

PRODUCTIP WORKSHOP RoHS

YOUR FREE COPY

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

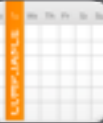
+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com





“We believe that it is possible for anybody to sell compliant consumer products at a competitive price.”

**Sell products that do not cause hassle.
We help you to achieve that.**

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



MANAGEMENT SUMMARY

1. NOT A NEW DIRECTIVE HOWEVER IT IS THE END OF GRACE PERIOD
2. MARKET SURVEILLANCE PRESSURE IS INCREASING
3. CONSEQUENCES OF NON COMPLIANCE EXTEND TO PROSECUTION
4. FORMAL NON COMPLIANCE CHECKS CAN BE DONE RETROACTIVELY
5. YOU NEED MORE BUDGET AND MORE TIME FOR TESTING BEFORE SHIPPING!
6. MORE DETAILED COMPLIANCE EVIDENCE REDUCES TEST COST AND LAG TIME NEEDED
7. ROHS 4 (OR 3?) IS IN THE MAKING (MCCP's)

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



TOPICS

- IT ALL STARTED WITH WEEE
- THE HISTORY OF ROHS - 2002 - 2019
- ROHS - EU AND REST OF WORLD
- ROHS - AFTER JULY 22, 2019
- ROHS VERSUS REACH (SVHC)
- AND ...

ProductIP Netherlands (HQ)

Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China

Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany

Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom

+44 20 3514 3121

ProductIP France

+33 9744 83364

info@ProductIP.com
www.ProductIP.com



IT ALL STARTED WITH WEEE



Photograph by Stefan Czapski, <https://blog.education.nationalgeographic.org/2017/01/17/e-waste-skyrockets-in-east-asia/>

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



WEEE ?

WASTE ELECTRICAL AND ELECTRONIC EQUIPMENT

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS AND WEEE

AIM IS REDUCE HAZARDOUS SUBSTANCES
TO ENSURE THAT
ELECTRICAL ELECTRONIC EQUIPMENT (EEE)
CAN BE RECOVERED - REUSED - RECYCLED

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



THE SCOPE - WHAT IS EEE?

ELECTRICAL ELECTRONIC EQUIPMENT

INCLUDED IS ALL EQUIPMENT THAT HAS AT LEAST ONE INTENDED FUNCTION WHICH IS DEPENDENT ON ELECTRIC CURRENT OR MAGNETIC FIELDS OR THAT TRANSFERS OR MEASURES SUCH CURRENTS AND FIELDS

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



EEE VOLTAGE LIMITATIONS?

A voltage rating not exceeding 1,000V for AC and 1,500V for DC

Cables with a voltage rating of less than 250 Volts

(connecting an EEE to the electrical outlet or connecting two or more EEE to each other)

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



EXAMPLES EEE

- A GAS COOKER WITH AN ELECTRICAL CLOCK
- A SINGING TEDDY BEAR
- SPORT SHOES WITH LIGHTS
- PETROL POWERED LAWNMOWERS WITH AN ELECTRIC SPARK FOR IGNITION

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



STATS ON WEEE 2016

THE TOTAL AMOUNT OF EEE PUT ON THE EUROPEAN MARKET
INCREASED BY 2.9% NOW REACHING 10.1 MILLION TONNES

(44.7 MILLION TONNES GLOBALLY)

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

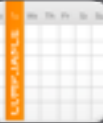
ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



STATS ON WEEE 2016



**55% ARE LARGE HOUSEHOLD APPLIANCES
(2.5 MILLION TONNES)**

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



STATS ON WEEE IN 2016

WASTE COLLECTED PER INHABITANT
VARIED PER MEMBER STATE

1.6 KG IN ROMANIA

16.5 KG IN SWEDEN

22.8 KG IN GERMANY

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



STATS ON WEEE 2016



18 EU MEMBER STATES
AND NORWAY AND LIECHTENSTEIN
SURPASSED THE 45% COLLECTION TARGET
(GLOBAL REACHED 20%)

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

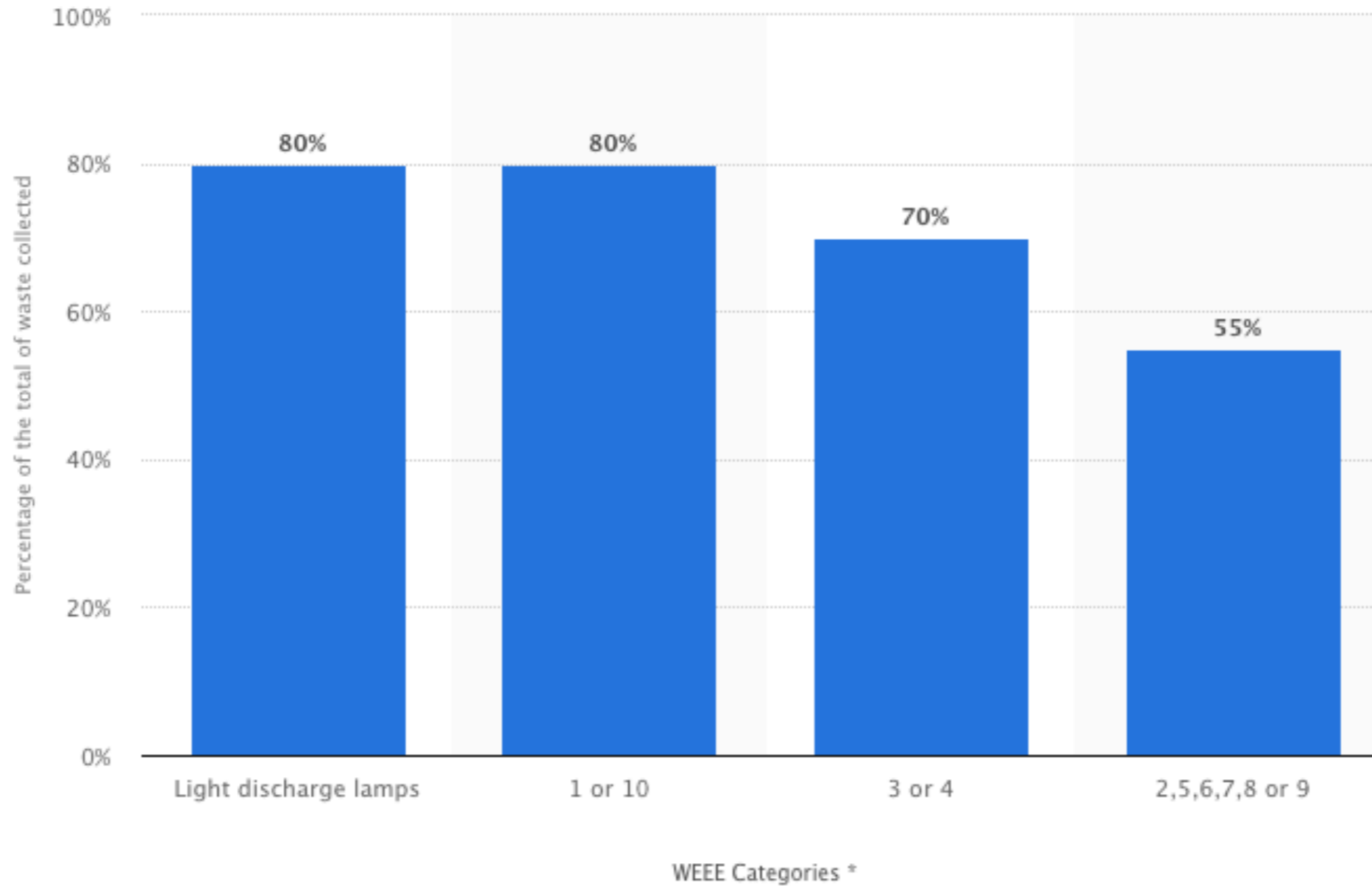
ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



