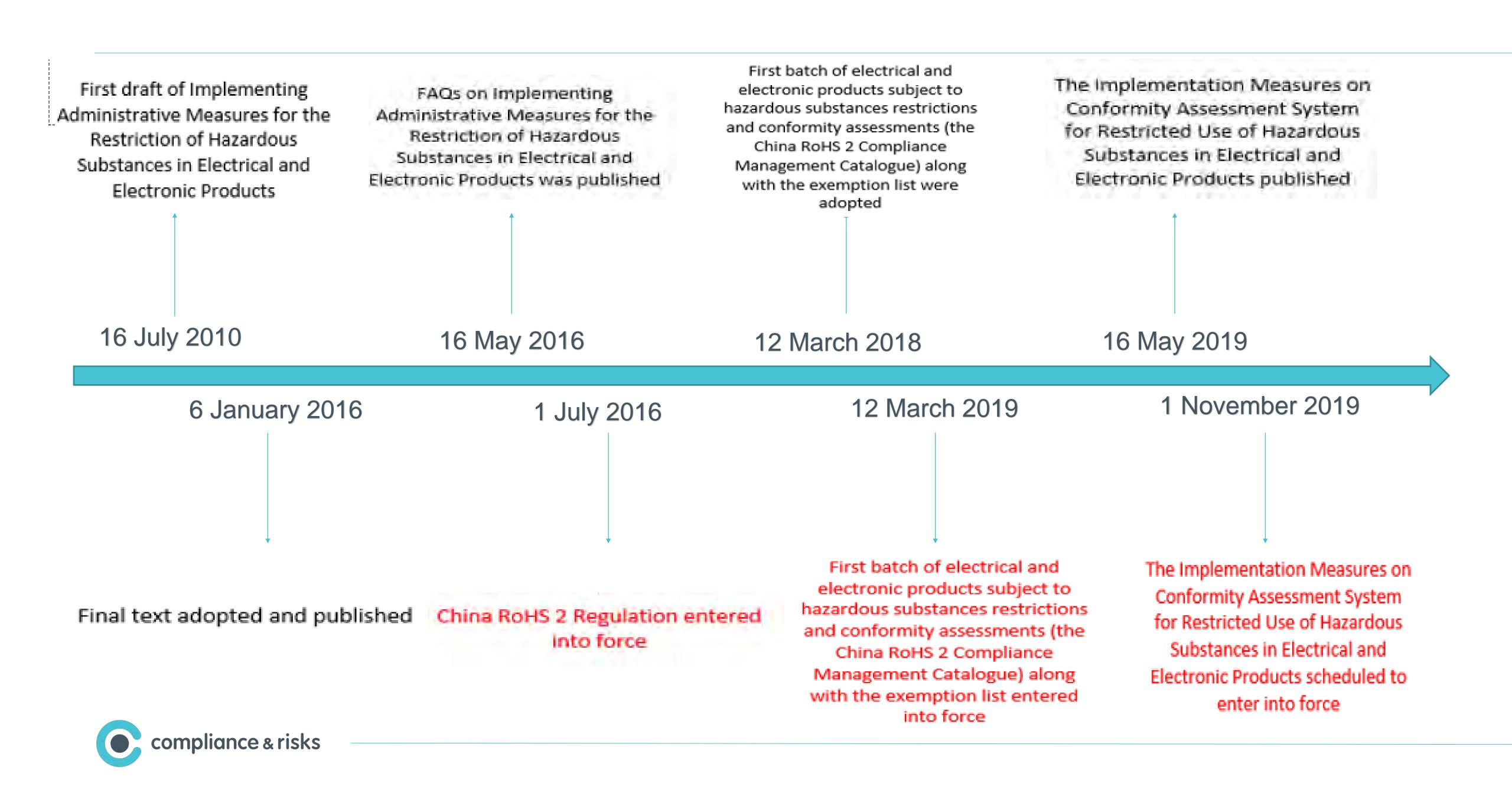




Welcome

Regulatory Updates and Analysis of China RoHS 2

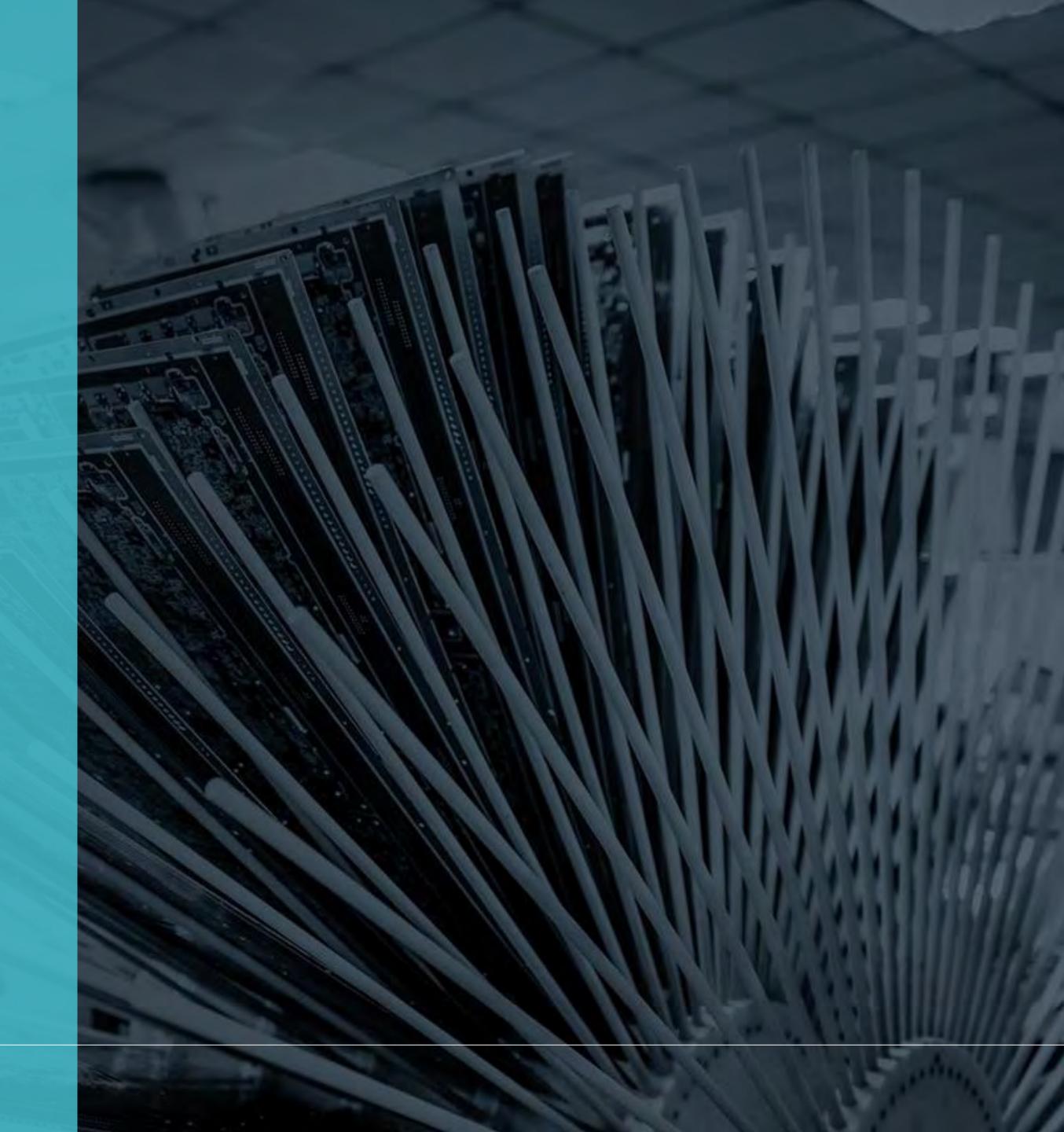
Amy Chen
Regulatory Consultant
26 November 2019



- 9 July 2019 Conference on implementing conformity assessment system is held in Beijing. List of Interpretation documents and suggestions are published
- 15 August 2019 --- CQC21-NV330-2019 Certification rules for the restriction on the use of hazardous substances in electric appliances and electronic products
- 30 August 2019 --- GB/T 37876-2019 Guideline of conformity assessment for hazardous substances in electronic and electrical products
- 8 October 2019 --- Public Service Platform on trial and User Guide published



Scope





compliance & risks

Definitions

 Electrical and Electronic Products - products that are dependent on electric current or electromagnetic fields to work, or to generate or transmit current and are designed for use with a voltage rating not exceeding 1000V A.C. and 1500V D.C.and its complementary products.

 Complementary products - modules, components, parts and materials of the electrical and electronic products falling under the scope of the China RoHS 2, including standard or optional accessories for the products, and spare parts used for repair, renovation, expansion or upgrade.



