

Articles in complex objects: illustrative examples

Webinar: communicating
information on substances in
articles - what you need to know

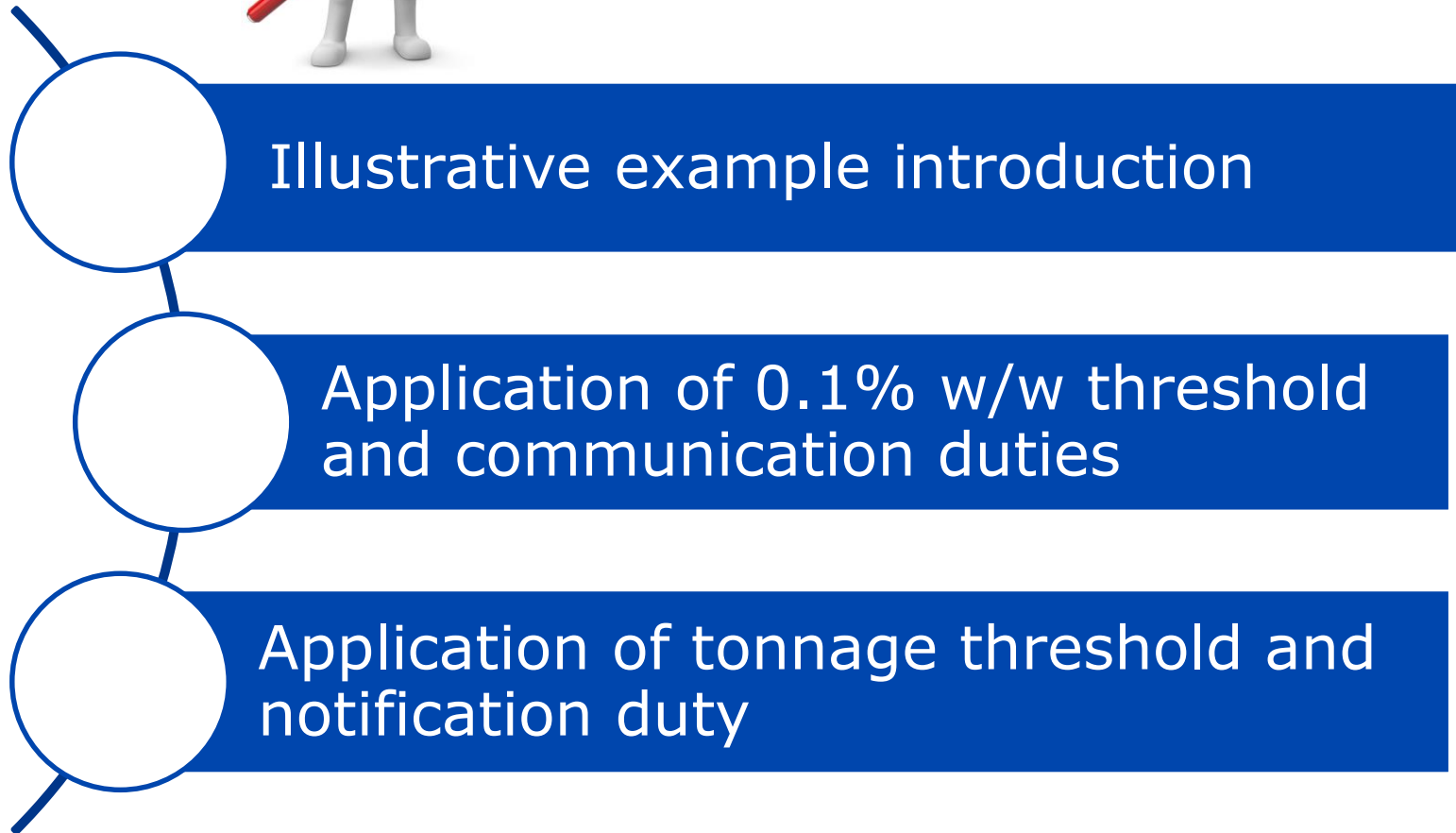
2 November 2017

Telmo Vieira Prazeres





Content



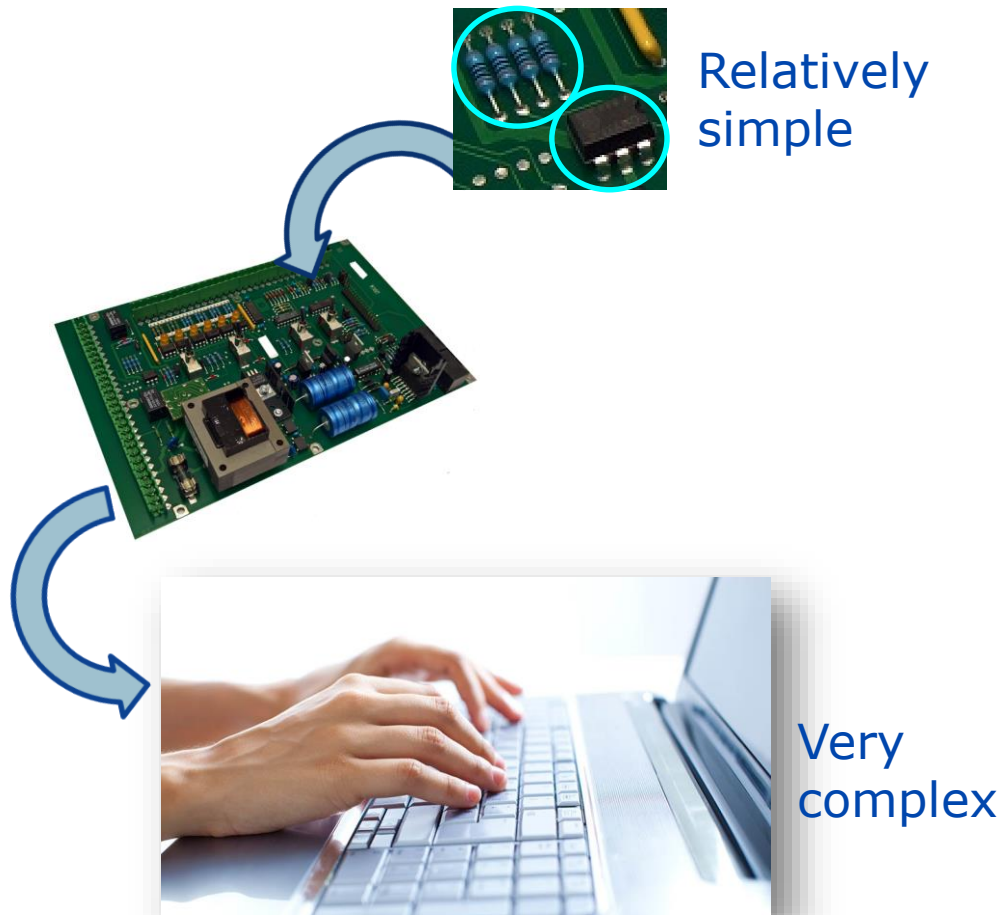
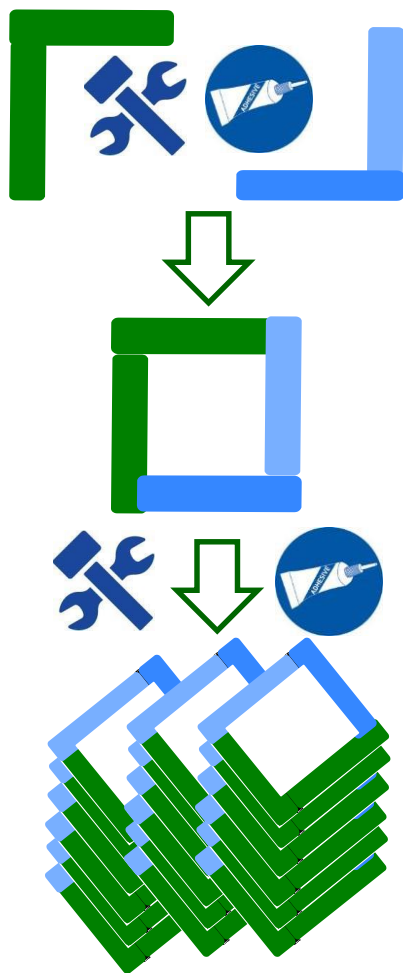


