

# Where do they come from?

Restricted materials legislations

Presented by:  
Bruce Calder  
VP Consulting Services



# Overview - Agenda - SCIP Declaration with Incomplete Part Data

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- Introduction
- Where do all the legislation come from?
- Common sources of legislation
  - Waste
  - Classification
  - Risk Management
  - UN Convention
- Commonality
  - Options
  - Differences
  - Effective approaches
- Q&A



Webinar is 50 minutes with 10  
minutes of Q&A  
(hopefully)

# Claigan - Webmeeting Updates Service

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- One per quarter or monthly
- Webmeeting run by Claigan to
  - Changes in restricted materials requirements
  - Compliance outputs
  - Impacts on your products
  - Q&A
- Very popular service

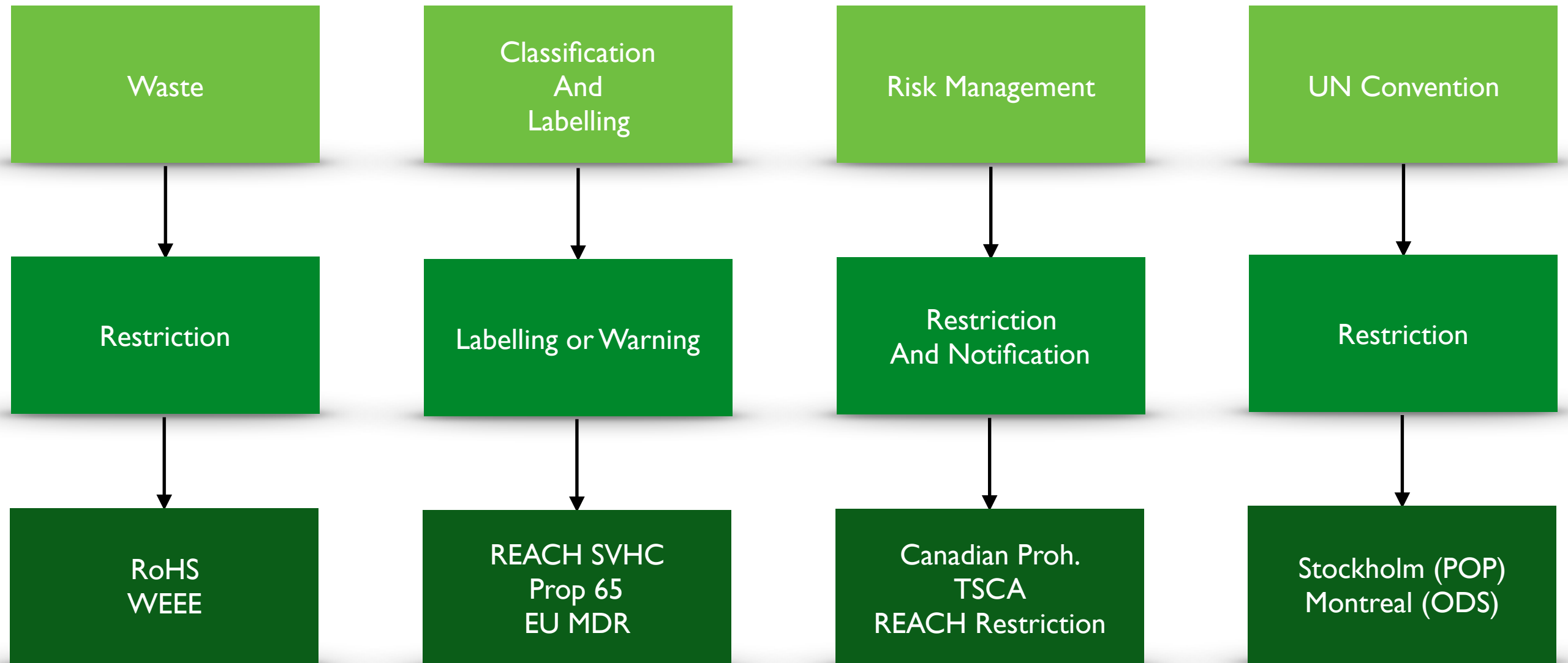
# Where do all the legislations come from?