Product Categories and Classifications

- Communications equipment
- Broadcasting equipment
- Computers and other office equipment
- Electrical and electronic products for household use
- Electronic instruments
- Electrical and electronic products for industrial use
- Power tools
- Medical electronic equipment and devices
- Lighting products
- Electronic products for cultural, educational, art and craft, sporting and entertainment purposes
- Primary batteries and secondary batteries



Products Categories and Classifications

- **GB/T 4754-2011** on the National Bureau of Statistics' Industrial Classification for National Economic Activities
- the Catalogue of product classifications for statistical use by the National Bureau of Statistics
- the Notes on Classification of Electronic Information Products
- FAQ document of China RoHS 2





Exemptions

China RoHS 2 excludes the following electrical and electronic products and their exclusive or customized complementary products:

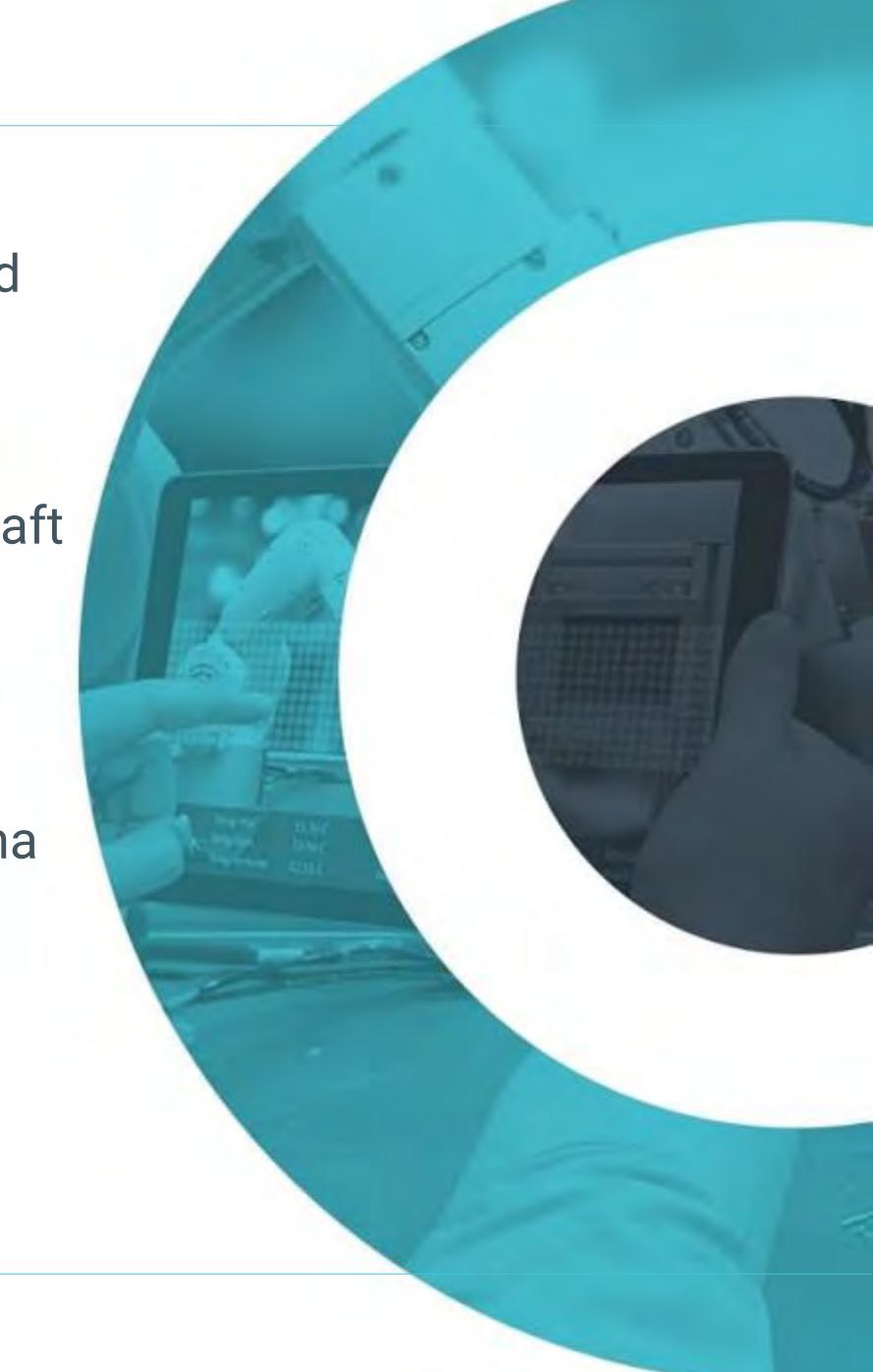
- 1. Equipment involved in the production, transmission and distribution of electrical energy, such as power plants, power transmission and distribution stations, and systems and equipment responsible for power supply and distribution to buildings;
- 2. Electrical and electronic products for military use;
- 3. Electrical and electronic products for use in special or extreme environments;
- 4. Electrical and electronic products for export;
- 5. Products imported temporarily or electrical and electronic products entering the country for repair but not for sale;
- 6. Prototypes used for the purposes of scientific research/R&D or for testing;
- 7. Samples or exhibits etc. used for the purposes of exhibition but not for sale;