Illustrative example introduction

Application of 0.1% w/w threshold and communication duties

Application of tonnage threshold and notification duty

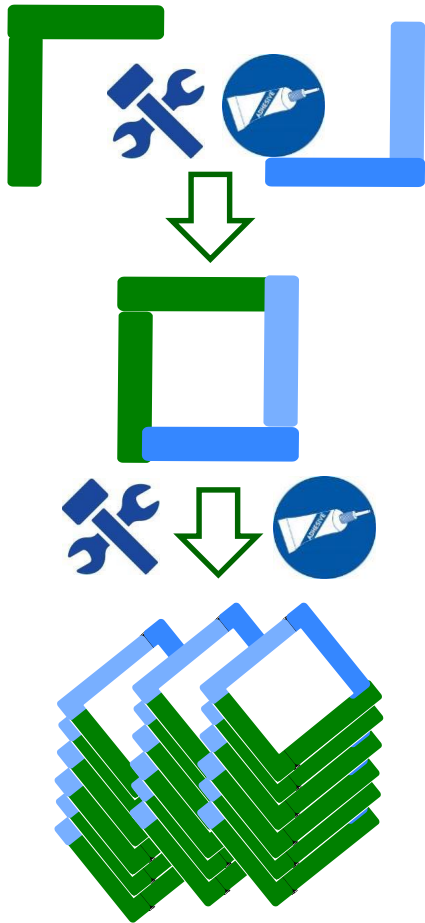
Complex objects



The applicable principles are always the same!

Illustrative example

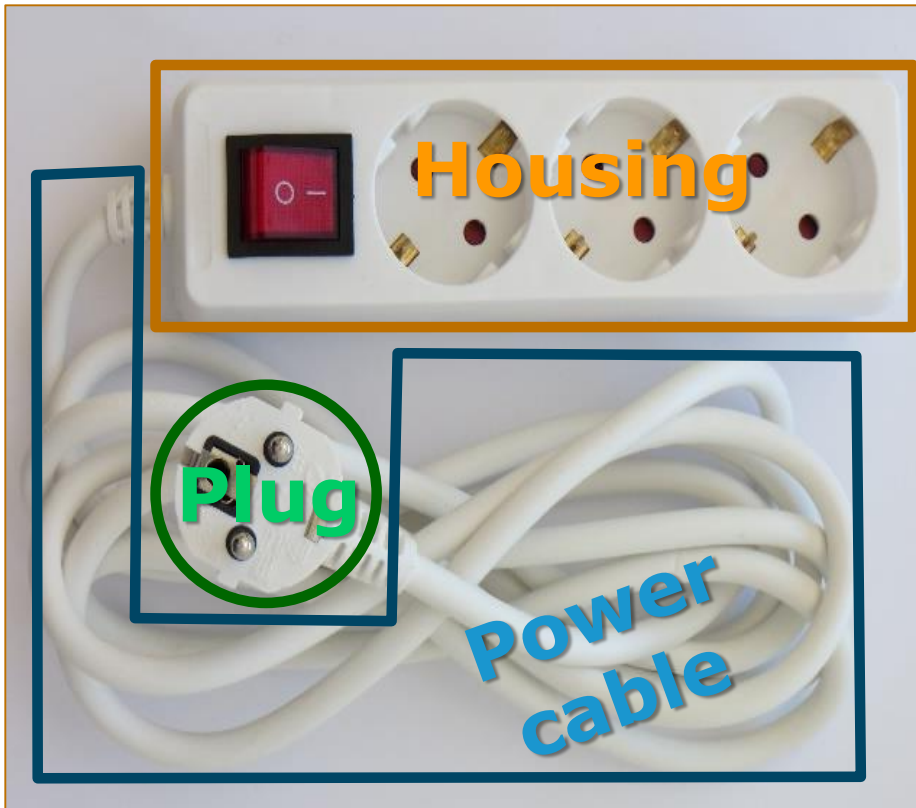
Multi-socket power strip and contained articles



- Suitable to illustrate some principles
- Reasonable level of complexity

Multi-socket power strip

Components



Housing

- Upper casing with 3 socket recesses
- Lower casing
- Insulated wires
- Power switch
 - Casing
 - (LED) lamp

