

Newsletter from November 1th, 2007

1. Malta WEEE registration deadline 15 November!

- *The Malta Environment and Planning Authority, MEPA, began to accept registration applications from WEEE producers in September 2007!*
- *The deadline for the submission of applications is 15 November 2007!*

The Malta Environment and Planning Authority, MEPA, began to accept registration applications from WEEE producers in September 2007. The deadline for the submission of applications is 15 November 2007.

Applications from non-Maltese entities will not be accepted. Maltese end-users importing equipment for their own use are required to register.

The registration application must contain information by unit and weight for the period 1 January - 31 December 2006 on:

- EEE put on the market from the 10 EEE categories
- Amount of WEEE collected, treated, recovered, reused, reused as a whole and recycled, separately for B2C and B2B WEEE

If data are based on estimates, the methodology used must be briefly described. The submission of recovery and recycling data is mandatory, except for WEEE in the medical device category.

Source: perchards.com

2. EU's REACH to Impact European Fab Costs!

- *The European Union's REACH program has cost implications that could make manufacturing in Europe overly expensive!*
- *Of the various EU programs, RoHS is the easiest, and REACH is scary. Nothing trumps REACH !*

Europe's comprehensive new program to monitor and restrict chemicals is causing suppliers and chip vendors alike to scramble to meet the program's early-stage requirements, according to speakers at an International Sematech Manufacturing Initiative (ISMI, Austin, Texas) workshop.

The European Union's Registration, Evaluation, and Authorization of Chemicals (REACH) program, signed into law June 1, 2007, has cost implications that could make manufacturing in Europe overly expensive, said Dawn Speranza, an Intel Corp. environmental, health and safety (ESH) engineer.

“The cost of manufacturing in Ireland is high anyway,” she said, arguing that if REACH is extended to an overly broad number of chemicals and substances, “It could put factories in Europe out of business. We need to keep the number of restricted chemicals to a minimum.”

Intel is also worried that competitors will figure out the vendors it uses and gain closely guarded process technology by mining data within the REACH archives.

Speranza said her early estimate is that Intel uses about 275 different chemicals in its fabrication processes, which include at least 400 different substances. By June 2009, all of those must be on a pre-registration list. If not, “Your suppliers can cease trading,” she warned.

To meet the pre-registration deadline, Intel is currently asking all of its vendors to respond to five questions designed to understand their compliance with REACH’s registration process. “At this point, the supplier community is not as organized as it needs to be,” she said. Speranza, who works at Intel’s Rio Rancho, N.M., fab, currently serves as the president of the Semiconductor Environmental Safety and Health Association (SESHA, McLean, Va.)

By 2010, REACH requires that the chemicals used in high volumes, or that present high levels of concern, must be registered. The deadlines stretch out as far as 2018 for registration of relatively benign chemicals, or those used in small volumes. By one estimate, the total REACH program will impact 30,000 companies and 30,000 different chemicals. Substances judged to present high risks could be banned and removed from European semiconductor fabs, she noted, estimating that there may be as many as 20 chemicals that could be challenged as unsafe. Now, Intel lawyers and lobbyists in Europe are working to reduce the number of chemicals that could be strictly controlled. The law requires toxicology testing and other expensive procedures intended to guard against environmental damage and harm to human health.

Because Ireland is the EU member company where Intel has its European manufacturing base, Ireland could argue for “exposure scenarios” that might aid Intel’s ability to meet the REACH deadlines and shorten the list of proscribed and restricted chemicals.

The situation is similar in China, a nation that has signed international agreements on environmental controls, including the Stockholm Accords, which go into effect in 2010. Speranza said, “For a chemical that has never been registered in China, we estimate that it will cost Intel \$150,000 to \$200,000 per substance for the toxicity testing alone.” Intel announced in March that it is building a chip factory in Dalian, China.

The REACH program, Europe’s overhaul of its 40-year-old chemical regulations, also presents substantial challenges to intellectual property (IP) protection. Proprietary knowledge can be divulged through the REACH registration process, both from Intel to vendors and competitors, and from one supplier to another competitive supplier seeking to understand a formulation used by Intel, Speranza said.

“Intel doesn’t necessarily want all of our [chemical] usage known to all suppliers,” she said. Suppliers face their own IP concerns. Lithography suppliers, for example, may be required to write “exposure scenarios,” she said, noting that, “In litho, the IP is critical.” Wafer manufacturers may be required to register as well.

For Intel to get a handle on its own chemical usage, the various information technology (IT) organizations within the company must work to develop a unified database. Now, data about what chemicals are used, the quantities consumed, and the compliance of the vendors is spread among vendors, technologists, purchasing departments and others.