Exemptions (continues)

- Electrical and electronic products intended only to be mounted on a product are exempted from the Administrative Measures are not in the scope.
- Exemple: a display screen to be mounted on a vehicle or aircraft seat, or a generic component intended for mounting on power generating equipment.
- However, the aforementioned products sold separately on the market without an explicit end use are in the scope of the China RoHS 2.





Some examples

• Q: How do wires and cables for different applications comply with the requirements of the Administrative Measures?

A: All wires and cables used in electrical and electronic products subject to the Administrative Measures shall comply with the RoHS 2 requirements, with the exception of wires and cables involved in the transmission and distribution of power.

Wires and cables available for sale on the market with no end use specified shall also satisfy the requirements of the Administrative Measures





Q: Are toner cartridges, ink cartridges and other consumables in the scope of the Administrative Measures?

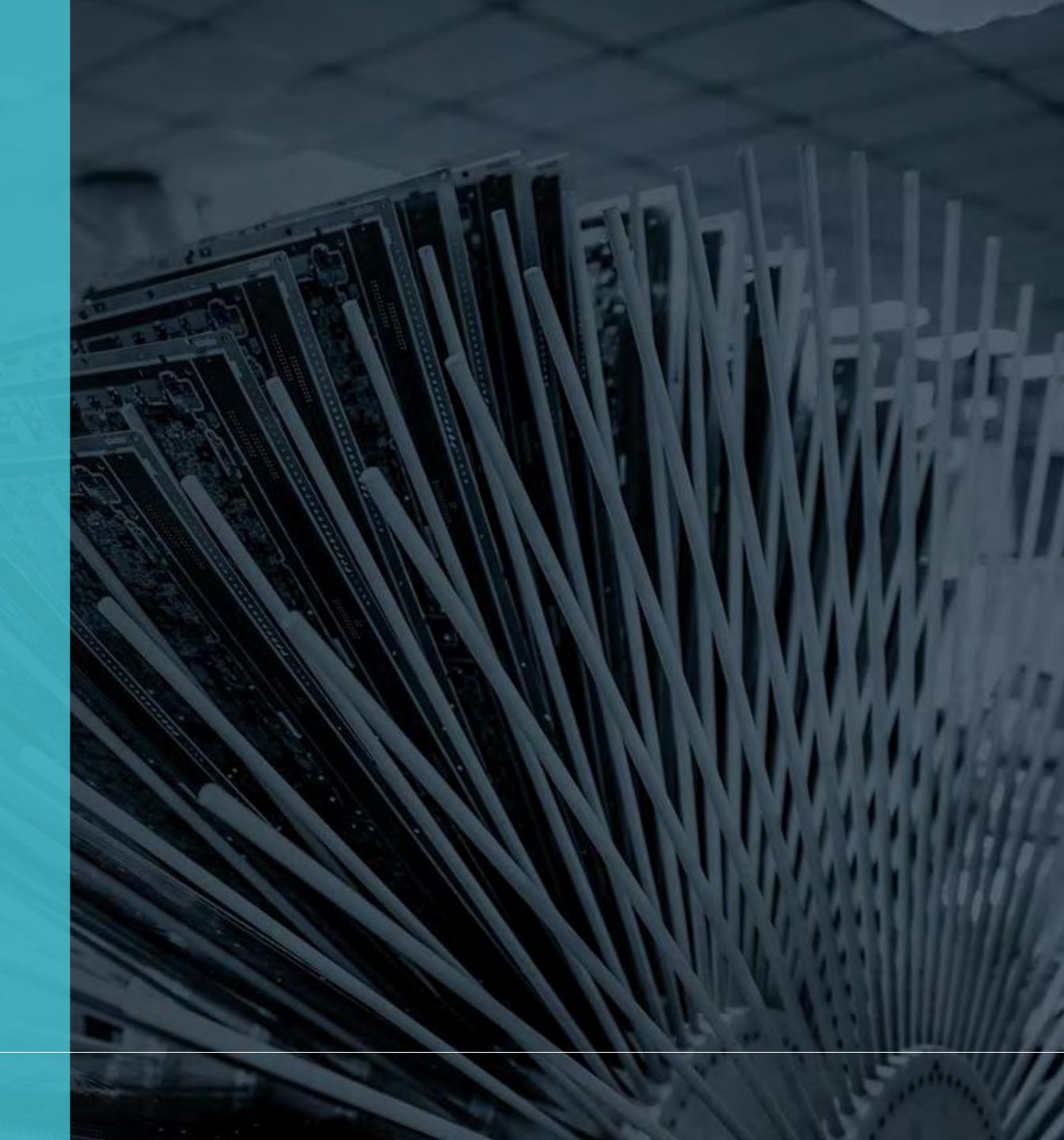
A: Consumables which are in themselves an electrical and electronic product that can be replaced, installed and used by the consumer (such as toner cartridges and ink cartridges) are in the scope of the Administrative Measures, either sold with the product or separately.

