



**Document Number:** ES600973  
**Document Title:** GREEN PROCUREMENT GUIDELINES

**REVISION HISTORY**

Revision	CO #	Release Date	Changed By	Description of Change
A	ECO-13-001563	January 28, 2013	C. Soetjpto	Initial release
B	ECO-13-0425	July 2, 2013	C. Soetjpto	- Update to new Elo logo. - Inclusion of: - Regulation No. 757/2010 amending Regulation No. 850/2004 of the European Parliament and of the Council on Persistent Organic Pollutants as regards Annex I and Annex III. - Substance Restriction and labeling requirement of Directive 2006/66/EC of the European Parliament and of the Council of 6 September 2006 on batteries and accumulators and waste batteries and accumulators and repealing Directive 91/157/EEC. - New December 2012 and June 2013 Revision to EU REACH SvHC Candidate List to Table 2 Chemical Substances. - China GB/T 18455-2010 Packaging Recycling Standard that replaced China GB 18455-2001. - Reference to regulations that regulate shipment of Lithium ion batteries. - Danish Restriction on Phthalate DEHP, BBP, DIBP and DBP, which will come into force on December 31, 2015. - U.S. Battery Act (Mercury-Containing Rechargeable Battery Management Act). - Updates to EU REACH Annex XVII Restriction List.
C	ECO-14-0211	February 6, 2014	C. Soetjpto	Updated: -Coming into force of Danish Restriction on Phthalate DEHP, BBP, DIBP, and DBP to December 1, 2016. Included: -Ban on Bisphenol-A in thermal receipt printer. -New December 2013 revision to EU REACH SvHC Candidate List to Table 2 Chemical Substances. -Restriction on use of certain PAH substances in plastic components per REACH Annex XVII Restriction List, which will come into force on December 27, 2015.
D	ECO-14-0776	June 18, 2014	C. Soetjpto	Update to latest SVHC list
E	ECO-14-0825	July 14, 2014	C. Soetjpto	Update dates by which PAHs and HBCDD shall be phased out in products supplied to Elo to ensure product compliance according to upcoming EU REACH Annex XVII and Stockholm Convention requirements.
F	ECO-15-0150	January 16, 2015	C. Soetjpto	-Include new EU REACH Candidate List SVHCs published on December 17, 2014. -Update according to repealing of Danish Restriction on Phthalate DEHP, DBP, BBP, and DIBP. -Update according to EU Commission intensions to add DEHP, DBP, BBP, and DIBP to the list of restricted substances under EU RoHS.
G	ECO-15-1017	July 14, 2015	C. Soetjpto	Include new EU REACH Candidate List SVHCs published on June 15, 2015. Include DEHP, DIBP, DBP, and BBP to the list of EU RoHS restricted substances. These new substance restrictions will apply from 22 July 2019 for Elo products. Elo asks that suppliers phase out by 31 December 2016. -Remove exemption for Mercury in button cell batteries per Directive 2013/56/EU. Button cells containing more than 0.0005% of Mercury by weight of cell are prohibited starting October 1, 2015. -Add BNST to list of banned substances per Canadian Environmental Protection Act requirements. -Updated / corrected reference to ES600665 (Packaging Specification)
H	ECO-15-1202	September 16, 2015	C. Soetjpto	Ban the use of red phosphorus in plastic parts that contact conductor(s) due to quality concern.
I	n/a	n/a	n/a	Intentionally skipped
J	ECO-16-0318	February 19, 2016	C. Soetjpto	Include new EU REACH Candidate List SVHCs published on December 17, 2015. Update EU REACH SVHC Candidate List notification obligations to capture new "once an article, always an article" rule. Communication down the supply chain is triggered not only for articles that contain Candidate List SVHC above 0.1% by weight of the article, but also when the article contains a sub-article that contains Candidate List SVHC above 0.1% by weight of the sub-article. -Capture update in China RoHS marking standard SJ/T 11364-2014. New marking per SJ/T 11364-2014 shall replace marking per SJ/T 11364-2006.
K	ECO-16-0604	April 20, 2016	C. Soetjpto	Update perchlorate category from restricted substance to declarable substance. Specify perchlorate warning label needed for products containing perchlorate (e.g. Lithium coin cell). Include Taiwan voluntary standard CNS 15663 requirements
L	ECO-16-0991	July 1, 2016	C. Soetjpto	Correct Nickel threshold limit per EU Regulation 1907/2006 Annex XVII Include new EU REACH Candidate List SVHC published on June 20, 2016. Delete EU RoHS Directive 2011/65/EU Annex III exemption 7b, which expires in July 2016.
M	ECO-17-0311	February 7, 2017	C. Soetjpto	Update header legal language from Elo Confidential and Proprietary to Elo Copyright. Update per January 2017 update to EU REACH Candidate List Correction to Cadmium battery labeling threshold limit typo.
N	CO-17-1595	August 30, 2017	C. Soetjpto	Update per July 07, 2017 update to EU REACH SvHC Candidate List Update HBCDD limit according to EU Regulation 2016/293 Add DiNP, DIDP, DnHP as declarable substances per Prop 65 Add polychlorinated and polybrominated dioxins and furans according to customer requirement
O	n/a	n/a	n/a	Intentionally skipped
P	CO-18-2421	March 12, 2018	C. Soetjpto	Remove expired exemptions around PFOS ban Update per January 15, 2018 update to EU REACH SvHC Candidate List Include upcoming restriction per EU REACH Annex XVII Restriction List on PFOA, its salts, and its related substances

