



Continuing on from last month's general look at the China RoHS directive, this month the more detailed questions that may arise for companies in the electronics sector wishing to do business in China are considered.

Q

What should I do if my product type is listed in the catalogue of priority products?

A

The as yet unpublished catalogue that represents a key element of the China RoHS directive will specify all product groups covered with implementation dates, plus details of any exemptions. If a product type is listed, then it cannot be imported after the specified date until an authorised Chinese laboratory has tested it and it has China Compulsory Certification (CCC) accreditation.

If the product meets the requirements, has a disclosure table printed in the manual as appropriate and has other compulsory marking for presence/no-presence of China RoHS substances and its environmentally-friendly use period (EFUP), it may be labelled with the CCC mark and sold in China.

It will be necessary to provide a test unit to the laboratory for destructive analysis although, to date, no guidance has been published that describes the procedure the laboratory will use.

Q

How do I determine EFUP?

A

A draft standard describing several methods for determining the EFUP of a product has been published. The options include by an experimental method, from the safe-use period (if known), from the products 'technical life', or based on the EFUP of other similar products.

Currently, the last of these options seems the most useful, accurate and cost-effective. This is helped by a number of examples given in the draft standard. It is likely that the final version of the standard will include a much longer list that will reinforce this approach as a reasonable method.

Q

Why and how do I produce a disclosure table?

A

Disclosure tables are required if the product you are exporting to China contains substances that are listed as being restricted under the China RoHS directive. Disclosure tables are needed in addition to product labelling that indicates RoHS substances are present and the product's EFUP.

If a disclosure table is required, the first step is to determine which controlled substances exist within each of the main parts of the finished product. Some may be known, but for most it may be best to ask the individual part or component supplier. If there is a PCB assembly, as is likely in electronics equipment, then the presence of restricted substances in each component on the board must be assessed until a substance is found (see next question) and the substance be marked with an "X" (or a "0" if none found) against PCB in the disclosure table.

Because under China RoHS there are no exemptions, it is not safe to assume that an EU RoHS compliant product meets requirements; it may contain China RoHS substances above the maximum concentration values (MCVs).

Once all the information for a product has been ascertained, the producer is required to print a table in the product manual. This provides a simple cross-reference of the six restricted substances and their presence in the primary assemblies that come together to make the finished product. As an example, in the case of a mobile phone handset these might be the PCB, a case, a display module and a battery pack. The table must be written in Chinese with a clear explanation of any symbols used.

Q

How do I find out if an individual electronic component contains a restricted substance?

A

Again, the easiest way is to ask the component supplier. Beware of suppliers who respond by saying that their component is RoHS-compliant; they are likely to be only referring to EU-RoHS, which will have been a major area of focus for them in the run-up of that directive coming into force in 2006.

Q

Where can I find details on China RoHS label specifications?

A

The Chinese government has provided details on dimensions, colours, where to use and so on in the official standard SJ/T11364-2006.

Q

Do I need to label spare parts or components?

A

The Chinese RoHS standard states that marking of components is not necessary if they are to be sold to OEMs for use in products that will be marked. However, information on any RoHS substances that are present in such components will need to be provided to the OEM. Components, including spare parts that are sold individually direct to end-users in China should be marked as they are classified as Electronic Information Products, or EIPs.

*Please email your questions to:
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 marking them as RoHS or WEEE.*