



RoHS/WEEE:

Setting Global Trends in Extended Producer Responsibility

2008 GlobalChem Conference

March 18, 2008

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Overview

- The Court of Public Opinion
- WEEE and RoHS
- Other Copies
- U.S. Analogues
- The 800 Pound Gorilla
- Going Forward

“Public” Opinion

- Environmentalism moving from contamination to chemicals/products, period
- Public just wants to know products are safe
- Customers just want to focus on core competency
- Supply chains are global and information is a click away

Ripple Effects

- Consumer/public concerns flow up the supply chain
- Key driver for producer responsibility
- Push toward higher environmental standards
- Technology forcing as products are reevaluated and reformulated in response

What are WEEE & RoHS?

- WEEE--Directive 2002/96/EC on waste electrical and electronic equipment
 - Facilitate the recycling, dismantling and recovery of electronic products and components
 - Product design
 - Financing
 - Information
- RoHS—Directive 2002/95/EC on the restriction of the use of certain hazardous substances in electrical and electronic equipment
 - protect human health by regulating use of certain heavy metals and hazardous materials in electronic equipment

What Does WEEE Cover?

- 10 categories of equipment (Annex IA):
 - Large and small household appliances
 - IT and telecommunications equipment
 - Consumer equipment
 - Lighting equipment
 - Electrical and electronic tools (not large-scale stationary industrial tools)
 - Toys, leisure and sports equipment
 - Medical devices
 - Monitoring and control instruments
 - Automatic dispensers

WEEE & Equipment

- Category 6 - Electrical and electronic tools
- Category 9 – Monitoring and control equipment
- Excludes
 - Large-scale stationary industrial tools
 - Equipment that is part of a “fixed installation”
 - Equipment that is part of other type of equipment or system
 - Don't forget voltage limits

What Does RoHs Cover?

- Applies to the ten WEEE product categories except:
 - Medical devices (category 8)
 - Monitoring and control instruments (category 9)
 - Electric light bulbs and luminaires in households.
- Does not cover spare parts placed on the market before 1 July 2006

What Does RoHS Require?

- Effective July 1, 2006, requires the replacement of the following substances in covered EEE:
 - Four heavy metals: lead, mercury, cadmium, hexavalent chromium
 - Polybrominated biphenyls (PBBs) and polybrominated diphenyl ethers (PBDEs)
- Commission Decision 2005/618/EC (18 August 2005) adopted maximum concentration values:
 - 0.1% by weight in homogeneous materials for lead, mercury, hexavalent chromium, PBB and PBDE
 - 0.01% weight in homogeneous materials for cadmium
 - “Homogeneous materials” – a unit that cannot be mechanically disjointed into different materials
 - “Mechanically disjointed” – can be separated by mechanical action
- BEWARE packaging!

There are Many Copies!

- China—*Administration on the Control of Pollution Caused by Electronic Information Products (China RoHS)*
 - Effective March 1, 2007
 - Duplicates most EU product categories + also covers packaging materials
 - Implemented in two phases
- Japan—*Enforcement Regulation of the Waste Management and Public Cleansing Law*
 - Effective July 1, 2006
 - Product categories are similar to EU RoHS
- Korea--*The Act for Resource Recycling of Electrical/Electronic Products and Automobiles*
 - Effective January 1, 2008
 - Categories similar to EU RoHS, but also includes vehicles

U.S. EPP Initiatives

- Federal – limited activity to date
- States – led by CA, MA, ME, NY, WA, VT
 - Increasingly regional in approach
 - WEEE laws
 - California ROHS
 - IMERC
 - TPCH
- Others?

Regulatory Trends

- Past
 - Lead (EPA)
 - Cadmium (EPA)
- Present
 - Hexavalent Chromium (OSHA)
 - PFOA/PFOS (EPA, Int'l)
 - Mercury-containing products (Int'l, states)
 - Cobalt Sulfide (NTP)
- Future
 - Nickel (EU, EPA)
 - Nanotechnology and metal oxides?
 - E-waste
 - Others?

The 800 Pound Gorillas

- Climate Change
 - Federal Initiatives
 - Vehicles
 - Registry
 - State Initiatives
- Voluntary initiatives

Going Forward

- Monitor Developments
- Educate Regulators
- Shrink Environmental Footprint
- Maximize Sustainability
- Manage Technology Transitions



Thank you!

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