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Q	CO-18-3226	August 3, 2018	C. Soetjijto	Update antimony trioxide declarable threshold to 1000 ppm according to industry standard Remove BNST from list of restricted / banned substances, following update in Canada regulations Removed RoHS metals from declarable substances when intentionally added into metal coatings under previous SJ/T 11363-2006. Update EU RoHS exemptions list to remove exemptions that does pertain to Elo products, and exemption expiration dates updated according to latest activities and European Commission decisions. Update per June 27, 2018 update to EU REACH SVHC Candidate List Update to add Prop 65 substances used in EEE industry that is not already covered under a separate restriction, ban, and/or notification requirements listed herein.
R	CO-18-4013	December 28, 2018	C. Soetjijto	Explicitly call out hexachlorobenzene banned per EU POP Regulation Add applicable exemptions to formaldehyde restriction in wood. Add requirement that applies to products containing wood
S	CO-19-0218	January 25, 2019	C. Soetjijto	Update to latest Jan 15 2019 SVHC list
T	CO-19-1404	August 5, 2019	A. Huang	Update to latest July 16 2019 SVHC list
U	CO-20-0263	February 19, 2020	R. Chiu	Update per Jan 16, 2020 update to EU REACH SvHC Candidate List Update the new regulation of persistent organic pollutants (POPs) Adding the standard regulations to 3.1 Update EU RoHS Exemption List
V	CO-20-1112	14-Jul-20	R. Chiu	Update to latest June 25 2020 SVHC list Update to latest Apr 4 2020 EU RoHS Exemption list
W	CO-20-1924	November 23, 2020	R. Chiu	According to QC080000 audit recommendations, update the related information for China RoHS (including label, restricted and exempted substances) Add Directive 2018/852, Amending Directive 94/62/EC on packaging and packaging waste Add Regulation (EU) 2020/784, Amending Annex I to Regulation (EU) 2019/1021 of the European Parliament and of the Council as regards the listing of perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds Remove PFOA of REACH XVII item 67 and 68, added to the EU POPs. Add four mandatory national standards of China VOCs which is relating to coatings, adhesives, inks and cleaning agents (GB 30981-2020, GB 33372-2020, GB 38507-2020, GB 38508-2020)
X	n/a	n/a	n/a	Intentionally skipped
Y	CO-21-0385	February 26, 2021	A. Cheng, R. Chiu	Update per January 19, 2021 update to EU REACH SvHC Candidate List Update banned / restricted substances of persistent organic pollutants (POPs) Update EU RoHS Exemption List
Z	CO-21-0523	March 16, 2021	A. Cheng	Add US PBT chemicals final rules and exemptions
AA	CO-21-1017	June 9, 2021	V. Pallaver, A. Cheng	Major reformatting for clarity. -Clarify what the requirements are for Elo products -Provide easy URL links to relevant standards, for reference -Clarify how Elo's suppliers (of raw materials or of finished/semi-finished goods) shall meet the requirements, including reference to new CoC forms EF000313 (for raw materials) and EF000314 (for finished/semi-finished goods) -Remove redundant information
AB	CO-21-1364	July 28,2021	A.Cheng	Update the date of last reviewed of EU REACH SVHC Add UK RoHS and REACH regulation Add batteries transit related regulations by UN, IATA and UNCE
AC	CO-22-0278	January 24,2022	A.Cheng	Update the date of last reviewed of EU REACH SVHC/REACH/RoHS, CP65, Canada Toxic Substances Regulation. Add Japan RoHS (J-Moss) Add Canada battery law in Annex 2
AD	CO-22-0628	April 1,2022	V. Pallaver, A. Cheng	Annex 1- Add US conflict mineral, OECD conflict mineral,mica, cobalt regulations Add Germany ChemVerbots Add Electronic Displays EcoDesign requirements (plastic, cadmium, halogenated flame retardants) Add Korea REACH,Bangladesh RoHS Add packaging Recycling symbol regulations from Italy,France,Bulgaria,Korea,China. Update the last reviewed date of CP65. Revise the Comments and labeling requirements of EU Directive 94/62/EC and 2008/98/EC. Annex 2- Add EU conflict mineral
AE	CO-22-1095	June 17,2022	A.Cheng	Update the date of last reviewed of EU REACH SVHC and RoHS
AF	CO-23-0298	February 10,2023	V. Pallaver, A. Cheng	Revise the comments of EU RoHS, to specify that Elo no longer accepts 6c,7a,7c-1,7c-II exemptions Update the date of last reviewed of EU RoHS, REACH,REACH SVHC,POP,CP 65, IATA Dangerous Goods, IMDG 2022, IEC 62474 regulations Update the link of Minamata Convention on Mercury,ISPM Publication 15,IATA Dangerous Goods special guidelines for lithium ion batteries, China RoHS exemption list, California RoHS law Update the standards: IMDG 2022, GB/T 16716.1-2018, GB 24427-2021 and GB/T 18455-2022 Add USA - Maine PFAS regulation Revise technical documentation standard EN50581:2012 to EN IEC 63000:2018 in Requirements
AG	CO-23-1151	July 7,2023	V. Pallaver, A. Cheng	Revise slightly the EU RoHS exemption allowances. Revise the comments of PFAS, last reviewed dates of REACH SVHC and CP65. Add the following new Applicable Standards: 85 (EU SRR Ship Recycling Regulation). This is not expected to affect any existing products or affect any reporting to Elo. 86 (Euratom for radioactive substances). This is not expected to affect any existing designs. Going forward, it will require new reporting on whether radioactive substances are contained in products supplied to Elo.