TARGETS WEEE 2015 - 2018



Source <https://www.statista.com/statistics/765110/objectives-minima-from-recycling-from-the-trash-technological/>

ProductIP Netherlands (HQ)
 Rubensstraat 211
 6717 VE, EDE
 +31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
 Room 2409, Main Building
 Golden Central Tower
 No. 3037, Jintian Road
 Futian District. Shenzhen
 +86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
 Am Mittleren Moos 53
 D-86167 Augsburg
 +49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
 D-22297 Hamburg
 +49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
 +44 20 3514 3121
ProductIP France
 +33 9744 83364
info@ProductIP.com
www.ProductIP.com



TARGETS WEEE 2019 +

65% OF EEE PUT ON THE MARKET

(OR 85% OF THE WEEE GENERATED ON THE
TERRITORY OF THAT MEMBER STATE)

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

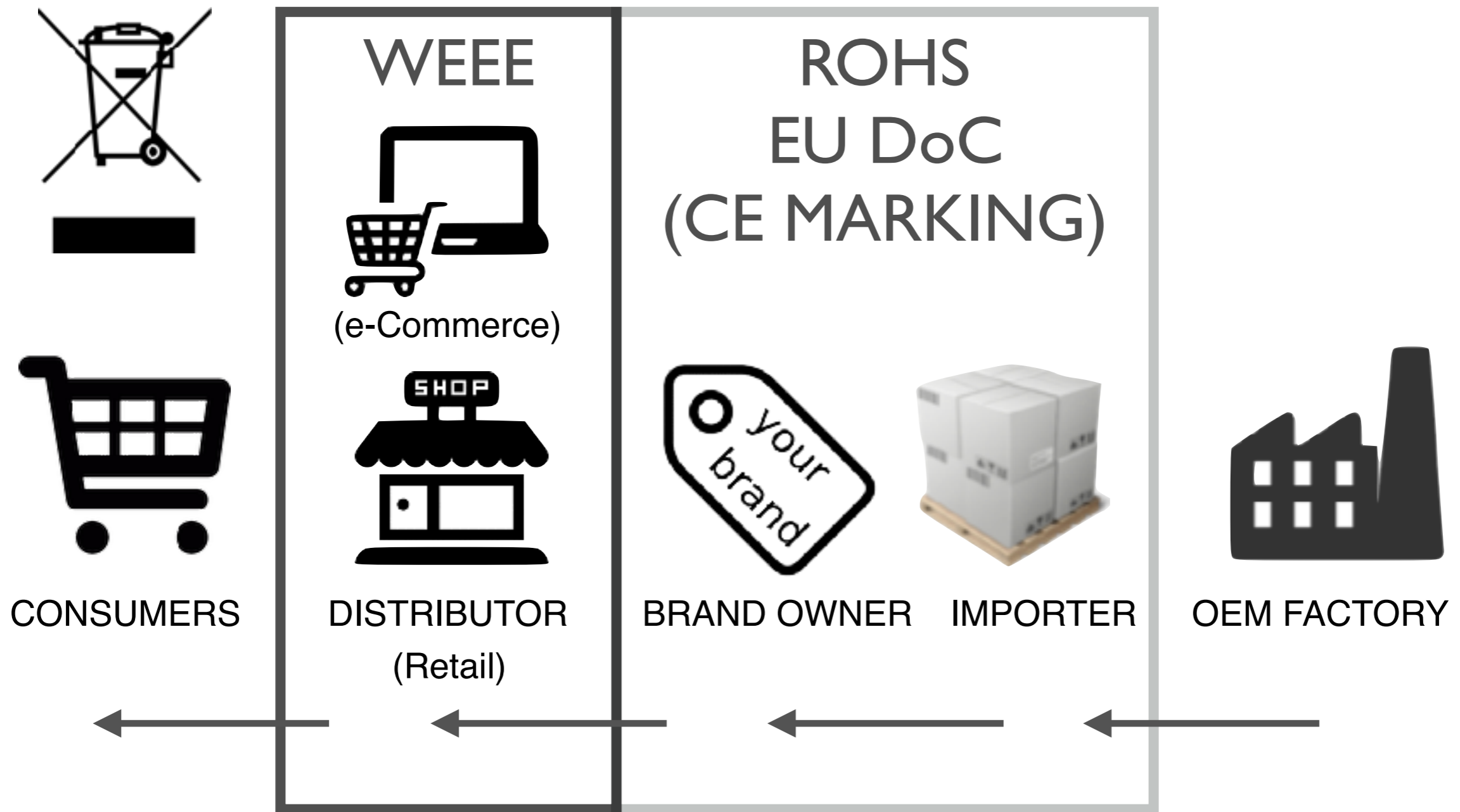
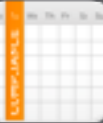
ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



