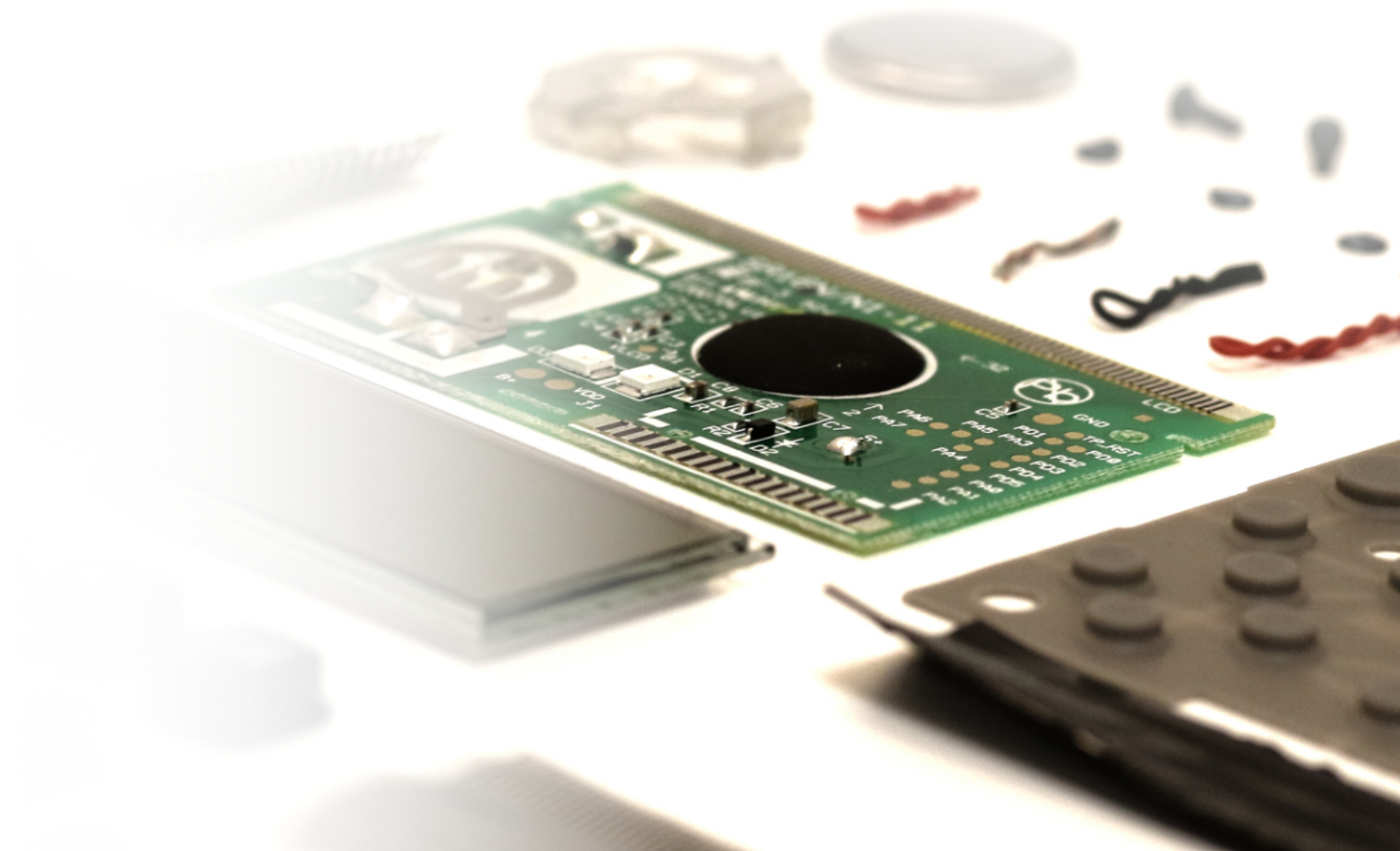


Claigan Webinar

Restricted Materials in 2025

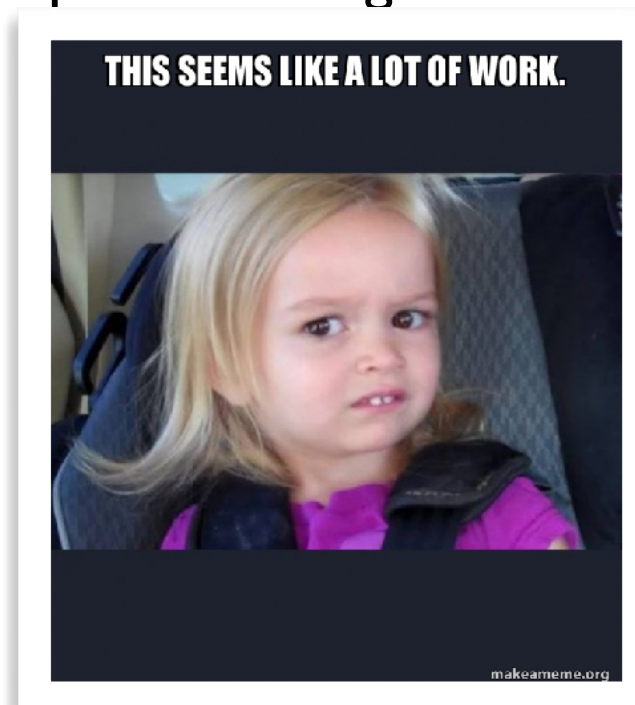
Presented by:
Bruce Calder
VP Consulting