Plug

- Body/casing
- Pins/blades

Power cable

- Insulated wires
- Sleeve



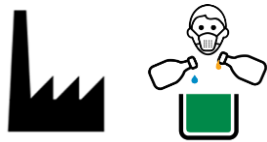
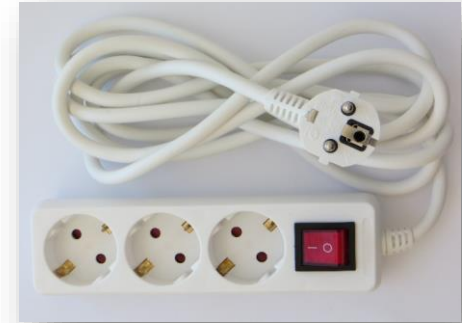
Illustrative example introduction

**Application of 0.1% w/w threshold
and communication duties**

Application of tonnage threshold and
notification duty

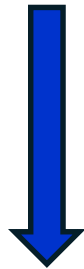
Checking 0.1% w/w threshold

For **each** (individual) **article** in the power strip

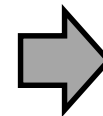


Manufacturer
/ Formulator

Substance(s)
/ mixture(s)



Article producer



Allows to know if a Candidate List substance (CLS) is used in the production of articles

Scenarios and rules to determine concentration in Table 5 of Guidance

Information held by producers

During production, each producer is aware of the concentration

Product / article name		Weight / Kg	Candidate List substance (CLS)	Conc. / % w/w
Housing	Upper casing	0.064	CLS 1	1.1
	Lower casing	0.050	CLS 1	1.1
	Insulated wires	0.010	CLS 2	4
	Power switch casing	0.010	CLS 1	3
Plug	Plug body/casing	0.037	CLS 1	3
			CLS 2	2
Power cable	Insulated wires	0.050	CLS 2	4
	Cable sleeve	0.055	CLS 2	20

For illustration purposes only

- Articles supplied to assemblers
- Assemblers make the power strip and/or other objects

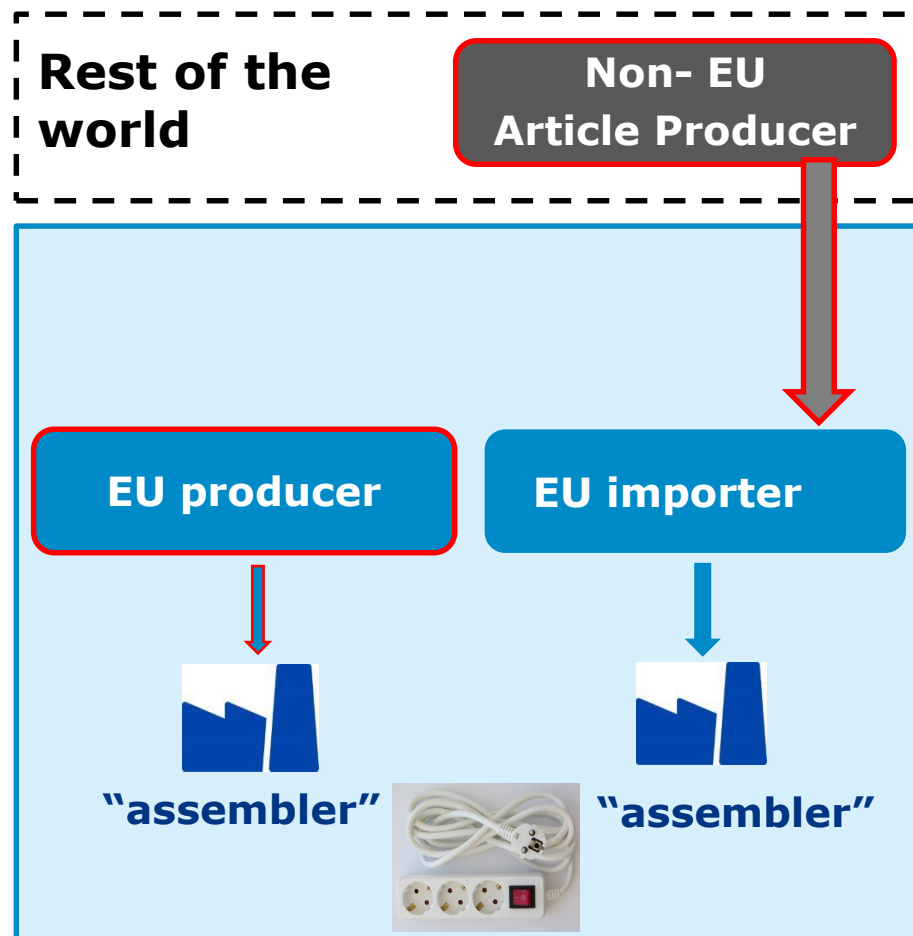
Information for EU importers or assemblers