WEEE = EXTENDED PRODUCER RESPONSIBILITY



ProductIP Netherlands (HQ)
 Rubensstraat 211
 6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
 Room 2409, Main Building
 Golden Central Tower
 No. 3037, Jintian Road
 Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
 Am Mittleren Moos 53
 D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
 D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
 +44 20 3514 3121

ProductIP France
 +33 9744 83364

info@ProductIP.com
www.ProductIP.com



THE HISTORY OF ROHS



IT STARTED IN 2002 WITH 2002/95/EC

ProductIP Netherlands (HQ)

Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China

Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany

Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom

+44 20 3514 3121

ProductIP France

+33 9744 83364

info@ProductIP.com
www.ProductIP.com



2002/95/EC

RESTRICTING THE USE OF CERTAIN HAZARDOUS SUBSTANCES IN ELECTRICAL AND ELECTRONIC EQUIPMENT

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



2002/95/EC - RESTRICTIONS



Maximum concentration values of hazardous substances

Restricted hazardous substances		Restricted limit (%)	Restricted limit (ppm)
Lead	Pb	0.1	1,000
Mercury	Hg	0.1	1,000
Hexavalent chromium	Cr(VI)	0.1	1,000
Cadmium	Cd	0.01	100
Polybrominated biphenyls	PBB	0.1	1,000
Polybrominated diphenyl ethers	PBDE	0.1	1,000

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



2002/95/EC - SCOPE



DEVICE CATEGORIES COVERED BY THIS POLICY

1. HOME APPLIANCES
2. SMALL HOUSEHOLD APPLIANCES
3. IT AND TELECOMMUNICATIONS EQUIPMENT
4. CONSUMER ELECTRONICS
5. LIGHTING FIXTURE
6. ELECTRICAL AND ELECTRONIC TOOLS (EXCEPT STATIONARY LARGE INDUSTRIAL TOOLS)
7. TOYS AND SPORTS AND LEISURE EQUIPMENT
8. MEDICAL DEVICES (EXCEPT IMPLANTED AND INFECTED PRODUCTS)
9. MONITORING AND CONTROL INSTRUMENTS
10. AUTOMATIC OUTPUT DEVICES

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



2002/95/EC - AND ALSO

- 14 AMENDMENTS
- 40 EXCEPTIONS

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS 2 - 2011/65/EC - SCOPE



DEVICE CATEGORIES COVERED BY THIS POLICY - **CATEGORIES ARE MAINLY RELEVANT FOR WEEE TARGETS**

1. HOME APPLIANCES
2. SMALL HOUSEHOLD APPLIANCES
3. IT AND TELECOMMUNICATIONS EQUIPMENT
4. CONSUMER ELECTRONICS
5. LIGHTING FIXTURE
6. ELECTRICAL AND ELECTRONIC TOOLS (EXCEPT STATIONARY LARGE INDUSTRIAL TOOLS)
7. TOYS AND SPORTS AND LEISURE EQUIPMENT
8. MEDICAL DEVICES (EXCEPT IMPLANTED AND INFECTED PRODUCTS)
9. MONITORING AND CONTROL INSTRUMENTS
10. AUTOMATIC OUTPUT DEVICES
- 11. OTHER ELECTRICAL AND ELECTRONIC EQUIPMENT PER 22 JULY 2019**

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

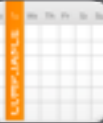
ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS 2 - 2011/65/EC - SCOPE



AND NOW IT IS PART OF
EU (DoC) REGIME
“CE DECLARATION OF CONFORMITY”

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS 2 - 2011/65/EC - AND ALSO

- 53 AMENDMENTS
- 42 EXCEPTIONS

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS 2 - 2015/863 - RESTRICTIONS



Maximum concentration values of hazardous substances

Restricted hazardous substances		Restricted limit (%)	Restricted limit (ppm)
Lead	Pb	0.1	1,000
Mercury	Hg	0.1	1,000
Hexavalent chromium	Cr(VI)	0.1	1,000
Cadmium	Cd	0.01	100
Polybrominated biphenyls	PBB	0.1	1,000
Polybrominated diphenyl ethers	PBDE	0.1	1,000
Bis (2-ethylhexyl) phthalate	DEHP	0.1	1,000
Butyl benzyl phthalate	BBP	0.1	1,000
Dibutyl phthalate	DBP	0.1	1,000
Diisobutyl phthalate	DIBP	0.1	1,000

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



WHY WE HAVE RESTRICTIONS?

Table 1 – Some types of chemicals of concern

Types of chemicals ²		Features or potential effects	Example
carcinogenic, mutagenic and/or reprotoxic (CMR) ³	carcinogens	inducing cancer or increasing its incidence	asbestos (used for instance in construction products)
	mutagens	increasing the occurrence of mutations	certain phthalates (used as plasticisers in a range of products, including flooring, roofing, cables, hoses and coated fabrics)
	reproductive toxicants	effects on sexual function and fertility in males and females, developmental toxicity in the offspring, effects through or via lactation	
persistent, bio-accumulative and toxic (PBT)	persistent	resisting environmental decomposition (for instance, through exposure to sunlight, other substances or bacteria)	certain brominated flame retardants (used in plastics, textiles and electrical/electronic equipment)
	bio-accumulative	accumulating in living organisms (often in their fat tissues); concentrations tend to increase in organisms that are at a higher level in the food chain	certain perfluorinated compounds (used, for instance, in weather-resistant clothing, cookware and water-repellent products)
	toxic	inducing adverse effects, for instance, on the DNA, the neurological system, the reproductive system or the immune system	
very persistent and very bio-accumulative (vPvB)	resisting environmental decomposition and accumulating in living organisms to a high degree		musk xylene (used, for instance, in some cosmetics and fragrances)
chemicals whose level of concern is equivalent to CMR substances	endocrine disruptors	altering the functions of the hormonal system	4-tert-octylphenol ethoxylates (used, for instance, in paints and medical products or devices)
	respiratory sensitizers	inducing allergic respiratory diseases	ADCA (used mainly as a blowing agent in the plastics and rubber industry)
	specific target organ toxicity	being toxic to a specific organ or system in the human body	cadmium – toxic to the kidneys (used, for instance, in certain pigments for plastics)



source: [http://www.europarl.europa.eu/RegData/etudes/IDAN/2016/595861/EPRS_IDA\(2016\)595861_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/IDAN/2016/595861/EPRS_IDA(2016)595861_EN.pdf)