January 15, 2025



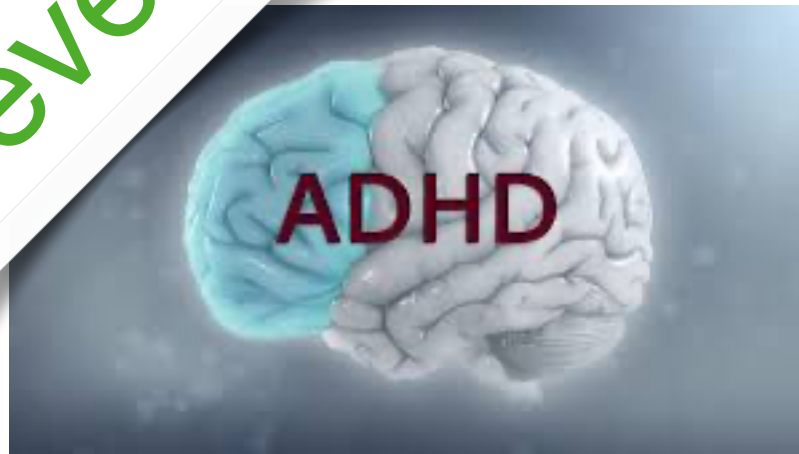
Overview - Agenda

- About Us
- Canada PFAS
- Canada Plastics Registry
- US TSCA PFAS Reporting
- New REACH SVHCs
- The New RoHS Exemptions
- Mandatory Testing for EU RoHS
- New California Prop 65 Warnings
- Q&A



What does Claigan Environmental do?

Prevent



Prevent



Trace



TIN



TANTALUM



TUNGSTEN



GOLD

To the warlords
in the Congo

Conflict Minerals

Claigan Environmental



Consulting



Testing



Declarations / Reporting

Claigan Environmental

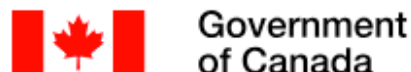
The Leader in PFAS in Products



Claigan is the only private company included in the PFAS regulations in 2024 at the United Nations (UN) Stockholm Convention.



Claigan submitted industry's PFAS derogations and uses for Consultation to the EU.



Claigan submitted PFOA / LC-PFAC exemptions and uses to Canadian Government.



Claigan submitted PFOA / LC-PFAC exemptions and uses to the Australian Government.



Claigan presented extensive PFAS report with large group of industry stakeholders to the US Federal Environmental Protection Agency.



Claigan spearheaded extensive PFAS report with large group of industry stakeholders for Certain Unavoidable Uses (CUU) to the State of Maine.



Claigan is a ISO 17025 Accredited Laboratory.

Canadian PFAS Reporting

Brief summary

- **Mandatory Data Gathering**
 - Section 71 Notice under Canadian Environmental Protection Act (CEPA)
- **Importers and manufacturers of specific PFAS in**
 - Chemicals, and
 - Physical products (articles)

- **By January 29 2025**

IMPORTANT NOTE

You can apply for an extension

See Claigan for details

Canada PFAS Reporting

- **So you report all PFAS in your products?**
- **Nope**

PFAS Reporting Canada

Positive Lists

- Canada PFAS is three (3) **POSITIVE LISTs** of PFAS substances
- To be reportable, the substance has to be on one of the three (3) lists

List 1 -

Part 1 - 273 substances. Mostly liquids and powders



List 2 -

Part 2 - 26 substances. Mostly polymers (solids)