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- Lots of legislations
  - EU RoHS, REACH (SVHC and Restriction), POP, Prop 65, China RoHS, China REACH, Canadian Prohibition, EU MDR, etc.....
- But is there any commonality?
  - Or predictability?
- Common question
  - Which ones do I have to pay attention to as they cover the others?

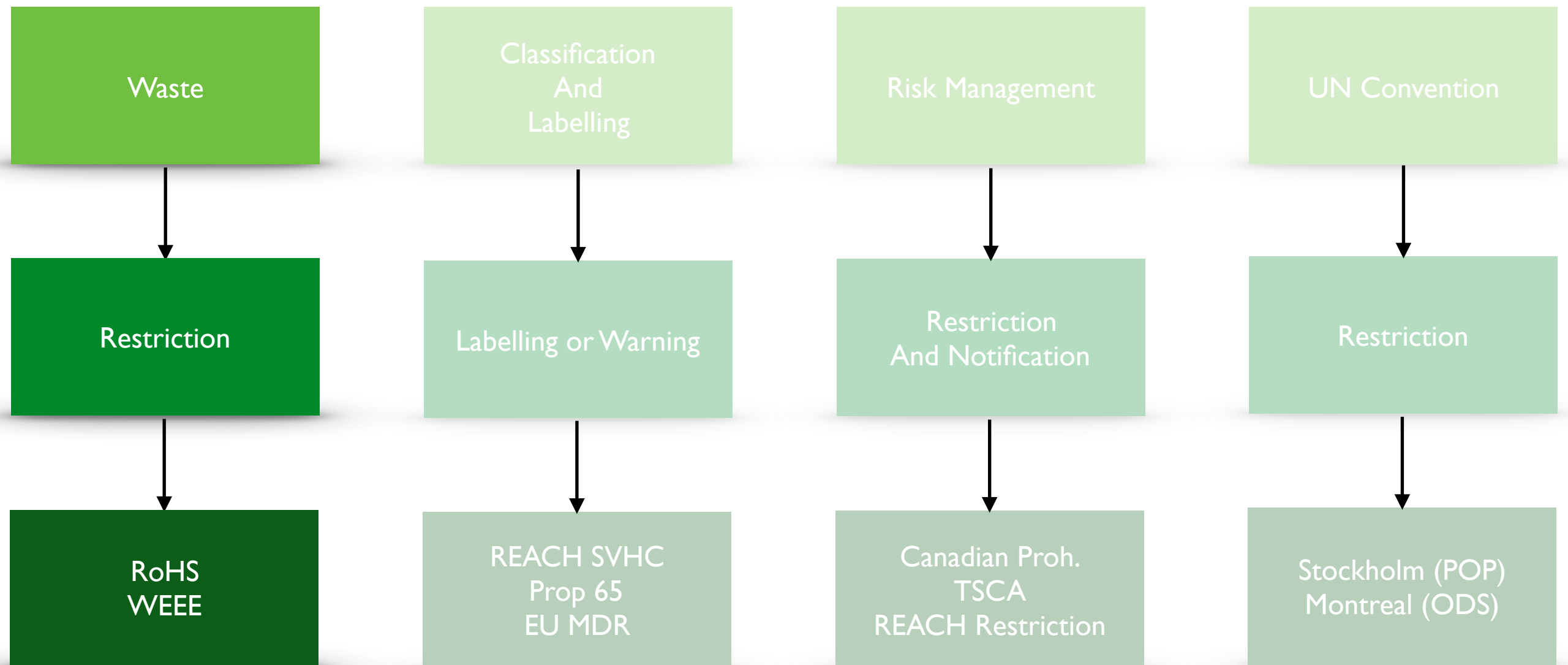
# Major Sources of Restricted Materials Legislations (Simplification)