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District, Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS AND REST OF WORLD

ROHS-TYPE LAWS HAVE BEEN INTRODUCED OR ARE CURRENTLY BEING INTRODUCED **IN MORE THAN 40 JURISDICTIONS** OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA). THESE **INCLUDE CHINA, INDIA, THE EURASIAN CUSTOMS UNION AND THE GULF STATES.**

EACH TIME THE EU UPDATES THE LEGISLATION, FOR EXAMPLE, WITHDRAWING, RENEWING OR GRANTING AN EXEMPTION, ADDING A SUBSTANCE, THIS WILL HAVE A DOMINO EFFECT ON THE REST OF THE WORLD.

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS AND CHINA

STARTED IN 2007

“ROHS 2” IN CHINA INTO FORCE IN 2016



ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS AND CHINA



5 - 7 - 10 - 25 - 50.

ENVIRONMENT FRIENDLY USE PERIOD (EFUP)

THE PERIOD OF TIME BEFORE ANY OF THE ROHS SUBSTANCES ARE LIKELY TO LEAK OUT, CAUSING POSSIBLE HARM TO HEALTH AND THE ENVIRONMENT

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

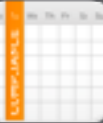
ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS AND USA



NO FEDERAL ROHS-TYPE LEGISLATION

BUT THERE IS LEGISLATION ON HEAVY METALS, FLAME RETARDANTS
AND PHTHALATES FOR SEVERAL PRODUCT GROUPS

CALIFORNIA (EWRA 2003) PROHIBITS SALE OF SOME EEE PER 2007
THAT ARE PROHIBITED FROM BEING SOLD UNDER EU ROHS
(CALIFORNIA PROP65 IS MORE SIMILAR TO EU REACH)

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS II - AFTER JULY 22 - FAQ

- ❑ CAN I STILL SELL EXISTING STOCK?
- ❑ HOW ABOUT SHIPMENTS THAT ARE UNDERWAY?
- ❑ SCOPE IS UNLIMITED - WHAT DOES THAT MEAN INCLUDING CABLES, SPARE PARTS, COMPONENTS?
- ❑ WHAT IS THE IMPACT OF TESTING THESE PHTHALATES, COST AND LEAD-TIME?
- ❑ HOMOGENOUS MATERIAL - ONCE A PART ALWAYS A PART?
- ❑ IS XRF SCANNING STILL USEFUL?
- ❑ HOW TO RECOGNISE A GOOD ROHS TEST REPORT?
- ❑ DO WE NEED TO MAKE NEW CE DECLARATIONS (EU DoC's)?
- ❑ DO I NEED TO UPDATE MY TECHNICAL FILES? NEW LVD REPORTS? EMC REPORTS?

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



CAN I STILL SELL?

**MAKING AVAILABLE IS DISTRIBUTING IT TO THE END USER (CONSUMER)
WAS NOT PERMITTED IN THE ORIGINAL PROPOSAL
(AND AS SUCH EVEN STILL MENTIONED LIKE THIS IN THE GUIDE)**

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com





12 December 2012

a new scope related provision, such as the clarified definition of EEE, which comprises any piece of equipment that needs electric currents or electromagnetic fields for at least one intended function.⁸

Q2.3 What does “**making available** on the market” mean in this context? (Articles 2(2), 3(11), 3(12))

Making available on the market includes the placing on the market, i.e. the first **making available** (on the market) and all secondary market operations, for example resale. This means that the products benefiting from Article 2(2) will have full market access until 22 July 2019. However, after that date none of these products shall be allowed to remain on the market even if they have been placed there before that date. **This means that the distribution chain within the EU must be clear of these non-compliant products by 22 July 2019.**

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



AMENDMENT 2017/2102 of 15 NOVEMBER 2017



12 December 2012

a new scope related provision, such as the clarified definition of EEE, which comprises any piece of equipment that needs electric currents or electromagnetic fields for at least one intended function.⁸

Q2.3 What does “making available on the market” mean in this context? (Articles 2(2), 3(11), 3(12))

Making available on the market includes the placing on the market, i.e. the first **making available** (on the market) and all secondary market operations, for example resale. This means that the products benefiting from Article 2(2) will have full market access until 22 July 2019. However, after that date none of these products shall be allowed to remain on the market even if they have been placed there before that date. **This means that the distribution chain within the EU must be clear of these non-compliant products by 22 July 2019.**

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District, Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



YES YOU CAN STILL SELL!

JULY 22, 2019 IS THE END OF THE GRACE PERIOD!

THAT GRACE PERIOD WAS RELEVANT FOR EEE CATEGORIES 1 TO 10 AS
NOW ALL EEE HAS TO COMPLY WHEN PLACING ON THE MARKET

(PER AMENDMENT 2017/2102 of 15 NOVEMBER 2017)

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

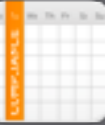
ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



PLACING ON THE MARKET



PLACING ON THE MARKET IS IMPORT

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



NO ISSUE FOR STOCK-LOT!

PROHIBITION OF SECONDARY MARKET OPERATIONS IS INCONSISTENT WITH THE GENERAL PRINCIPLES UNDERLYING UNION MEASURES FOR THE APPROXIMATION OF LAWS RELATING TO PRODUCTS AND SHOULD THEREFORE BE REMOVED.