List 3 -

Part 3 - 13 substances. Mostly gases



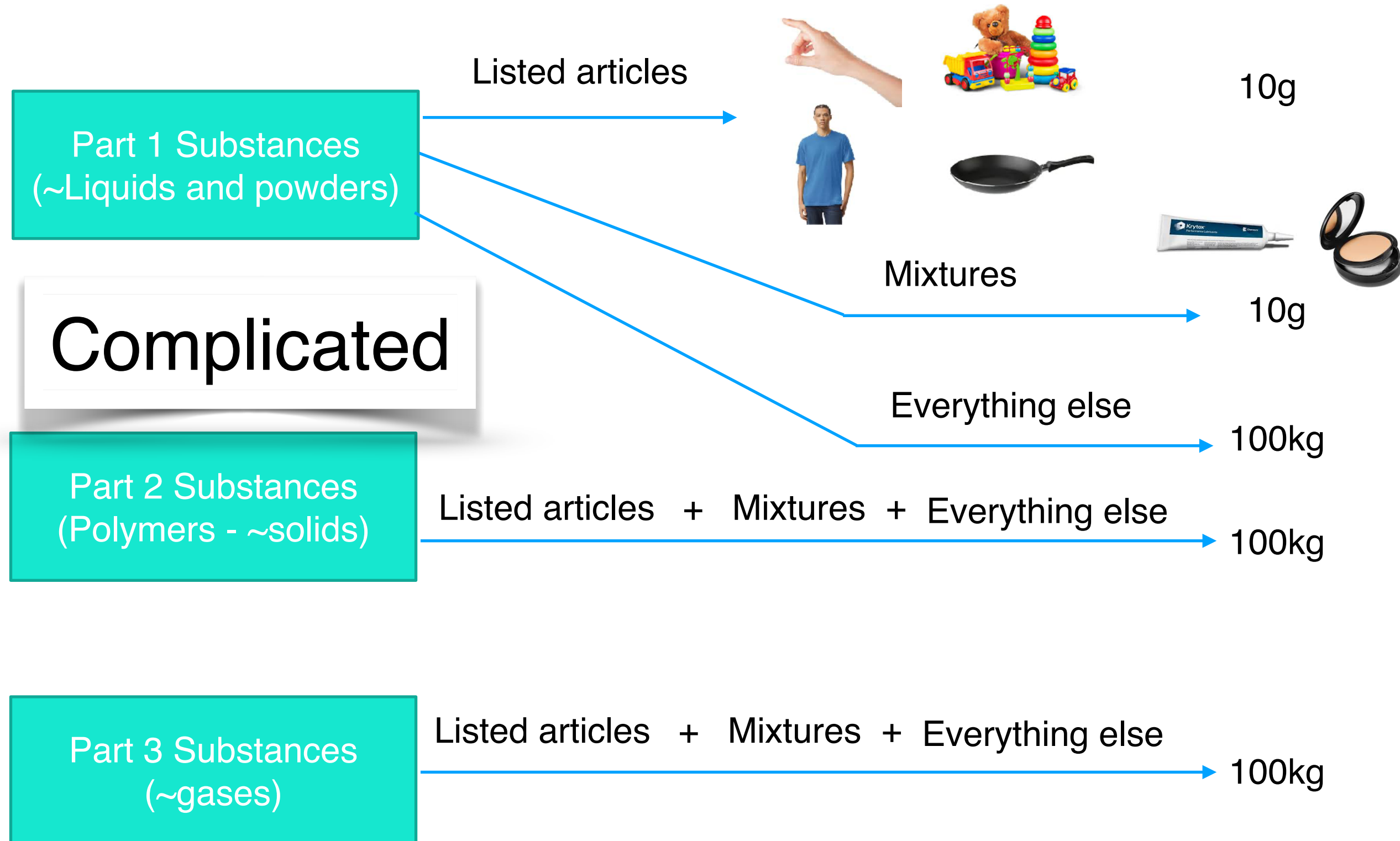
PFAS Reporting Canada

Positive Lists

- Do you have to report all substances on those lists?
 - **Nope**
- You need to meet reporting thresholds
 - Based on your use

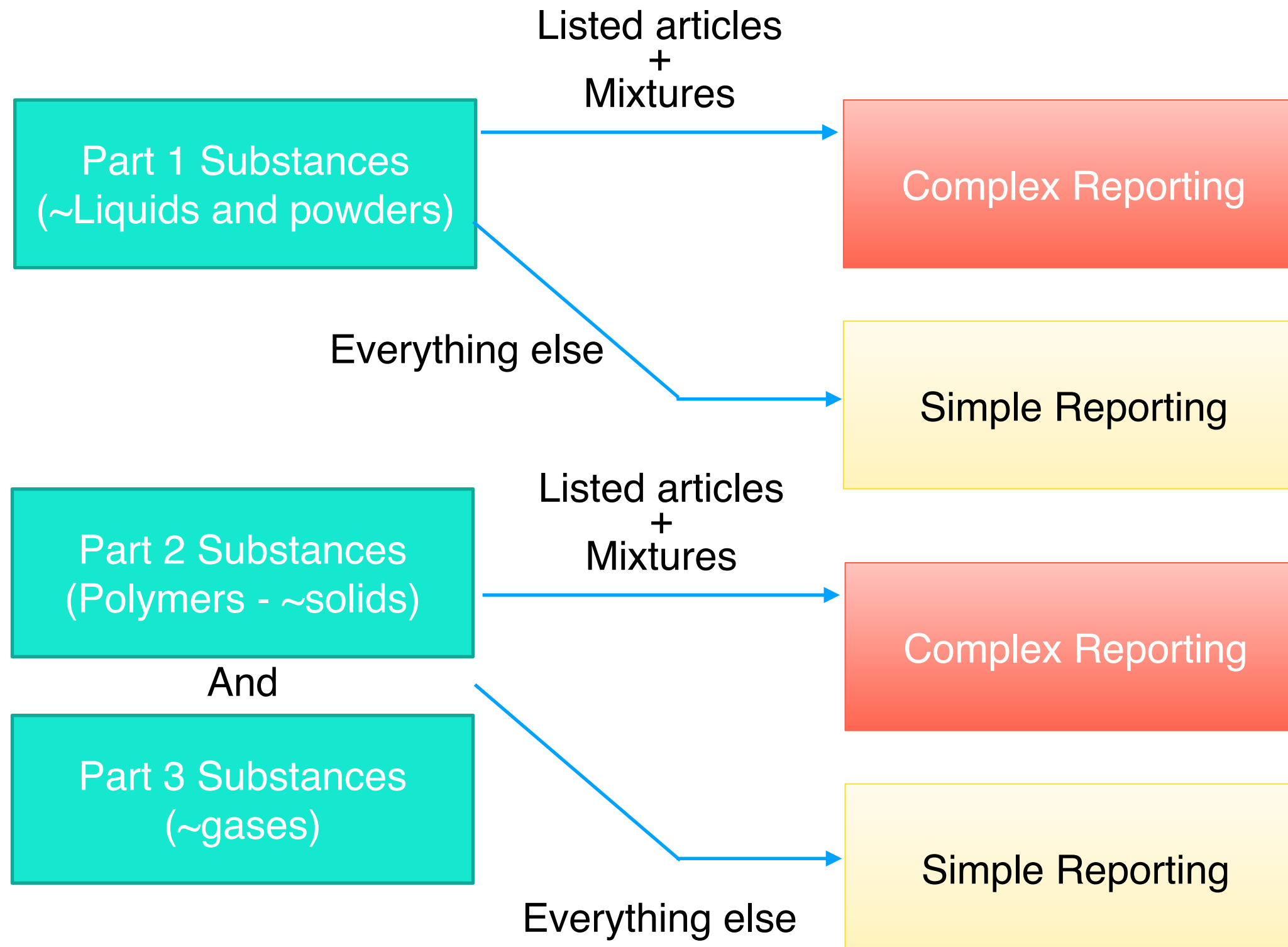
PFAS Reporting Canada

Minimum Volumes for Reporting



PFAS Reporting Canada

Reporting



Canada PFAS Reporting

Steps 1 to 3

- **Step 1 - Review the chemicals in scope**
 - Do these chemicals apply to your products?
 - Can they possibly be in your products at a reportable level?
- **Step 2 - Take actions based on Step 1**
 - Based on the applicable substances / applications
 - Pursue those small number of applicable situations
- **Step 3 - Complete reporting**
 - Complete simple or complex reporting (as warranted)

See Claigan for details

Alternative Reporting Canada PFAS

- **Declaration of Stakeholder Interest**
 - PFAS that are used by your company
 - That you do not have to report
 - But you do not want regulated
- **Declaration of Non-Engagement**
 - If no reporting required and no reason for declaration of stakeholder interest

See Claigan for details

PFAS Reporting - Canada and US

- **If companies report**

- **Uses of fluoropolymer**

- Canadian Guidance on PFAS Reporting

The absence of information may result in the use of conservative assumptions in risk assessment or potential risk management measures which may impact your ability to manufacture, import or use certain substances, or mixtures, product and manufactured items containing these substances in Canada.

