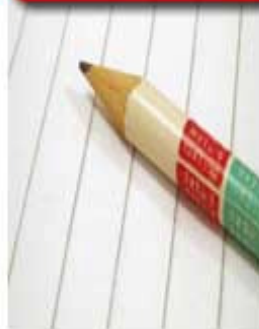


Newsletter from January 3<sup>th</sup>, 2008

1.

## 12% of consumers understand WEEE implications!

- A lack of understanding of the WEEE directive among the public!
- If the public doesn't know what to do, a huge proportion of these products will never enter the recycling chain, and will continue to end up in landfill!



## 百分之十二的消费者理解WEEE含义!

- 民众缺乏对WEEE指令的了解!
- 如果市民不知如何去做, 大量产品将永远不会进入循环链, 而是继续被丢弃在垃圾场!

A lack of understanding of the WEEE directive among the public means that few of the over 11 million consumer electronics devices thrown out this year will be adequately dealt with, according to the European Recycling Platform.

A survey conducted by YouGov revealed that a third of people expect to receive an electrical product and 42 per cent expect to buy an electrical product.

To make space for the new product 44 per cent of respondents said their household would get rid of at least one electrical household product – equivalent of at least 11 million devices.

However, only 12 per cent of respondents claimed to understand how to throw away their old appliances and more than two thirds said they knew very little or nothing at all.

The survey did show that 40 per cent knew that changes to recycling laws had taken place, only a quarter changed the way they disposed of electrical goods.

"If unwanted electrical products are properly sorted and delivered to civic amenity sites by households, then the electronics industry, through compliance schemes such as ERP, will recycle them at no charge," ERP UK general manager Scott Butler told My-Esm website.

"However, if the public doesn't know what to do, a huge proportion of these products will never enter the recycling chain, and will continue to end up in landfill."

Rapid Electronics are one of the UK's leading suppliers of electronic components, electrical products, and industrial supplies to the Assembly Manufacture sector.

**Source: Rapid**

2.

## Quiet before the storm of environmental compliance!

### 环保暴风雨前的平静!

- Compared to recent years, 2007 was quiet in regard to product environmental regulations!
- Aside from China's Restrictions on Hazardous Substances taking effect, there were few new governmental requirements or actions!
- 与近几年相比，2007年是关于产品环保法规的平静年!
- 除了中国的有害物质限制指令生效之外，也有许多新的政府要求或行动!

Compared to recent years, 2007 was quiet in regard to product environmental regulations. Aside from China's Restrictions on Hazardous Substances taking effect, there were few new governmental requirements or actions.

There were no major RoHS or WEEE enforcements, and a bill to expand California's RoHS legislation was vetoed.

Unfortunately, 2007 was also the "quiet before the storm." As we enter 2008, it would be prudent to expect a tumultuous year - and a tumultuous next 10 years - for many reasons.

First, we have crossed the "greening of industry" tipping point. One example: Several thousand scientists participated in a Nobel Prize-winning scientific consensus when they produced material for the Inter-Governmental Panel on Climate Change's Fourth Report. Hundreds of corporate executives are calling for mandatory caps on greenhouse gas emissions. Virtually every leading company is launching energy-related initiatives in regard to products, facilities and logistics.

Second, it appears that we will finally see China RoHS's Phase 2 Catalogue. An initial public meeting to discuss it was set for this week. Products in the catalogue will be required to undergo pre-market testing.

Third, we will see the first wave of implementing legislation from the European Union's Energy-Using Products Directive. For covered products, there will likely be requirements for energy reductions and for life-cycle analysis.

Fourth, results of the E.U.'s review of the RoHS regulation will be published. It is likely that at least some medical devices and control and monitoring instruments will be included in the directive's scope. Certain exemptions may be removed, and additional substances may be added.

Finally, the E.U.'s Registration, Evaluation and Authorization of Chemicals (REACH) will kick into high gear with a 2008 pre-registration period and subsequent registration deadlines over the next 10 years. In my estimation, REACH will be to "toxicity in products" what climate change is to "energy use in products."

Why? Because REACH addresses tens of thousands of substances for which health and environmental testing is scarce; because it will require companies to obtain authorization to use the most detrimental

1,500 of those substances; and, most importantly, because it is an unequivocal statement: "No data. No market. No E.U. sales revenue."

For companies that see the green handwriting on the wall, design innovation is the key. Gathering full-disclosure substance data is a must. Capturing new business from slower movers is the reward.

Source: [emsnow.com](http://emsnow.com)

3.



**ROHS: It ain't over!**

**ROHS: 还没有结束!**

- The ROHS directive is set to be adjusted in 2008 to reflect additional substances and changes to exemptions!
- The European Commission is examining its current 29 exemptions, plus an additional 7 requested exemptions!

- RoHS指令将于2008年被调整，以反映豁免项目的附加物质和变化!
- 欧洲委员会正在对目前的29个豁免项目，再加上要求增加的7个豁免项目进行审查!

Don't get too comfortable with your European Union (EU) Restriction of Hazardous Substances (ROHS) standing, as the directive is set to be adjusted in 2008 to reflect additional substances and changes to exemptions.

ROHS is currently under a scheduled review as required by Article 6 of the directive. As such, the European Commission is examining its current 29 exemptions, plus an additional 7 requested exemptions; categories 8 and 9 of the directive, which include effects of materials on medical devices and monitoring and control instruments; and some definitions within the directive as to what products are impacted.