(THEY MUST BE IMPORTED - NOT IN A BONDED WAREHOUSE!!)

AMENDMENT 2017/2102 of 15 NOVEMBER 2017

ProductIP Netherlands (HQ)

Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China

Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany

Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom

+44 20 3514 3121

ProductIP France

+33 9744 83364

info@ProductIP.com
www.ProductIP.com





SO WHAT ABOUT SHIPMENTS?

ALL MUST COMPLY WITH THE NEW RESTRICTIONS

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



WHAT ARE THE RISKS?

NON COMPLIANT SHIPMENTS - PLACING ON THE MARKET

IMPORT WILL BE BLOCKED

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



THE NEW SCOPE - UNLIMITED



ALL THESE MUST ALSO COMPLY

1. CABLES
2. SPARE PARTS FOR REPAIR OR RE-USE
3. ACCESSORIES FOR UPDATING OR UPGRADING FUNCTIONALITIES

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



SPARE PARTS AS WELL?

EXCEPT SPARE PARTS (AS PER THE AMENDMENT IN 2017)

1. CLOSE LOOP B2B RETURN REPAIR IS ALLOWED WITH NOTIFICATION TO THE CONSUMER (A BRAND REPAIRING ITS OWN ARTICLES)
2. RECOVERED FROM EEE PLACED ON THE MARKET BEFORE JULY 1, 2006 AND USED TO REPAIR EEE PLACED ON THE MARKET BEFORE JULY 1, 2016 (EEE CATEGORY 1 - 10)
3. ALL OTHER EEE (CATEGORY 11)
RECOVERED FROM BEFORE JULY 22, 2019 USED IN BEFORE JULY 22, 2029

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

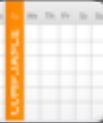
ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



SPARE PARTS AS WELL?



EXCEPT SPARE PARTS

4. MEDICAL DEVICES OR MONITORING / CONTROL INSTRUMENTS

RECOVERED FROM BEFORE JULY 22, 2014 USED IN BEFORE JULY 22, 2026

5. IN VITRO DIAGNOSTIC

RECOVERED FROM BEFORE JULY 22, 2016 USED IN BEFORE JULY 22, 2026

6. INDUSTRIAL MONITORING AND CONTROL

RECOVERED FROM BEFORE JULY 22, 2017 USED IN BEFORE JULY 22, 2027

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



WHAT ABOUT BATTERIES?



BATTERIES AND ACCUMULATORS ARE EXCLUDED FROM ROHS
BECAUSE THEY NEED TO COMPLY WITH BATTERY DIRECTIVE

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



MORE EXCLUSIONS 1 / 2

- **LARGE-SCALE STATIONARY INDUSTRIAL TOOLS**
(METAL FORMING PRESSES, NEWSPAPER PRINTING, CRANES)
- **LARGE-SCALE FIXED INSTALLATIONS**
(PRODUCTION LINES, PASSENGER LIFTS, CONVEYOR SYSTEMS)

GENERAL RULE:

BENCH TOP TOOLS AND IT EQUIPMENT DO NOT FALL WITHIN THE CATEGORY OF LARGE-SCALE STATIONARY INDUSTRIAL TOOLS.

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



MORE EXCLUSIONS 2 / 2

- NON-ROAD MOBILE MACHINERY IS EXCLUDED WHEN MADE AVAILABLE EXCLUSIVELY FOR PROFESSIONAL USE
- PROFESSIONAL MACHINES WITH AN ONBOARD POWER SOURCE ARE EXCLUDED (PROFESSIONAL CLEANING MACHINES, MINING MACHINES)
- PIPE ORGANS ARE EXCLUDED
- ACTIVE IMPLANTABLE MEDICAL DEVICES ARE EXCLUDED
- PHOTOVOLTAIC PANELS FOR PROFESSIONALS (PRODUCING ENERGY) ARE EXCLUDED
- SPECIFIC R&D EQUIPMENT IS EXCLUDED
- EQUIPMENT FOR MILITARY PURPOSES, USE IN SPACE, ARE EXCLUDED

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



THE NEW SCOPE - CABLES

- CABLES ALREADY FOLLOWED THE RESTRICTIONS FROM THE PRODUCT CATEGORY THEY WOULD FALL IN. FOR EXAMPLE:
HDMI CABLES, SCART CABLES, NETWORK CABLES
WOULD FALL UNDER CATEGORY 3 OR 4
- NON-FINISHED CABLES (CABLE REELS WITHOUT PLUGS) WERE EXEMPTED TILL 22 JULY 2019, BUT ARE NOW IN CATEGORY 11 - ALL OTHER PRODUCTS

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



INTERNAL WIRING?

- INTERNAL WIRES ARE NOT CABLES
- ALWAYS PART OF THE PRODUCT (OF THE EEE)
- NO INDIVIDUAL CE MARKING OR EU (DoC) FOR INTERNAL WIRING
- THE SAME FOR PERMANENTLY ATTACHED CABLES
(LIKE MOST LAMP CABLES)

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



EXTERNAL CABLES

- EXTERNAL CABLES PLACED ON THE MARKET SEPARATELY
- NEED THEIR OWN EU DECLARATION OF CONFORMITY AND CE MARKING
- AND ARTICLE NUMBER AND TRADE-NAME CONTACT INFORMATION

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



EXTERNAL CABLES

- EXTERNAL CABLES PLACED ON THE MARKET SEPARATELY
- NEED THEIR OWN EU DECLARATION OF CONFORMITY AND CE MARKING
- AND ARTICLE NUMBER AND TRADE-NAME CONTACT INFORMATION

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

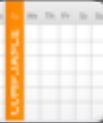
ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



CABLES AND CONSTRUCTION PRODUCTS



CABLES THAT WILL BE USED IN A BUILDING

(FOR EXAMPLE DATA CABLE)

ALSO NEED TO COMPLY WITH REQUIREMENTS FOLLOWING

FROM THE CONSTRUCTION PRODUCTS REGULATION.