- **Restriction by countries is very difficult**

- **You WANT to report**

- **Reporting protects your products**

Canadian PFAS Reporting

Brief summary

- **Mandatory Data Gathering**
 - Section 71 Notice under Canadian Environmental Protection Act (CEPA)
- **Importers and manufacturers of specific PFAS in**
 - Chemicals, and
 - Physical products (articles)

- **By January 29 2025**

IMPORTANT NOTE

You can apply for an extension

See Claigan for details

Canadian Federal Plastics Registry

- **Mandatory requirement to report plastics in**

- Packaging, and
- “Plastic products”

Canada Gazette, Part I, Volume 158, Number 16: GOVERNMENT NOTICES

April 20, 2024

DEPARTMENT OF THE ENVIRONMENT

CANADIAN ENVIRONMENTAL PROTECTION ACT, 1999

Notice with respect to reporting of plastic resins and certain plastic products for the Federal Plastics Registry for 2024, 2025 and 2026

- **First Deadline September 29 2025**

If over 1 tonne per annum of applicable plastic products

- **Reporting entity**

- **Brand owner**

- Unless the brand owner is not a resident in Canada

- Then **importer** instead

Key Note #2 - Reporting 2025 vs 2026

Residential Waste

2025

“Consumer”



Institutional Waste

2026

“Institutional”



Scope of the Canadian Plastics Registry

2025 Reporting (For 2024 year)



Consumer Electronics
Including medical devices



Consumer packaging



Specific single use plastics

2026 Reporting (For 2025 year)



Professional Electronics
Including medical devices



Professional Packaging



Apparel & Textiles

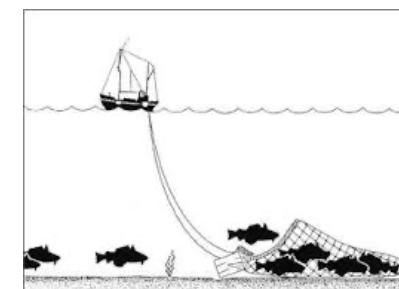
And.....



Transportation



Construction



Fishing
And agriculture

Canadian Federal Plastics Registry



Facility Waste

- **Industrial / institutional waste**
 - From
 - Manufacturing operations
 - Employee waste
 - Restaurant services
 - In Canada

2026 Reporting

For quickly approaching 2025 year

Claigan Plastic Registry

Canadian Environmental Protection Act (CEPA)

WE KNOW CANADA.

CLAIGAN IS THE MOST WELL KNOWN NAME IN CANADIAN ENVIRONMENTAL PROTECTION ACT (CEPA) COMPLIANCE FOR PHYSICAL PRODUCTS (MANUFACTURED ITEMS).



Canadian Plastics Registry

Every year, companies must report the plastics in their electronics and packaging to the Canadian government. Claigan's process will create for you the plastics submission for individual products or for entire companies including:

- Electronics
- Packaging
- Waste
- Automotive
- Textiles

[PLASTICS REGISTRY FAQ](#)

[LEARN MORE ABOUT THE PLASTICS REGISTRY](#)

CLAIGAN PLASTICS REGISTRY SERVICE – PRODUCTS

Plastics in packaging and products (including electronics, automotive, food take-out, and apparel) are required to be reported to the Canadian Plastics Registry.

Claigan has extensive experience with creating submissions for plastics reports for simple and very complex products – including the industry's best models for dense electronics.

[CONTACT US](#)



Claigan - Plastics Registry - Products

Canadian Plastics Registry FAQ

Note – the FAQ below is a streamlined interpretation of the Canadian Plastics Registry. For full details see [Canadian Plastics Registry Notice](#).

Who is in scope?



CLAIGAN PLASTICS REGISTRY SERVICE – WASTE AUDIT

Companies disposing of plastic waste in the industrial or institutional waste stream are required to report by plastic and product subcategory to the Canadian Federal Plastics Registry.

Claigan's Federal Plastics Registry Waste Audit is designed for a range of companies, including manufacturers, restaurants, office buildings, schools, and retirement homes. Claigan's plastic waste audit is a simple and direct way for businesses to report their plastics waste to the Plastics Registry.

Claigan - Plastics Registry - Waste

www.claigan.com

<https://www.claigan.com/canada-cepa/>

Canadian Plastic Reporting Reporting Requirement in 2025

- **Requirement**
 - Certification that information is true
 - Business identity and address
 - Per sub-category *(If over 1 tonne imported per year)*
 - For each plastic resin (imported or manufactured)
 - Identity of each resin (NAPCS Code)
 - Source of resin (virgin, recycled, etc..)
 - Total quantity of each resin (in kg)
 - Method used to quantify the above

Canadian Plastic Reporting NAPCS Codes

- **From Statistic Canada Listings**

- 281 Plastic resins**

- 28112 Thermoplastic resins, except biodegradable**

- 281121 Thermoplastic polyester resins**

- 2811211 Polyethylene terephthalate (PET) resins

- 2811219 Other thermoplastic polyester resins

- 281122 Polyethylene resins**

- 2811221 Low-density polyethylene (LDPE) resins

- 2811222 Linear low-density polyethylene (LLDPE) resins

- 2811223 High-density polyethylene (HDPE) resins

- 2811229 Other polyethylene resins

- 281123 Polystyrene (PS) resins**

- 2811231 Polystyrene (PS) resins

- 281129 Other thermoplastic resins**

- 2811291 Acrylonitrile-butadiene-styrene (ABS) resins

- 2811292 Polyvinyl chloride (PVC) resins

- 2811293 Polypropylene (PP) resins

- 2811294 Thermoplastic polyurethane (TPU) resins

- 2811295 Polyamide (PA, nylon) resins

- 2811299 All other thermoplastic resins, n.e.c.