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AH	CO-24-0420	March 5,2024	V. Pallaver, S.Zhu, A. Cheng	Revise the last reviewed dates of EU RoHS, Pops,REACH SVHC and CP65. Add the internet linkage for China RoHS 2 Add the following new Applicable Standards: 87 (Japan Industrial Safety and Health Act) 88 (USA Toxic Substances Control Act -PFAS under section 8(a)(7)) 89 (Batteries Regulation (EU) 2023/1542) Move 81 Bulgaria regulation-Ordinance on Packaging and Packaging Waste to Annex2
AJ	CO-24-1314	July 30,2024	V. Pallaver, S.Zhu, A. Cheng, M.burgos	Annex 1- Revise the last reviewed dates of REACH SVHC,Maine PFAS ,WEEE and China RoHS. Add the following new Applicable Standards: 90 Consumer Product Safety Improvement Act 91 PRODUCTS CONTAINING PFAS 92 PPWR 93 FTC Guide for Leather Labeling 94 China Limit of Harmful Matters in Leather and Fur Annex 2- Add France Decree No. 2022-748 of April 29, 2022
AK	CO-25-0360	26-Feb-25	V. Pallaver, S.Zhu, A. Cheng	Annex 1: Update REACH SVHC; 5 substances added on January 2025 for total of 247 substances Update latest publication date of california proposition 65 list Update 35-China RoHS, 4 Phthalates were new added and related labelling requirement was updated Update Minnesota PFAS to clarify the notification and substance restriction deadlines Update Maine PFAS regulation (which otherwise shares similar restrictions and notification deadlines as Minnesota) to show that their draft regulations currently show Elo products as out of scope. Minor clarifications and date review for EU REACH regulation Minor clarifications and date review for EU POP regulation Minor clarifications and date review for Japan CSCL regulation Add the following new Applicable Standards: 95 Notice with respect to certain per- and polyfluoroalkyl substances (PFAS)  Annex 2: Added EU Deforestation regulation 2023/1115