THIS MEANS THERE WILL BE AN EU DOC - COVERING ROHS

AND THERE AN EU DOP (PERFORMANCE) - COVERING CPR

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



GRAPHIC CARDS AND THE LIKE?



CARDS THAT ARE A FINISHED PRODUCT (COMPONENT) ARE
CONSIDERED WITHIN THE SCOPE OF ROHS

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

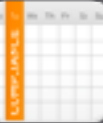
ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



RFID TAGS?



BOTH ACTIVE AND PASSIVE RFID TAGS ARE WITHIN THE SCOPE
UNLESS THEY ARE REMOVED PRIOR TO SHIPMENT OR USE
FOR EXAMPLE THEFT CONTROL RFID TAGS

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



IS AN RFID WALLET EEE?



RFID BLOCKING WALLET: KEEPS YOUR VITAL INFORMATION IN CARDS FROM BEING STOLEN.

DOES BLOCK 13.56 MHZ FREQUENCY (CREDIT CARDS, DEBIT CARDS, DRIVER LICENSE AND ID CARDS).

DOES NOT BLOCK 125 KHZ FREQUENCY (SIGNAL OF SOME ID BADGE, ACCESS CARDS AND HOTEL ROOM CARD CAN'T BE BLOCKED)

INCLUDED IS ALL EQUIPMENT THAT HAS AT LEAST ONE INTENDED FUNCTION WHICH IS DEPENDENT ON ELECTRIC CURRENT OR MAGNETIC FIELDS OR THAT TRANSFERS OR MEASURES SUCH CURRENTS AND FIELDS

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



IS AN RFID WALLET EEE?



NO MATTER IF IT WORKS OR NOT ...

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



PROFESSIONAL USE?



ROHS 2 DOES NOT DIFFERENTIATE BETWEEN EEE FOR PROFESSIONAL
OR NON-PROFESSIONAL USE OTHER THAN IN A FEW EXCLUSIONS

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



IMPACT OF TESTING

- TESTING FOR PHTHALATE SHALL BE MORE COSTLY AND MORE TIME CONSUMING THAN TESTING FOR HEAVY METALS.
- IT IS DESTRUCTIVE TESTING SO MORE SAMPLES / PARTS NEEDED
- ADVISE IS TO CHECK WITH YOUR TESTING AND INSPECTION PARTNERS ON THE IMPACT
- ADJUST THE NEEDED BUDGET
- ENSURE THERE IS SUFFICIENT TIME FOR TESTING BEFORE SHIPPING

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



HOMOGENEOUS MATERIAL

- “ONCE A PART ALWAYS A PART”
- IF TWO MATERIALS CAN BE SEPARATED BY A PHYSICAL METHOD THEN THESE ARE TWO MATERIALS
(COATING < 100 nm can be excluded)
- 0.1% WEIGHT ON WEIGHT = PER PART

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



IS XRF SCANNING STILL USEFUL?

IT IS STILL USEFUL
BUT THE SCOPE IS LIMITED TO
“METALS”

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



WHAT IS A GOOD REPORT?

A GOOD REPORT IS A REPORT THAT CAN BE LINKED TO THE PRODUCT.

TRACEABILITY

IT IS ALL ABOUT LEVEL OF DETAIL.

A CLEAR BILL OF MATERIAL

CLEAR PICTURE(S) OF THE PRINTED CIRCUIT BOARD(S)

WITH REVISION INFORMATION

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



NEW EU DoC NEEDED?

HAS THE PRODUCT CHANGED IN SUCH A WAY THAT RISKS
RELATED TO ELECTRICAL CURRENT / VOLTAGE
REQUIRE NEW TESTS?

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

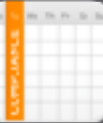
+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com





NEW TEST REPORTS NEEDED?

- NEW INTERNAL WIRES CARRYING MAINS POWER / CURRENT?
- ELECTRICAL ENCLOSURE MADE OF NEW MATERIALS?
- PARTS HOLDING CURRENT CARRYING PARTS IN PLACE CHANGED?
(CONNECTORS, WIRE CLAMPS, TERMINAL BLOCKS)

CREATE A NEW FILE (CLONE) WITH NEW MARKET RELEASE DATE!

ProductIP Netherlands (HQ)

Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China

Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany

Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom

+44 20 3514 3121

ProductIP France

+33 9744 83364

info@ProductIP.com
www.ProductIP.com



PRODUCT HAS BEEN CHANGED

THIS MEANS AN UPDATED EU DoC

ProductIP Netherlands (HQ)

Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China

Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany

Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom

+44 20 3514 3121

ProductIP France

+33 9744 83364

info@ProductIP.com
www.ProductIP.com



NEW EU DoC

IT WILL BE THE SAME EU DOC
MOST LIKELY WITH EXACTLY THE SAME SCOPE
HOWEVER WITH A NEW DATE

THERE IS NO NEW ROHS DIRECTIVE
JUST THE END OF A GRACE PERIOD

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



TECHNICAL DOCUMENTATION

- INFORMATION LINKING THE PRODUCT TO COMPLIANCE EVIDENCE
- PROOF OF INTERNAL PRODUCTION CONTROL
- (RANDOM) CHECK IF THIS INDEED HAS BEEN DONE (INSPECTIONS)
- EU DECLARATION OF CONFORMITY [CE DECLARATION]

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

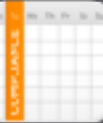
ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS VERSUS REACH (SVHC)



WHY IS THIS RELEVANT?

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS VERSUS REACH (SVHC)

- A. BECAUSE LEAD WAS RESTRICTED UNDER ROHS AND NOW ALSO PART OF REACH SVHC

- C. PHTHALATES WERE RESTRICTED UNDER REACH SVHC AND NOW ALSO UNDER ROHS

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS VERSUS REACH (SVHC)



1.

CAN A PART OF THE EEE CONTAIN
LEAD OVER 0.1% w/w

AND ALLOWED BY EXCEPTION?