- 28113 Thermosetting resins, except biodegradable**

- 281131 Phenol-formaldehyde resins**

- 2811311 Phenolic (PF) resins

- 2811312 Urea formaldehyde (UF) resins

- 2811319 All other formaldehyde based resins

- 281139 Other thermosetting resins**

- 2811391 Thermosetting unsaturated polyester (UPR) resins

- 2811392 Thermosetting polyurethane (PU) resins

- 2811399 Other thermosetting resins, n.e.c.

- 28114 Biodegradable plastic resins**

- 281141 Biodegradable plastic resins**

- 2811411 Bio-based thermoplastic resins

- 2811412 Petroleum-based biodegradable thermoplastic resins

- 2811413 Bio-based thermoset resins

- 2811414 Petroleum-based biodegradable thermoset resins

Example IKEA Product

- Example **individual product** output

Havris Hanging Lamp

Product	Hanging Lamp Cord Ikea Samples			
Date Evaluated	10/2/2024			
Product Weight (including packaging in g)	413			
Plastic Composition	48.61%			
Method used	Specific component identification method			
	Product	Textiles		Packaging
	g	g	%	g
2811211 Polyethylene terephthalate (PET) resins	21.54	0	5.22%	0
2811219 Other thermoplastic polyester resins	6.02	0	1.46%	0
2811221 Low-density polyethylene (LDPE) resins	0.00	0	0.00%	1.41
2811222 Linear low-density polyethylene (LLDPE) resins	0.00	0	0.00%	0
2811223 High-density polyethylene (HDPE) resins	0.00	0	0.00%	0
2811229 Other polyethylene resins	13.40	0	3.24%	0
2811231 Polystyrene (PS) resins	0.02	0	0.01%	0
2811291 Acrylonitrile-butadiene-styrene (ABS) resins	0.00	0	0.00%	0
2811292 Polyvinyl chloride (PVC) resins	96.47	0	23.36%	0.75
2811293 Polypropylene (PP) resins	0.88	0	0.21%	0
2811294 Thermoplastic polyurethane (TPU) resins	0.00	0	0.00%	0
2811295 Polyamide (PA, nylon) resins	0.30	0	0.07%	0
2811299 All other thermoplastic resins, n.e.c.	59.97	0	14.52%	0
2811411 Bio-based thermoplastic resins	0.00	0	0.00%	0
2811412 Petroleum-based biodegradable thermoplastic resins	0.00	0	0.00%	0
2811311 Phenolic (PF) resins	0.00	0	0.00%	0
2811312 Urea formaldehyde (UF) resins	0.00	0	0.00%	0
2811319 All other formaldehyde-based resins	0.00	0	0.00%	0
2811391 Thermosetting unsaturated polyester (UPR) resins	0.00	0	0.00%	0
2811392 Thermosetting polyurethane (PU) resins	0.00	0	0.00%	0
2811399 Other thermosetting resins, n.e.c.	0.00	0	0.00%	0
2811413 Bio-based thermoset resins	0.00	0	0.00%	0
Total Weight (Plastics)	198.6	0	48.09%	2.16
Gross Weight (Plastics) - Product, Textiles, and Packaging	200.8			

Ring holder

Cable Internals
(Model)

White clip

Material

Ceiling cord set:
PVC

Hanger:
Acetal plastic

Lampholder cup:
Polycarbonate plastic (min. 50% recycled)

Shade ring:
Polyester



Canadian Plastics Registry

The Better Way

- **Create ‘Average Bill of Materials’ for product types**
- **Basis of ‘Average Bill of Materials’**
 - Representative products for each family

Average bill of materials (ABOM) method

From draft guidance

Company Y manufactures 5 drills of different quality but with similar compositions. The bills of material for the formulation of a sample of these drills (Products D, E, and F) are provided below.

Product D Bill of Materials			
Material Code	Material	Quantity	Unit
P599762	Acrylonitrile butadiene styrene casing	0.205	kg
P762409	Thermoplastic elastomer overmoulding	0.121	kg
P701342	Nylon Trigger	0.052	kg
P466334	Nylon Speed switch	0.013	kg
P138839	Nylon Direction switch	0.018	kg
P907559	Polyvinyl chloride cabling	0.008	kg
P958451	Acrylonitrile butadiene styrene torque adjuster	0.083	kg
P255200	Nylon chuck grip	0.064	kg

Canadian Plastics Registry

The Better Way

- **Using models**
 - Use dozens of models to represent thousands of products
 - <20% of the work of the full project
- **Much better accuracy** than trying to put together thousands of details
 - Easier to work on accuracy / correctness on a smaller subset

Scope of the Canadian Plastics Registry

2025 Reporting (For 2024 year)



Consumer Electronics
Including medical devices



Consumer packaging



Specific single use plastics

2026 Reporting (For 2025 year)



Professional Electronics
Including medical devices



Professional Packaging



Apparel & Textiles

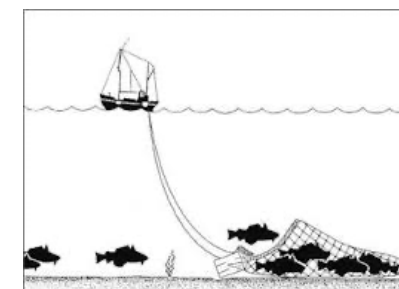
And.....