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# Waste Legislation

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# Waste Legislation

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- Restriction of substance to prevent exposure to
  - Waste worker, or
  - Environment
- Examples
  - EU RoHS, and national version
  - UAE RoHS, China RoHS, Taiwan RoHS, EAEU RoHS, etc..
  - Waste Framework Directive (WFD)
    - Really a classification legislations

## EU RoHS

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- Originated from WEEE
- WEEE could not be implemented with increased risk to recycling workers
  - So RoHS was created
- Restricted
  - Pb, Hg, Cd, Cr6+, PBB, PBDE
- Updated due to other recycler risks
  - DEHP, DBP, DIBP, BBP



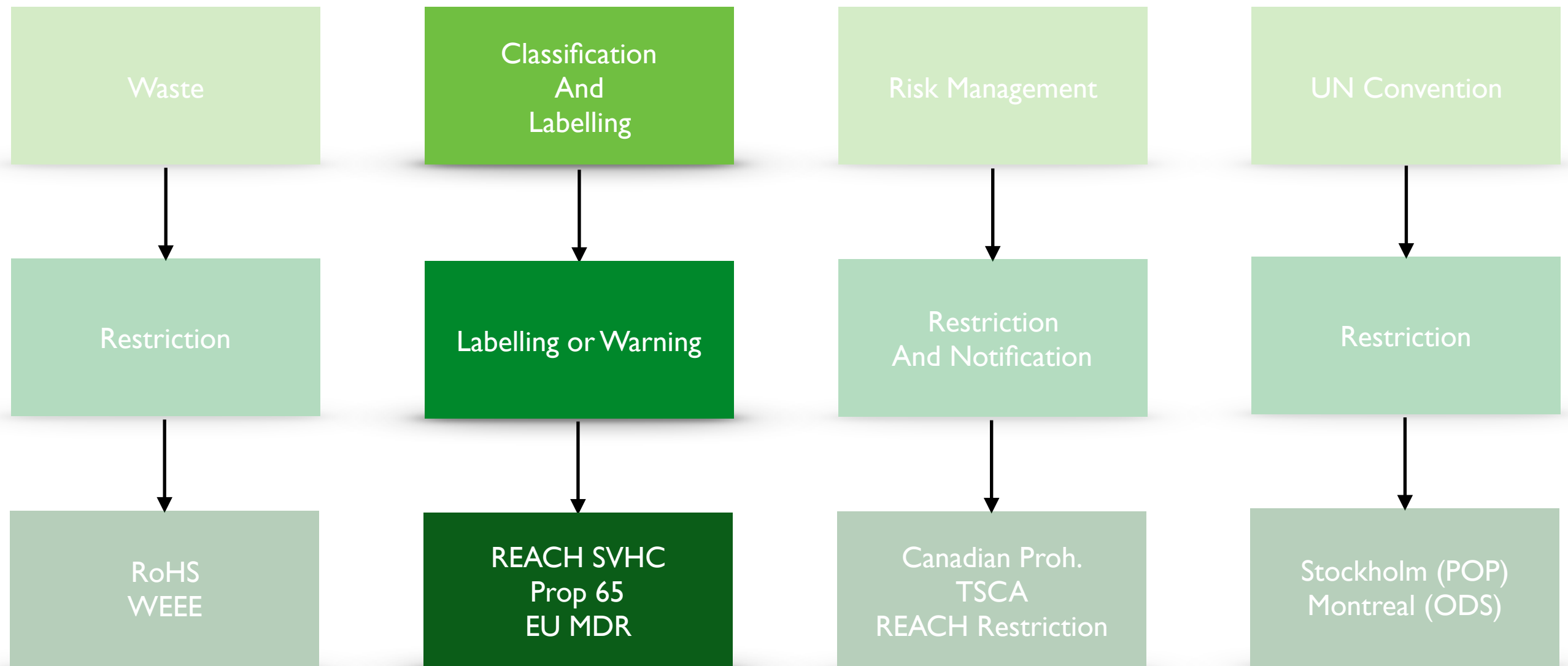
# Commonality - RoHS

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- Many countries have implemented
- Requirements
  - Restrictions
  - (with some countries phasing in labelling first)
  - Registration in some countries
- Standardized
  - Substances
  - Tests
  - Conformity assessment