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS VERSUS REACH (SVHC)



YES FOR EXAMPLE LEAD AS PART OF COPPER
ALLOY ALLOWED UP TO 4%

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

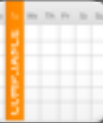
ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS VERSUS REACH (SVHC)



2.

AND IS IT WITHIN THE LIMITS OF
REACH ANNEX XVII
BUT OVER THE LIMITS OF REACH SVHC?

(IF OVER 0.1% w/w IT AUTOMATICALLY IS OVER REACH SVHC LIMIT)

SVHC = SUBSTANCES OF VERY HIGH CONCERN

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

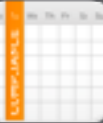
ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS VERSUS REACH (SVHC)



3.

IN THAT CASE YOU MUST INFORM
B2B SUPPLIERS PRO-ACTIVELY

B2C - INFORM CONSUMERS ONLY
WHEN THEY ASK ABOUT SVHC
(WITHIN 45 DAYS)

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



MARKING OR MARKETING?



ProductIP Netherlands (HQ)
 Rubensstraat 211
 6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
 Room 2409, Main Building
 Golden Central Tower
 No. 3037, Jintian Road
 Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
 Am Mittleren Moos 53
 D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
 D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
 +44 20 3514 3121

ProductIP France
 +33 9744 83364

info@ProductIP.com
www.ProductIP.com



MARKING OR MARKETING?



THE CE MARKING IS THE ONLY MARKING THAT INDICATES CONFORMITY TO ALL THE ESSENTIAL REQUIREMENTS OF THE UNION HARMONISATION LEGISLATION THAT PROVIDE FOR ITS AFFIXING.

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



MARKING OR MARKETING?



A PRODUCT MAY BEAR **ADDITIONAL MARKINGS** PROVIDED THAT THEY **DO NOT HAVE THE SAME MEANING** AS THE CE MARKING, THAT THEY ARE **NOT LIABLE TO CAUSE CONFUSION** WITH THE CE MARKING AND THAT THEY **DO NOT IMPAIR THE LEGIBILITY** AND VISIBILITY OF THE CE MARKING.

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



MARKING OR MARKETING?

**IN THIS RESPECT, OTHER MARKINGS MAY BE USED ONLY IF THEY
CONTRIBUTE TO THE IMPROVEMENT OF CONSUMER PROTECTION AND
ARE NOT COVERED BY HARMONISATION LEGISLATION OF THE
EUROPEAN UNION.**

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

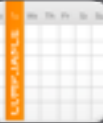
ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



MARKING OR MARKETING?



Q8.12 Can I have any RoHS marks other than the CE mark?

From 2nd January 2013, CE marking shall be the **only** marking which attests the conformity of the product with the requirements of RoHS 2. Pursuant to EC/765/2008 markings, signs or inscriptions that are likely to mislead third parties regarding the meaning or form of the CE marking shall be prohibited.

text from EU RoHS_FAQ_20121212.pdf

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



MARKING OR MARKETING?

THE QUESTION IS:
IS THE STATEMENT ACTUALLY TRUE?

THE IMPACT OF USING A ROHS COMPLIANT LOGO
ON A PRODUCT THAT IS IN FACT NOT ROHS
COMPLIANT SHALL BE CONSIDERED MORE SEVERE

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

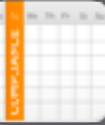
ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



COST?



STAKEHOLDERS STUDY REGARDING ROHS COMPLIANCE COST

0.014% OF TURNOVER (WEIGHTED AVERAGE)

TESTING - CHECKS - DOCUMENTATION OF COMPLIANCE

source http://ec.europa.eu/environment/waste/rohs_eee/pdf/impact_assessment.pdf

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



SAFETY GATE (RAPEX) NOTIFICATIONS

1. CLEARLY TREND IN 2019. **ALREADY 50 RECALLS!**
2. MOSTLY BECAUSE OF **LEAD IN SOLDER**
3. AND **CADMIUM IN PLASTICS**
4. TOYS, LIGHTING EQUIPMENT, HEADSETS, CABLES, CHARGERS
RELATIVE SIMPLE ELECTRONICS (EVEN BATTERY OPERATED),
ONLY FEW SMALL HOUSEHOLD APPLIANCES,
5. RETROACTIVELY CHECKING FOR FORMAL NON-COMPLIANCE

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



FORMAL NON-COMPLIANCE

GERMANY ANNO 2019 A SYSTEM AUDIT ON ROHS COMPLIANCE

Anlässlich einer landesweiten Jahresaktion möchten wir in Ihrem Hause eine Überprüfung durchführen. Der **Fokus** liegt dabei auf der Etablierung eines **Systems** zur Erfüllung der Pflichten nach der ElektroStoffV i. V. m. der Umsetzung der Richtlinie 2011/65/EU des Europäischen Parlaments und des Rates über die Beschränkung der Verwendung bestimmter gefährlicher Stoffe in Elektro- und Elektronikgeräten (**RoHS**) sowie der DIN EN 50581.

YOU'LL RECOGNISE THE WORDS: FOCUS - SYSTEM - RoHS

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



FORMAL NON-COMPLIANCE

- Die **Kennzeichnung** der Geräte
 - Die **Konformitätserklärungen**
 - Die Anforderungen an die betriebliche Organisation
 - Ggf. die Umsetzung der Anforderungen aus Modul A der Richtlinie EG 768/2008 (**interne Fertigungskontrolle**)
 - Ggf. die Anforderungen an die **Dokumentation** (Materialdeklaration, Lieferantenanfragen, Beschaffung etc.), entsprechend der DIN EN 50581
-
- MARKINGS
 - EU DoC (CE DoC),
 - REQUIREMENTS FOR THE SUPPLIERS
 - VERIFICATION OF QUALITY CONTROL (Inspection),
 - DOCUMENTATION

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



MEASURES

1. DESTRUCTION OF THE PRODUCT
2. WITHDRAWAL OF THE PRODUCT FROM THE MARKET
3. THE COMPANY IS REPORTED TO THE PROSECUTOR - **TREND!**

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



MEASURES



Alert number: A12/0331/19



Category: Lighting equipment

Product: Torch

Brand: Unknown

Name: Unknown

Type / number of model: 341377VN

Batch number / Barcode: Unknown

Share on



Risk type: Environment

The solder contains lead (measured value up to 50% by weight) in concentrations above limit values.
Lead poses a risk to the environment.

