



JOINT STATEMENT

Commission Roadmap for the RoHS Review: considering the global dimension

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Since its inception in 2002, the RoHS Directive has become a global reference point for regulation of hazardous substances in electrical and electronic equipment (EEE). This has been effective and given the EU a competitive advantage. The worldwide impact of RoHS is significant and the undersigned associations consider that this should be considered in the roadmap for reviewing the Directive.

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. Sometimes RoHS is copied exactly. However, often it is not. For example, countries might introduce a completely different approach on the scope, exemptions and declaration of conformity. Each time a new “RoHS” law is proposed, industry has to establish a bi-lateral dialogue with the relevant local public authorities improving the knowledge and understanding of regulatory stakeholders based on experience with the framework legislation in the EEA. Industry continues to spend a lot of time and money to ensure alignment with EU RoHS as far as possible. This is crucial for the global and complex EEE supply chains.

The European Commission’s DG TRADE “Market Access” services have been helpful with draft laws that have been notified to the WTO and have raised concerns with the Technical Barriers to Trade (TBT) Committee as well as bi-laterally with the countries in question. A recent example was the draft legislation in the United Arab Emirates.

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.

To this end, we urge the Commission to, at a minimum, consider dedicating more resources to a targeted outreach programme with third countries. The EU recently adopted a Regulation on responsible minerals supply chains and DG TRADE subsequently launched such outreach with the United States, China, India, United Arab Emirates, Colombia, Mexico, South Africa, Malaysia, Thailand and Canada.

We, the undersigned associations, endorse the Commission’s [roadmap](#) for the evaluation and the aim to review and improve the effectiveness, efficiency, relevance of the RoHS Directive, as well as coherence with other EU laws and policies. However, we feel this important global dimension is absent and should be incorporated into the Review.

The following associations have signed this statement:

- AmCham EU – American Chamber of Commerce to the EU
- APPLiA – Home Appliance Europe
- BeST - Beryllium Science & Technology Association
- BSEF – The International Bromine Council
- CEFIC – European Chemical Industry Council
- COCIR – Representing the medical imaging, radiotherapy, health ICT & electromedical industries
- DIGITALEUROPE – Representing the digital technology industry in Europe
- EDG – European Domestic Glass
- EPCIA – European Passive Components Industry Association
- EPEE – European Partnership for Energy and the Environment
- ESGA – European Special Glass Association
- ESIA – European Semiconductor Industry Association
- I2A – International Antimony Association
- IPC – Association Connecting Electronics Industries
- ITI – Information Technology Industry Council
- JBCE – Japan Business Council in Europe
- KEA – Korea Electronics Association
- LightingEurope – Representing the lighting industry in Europe
- MMTA – Minor Metals Trade Association
- NEMA – National Electrical Manufacturers Association
- SEMI – Global industry association serving the manufacturing supply chain for the electronics industry
- TIE – Toys Industries of Europe
- ZVEI – Zentralverband Elektrotechnik- und Elektronikindustrie e. V.