# Classification and Labelling Legislation

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# Classification and Labelling

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- Classification and labelling of substances in articles
- Warnings or labelling related to classification of chemicals
  - CMR I (known carcinogen, reproductive toxic, or mutagen)
  - Endocrine disruptor
  - Respiratory sensitizer
  - Allergen
- Examples
  - REACH SVHC, Prop 65, EU MDR

# Classification

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- Based on chemical hazard classification
  - Generally ECHA (EU) Classification
- Most common classifications requiring warning in articles
  - Cat I carcinogen
  - Cat I reproductive toxin
  - Allergen
- Newer
  - Endocrine disruptor (strong overlap with Cat I reproductive)
  - Respiratory sensitizer

# Commonality

- Hazard classification
  - Generally follow EU classification
- Highest risk substances
  - Cat I carcinogens and reproductive toxins
- Differences
  - Type of label / warning, and thresholds



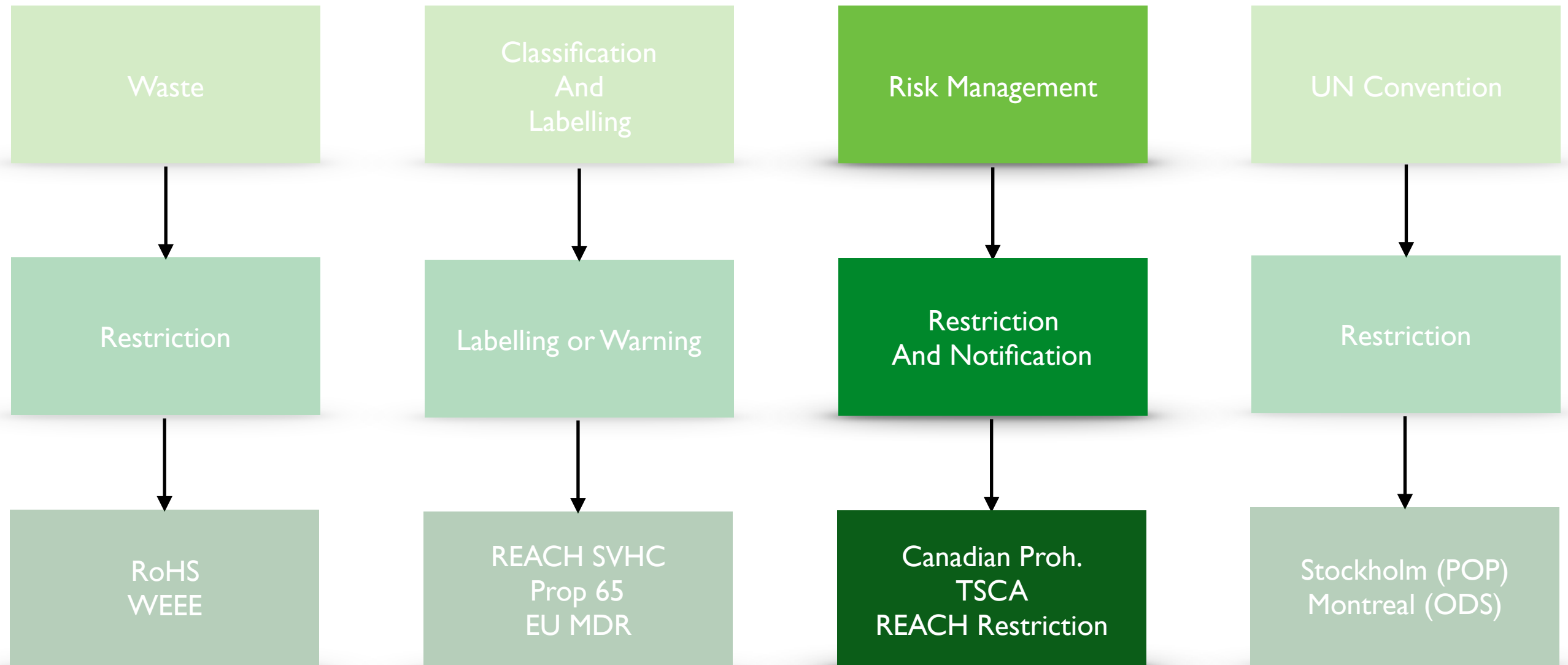
**Bis(2-ethylhexyl) phthalate**

Regulatory process names 10 Translated names 38 CAS names 1 EPRAC names 19 Trade names 15 Other identifiers 15 | Groups: 1