Information on (individual) article containing CLS(s) >0.1% w/w threshold:

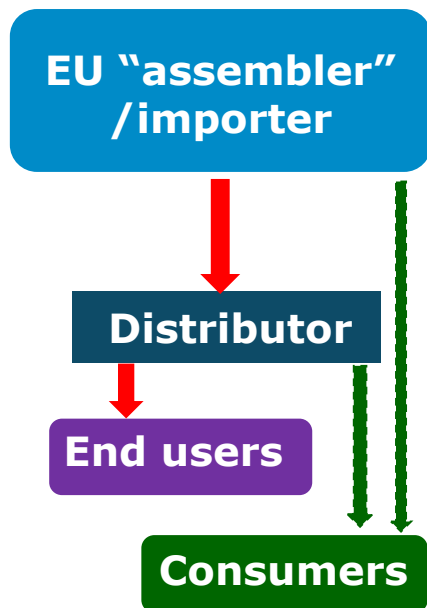
- Name
- Weight

Additional information needed for EU importers to check notification tonnage threshold

- Concentration of the CLS



Communication by EU suppliers

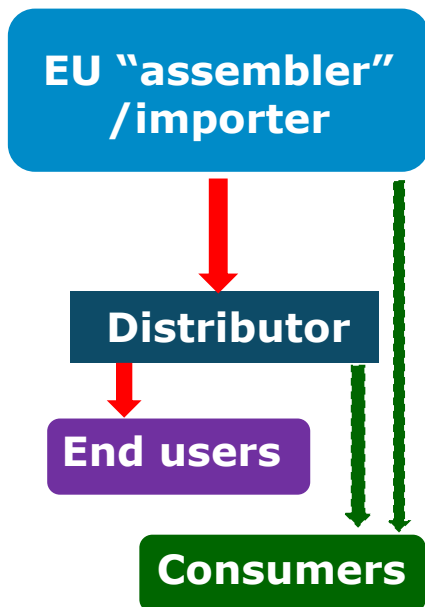


In the EU supply chain and to consumers upon request:

- **Name of the Candidate List substances** and identification of the articles containing it
- Other **information to allow safe use** of all articles in the power strip and how to dispose of them properly

Communication by EU suppliers (2)

Recalling our previous hypothetical example, as an illustration, at least the following information should be communicated regarding Candidate List substance 2 (CLS 2):



- CLS 2 is present (>0.1% w/w) in the following articles of the power strip:
 - plug body/casing
 - insulated wires within the casing and the power cable
 - sleeve of the cable
- *Due to the presence of this substance... [safe use information: e.g. wash hands after handling; Do not open...; Keep away from children; Dispose as of as WEEE]*

Similar information should be provided for CLS 1



Illustrative example introduction

Application of 0.1% w/w threshold
and communication duties



Application of tonnage threshold and
notification duty

Tonnage threshold for notification

EU importers



**Import of
300 000 units**



Total CLS tonnage for **each imported article** determined by:

- Concentration of CLS substance
- Article weight (per unit)
- Total units

(subchapter 3.2.3.2
Guidance)

Tonnage threshold for notification

EU importers (2)

Import of 300 000 units

	Product / article name		Total weight, t/a
CLS 2	Housing	Insulated wires	0.12
	Plug	Plug body/casing	0.22
	Power cable	Insulated wires	0.60
		Cable sleeve	3.3
		(CLS2) Σ	4.2 > 1 t/a
CLS 1	Housing	Upper casing	0.21
		Lower casing	0.17
		Casing of the power switch	0.09
	Plug	Plug body/casing	0.33
		(CLS1) Σ	0.80 ≤ 1 t/a

For illustration purposes only

What needs to be notified?