“I hope the IT tools will improve,” she told participants at the ES&H workshop. “To assemble our ingredient category, I have to go through at least 10 different databases within Intel to figure out how much we use,” she said.

REACH has equally challenging requirements for suppliers, said Mary Majors, principal safety specialist at Air Products and Chemicals Inc. (Allentown, Pa.), who noted that the REACH technical guidelines are due

out in November. “We realize this [environmental safety] is not just an EU issue, it is a global issue. I don’t think we will need to go out and hire 12 Ph.D.-level toxicologists,” Majors said, adding that toxicity testing alone will require that Air Products “bear significant financial costs.”

As a company that buys chemicals from others as well as makes its own chemicals, Air Products also faces a complicated data collection process. For companies that do not have EU legal entities, those vendors probably will have to employ a European law firm, one which may employ toxicologists to help prepare the registration forms.

She said, “One interesting twist is that if we are making a formulation from substances supplied by an original manufacturer in the EU which is registered, if we are just blending, then we need not register that substance.”

The issue could be complicated by the ability of academics or non-governmental organizations (NGOs) that claim to have knowledge about chemical toxicities to join the substance exchange forums set up within REACH, Majors said.

John Messina, a computer scientist working at the National Institute of Standards and Technology (NIST, Gaithersburg, Md.), said he worked on data exchange standards used by suppliers working to meet the EU’s Restrictions on Hazardous Substances (RoHS) law, which severely limited the use of lead, cadmium, mercury and other dangerous substances. NIST was asked to work on the problem by materials suppliers challenged by the RoHS law.

“Of the various EU programs, RoHS is the easiest, and REACH is scary. Nothing trumps REACH.” Messina said.

NIST is working to adapt the data exchange model used for RoHS to REACH, he said, adding that his NIST colleague, Eric Simmon, is in Paris this week at an EU meeting to discuss the data formatting challenges.

Source: semiconductor.net

3. EERA calls for re-use to be removed from revised WEEE Directive!

- *More influence over treatment rules for manufacturers and recyclers!*
- *The re-use of defunct electrical and electronic appliances should be removed from the scope of the EU WEEE Directive!*

The re-use of defunct electrical and electronic appliances should be removed from the scope of the EU Waste Electrical and Electronic Equipment (WEEE) Directive. This opinion was voiced by Johan Zwart, the vice-president of the European Electronics Recyclers Association (EERA) at an event in Brussels tacking the forthcoming revision of the WEEE Directive. Businesses should only be able to export scrap appliances to non EU countries for re-use if the countries of destination had suitable recycling infrastructure, he believed. Mr. Zwart had major doubts about the viability of electronics recycling. In

Europe, 15kg to 20 kg of new appliances are brought on the market per capita each year, of which an average of just 3.3 kg were collected and reported to national registries.

In the view of Mr. Zwart, the revised WEEE Directive should feature a collection target of at least 50 per cent of volumes placed on the market. He felt that there must be a duty for scrap electrical and electronic devices only to be returned to approved and certified recyclers or take-back schemes. People monitoring the enforcement of the provisions must receive better training and there should be more co-ordination between EU member states, he added. WEEE should also only be exported to countries outside the EU if they met EU standards.

Furthermore, the EERA advocated no changes to the directive's recycling targets. In the future, treatment standards should be developed together by manufacturers, take-back schemes and recyclers, before being implemented in the member states in the form of a guideline, Mr. Zwart continued. Moreover, monitoring should be carried out throughout Europe in accordance with uniform rules.

While the current version of the WEEE Directive is based on Article 175 of the EC Treaty dealing with environmental protection, the EERA hoped that the revised legislation would be partially or fully founded on Article 95 with a view to the Common Market. The association hoped that this change would lead to greater harmonisation of the rules within the EU.

The association Re-use and Recycling European Union Social Enterprises (reuse) backed the re-use of appliances for environmental and social reasons. The organisation felt that re-use did not only result in the sustainable use of resources but also created employment for the long-term unemployed, disabled and other socially disadvantaged groups. Some 40,000 full-time jobs and 110,000 trainees and volunteers were involved in this sector, the association noted.

With regards to the forthcoming revision of the directive, reuse called for a re-use target of 10 per cent of all electrical and electronic appliances, which could be broken down into product groups at a later date.

Furthermore, all collection points should be required to separate re-usable appliances at the earliest possible stage. The organisation also urged the creation of quality criteria for re-use and for approving re-use centres. A description of treatment technologies should also create the highest possible environmental protection level and the greatest possible yield of components, reuse felt. Producers should have to provide all information needed for re-use and repair, the organisation added.

Source: EUWID