Transportation



Construction



Fishing
And agriculture

Canadian Federal Plastics Registry



Facility Waste

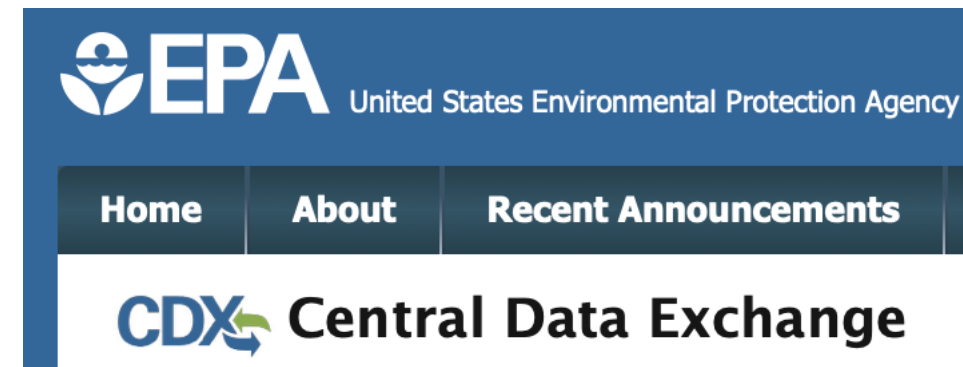
- **Industrial / institutional waste**
 - From
 - Manufacturing operations
 - Employee waste
 - Restaurant services
 - In Canada

2026 Reporting

For quickly approaching 2025 year

US TSCA PFAS Reporting

- [Companies must report](#) PFAS imported into or manufactured in the US
 - 2011 to 2022
- Deadline
 - **January 11 2026**
 - If > 120M in sales in US (including parent company)
 - **July 11 2026**
 - If < 120M in sales in US (including parent company)



PFAS Data to Report

- **Chemical data to report**
 - US TSCA Reporting is by chemical
 - Not product

Chemical	PTFE	Fluoroelastomer	PFA
Chemical	Poly(tetrafluoroethylene)	Vinylidene fluoride-hexafluoropropene polymer	Perfluoroalkoxy alkane
Generic Name	PTFE	FKM	PFA
Cas number	9002-84-0	9011-17-0	26655-00-5
Concentration in product	<0.1% ▼	0.1% to 1% ▼	0.1% to 1% ▼
Process or Use Operation	U - Use - non-incorporative... ▼	U - Use - non-incorporative ... ▼	U - Use - non-incorpora... ▼
Industrial Sector (IS)	IS42 - Electrical equipment... ▼	IS42 - Electrical equipment,... ▼	IS42 - Electrical equipm... ▼
Product Category Codes	CC219 - Machinery, mecha... ▼	CC219 - Machinery, mecha... ▼	CC219 - Machinery, me... ▼
Function 1	F034 - Insulators ▼	F006 - Sealant (barrier) ▼	F034 - Insulators ▼
% 1	50%	100%	100%
Function 2	F029 - Flame retardant ▼	▼	▼
% 2	25%	0	0
Function 3	F041 - Lubricating Agent ▼	▼	▼
% 3	20%	0	0
Function 2	F006 - Sealant (barrier) ▼	▼	▼
% 4	5%	0	0

Merging Sales Volumes

- **Merging Sales Volumes**
 - Mapping of product lines to chemical templates
 - Adding sales volumes from 2011 to 2022 by product line
 - Generating final reporting numbers
 - In # of units or kg (lb)

Product Family 1	100%
Product Family 2	100%
Product Family 3	0%
Product Family 4	75%
# of units	
Consumer	Commercial
Intended for Children	No
Chemical	PTFE
Chemical	Poly(tetrafluoroethylene)
Generic Name	PTFE
Cas number	9002-84-0
Concentration in product	<0.1%
Process or Use Operation	U - Use - non-incorporative...
Industrial Sector (IS)	IS42 - Electrical equipment...
Product Category Codes	CC219 - Machinery, mecha...
Function 1	F034 - Insulators
% 1	50%
Function 2	F029 - Flame retardant
% 2	25%
Function 3	F041 - Lubricating Agent
% 3	20%
Function 2	F006 - Sealant (barrier)
% 4	5%
Total %	100%
Units Volume	# of Units
2011	2750
2012	2975
2013	3218
2014	3478
2015	3756
2016	4053
2017	4369

Total Sales Volumes

- **Sales Volumes**
 - Client products sales volumes per product line
 - # of units sold
 - *Can be approximated by \$ of sales / average value of sale*

Year	Product Family 1	Product Family 2	Product Family 3	Product Family 4
2011	1000	1000	500	1000
2012	1200	1100	550	900
2013	1400	1210	605	810
2014	1600	1331	666	729
2015	1800	1464	733	656
2016	2000	1610	806	590
2017	2200	1771	887	531
2018	2400	1948	976	478
2019	2600	2143	1074	430
2020	2800	2357	1181	387
2021	3000	2593	1299	348
2022	3200	2852	1429	313

Final - Data to Submit

- **Data to Submit**
 - Per chemical
 - Chemical name
 - CAS number
 - Max concentration in product
 - Product or Use
 - Industrial Sector
 - Product Category Codes
 - Function(s)
 - % of chemical use is each function
 - # of units, or
 - Tonnage

Chemical	PTFE
Chemical	Poly(tetrafluoroethylene)
Generic Name	PTFE
Cas number	9002-84-0
Concentration in product	<0.1%
Process or Use Operation	U - Use - non-incor...
Industrial Sector (IS)	IS42 - Electrical eq...
Product Category Codes	CC219 - Machiner...
Function 1	F034 - Insulators
% 1	50%
Function 2	F029 - Flame retardant
% 2	25%
Function 3	F041 - Lubricating Agent
% 3	20%
Function 2	F006 - Sealant (barrier)
% 4	5%
Total %	100%
Units Volume	# of Units
2011	2750
2012	2975
2013	3218
2014	3478
2015	3756
2016	4053
2017	4369
2018	4707
2019	5066
2020	5447
2021	5854
2022	6287
Tonnage volume	kg
2011	1650
2012	1785
2013	1930.5
2014	2086.7
2015	2253.6
2016	2431.5
2017	2621.6

See Claigan for details

New RoHS Exemptions

- Ok. Not really new
 - These were proposed by Oeko (consultant) in [2022](#)
- **Current status**
 - Consultation until February 10 2025
 - [6\(a\), 6\(b\), 6\(c\)](#)
 - [7\(a\)](#)
 - [7\(c-i\)](#)

Snap Judgements - Part I

- **OMG. All the exemptions are going away**
 - Either December 2026, or December 2027

NO.