Consumables which are not electrical or electronic products, such as the dust bags used in a vacuum cleaner, shall comply with the Administrative measures when they are sold together with the vacuum cleaner, but are exempted from the requirements when sold separately on the market.





General Requirements





compliance & risks

Restricted Hazardous Substances

- Lead and its compounds;
- Mercury and its compounds;
- Cadmium and its compounds;
- Hexavalent chromium compounds;
- Polybrominated biphenyls (PBB);
- Polybrominated diphenyl ethers (PBDE);
- Other hazardous substances regulated by the State





Standards to be complied with

- SJ/T 11364-2014 Marking for the Restricted Use of Hazardous Substances in Electrical and Electronic Products
- SJ/T 11388-2009 Environment-friendly Use Period of Electronic Information Products- General Guidelines
- **GB/T 26572-2011** Requirements of Concentration Limits for Certain Restricted Substances in Electrical and Electronic Products
- **GB/T 26125 2011** Electrical and Electronic Products Determination of Six Regulated Substances (Lead, Mercury, Cadmium, Hexavalent Chromium, PBB, PBDE) (IDT IEC 62321:2008)
- **GB/T 29783-2013** Determination of Chromium (VI) in Electrical and Electronic Products Atomic Fluorescence Spectrometry



Two-Step Approach

 First Step - EFUP Label and declaration of information of hazardous substances contained

 Second Step - Conformity assessment and labels



Step - One

- Applies to all electrical and electronic products falls under the Administrative Measures
- EFUP/EPUP Label





Name and content of hazardous substances in products

Component name	Hazardous substance							
	Lead (Pb)	Mercury (Hg)	Cadmium (Cd)	Hexavalent chromium (Cr (VI))	Polybrominated biphenyls (PBB)	Polybrominated diphenyl ethers (PBDE)		
		S	()			3		

This table was developed according to the provisions of SJ/T 11364

⁽Enterprises may further explain the technical reasons for ticking "X" in the table above according to their actual situation herein.





O: The content of such hazardous substance in all homogeneous materials of such component is below the limit required by GR/T 26572

X: the content of such hazardous substance in a certain homogeneous material of such component is beyond the limit required by GB/T 26572

Step - Two: Application Scope

- Applies to products listed in the Compliance Management Catalogue for Restricted Use of Hazardous Substances in Electrical and Electronic Products ("the Compliance Management Catalogue") and manufactured after 1 November 2019
 - Refrigerators (up to 800 liters)
 - Air conditioners (<= 14,000 watts)
 - Washing machines (<=10kg of dry clothes)
 - Water heaters
 - Printers (<=A3, <=60 pages/minute)</p>
 - Copiers (<=A3, <=60 pages/minute)
 - Fax machines
 - TV sets
 - Monitors
 - Microcomputers (desktop with necessary peripherals, laptops, tablest)
 - Mobile communication handset
 - Telephones



Step-Two: Exemptions

- Exemption List providing 39 exemptions on uses of lead, cadmium, mercury and hexavalent chromium in electrical and electronic products
- Basically adopts EU exemption list
- Only one exemption is time-limited mercury in high pressure vapour lamps (HPMV) which is set to expire on **31 December 2020**