The product does not comply with the requirements of the Commission Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS 2 Directive).

Measures taken by economic operators: Withdrawal of the product from the market (By: Importer)

Measures ordered by public authorities (to: Other): The company is reported to the prosecutor

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



ROHS 4 (OR 3?) - MCCP's NEXT?

1. **MEDIUM-CHAIN CHLORINATED PARAFFIN**
2. **USED PREDOMINANTLY A SECONDARY PLASTICISER IN PVC
AND ALSO USED AS FLAME RETARDANT
UP TO 10-15% WEIGHT OF THE TOTAL PLASTIC**
3. **AND AS SHEATHING AND INSULATION JACKET FOR CABLES AND WIRES
UPT TO 20% FOR PVC SHEATING**
4. **MAY-CAUSE HARM TO BREAST-FED CHILDREN**
5. **WORKERS ARE AT RISK WHEN SHREDDING PVC CABLE WASTE**
6. **SECONDARY POISONING (VIA EARTHWORM FOOD CHAIN)**

http://ec.europa.eu/environment/waste/rohs_eee/substances_en.htm

<https://chemicalwatch.com/67604/sweden-proposes-mccp-restriction-in-electrical-electronic-goods>

ProductIP Netherlands (HQ)
Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China
Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany
Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom
+44 20 3514 3121

ProductIP France
+33 9744 83364

info@ProductIP.com
www.ProductIP.com



Q&A from the various sessions

1. DOES THE LIQUID IN A LAVA LAMP HAVE TO COMPLY WITH ROHS?

>> We have not been able to find any exemption. Also you should consider REACH requirements for the substances in the liquid although the exposure is only in case of breakage or disposal / waste processing

2. A BICYCLE HAS LIGHTS. DOES IT HAVE TO COMPLY WITH ROHS?

>> In the Directive 2011/65 of the EU Parliament and of the Council article 2 says that e-bikes which are not type approved do not apply to this European regulation until 22 July 2019. After that the complete bicycle need to comply. We don't see any reason why this should not be the same for a regular bicycle with integrated electronics.

3. IS A PIEZO IGNITOR EXCLUDED FROM ROHS? (> 1000 VOLT?)

>> Exemption for Piezo-electric ignition > 1500 V per 1.2 Nr 2 of WEEE guidance on 2002/95/EC

4. IS THERE A VOLTAGE LIMIT FOR ROHS COMPLIANCE?

>> The scope of EEE per article 3(1) of 2011/65/EU is up to 1000 Vac and 1500 Vdc For Cables the scope is limited to cables with a voltage rating less than 250 V.

5. HAS SOLDER MATERIAL (WITH LEAD) THAT YOU CAN BUY IN A STORE SEPARATELY NEED TO COMPLY WITH ROHS?

>> Solder is not EEE and is therefor not part of scope of RoHS. Note that REACH is also restricting LEAD.

6. A RAZOR IS SOLD WITH A BAG AND A BRUSH. DO THESE PARTS NEED TO COMPLY WITH ROHS?

>> Q7.4 and Q8.5 of the FAQ from 12.12.2012

NO. Consumables (and parts, not spare parts) not meeting the definition of EEE are not equipment and not in the scope of RoHS

7. A CLOCK IS WORKING ON A BATTERY MODULE WITH A GEARBOX. DOES THE CLOCK AS A WHOLE NEED TO COMPLY WITH ROHS OR ONLY THE BATTERY MODULE WITH THE GEARBOX?

>> We have not been able to find an exemption and conclusion is the clock as a whole has to match RoHS requirements and is WEEE as a whole

8. A PRODUCT HAS A SEPARATE CABLE BUT THIS CABLE DESIGN MAKES IT SUCH THAT IT CAN ONLY BE USED WITH THIS PRODUCT. DOES THIS CABLE NEED A SEPARATE CE MARKING OR CAN IT BE CONSIDERED PART OF THE PRODUCT EVEN IF IT IS NOT INTEGRAL PART OF THE PRODUCT?

>> Q5.3 of the FAQ from 12.12.2012 states clearly that external cables that are shipped with the EEE for example power cords must meet the material restrictions but to not need an individual CE marking and Declaration of Conformity if the care covered by the DoC for the EEE and the EEE is CE marked. Note: In some cases other applicable legislation such as the Low Voltage Directive MAY require individual CE marking and DoC.

9. HOW TO SIGN OFF THE RoHS REQUIREMENTS WITH A REPORT IN PRODUCTIP? 2011/65 2015/... 2017/... (EN 50581)

>> If you have a report with only the 6 substances. You sign off the 2011/65/EU only. If you have a report with the 10 substances (which you should get now) you will sign off 2011/65/EU and 2015/863 and 2017/2102.

The EN 50581 and the exemptions that we list are category G for GUIDE. You can sign these off with text "Guide only - no test report" or set them to Not Applicable with that text or leave them open

10. WHAT TO DO WITH TEST METHODES FOR ROHS - SHOULD THESE COME ON THE EU DOC OR NOT?

>> We know of cases were authorities have requested to list test methods on the Eu DoC. In our opinion this is not required.

ProductIP Netherlands (HQ)

Rubensstraat 211
6717 VE, EDE

+31 318 700 622
www.ProductIP.nl

ProductIP Shenzhen China

Room 2409, Main Building
Golden Central Tower
No. 3037, Jintian Road
Futian District. Shenzhen

+86 755 8323 0515
www.ProductIP.com.cn

ProductIP Germany

Am Mittleren Moos 53
D-86167 Augsburg

+49 821.8083048
www.ProductIP.de

Kapstadtring 7, 2nd Fl.
D-22297 Hamburg

+49 40 87409040
www.ProductIP.de

ProductIP United Kingdom

+44 20 3514 3121

ProductIP France

+33 9744 83364

info@ProductIP.com
www.ProductIP.com

