

Newsletter from October 18th, 2007

1. Norway beats EU in banning materials!

- *Norway appears to be more rigorous than the European Union!*
- *The Prohibition on Certain Hazardous Substances in Consumer Products (PoHS) is scheduled to come into force beginning 2008!*

ban of 18 hazardous substances scheduled

When it comes to protecting people and the environment from hazards, Norway appears to be more rigorous than the European Union. While the EU has banned six harmful materials, there are plans in the Far North to put 18 substances on the list. Unlike the European RoHS Directive, the ban not only excludes these substances from being used in electrical and electronic equipment, but also in most consumer products.

long list of banned substances

The Prohibition on Certain Hazardous Substances in Consumer Products (PoHS) is scheduled to come into force beginning 2008. It bans the use of lead, cadmium (the only two analogies with RoHS), arsenic, TBBPA, HBCDD (brominated flame retardants), chlorinated paraffins, TBT, TPT, synthetic musk, PFOA, DTDMAC, DODMAC, DSDMAC, DHTDMAC, bisphenol A, DEHP, pentachlorophenol and triclosan.

no exemptions for monitoring instruments

Norway's PoHS is also more stringent in terms of exclusions. Exemptions granted by EU's RoHS which apply to monitoring and control instruments will not be accepted in the Land of the Fjords. Only foodstuffs, food packaging, fertilizers, medical equipment and transportation facilities will apparently not be subject to PoHS regulation.

Source: kerp.at

2. Photovoltaic industry proposes a voluntary take-back system for waste!

- *Recycling PV products is still limited!*
- *The take-back system proposed by PV-Cycle would instead create a coherent EU-wide recycling system!*

The 4th EPIA Round-table in a cycle of 6 debates, running until December 2007, focused on waste and recycling in the photovoltaic sector. The round table event highlighted the PV sector's initiative to establish a voluntary take-back system for photovoltaic products and at the same time urged the European Commission not to include photovoltaic in the EC directive on Waste Electrical and Electronic Equipment (WEEE), currently under revision. Photovoltaic (PV) products are at present not included in the WEEE directive, but the directive is under revision and a possible inclusion of new products will be presented during 2008, the European Photovoltaic Industry Association reports in a press release.

Recycling PV products is still limited

The current WEEE directive stipulates the prevention of waste through the reuse, recycling and recovery of electrical and electronic equipment waste so as to reduce disposal. Each producer is responsible for financing the collection, treatment, recovery and disposal of its own products. Due to EPIA today the need to recycle PV products is still limited as the sector only took-off a few years ago. However EPIA foresees a drastic change of the situation in 20 years time, as products will reach their end-of-life and spent modules will have to be recycled. To anticipate the future needs, the PV sector, through the association "PV Cycle", is now proposing a voluntary take-back system for PV waste that will enable the sector to recover up to 90% of PV products by 2015. The association currently represents over 70 % of the global photovoltaic market. Its key objectives are:

- . Promoting and setting up an industry wide voluntary PV module reclaim and recycling program;
- . Promoting industry-led sustainable product life cycle management practices;
- . Strengthening the industry's overall joint product responsibility;
- . Ensuring regular monitoring;
- . Supporting targeted future research.

An inclusion of the PV-sector in WEEE would result in 27 differently designed recycling systems, with inherent administrative procedures and costs, EPIA forewarns. The take-back system proposed by PV-Cycle would instead create a coherent EU-wide recycling system that may enable efficient and economically viable management of waste from the PV-sector. EPIA together with PV Cycle is therefore urging the Commission, the Member States and the European Parliament not to include photovoltaic products within the future scope of the revised WEEE Directive.

Source: epia.org

3. German-Chinese Environmental Symposium in Osnabrück: Focus on China-RoHS, China-WEEE, and European Environmental Issues

- *The first German-Chinese environmental symposium!*
- *A number of renowned Chinese and German experts arrived for the first joint environmental symposium!*

The first German-Chinese environmental symposium sponsored by the new company C & E Recycling Portal GmbH & Co. KG (C&ERP) and SGS Deutschland GmbH was held on September 27. Exactly one year ago, C&ERP emerged from a joint venture between Hellmann Process Management GmbH & Co. KG, Osnabrück and CHEARI, the Chinese association of household appliance manufacturers. C&ERP, with locations in Osnabrück and Peking, offers all of its services in German, English, and Chinese.

A number of renowned Chinese and German experts arrived for the first joint environmental symposium to discuss the proposed China-WEEE¹ as well as the new China-RoHS (the European guideline 2002/95/EC “Restriction of the Use of Hazardous Substances” – abbreviated as RoHS – formed the basis for China-RoHS). Mr. Liang Feng, Director of Resources Comprehensive Utilization Division Department of Environment & Resources Conservation, presented the Chinese government proposal to return and recycle used electric and electronic low-heat appliances in front of nearly 100 international guests. He stated that a draft law developed over 5 years is based on international experience while also considering national circumstances. The basic idea is to make manufacturers responsible for recycling used electric and electronic appliances; at the same time, the Chinese government would have to facilitate a recycling system. In the introductory phase, the new law would mainly affect all video terminals, cooling units, washing machines, air conditioners, and computers. Manufacturers would be responsible for financing the recycling process for these types of used appliances. According to Mr. Feng, there will be state funding for the construction of recycling facilities. A registration system for all affected devices similar to the European system will be established in China shortly. At this time, it is not possible to say when the new law will come into force.