- The only exemption that is going away is
 - Pb in machined Al
 - *Plus a reduction in Pb in cast Al to 0.3% from 0.4%*

Snap Judgements - Part I - Example

6(b)-II	Lead as an alloying element in aluminium for machining purposes with a lead content up to 0,4% by weight* Text for expiring <i>X number of months from entry into force</i>	Expires on [PO: 18 months after the entry into force of the Delegated Directive] for categories 1-7, 10. Expires on 31 December 2026 for categories 9 (industrial monitoring and control instruments) and 11.*
---------	---	--

- **Any ‘expiry’ with an actual date can be renewed**

Snap Judgements - Part 2

- **OMG. They missed my exemption**
 - I am screwed

NO.

- All the main exemptions (for example 7(a))
 - Have a December 2026 expiry
 - Which means they can still be renewed
 - In reality
 - Any missing exemptions will need specific application language in their renewal request

Snap Judgements - Part 2 - Example

'7(c)-I	Electrical and electronic components containing lead in a glass or ceramic other than dielectric ceramic in capacitors, e.g. piezoelectronic devices, or in a glass or ceramic matrix compound	Applies to all categories and expires on 31 December 2026.
---------	--	--

Language allowing renewal

- **Following normal rules for application and acceptance of renewals**

Snap Judgements - Part 3

- **OMG. Some of these exemptions are a stone-cold b#tch to understand**
 - And am I even covered by them?

True.

- I doubt that the EU even understands the text of some of the proposed exemptions

Snap Judgements - Part 3 - Example

7(a)-I	Lead in high melting temperature type solders (i.e., lead-based alloys containing 85% by weight or more lead) for internal interconnections for attaching die, or other components along with a die in semiconductor assembly with steady state or transient/impulse currents of 0.1 A or greater or blocking voltages beyond 10 V, or die edge sizes larger than 0.3 mm x 0.3 mm	Applies to all categories (except applications covered by point 24 of this Annex) and expires on 31 December 2027.
--------	---	---

What is with the commas in this exemption?

High melting temperature solder is allowed to connect to all die over 0.3mm?

Snap Judgements - Part 3 - Example

7(a)-II	Lead in high melting temperature type solders (i.e., lead-based alloys containing 85% by weight or more lead) for integral (meaning internal and external) connections of die attach in electrical and electronic components, if all the following conditions are met: - the thermal conductivity of the cured/sintered die-attach material is $>35\text{W}/(\text{m}\cdot\text{K})$, - the electrical conductivity of the cured/sintered die-attach material is $>4.7\text{MS}/\text{m}$, - solidus melting temperature is higher than 260°C	Applies to all categories (except applications covered by point 24 of this Annex) and expires on 31 December 2027.
---------	--	---

Really really technical

See Claigan for more details

Those are actually the physical parameters of high temp solder

RoHS Standard Update

Updates to IEC 63000

- **Official request from EU Commission Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs**
 - To update RoHS compliance standard to identify that testing data is mandatory for an RoHS technical file
 - [Text of Request](#)

RoHS Standard Update

- **Why?**

- To align the harmonised standard EN IEC 63000:2018 with the Decision No 768/2008/EC

- **Summary - The current standard does not meet the EU's conformity assessment requirements**

- And - *“The revised standard shall reflect the generally acknowledged state of art.”*
- Testing for RoHS has matured greatly since the original EN 50581 was written

RoHS Standard Update

- **Key points**
 - If it can be tested
 - And a non-compliance is possible
 - It should be tested
- CENELEC (EU Standardization body) has 32 month to complete

RoHS Standard Update

- **Risk assessment for testing is allowed**
 - The IEC 62321-2 chart does not reflect the 'state of the art'
 - Being updated by Claigan

Allowed but outdated

Table B.1 – Probability of the presence of certain substances in materials and parts used in electrotechnical products

Materials and parts	Certain substances ^a							Number of homogeneous materials ^b	Remarks
	Hg	Cd	Pb	Cr (VI)	PBBs	PBDEs	Phthalate		
Mechanical parts									
Framework – metal	L	L	L	L	N/A	N/A	N/A	1	Unpainted and not chromated
Housing – plastic	L	L	L	L	L	M	L	1	
Power cord or cable	L	M	H	L	L	M	H	> 1	
Thick film sensor	L	M	M	L	L	L	L	> 1	
Heat sink	L	L	L	L	N/A	L	N/A	1	
Screw, washer, fastener – metal	L	M	M	H	N/A	L	N/A	1 and > 1	Some are coated, e.g. black and yellow chromate

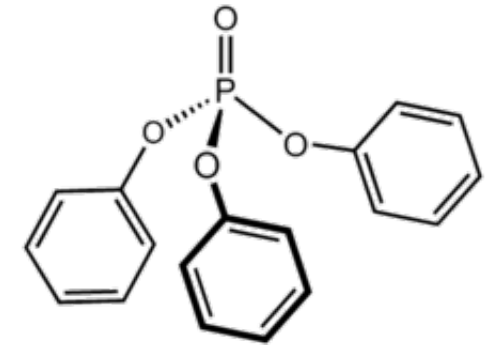
RoHS Standard Update In Practice Today

- **What to do now**
 - Current designs
 - Plan to test in future
 - New designs
 - Include RoHS testing
 - Combine with as many compliance requirements as possible
 - Best 'bang' for the 'buck'

See Claigan for more details

Nov 2024 - Triphenyl Phosphate

- **Phosphate based flame retardant**
 - Very common in
 - Flame retarded foam
 - Polyethylene wires
- **Most common SVHC in electronics ever**