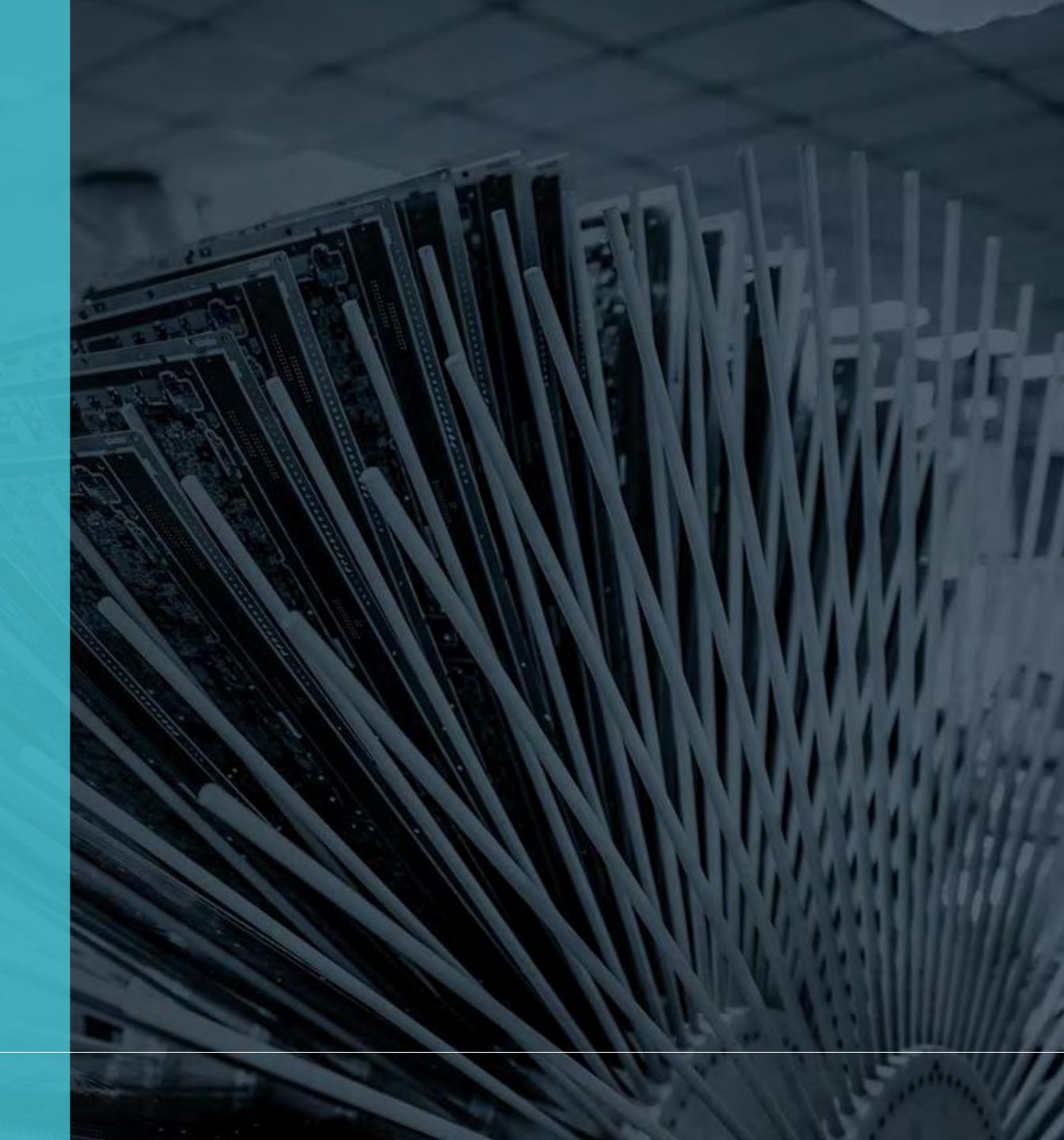
Step-Two: Conformity Assessment

- Article 18 of Administrative Measures
- The Implementation Measures on the Conformity Assessment System published on **16 May 2019**.
- Voluntary Certification and Self-declaration
- Conformity assessment label
- Submitting all information to the Service Platform
- **GB/T 37876-2019** Guideline on conformity assessment for hazardous substances in electronic and electrical products
- **GB/T 36560-2018** Specifications for technical documentation for the conformity demonstration of electrical and electronic products with respect to the restriction of hazardous substances





