

January 18th, 2008 U.S. Mission to the EU WEEE/RoHS Update

Headlines:

- **The European Commission has just published a draft final report on the impacts of WEEE and RoHS. There is a short comment period.**
- **IEC continues to move towards a set of RoHS testing standards.**

As always, we welcome feedback on our [WEEE/RoHS web pages](#), and will strive to keep them as accurate and up-to-date as possible, so don't hesitate to let us know if you have better or newer information!

DG ENTR Publishes WEEE & RoHS Impact Study

The European Commission's Directorate-General for Enterprise and Industry (DG ENTR) has published a "draft final" report by consultancies RPA and Ecolas about the environmental and economic impacts of the WEEE and RoHS Directives.

The RoHS component of the report contains in-depth analysis of the environmental and economic impacts of the Directive. It has been drafted partly on the basis of input from industry, although this has been fairly limited.

The shorter WEEE component examines some of the structural aspects of the economic systems that are developing in response to the WEEE Directive.

The study is available on DG ENTR's web site at:

http://ec.europa.eu/enterprise/environment/reports_studies/index.htm

The Commission has provided a short comment period, during which stakeholders can comment on the report to the contractor, with a view to making adjustments in light of new information or corrections if necessary. We strongly encourage U.S. companies to provide feedback to the contractor before January 31st, so that further information can be taken into account in the final report. Emails should be sent to Sarah Bogaert at:

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Draft Test Methods Clear Hurdle on Path to Approval as International Standard for Testing RoHS Substances

International Electrotechnical Congress Technical Committee 111 Working Group 3 recently announced that member nations voted unanimously to approve the latest committee draft of document 62321 as a Final Draft International Standard (FDIS). FDIS 62321 Electrotechnical Products - Determination of Levels of Six Regulated Substances (Lead, Mercury, Cadmium, Hexavalent Chromium, Polybrominated Biphenyls, Polybrominated Diphenyl Ethers) will undergo revision in early 2008 to incorporate accepted comments submitted by voting nations. Following that process, FDIS 62321 will be submitted for a final ballot.

IEC 62321 will provide some, but not all, of the test methods needed for RoHS. The current version of the document contains *normative* methods for elemental analysis, i.e. screening by X-ray fluorescence and quantification of total Cr, total Br, Cd, Hg, and Pb by atomic spectrometric methods. Test methods for hexavalent Cr in coatings and polymers and for brominated flame retardants are included as *informative* annexes. The scopes of the methods

are limited due to the limited resources available to validate them, including few certified reference materials, few experienced laboratories, and resistance of some sample matrices to sample preparation by digestion. Interlaboratory validation was accomplished for a fraction of the wide variety of materials found in products covered by RoHS.

In IEC parlance, *normative* indicates the methods are valid within their published scopes and can be used for product specifications. In contrast, *informative* documents have not been demonstrated to be valid and are presented only for guidance. IEC TC111 will continue to improve the standard and has requested an accelerated review schedule forcing TC111 to ballot an improved version of 62321 within two years of its publication.

Experts at the National Institute of Standards and Technology participate in IEC TC111 activities, including development of FDIS 62321. NIST is developing Standard Reference Materials for RoHS applications including lead-free solder, free-cutting brass, plastics, and flame retardants in solution and other matrices.