

- Existing legislation shall be screened to identify existing restrictions of substances:
- REACH (particularly Annex XIV and Annex XVII);
- Stockholm convention;
- Basel Convention;
- UNECE Convention on Long-range Transboundary Air Pollution (CLRTAP)
- Additional legislation of relevance?

## Methodology Task 3: Approach (2)

- Collect quantitative usage data for top-priority substances, prioritization (planned on the basis of the 2014 substance prioritization).
  - Determine priorities for review in approval with the Commission;
  - Collect initial data, set up data base on substances of relevance for use in consultation (legal basis, classifications, applications, quantities in use);
- Stakeholder consultation
  - Ask stakeholders for additional data (applications, quantities, comments);
- Compile data and finalize substance prioritization;
  - Possible clarification with participating stakeholders/additional stakeholders of relevance (manufacturers, users);
  - Compilation of data, conclusion and final prioritization;



## Methodology Task 3: Schedule

- The task is planned between April 2018 and February 2019;
- Input from stakeholders shall be requested during:
- 1st Stakeholder consultation expected to begin in July/August 2018;
- Possible direct consultation with specific stakeholders;
- 2<sup>nd</sup> Stakeholder consultation planned for November 2018; stakeholders may be provided additional time to submit final comments;

# Any other business?

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## Thank you for your attention!

- Do you have any further questions / comments?

## Your contacts

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