<p><b>Substance Identity</b></p> <p>EC / Mat. no.: 204-211-0</p> <p>CAS no.: 117-81-7</p> <p>Mol. formula: C24H38O4</p> 	<p><b>Hazard classification &amp; labelling</b></p> <p></p> <p><b>Danger!</b> According to the harmonised classification and labelling (CLP) approved by the European Union, this substance may damage fertility and may damage the unborn child.</p> <p>Additionally, the classification provided by companies to ECHA in REACH registrations identifies that this substance may damage fertility or the unborn child and is very toxic to aquatic life.</p>	<p><b>Properties of concern</b></p> <p> Toxic to Reproduction</p> <p> Endocrine Disrupting</p> <p><b>Important to know</b></p> <p>• Substance of very high concern (SVHC) and included in the candidate list for authorisation.</p>
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# Risk Management Legislation

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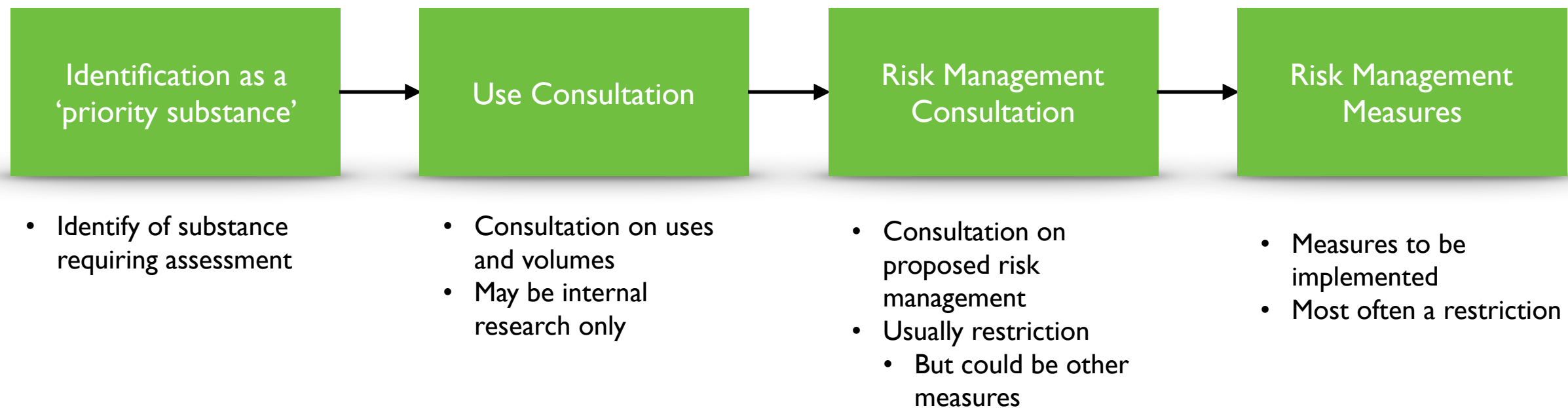
# Risk Mitigation

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- Process to identify priority substances and determine risk mitigation / management steps
- Stepwise process to determine best way to mitigate risk of a real or processed dangerous chemical
- Examples
  - REACH Restrictions, TSCA, Canadian Prohibition

