

China RoHS Policy



Overview

The Ministry of Information Industry (MII) of the People's Republic of China has begun issuing standards for their equivalent of the EU RoHS Directive. The official title of their overall legislation is "Management Methods for the Control of Pollution from Electronic Information Products (EIP)," but it is more commonly referred to as China RoHS. This standard covers the same six substances as the European Union's RoHS Directive -- namely lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyl (PBB), and polybrominated diphenyl ether (PBDE), and also uses the same maximum concentration values (MCV) of these substances. China RoHS officially goes into effect on March 1, 2007.

Initially, the China RoHS initiative will require product and packaging markings, and RoHS disclosure tables for all EIP imports.

Product Marking Requirement

In accordance with the Marking Standard (Marking for Control of Pollution Caused by Electronic Information Products SJ/T11364-2006), electronic products sold in China after March 1, 2007 must have an Environmental Friendly Use Period (EFUP) logo as follows:



Figure 1



Figure 2



Figure 3

Figure 1. This logo signifies a product with none of the six substances above the MCV. As the vast majority of electronic products today use one or more of the EU RoHS Directive exemptions such as lead in ceramics, high temperature solder, or component glass and contain levels of some substances in excess of China RoHS MCVs, few electronic products will use this logo.

Figure 2. This logo is used on products with one or more of the six substances above the MCV. The number in the circle is the Environmental Protection Use Period (EFUP) as defined in Paragraph 3.5 of Marking Standard SJ/T11364-2006. The EFUP is time in years for which hazardous/toxic substances will not, under normal operating conditions, leak out the product, or the product will not change in such a way as to result in severe environmental pollution, injury to health, or great damage to property.

After long and careful consideration, Performance Technologies has decided to use 50 years (see figure 3) for the EFUP for all of our products based on the Technical Life Method as described in the draft General Rule of Environment-Friendly Use Period Electronic Information Products. Although our customers may request other EFUPs, due to legal issues involved, determining the EFUP used on our products remains the sole responsibility of Performance Technologies. When Performance Technologies systems consist of integrations of products with more than one EFUP, the system will be marked consistent with the system element with the lowest EFUP, such as in figure 2.



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Performance Technologies' Product Marking Policy

Performance Technologies will mark all of our electronic products and electrical items that can be sold as field replaceable units (FRUs) with the China RoHS EFUP marking consistent with the example shown in Figure 3 or in accordance with the manufacturer's EFUP determination.

Hazardous Substance Disclosure Requirement

There is also a requirement for a Hazardous Substance Disclosure Table that lists the few major parts and subassemblies entailed in product shipments that may have the presence of restricted substances at levels that exceed permitted maximum concentration values. This requirement applies to substances used by component manufacturers in their products under application exemptions permitted by European Union ROHS regulations.

Performance Technologies' Hazardous Substance Disclosure Policy

Performance Technologies will incorporate Hazardous Substance Disclosure Tables into product shipping documentation in accordance with the Marking Standard. To comply with China RoHS, each table must be in Chinese. Tables for custom products are provided in accordance with customer specifications.

Packaging Marking Requirements

In addition to the EFUP product marking and Hazardous Material Disclosure requirements, all packaging material must be marked with the applicable Packaging Recycling Marks as specified in China National Standard GB 18455-2001.

Performance Technologies' Packaging Marking Policy

It is the policy of Performance Technologies to use only nontoxic, nonhazardous, degradable and recyclable materials in the construction of all packaging materials. Product packaging will be marked in accordance with the China National Standard and international standards for packaging recycling. Performance Technologies will comply with these marking requirements by March 1st, 2007.

China RoHS - Future Implications

The product and packaging marking and related disclosure tables are the only China RoHS requirements that go into effect on March 1, 2007. In a second implementation phase, the MII will publish a list of specific products, known as the Catalogue for Pollution Control in Key Electronic Information Products, which must meet RoHS MCV requirements.

China is setting up laboratories throughout China where actual product testing of products for RoHS substances will take place. MII has also developed a uniform testing standard (SJ/T 11365-2006 Testing Methods Testing Methods for Hazardous Substances in Electronic Information Products) for these laboratories to use. Once MII starts to publish lists of specific products which must meet the RoHS MCV requirements, these products will have to be tested and certified by the Chinese labs in order to be marketed in China.

The first batch of products to be listed in this catalog has not yet been decided and it is expected that this will begin no earlier than October 2007. Performance Technologies will closely monitor developments for China RoHS, so we can respond in a timely manner for our customers.

For questions, please contact Performance Technologies at rohs@pt.com.

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