Power strip importer

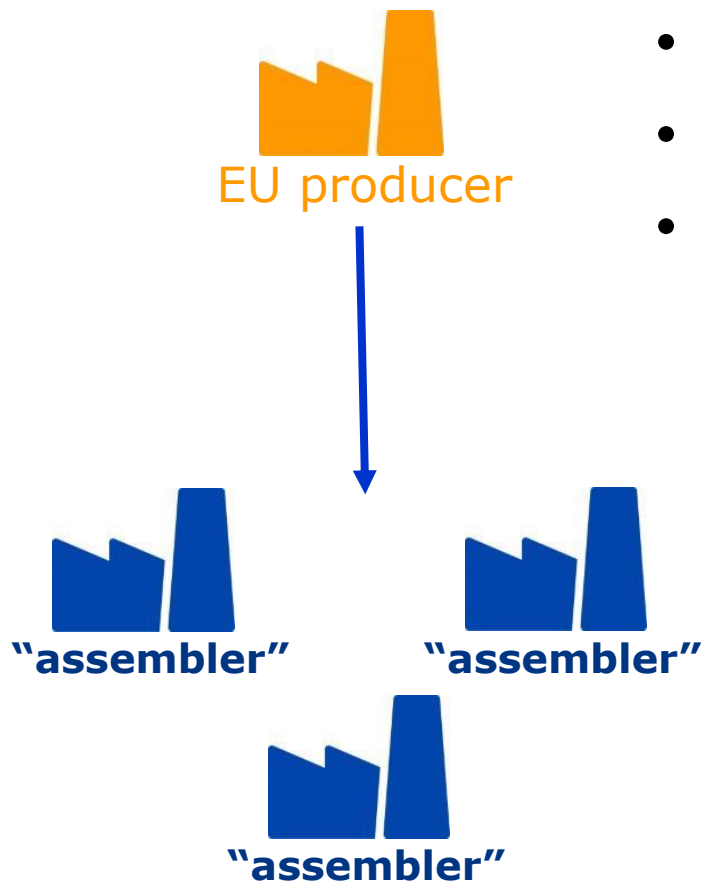
Candidate List substance 2 (CLS 2)
Identification and classification



Role; Tonnage band	Use(s) of the substance	Use(s) of the article
<p>Importer; 1-10 t/a</p>	<ul style="list-style-type: none"> • Technical function: e.g. plasticiser • (PROCs) 	<p>Description of article(s):</p> <ul style="list-style-type: none"> • Insulated wires in the housing and power cable of a power strip; The substance is contained in the insulator material of the wires; AC (e.g. AC 13) • Plug body/casing of a power strip; AC (e.g. AC 13) • Sleeve in the power cable of a power strip; AC (e.g. AC 13) <p>(further description)</p> <p>Description of the use of article(s)</p> <p>Used by consumers/workers during power strip service life; ERCs (e.g. ERCs 11a, 12c); further description</p>