# Risk Management Process

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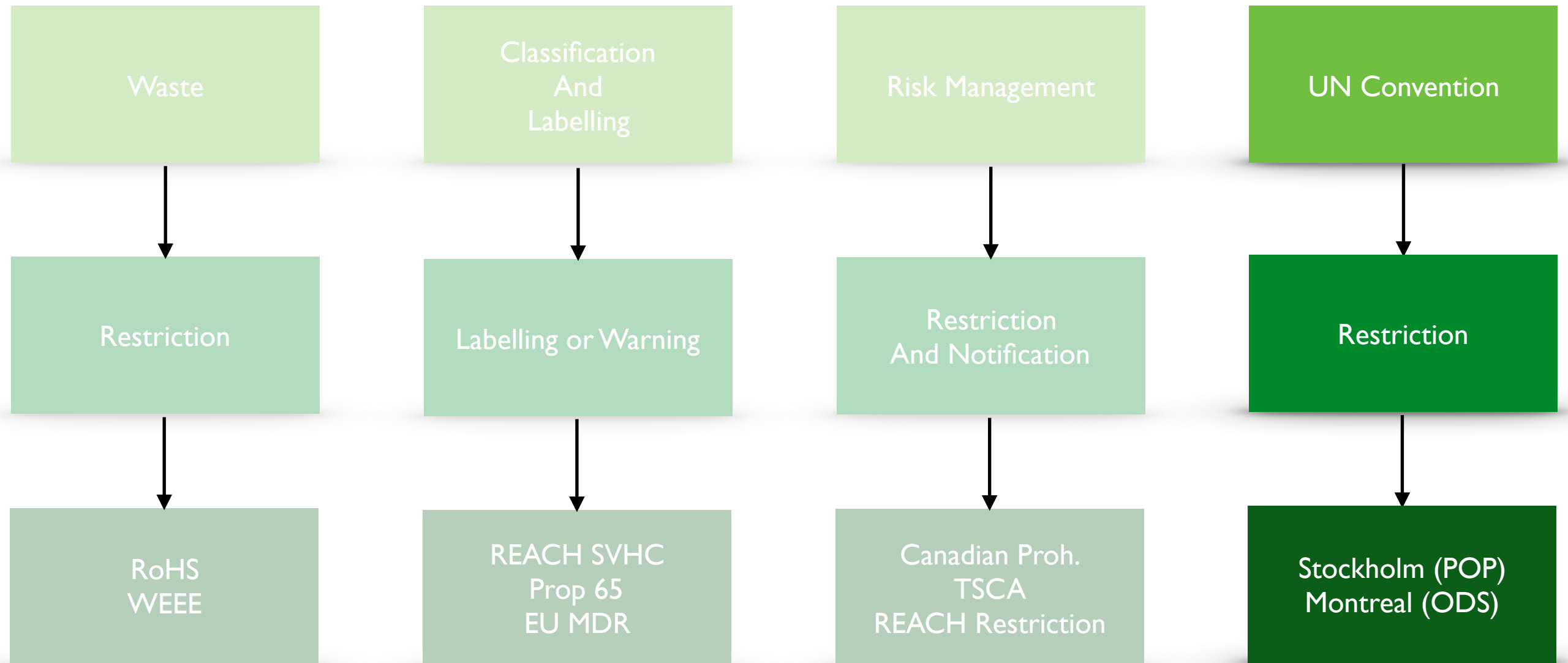
# Commonality

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- Less commonality than other requirements
- Follows both
  - technical, and
  - political priorities
- Generalities
  - Variations on EU REACH Restrictions
- Less predictable than other sources

# UN Conventions

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# UN Convention

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- UN agreement to restrict or limit a family of chemicals
- Global agreement by all countries
  - But often patchwork implementation
- Examples
  - UN Stockholm Convention (EU POP, Canadian Prohibition)
  - Montreal Protocol

# Persistent Organic Pollutants

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- UN Stockholm Convention
  - Global regulation of persistent organic pollutants
- Persistent bioaccumulants
  - Substances that accumulate in the environment until harmful
  - In general, substances that are not otherwise regulated
- Related regulations
  - EU POP, Canadian Prohibition