Conformity Assessment





Voluntary Certification

- Established in May 2010
- Regulations on Voluntary Certification for Restricted Use of Hazardous Substances in Electrical and Electronic Products - Annex 1 of Implementation Measures
- Voluntary RoHS certification rules was repealed on 5 September 2019 with the new Implementation Rules CQC21-NV330-2019
- Standards to be complied with
 - **GB/T 27050.1-2016** Conformity Assessment Supplier's Declaration of Conformity Part 1: General Requirements
 - **GB/T 26572 -2011** Requirements of Concentration Limits for Certain Restricted Substances in Electrical and Electronic Products
 - **GB/T 26125 2011** Electrical and Electronic Products Determination of Six Regulated Substances (Lead, Mercury, Cadmium, Hexavalent Chromium, PBB, PBDE) (IDT IEC 62321:2008

- Manufacturer must comply with Management Competency Requirements set out in Annex 1 of CQC21-NV330-2019
- Certificate valid for 5 years
- Conformity label comply with Administrative Measures on the Use of the Green Product Certification Marks and Annex 5 of the CQC21-NV330-2019



The certification institution should submit certification decisions to the Service Platform within
 5 days of issuance of certificate.

Self-declaration

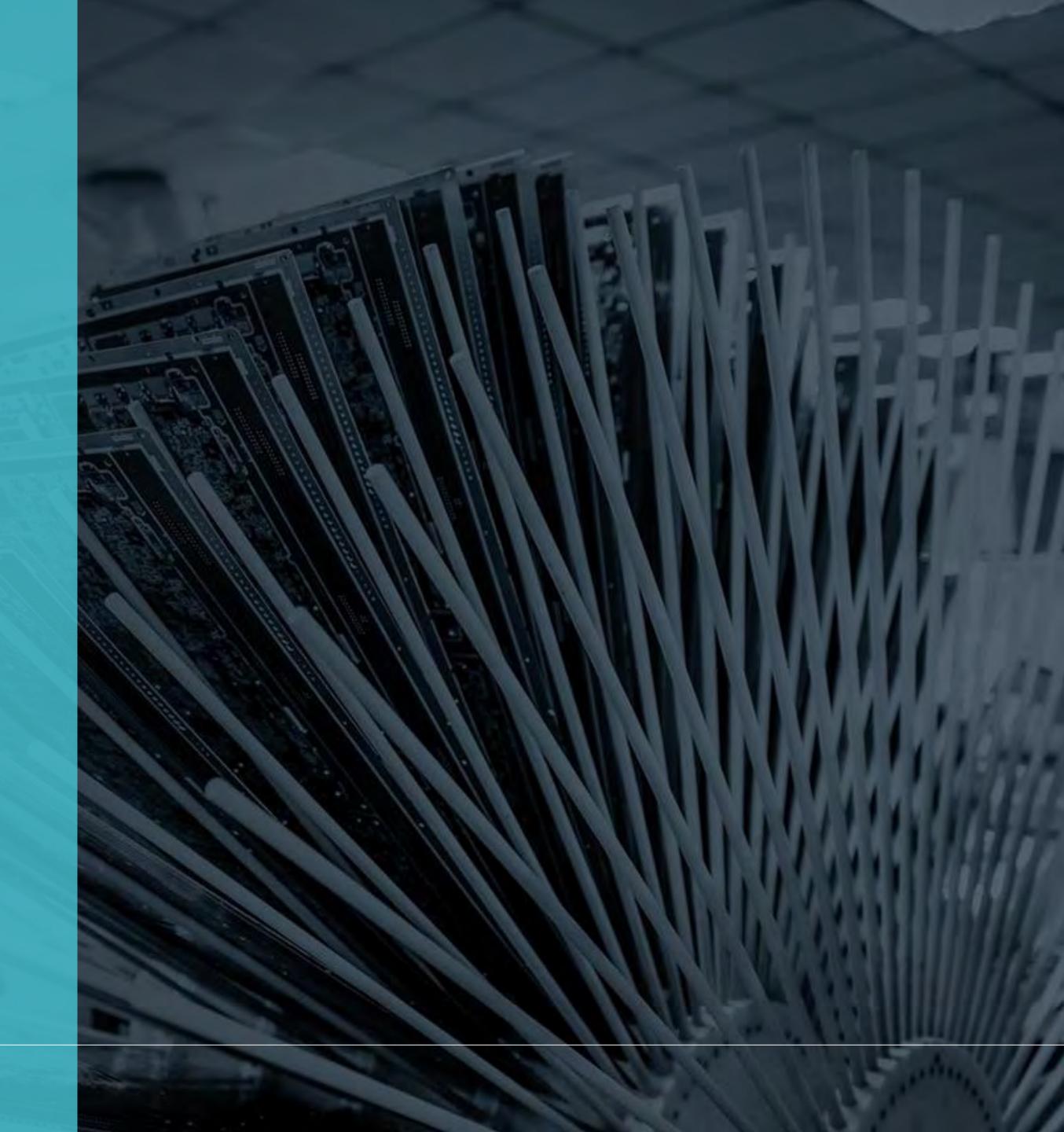
- Suppliers manufacturers or delegated representatives if the manufacturer is not a legal entity in China
- Regulation on Suppliers' Declaration of Conformity Annex 2 of the Implementation Measures
- "Declaration of Conformity" no time limit
- Conformity reports demonstrate the compliance of products in one of the following ways:
 - The conformity reports must contain a product testing report issued by in-house testing lab or third-party testing lab in compliance with national or industrial standards
 - The conformity report is formed on the basis of evaluation of hazardous substances contained in all components, parts, and material
- All documents should be in Chinese (Simplified) and submitted to the Service Platform within
 30 days of launching the product on the market
- Conformity label for self-declaration