Tonnage threshold for notification

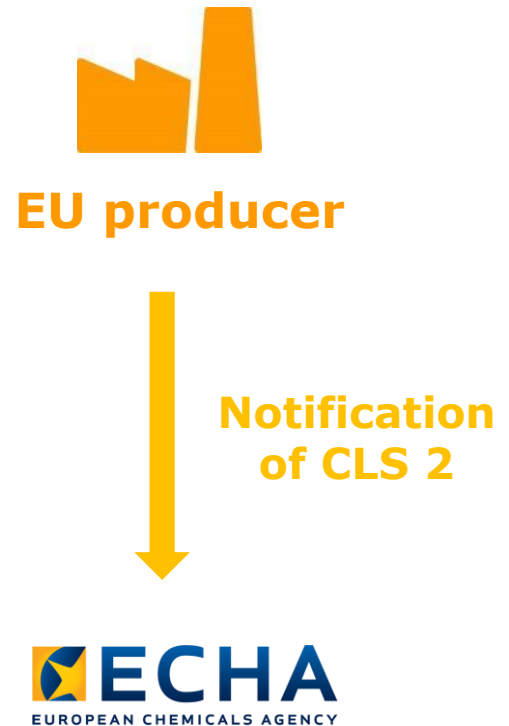
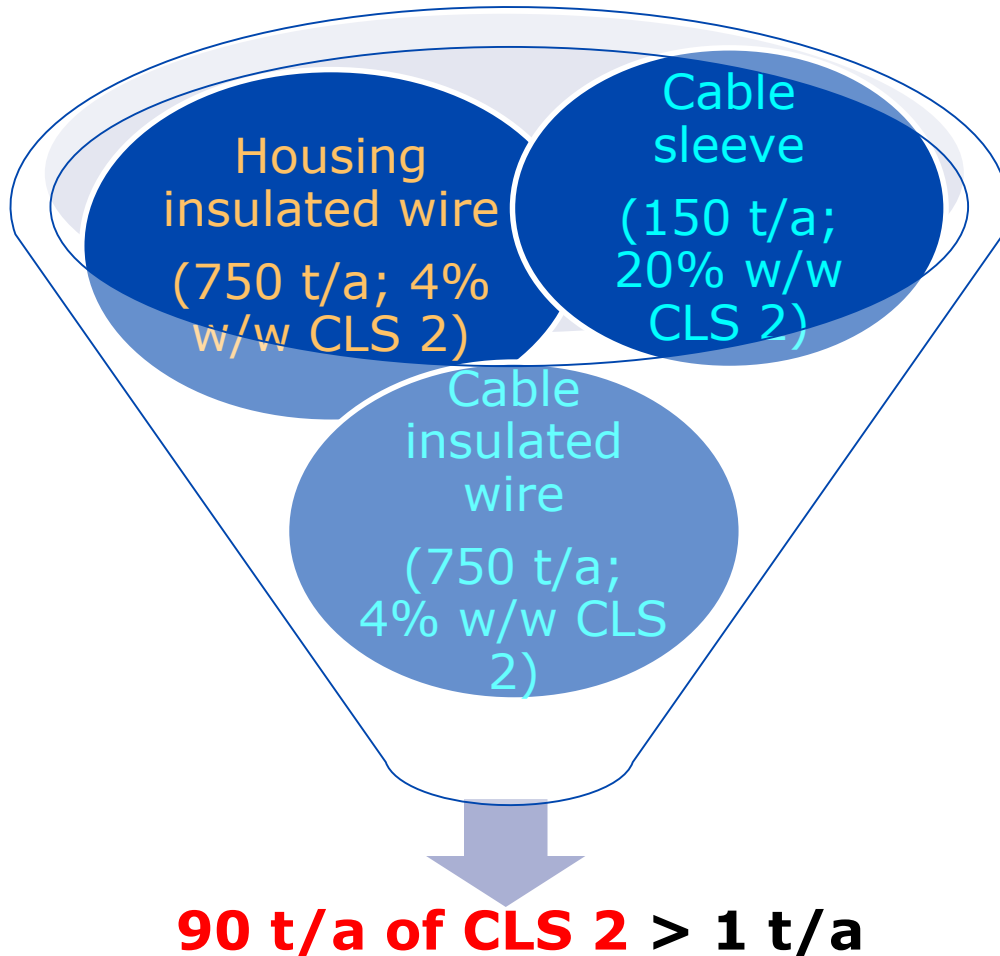
EU producers



- Housing insulated wire
- Cable insulated wire
- Cable sleeve



Checking tonnage threshold EU producers (2)



What needs to be notified?

EU producer of wires and sleeves

Candidate List substance 2 (CLS 2):
Identification and classification

Role; Tonnage band	Use(s) of the substance	Use(s) of the article
<p>Producer; 10-100 t/a</p>	<ul style="list-style-type: none"> • Technical function: e.g. plasticiser • PROCs 	<p>Description of article(s):</p> <ul style="list-style-type: none"> • Insulated wire to be incorporated in housing and cable of power strips; The substance is contained in the insulator material of the wires; AC (e.g. AC 13) • Cable sleeve to make power cables for power strips; AC (e.g. AC 13) <p>(further description)</p> <p>Description of article use</p> <ul style="list-style-type: none"> ○ Used by workers, e.g. assembling the power strip; Used by consumers/workers during power strip service life ○ + ERCs (e.g. ERCs 11a, 12a,c); further description

Notification exemption may not be easy...

- Exemption based on **exclusion of exposure**
- Exemption for substances already **registered for that use**

In most cases:

Easier to submit a notification than to demonstrate that exemptions apply

Conclusion

Communication and notification obligations regarding Candidate List substances in articles **apply to** substances present in all **articles that are incorporated in a complex object** such as a multi-socket power strip



Thank you!

echa.europa.eu/contact

Subscribe to our news at
echa.europa.eu/subscribe

Follow us on Twitter
[@EU_ECHA](https://twitter.com/EU_ECHA)

Follow us on Facebook
[Facebook.com/EUECHA](https://facebook.com/EUECHA)