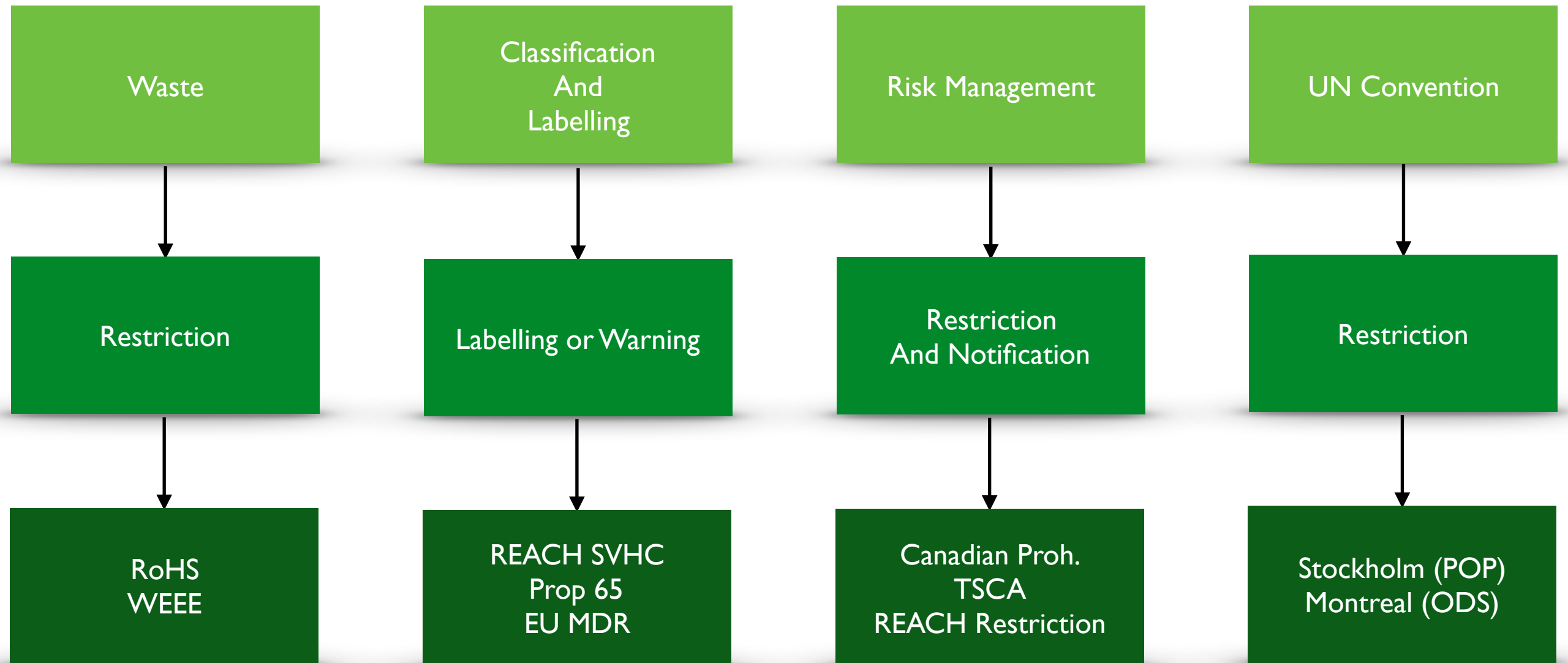
# Commonality

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- High commonality of substances
- Low commonality of application and limits
- Examples
  - SCCPs
- Leading regulations
  - EU POP
  - Canadian Prohibition (now leading with new restriction such as dechlorane plus and DBDPE)

# Major Sources of Restricted Materials Legislations (Simplification)

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# Are there common substances or approaches?