Triphenyl Phosphate

Common Uses

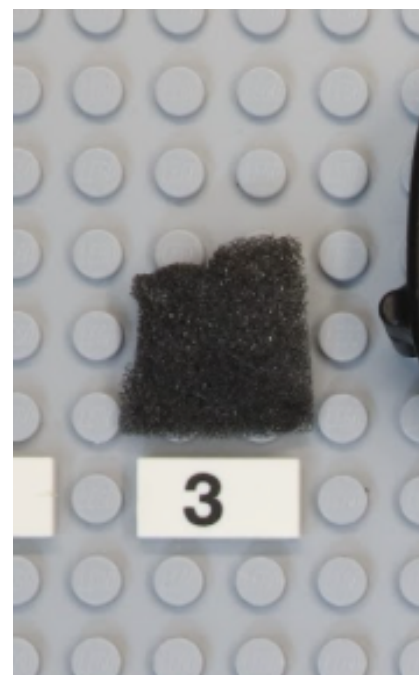
Flame Retarded Foam



>1,000 ppm

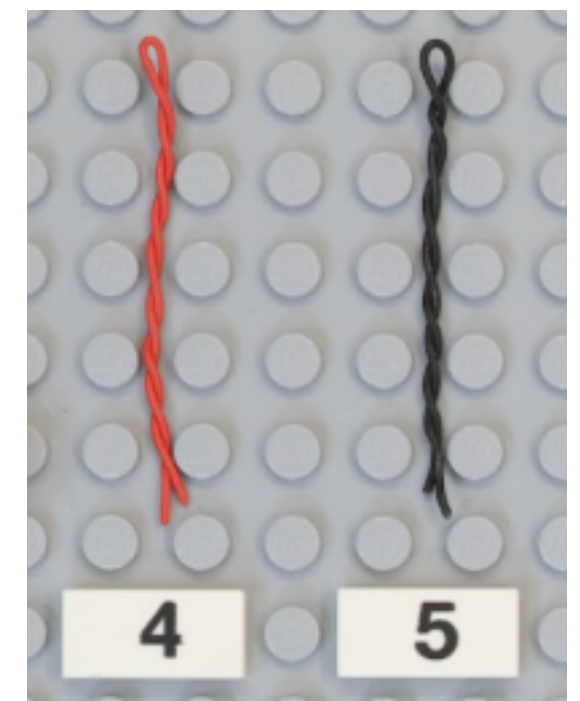


>1,000 ppm



>1,000 ppm

Polyethylene Wire



>1,000 ppm

See Claigan for more details

Identified by

- P at XRF
- Direct Mass Spec

REACH SVHC - ESG Ratings

- **Btw -**
 - REACH SVHC compliance is part of a public company's ESG (Environmental, Sustainability, Governance) rating

We focus on the key issues material to the **household durables industry**. Here is how **Panasonic** compares to industry peers. For more details, visit the [ESG investing page](#).

ESG LAGGARD	AVERAGE	ESG LEADER
 SUPPLY CHAIN LABOR STANDARDS	 CORPORATE GOVERNANCE	 CORPORATE BEHAVIOR
 LABOR MANAGEMENT	 CONTROVERSIAL SOURCING	 CHEMICAL SAFETY
 OPPORTUNITIES IN CLEAN TECH		 ELECTRONIC WASTE

REACH SVHC

Substances of very high concern are hazardous substances with severe consequences and carry a weight of 70%. The Substitute It Now list is a list of hazardous chemicals that are likely to face regulatory restrictions in the future and carry a weight of 30%.

Conflict Minerals

New Proposition 65 Warnings

- New warnings text
 - New rules for short form warning
 - Long form unchanged
 - [Link](#)
- Timeline
 - Published Nov 26, 2024
 - In effect January 1, 2025
- **Deadline**
 - January 1 2028 (Products manufactured after this date)



New Short Form warnings

- **Labelling Requirements**

- No longer has to be equivalent to largest font size on product
- “consumer product exposure warnings must be prominently displayed on a label, labeling, or sign, and must be displayed with such conspicuousness as compared with other words, statements, designs or devices on the label, labeling, or sign, as to render the warning likely to be seen, read, and understood by an ordinary individual under customary conditions of purchase or use.”

New Short Form warnings

- **Internet purchases**

- Warning location
 - Warning on the product display page, or
 - a clearly marked hyperlink using the word “**WARNING**” or the words “**CA WARNING**” or “**CALIFORNIA WARNING**” on the product display page that links to the warning, or
 - an otherwise prominently displayed warning provided to the purchaser prior to completing the purchase. If the warning is provided using the short-form warning label content ... the warning provided on the website may use the same content. For purposes of this subsection, the warning is not prominently displayed if the purchaser must search for it in the general content of the website.
- The retailer has 60 days to update the warning after it is provided by the manufacturer

Short Form Warning Options

- **Contents of warning**

- Symbol 
- The word “**WARNING:**” or the words “**CA WARNING:**” or “**CALIFORNIA WARNING:**” in all capital letters and bold print
- And new exposure warning (see next page)

New Exposure warnings (Short Form)

- **Exposure warnings options**

- “Risk of cancer from exposure to [name of chemical] and reproductive harm from exposure to [name of chemical]. See www.P65Warnings.ca.gov.”; or
- “Can expose you to [name of chemical], a carcinogen, and [name of chemical], a reproductive toxicant. See www.P65Warnings.ca.gov.”

Notes -

With variations for carcinogen only, reproduce toxicant only, or substances that are both

- Example (substance that is both)
 - “Risk of cancer and reproductive harm from exposure to [name of chemical]. See www.P65Warnings.ca.gov.”

New Proposition 65 Warnings

- New warnings [text](#)
- Timeline
 - Published Nov 26, 2024
 - In effect January 1, 2025
- Deadline
 - **January 1 2028 (Products manufactured after this date)**
- Note
 - Long form warning unchanged

See Claigan for more details

Restricted Substances 2025

- **January 2025**
 - Canada PFAS reporting
- **September 2025**
 - Consumer products and packaging plastics registry reporting
- **June 2025**
 - Deadline for RoHS exemption renewals for Dec 31 2026
- **November 2025**
 - SVHC - TPP
- **January 2026**
 - US TSCA Reporting
- **September 2026**
 - Institutional products and packaging plastics registry reporting



Q&A