In a second key presentation, Mr. Wen Lei, Vice Director of the Department of System Reform and Market of the MII (Ministry of Information Industry), introduced the China-RoHS in force since March 1, 2007. It affects all electric appliances brought to the Chinese market, with the exception of military and exported electric and electronic appliances². The key points are as follows:

- Electric appliances brought to market must be identified with the “Environmental Friendly Using Period” if they fall under the area of application and are listed in the “Key Administrative Catalogue” (each product in this catalogue must be certified according to CCC³ before being sold or imported to China).
- The names and ingredients of hazardous substances contained in electric appliances brought to the Chinese market must be identified.
- Manufacturers and importers of electric appliances must explicitly identify the names of hazardous substances on product packaging.

¹ China-WEEE: Chinese draft based on the WEEE directive 2002/96/EC Waste Electrical and Electronic Equipment

² All affected products can be viewed at <http://www.mii.gov.cn/col/col11221/>.

³ CCC certification: Compulsory Product Certification

- Hazardous substances contained in electric appliances must conform to relevant national and industry standards.
- The products listed in the “Key Administrative Catalogue” (product catalogue expected to be published in 2008) are subject to CCC certification.



The concentration of hazardous substances in the device does not exceed the specifications



The concentration of one or more hazardous substances in the device exceeds the specifications but a guarantee can be provided for a period of 10 years.

Figure 1: Identification standard according to China-RoHS.

According to Mr. Lei, three standards have been published to date. They include the identification standards (see Figure 1), threshold value standards, and standards regarding test methods for hazardous substances. He indicated that the requirements for concentration limits are formulated more clearly than those in the European RoHS. This is because China-RoHS has various classifications on which the concentration limits for hazardous substances are based (see Table 1), a fact that has been verified by attending European experts.

Standard Classification	Definition of the Material Type (Requirements for Concentration Limits)
EIP-A	Homogenous materials for the composition of electric appliances (allowable Pb, Hg, Cr VI, PBB, PBDE equals 0.1 % of weight, allowable Cd equals 0.01 % of weight)
EIP-B	Metal coating of each individual component in the electric appliances (Pb, Hg, Cd, Cr VI should not be added intentionally)
EIP-C	Small parts or materials that cannot be removed from the electric appliances; the size of such products is usually less than or equal to 4 mm ³ (Pb, Hg, Cr VI, PBB, PBDE may not exceed 0.1 % of the weight, Cd may not exceed 0.01 % of the weight)

Table 1: Concentration limit requirements (if the classifications overlap or do not appear reasonable, the sequence EIP-A, EIP-B, EIP-C should be followed).

At the end of his presentation, Mr. Lei told the affected manufacturers attending the symposium: “Keep up to date with the definitions in the “Key Administrative Catalogue”, get involved in finding substitutes for hazardous substances, and find out whether your products are listed in the catalogue as well as the effective date of the catalogue.” After the introduction into the details of China-RoHS, the Chinese expert Quan Pan, director of the materials analysis and test institute for electric household appliances, explained

the extremely comprehensive CCC certification process and the tests according to China-RoHS. However, he emphasised that as long as the “Key Administrative Catalogue” has not been published, manufacturers only have to identify the content and location of hazardous substances and use corresponding identification (see Figure 1).

Whether corresponding standard European test methods will be recognised when affected appliances are imported into China was not clear after the presentations. According to statements made by attending European market experts, this would be a key requirement for the free flow of goods. They indicated that the acceptance of test methods according to the ISO standard is an essential prerequisite for open markets.

In their speeches, both Nadine Michael, C&ERP, and Dr. Udo Krischke, SGS, emphasised that both Chinese and European manufacturers who want to bring their devices to the European or Chinese markets face a huge challenge in order to meet all current regulations related to electric and electronic appliances. This is why both C&ERP and SGS offer a comprehensive range of services from consulting and conformity with the law to test methods. Furthermore, representatives from these companies are involved in numerous committees and will continue to promote the harmonisation of WEEE and RoHS with their Chinese counterparts via the C&ERP recycling platform.

Ms. Kathrin Gause, a speaker from the Federal Ministry of the Environment, and Mr. Jürgen Wituschek from the Federal Ministry of Economics, also asked for improved harmonisation within Europe. However, they also said that Germany considers the overall results to be positive after collecting experience with the ElektroG (electric and electronic appliances law) for more than a year. According to Ms. Gause, a trend-setting, cost-effective system has been created for both manufacturers and consumers. When she was asked why Germany has not published any monitoring results, Ms. Gause confirmed that there are, in fact, problems with data collection via the EAR foundation. The 2006 figures are not expected to be published until the end of 2007. The representative from the Federal Ministry of Economics, commenting on the question of whether the increase in environmental regulations could lead to market restrictions, criticised the WEEE and RoHS standards being discussed in China. He indicated that regulations need to be harmonised as far as possible and the high technical measurement and certification standards of individual states need to be recognised in order to facilitate free global trade. Any other approaches could easily reach protectionist proportions.

The results of the event, which were positive overall, were summarised by symposium manager Dr. Beate Kummer: “We will require more regular exchanges with Chinese experts in the future. When new recycling regulations are implemented in China, mistakes and false starts in our European system should be taken into account. But above all, we need to work on global harmonised regulations; this is the main challenge facing our political representatives in the EU and China.”

Source: C&E Recycling Portal