



China RoHS 2 2019

21 Jan 2016, the Chinese Ministry of Industry and Information Technology (MIIT) published its final revised version of the Administrative Measures for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products (known as China RoHS 2). The new regulation will come into force on 1 July 2016. In this article we will give you a brief introduction to China RoHS 2 and compare it with EU RoHS 2.

SCOPE OF CHINA ROHS 2

China RoHS 2 will expand product scope from electronic information products (EIP) to electrical and electronic products. The definition of electrical and electronic products has been added. They refer to the devices and accessory products with rated working electrical voltages that do not exceed 1500V direct current and do not exceed 1000V alternating current and function by means of current or electromagnetic fields and generate, transmit and measure such currents and electromagnetic fields. Batteries are also within the scope.

A list of electrical and electronic products will be added to the catalogue of electrical and electronic products subject to compliance management (China RoHS compliance management catalogue). Products listed in the Catalogue are subject to mandatory compliance with hazardous substance restriction limits. Non-listed products or parts which contain certain hazardous substances exceeding above limits can still be sold in China. However, the affected products need to be marked.

CHINA ROHS 2 RESTRICTED SUBSTANCES

China RoHS 2 currently restricts the same 6 hazardous substances as EU RoHS 2 (refer to the table below). Detailed concentration limits are set by GB/T 26572 the requirements for concentration limits for certain restricted substances in electronic and electrical products.

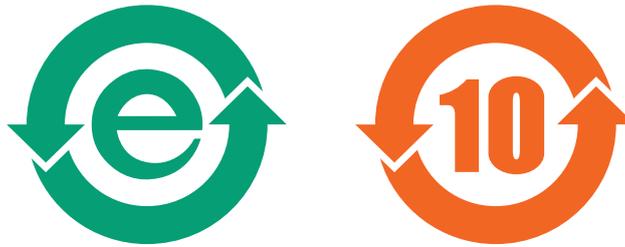
Status	Substances and Limits
Current Restrictions	Cadmium(Cd) and its compounds: 0.01% Mercury and its compounds: 0.1% Lead(Pb) and its compounds : 0.1% Hexavalent chromium (Cr6+) and its compounds: 0.1% Polybrominated biphenyls (PBB): 0.1 %; Polybrominated diphenyl ethers (PBDE): 0.1 %

It shall be noted that above maximum concentration values apply to each homogeneous material rather than a product itself. Right now, the limits only apply to products listed in the catalogue of electrical and electronic products subject to compliance management. Non-listed EEE products or parts which contain certain hazardous substances exceeding above limits can still be sold in China. However, the affected products need to be marked. In addition, the names and content of the hazardous substances shall be disclosed.

On 15 March 2018, China MIIT publishes the first catalogue of electrical and electronic products subject to compliance management and a list of RoHS exemptions. The catalogue includes 12 categories of electrical and electronic products. The catalogue comes into force on 15 March 2019.

CHINA ROHS MARKING

China RoHS 2 requires that all electronic and electrical products that are sold in the People’s Republic of China be marked with one of the following two logos depending on whether if they contain any hazardous substances exceeding official concentration limits.



- Green symbol with "e" in it: This product does not contain any hazardous substances exceeding concentration limits and is a green environmentally friendly product which can be recycled;
- Orange symbol with a number in it: This product contains certain hazardous substances and can be used safely during its environmental protection use period (as indicated by the number in the center) which should enter into the recycling system after its environmental protection use period.

If a product contains certain hazardous substances exceeding concentration limits, its environmental protection use period ((unit in years (a)) must be determined and marked. The date of manufacture shall also be indicated. In addition to that, manufacturers and importers shall provide the names and contents of hazardous substances in product instructions (not on marked on product itself) and mark them on the parts where they are contained by using the table below:

Part number	Hazardous Substances					
	Lead(Pb)	Mercury (Hg)	Cadmium(Cd)	Hexavalent chromium (Cr (VI))	Polybrominated biphenyls (PBB)	Polybrominated diphenyl ethers (PBDE)

It shall be noted that above markings are only required for finished electrical and electronic products. Suppliers of materials and parts that are used to manufacture electronic and electrical products do not need to mark their products. However, they need to provide necessary information to their downstream users to help them determine the final China RoHS markings.

SJ/T 11364-2014 specifies detailed marking requirements for hazardous substances in electronic and electrical products, the environmental protection use period and recyclability. Once China RoHS 2 comes into force, SJ/T 11364-2014 will also become effective.

ADDITIONAL INFO ABOUT ENVIRONMENTAL PROTECTION USE PERIOD

Environmental Protection Use Period refers to the period during which the hazardous substances contained in the electronic and electrical products will not leak or mutate suddenly under normal operating conditions and will not result in serious environmental pollution or cause serious bodily injury to the user or damage to their assets during the normal use by the user of the electrical and electronic products. It can be determined in accordance with SJ/Z 11388.

The date of manufacture is the start of environmental protection use period. The date of manufacture shall also be marked on the product and product packing. It shall be noted that there is no fixed format for marking the date of manufacture. Enterprises may mark product serial number or product barcode that includes the date of manufacture to comply with this requirement.



CHINA ROHS 2 2019

CHINA ROHS 2 VS EU ROHS 2

Items	China RoHS 2	EU RoHS 2
Scope	<ul style="list-style-type: none">China: Listed electronic and electrical products;Batteries included	EU: All electronic and electrical products except those that are exempt; Batteries out of scope
Restricted Substances	<ul style="list-style-type: none">China: 6 substances;	EU: 6 + 4 phthalates (added in 2015);
Marking	<ul style="list-style-type: none">China: China RoHS mark; ?Environmental Protection Use Period shall be indicated; ?The content and names of hazardous substances need to be disclosed in product instructions;	EU: CE Mark + WEEE Mark;
Conformity Assessment	<ul style="list-style-type: none">China: Applies to products listed in the Catalogue.The conformity system has not been established.For the products listed in the Catalogue, RoHS compliance might become part of China Compulsory Certificate system. Compulsory testing by a third party lab may be required;	EU: Self-declaration accepted.

Note: EU RoHS compliance is not equal to China RoHS compliance. Many electronic and electrical products/components which qualify EU RoHS exemptions are not exempt under China RoHS. Companies need to disclose hazardous substances in those products or components. Please be noted that the quoted standards have been updated.