	China RoHS Supplier Declaration of Conformity	EU RoHS Declaration of Conformity	
Legal base of conformity assessment	The Implementation Rules on Supplier Declaration of Conformity on Restricted Use of Hazardous Substances in Electrical and Electronic Products; List of Exemptions	1. Large household appliances. 2. Small household appliances. 3. IT and telecommunications equipment. 4. Consumer equipment. 5. Lighting equipment. 6. Electrical and electronic tools. 7. Toys, leisure and sports equipment. 8. Medical devices. 9. Monitoring and control instruments including industrial monitoring and control instruments. 10. Automatic dispensers. 11. Other EEE not covered by any of the categories above.	
Application scope	 Refrigerators Air conditioners Washing machine Water heaters Printers Copiers Fax machines TV sets Monitors Microcomputers Mobile communication handset Telephones 		
Restricted Hazardous Substances	Pb (0.1%); Hg (0.1%); Cd (0.01%); Cr (VI) (0.1%); PBB (0.1%); PBDE (0.1%)	Pb (0.1%); Hg (0.1%); Cd (0.01%); Cr (VI) (0.1%); PBB (0.1%); PBDE (0.1%); DEHP (0.1%); BBP (0.1%); DBP (0.1%); DIBP (0.1%)	
Exemption	List of Exemptions published with the Compliance Management Catalogue (39 exemptions)	Annex III (42 exemptions)	
Enforcement date	1 November 2019	2 January 2013	
Applicable standards	GB/T 26125, GB/T 26572	EN 50581; EN 6231	
Label		CE	



Labelling





compliance & risks

EFUP/EPUP Label

- Environment Friendly Use Period / Environment Protection Use Period Label
- Applicable to all electrical and electronic products fall in the scope set out in Administrative Measures of China RoHS 2
- SJ/T 11364-2014 Marking for the Restricted Use of Hazardous Substances in Electrical and Electronic Products
- Products that do not contain hazardous substances or in which the contents of all hazardous substances fall within the limits set forth in GB/T 26571-2011 should be labelled with the "e" label and no need to attach a hazardous substance content table







 Products in which the content of hazardous substances exceeds the limits in GB/T 26572-2011 should be labeled as follows, with a hazardous substance content table attached in product manual



Component name	Hazardous substance							
	Lead (Pb)	Mercury (Hg)	Cadmium (Cd)	Hexavalent chromium (Cr (VI))	Polybrominated biphenyls (PBB)	Polybrominated diphenyl ethers (PBDE)		
			(

This table was developed according to the provisions of SJ/T 11364.

(Enterprises may further explain the technical reasons for ticking "X" in the table above according to their actual situation herein.

 SJ/Z 11388-2009 General Guidelines of Environment Friendly Use Period of Electronic Information Products





O: The content of such hazardous substance in all homogeneous materials of such component is below the limit required by GB/T 26572

X: the content of such hazardous substance in a certain homogeneous material of such component is beyond the limit required by GB/T 26572

Conformity Assessment Label

- Applicable to all electrical and electronic products listed in the Compliance Management Catalogue and manufactured after 1 November 2019
- The conformity assessment label does not supersede the EFUP/EPUP label
- Voluntary Certification



Self-declaration



 Administrative Measures on the Use of the Green Product Certification Mark

• What is the relationship between conformity assessment label and green mark?











Public Service Platform





On trial from 8 October 2019

Conformity assessment result search; Self-declaration submission;
 Voluntary certification submission

User Manual is available on the website















Questions???







Thank You

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