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- Substances
  - Significant overlaps in chemicals
  - Different limits
- Is there a useful subset
  - Yes and no

## Useful Subset

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- Key regulations
  - EU RoHS, EU REACH SVHC, EU REACH Restrictions, Prop 65
    - Plus Canadian Prohibition going forward
- These regulations cover virtually all the key substances
  - Often at different limits or with different warnings
- Good starting point for substance regulation
  - However companies need to stay abreast of changes in regulations



## Next Webinar

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- April 2020
  - SCIP and your business
- Topics
  - How to do SCIP as part of a business
    - Rolling it out corporately
    - Covering all the products
    - Managing business units
    - Managing other regulations in parallel

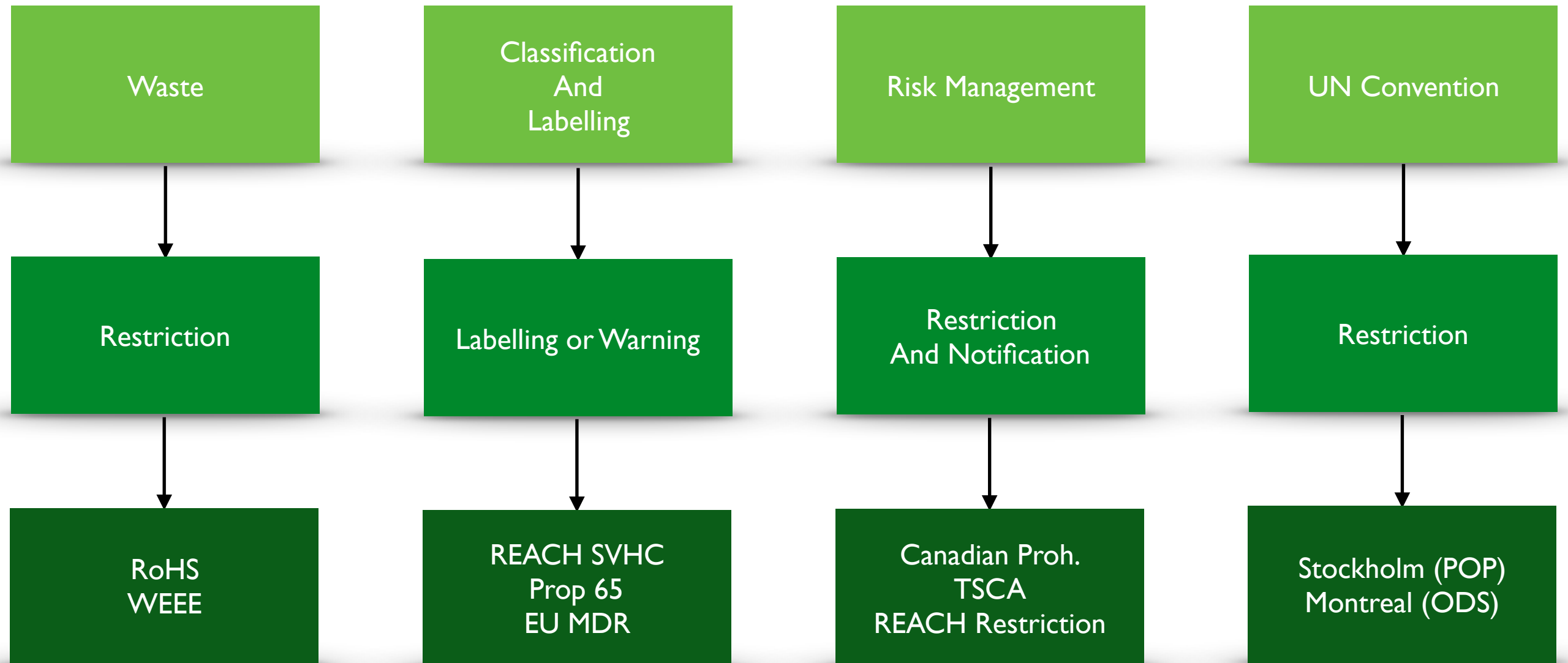
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# SCIP Services

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- **Option 1: Product Testing**
  - Testing of a product for REACH SVHC
  - Product SCIP declaration in excel
- **Option 2: Engineering Evaluation (Web)**
  - Engineering evaluation
  - Component templates
  - Six (6) months of support

Q&A