"Each of the 29 exemptions will be reviewed and if they are no longer required, because substitutes now exist, they will be deleted," Gary Nevison, Newark's spokesperson and customer interface on legislation that affects the electronics industry, said. "If the consultants that the European Commission have put in place to do this review find alternatives, but receive no input from manufacturers who cannot replace ROHS substances, the exemptions will be deleted. So it's important for all manufactures who rely on the exemptions that want them to continue to submit the required technical data to the European Commission.

Letters begging that an exemption should stay in place will be of no use whatsoever. The manufactures must find technical data to support the need for an exemption. For an example, if they feel an alternative causes more damage to the environment or to human health than the original exemption.”

Nevison reminded that while all 29 exemptions are being reviewed, that doesn't mean for certain that any will be deleted, but warned of the possibility.

“Some of those exemptions, manufactures have taken for granted. I look in our industry and there is lead in ceramics and lead in glass of electronic components. In Europe, many passive components are compliant simply because they have that exemption,” he said.

In addition, 7 requested exemptions are currently being reviewed by the European Commission, including the use of mercury in plasma TVs.

### **Impact of categories 8 and 9**

When ROHS was first laid out, it included 8 of the 10 product categories listed in Waste Electrical and Electronic Equipment (WEEE), the EU recycling directive. However, 2 categories, 8 and 9, were excluded because of concern over the reliability of substituted materials, especially lead-free solders, according to a European Commission commissioned report on the product categories. Health and safety risks are at paramount in these categories, which influence products in the medical and healthcare fields, as well as test equipment.

“These 2 categories have now undergone a review and the consultants' recommendation to the European Commission is that these 2 categories will be added to the scope of ROHS,” Nevison said. “This review is going to lead to further additional components, a larger set of product categories, and then following that, the European Commission is looking at adding extra substances beyond the original 6 [lead, mercury,

cadmium, hexavalent chromium, polybrominated biphenyls (PBB), and polybrominated diphenyl ether (PBDE)].

“Obviously this is very significant. These will be mainly things like flame retardants; arsenic, which can be found in infrared LEDs, some ICs and alloys; and things like beryllium, that can be found in springs. These things are all damaging and the European Commission review will be looking at those.”

On top of this, the European Commission is looking into clarifying some of the product definitions within the directive that have caused grey areas. Nevison exemplified “fixed installation,” a product that would be left behind because of its fixed or permanent, such a house boiler or air-conditioning system. “It is possible that there will be no exemptions for fixed installations, so products that we felt didn't fall within scope may well do,” he said.

“So, potentially more products, more restrictions – it's kind of a mini ROHS and we'll have to start again with data collection and manufactures looking at different processes,” Nevison warned.

The reviews of categories 8 and 9 are finished and results are expected to be announced by the European Commission sometime in 2008. Recommendations for these product categories call for significant time for manufacturers to embrace products and a suggested 2012 timeframe is expected for implementation. As to adding further substances to the ROHS directive's restrictions, clarity of definitions is expected to come out in 2008 and implementation could be in the none too distant future, dependent on manufacturer feedback.

### No end in sight

Unfortunately, said Nevison, once the electronics supply chain moves through this “mini ROHS,” there will be additional future reviews of the directive and further restriction requirements coming from other environmental regulations, like China ROHS, an EU ROHS-like law set in China; REACH, an EU chemical restriction directive; and Energy Using Products (EuP), an EU framework directive on eco-design of energy-using products.

“After a lull of a year or more on legislation, everything is just moving so quickly. Especially in Europe with the REACH chemical legislation, which is going to have a huge impact on industry, and to a lesser extent Energy Using Products, and that will have the biggest impact on the design engineer,” Nevison said. “We now have all of these other countries developing their equivalents to ROHS and only in Asia is there talk whatsoever of a harmonized approach, but there is certainly no agreement just yet.”

Indeed, a recent Ernst and Young report stated that regulatory and compliance risk was the greatest strategic challenge facing global businesses in 2008.

“This is being driven by an escalating regulatory burden in many markets, as well as numerous compliance challenges as companies extend their value chains well beyond Europe, North America, and the BRICs (Brazil, Russia, India and China),” the online report states. “As companies become more and more global, compliance becomes a greater challenge, forcing them to manage diverse regulations in different markets. ... The importance of understanding local regulations, as well as major global industry regulations is crucial to those companies expanding their global reach.”

This was further backed by a JPMorgan Global Trade Services research note earlier this month that stated manufacturers are lagging in environmental compliance. “Though a number of environmental regulations have been implemented globally over the past year, a majority of manufacturers are lagging in terms of demonstrating and maintaining compliance with new trade laws, such as the Restriction of Hazardous Substances regulations in effect in China, Japan and the European Union. Non-compliance with these directives can result in stalled supply chains, lost revenue, fines and damage to corporate reputation,” Bernie Hart, global product executive, logistics, JPMorgan Global Trade Services, wrote in the 2008 global trade/supply chain predictions note.

“While many companies claim to have met certification requirements, others may not be up to par and will need to make further adjustments to their manufacturing processes. Make sure that an internal team or outside trade specialist is actively managing compliance with these regulations as laws may evolve. Validate that your supply chain partners are shipping ROHS-compliant products and that you maintain an audit trail to track and capture data pertaining to compliance measures you have taken,” Hart suggested.

Source: [edn.com](http://edn.com)