**All Elo products shall conform to the applicable standards from Annex 1 "Applicable Standards"**

These requirements may affect:

- Design of product or packaging
- Labelling of product or packaging
- Product documentation
- Product registration with regulatory bodies.

Annex 2 "Non-Applicable Standards" is included for reference only. It is a list of standards that Elo has reviewed and determined are not applicable, whether because of "out of scope" of current Elo product line, or because of standard's obsolescence.

**Elo suppliers shall provide a statement of compliance and necessary proof for each supplied part/material.**

This requirement includes:

-Supplier shall provide the data to support Elo products' ES600973 compliance in Elo's compliance management software database. If supplier cannot maintain online database, then:

- 1) suppliers of raw materials shall certify compliance using form EF000313
- 2) suppliers of finished and semi-finished goods shall certify compliance using form EF000314

-Supplier shall provide documentation to demonstrate the basis for compliance statements. This may consist of Full Material Declaration (for example, in IPC 1752 format), or of physical test reports from test labs that are ISO 17025 certified and accredited to perform chemical testing of EEE.

-For EU RoHS in particular, Technical Documentation complying to 2011/65/EU and/or EN IEC 63000:2018 shall be kept. This Technical Documentation shall be maintained, updated, and made available upon request to Elo for 10 years following product release.

**Elo suppliers shall comply with all applicable legal and regulatory requirements.**

This includes:

- Any additional legal, regulatory, or customer requirements of which supplier is aware.
- Supplier shall notify Elo of any such additional requirements not yet listed in this document

Source Number	Geography	Substance Category	Regulation/Standard Number	Regulation/Standard Title	Effect on Elo product			Comments	Internet link to standard/regulation	Date/revision of standard/regulation last reviewed
					Substance Restriction (Whether in Product or Packaging)	Declaration/Notification of Substance (Whether to Customer, Carrier, Manufacturer, Distributor, or Shipping/Logistics provider)	Labelling (Whether Product, Packaging, or Product Documentation)			
1	Europe	RoHS	EU Directive 2011/65/EU	on the Restriction of the use of Certain Hazardous Substances in Electrical and Electronic Equipment	X		X	<p>Note: this directive includes the 4 phthalates from amendment 2015/863 (often incorrectly called RoHS3 in industry).</p> <p>Parts supplied to Elo that are in scope of EU RoHS (that are EEE electrical and electronic equipment) require labelling with the CE mark.</p> <p>Parts supplied to Elo that are out of scope of EU RoHS (that are not EEE) require product packaging to be labelled with Elo's non-standardized RoHS label SD503235.</p> <p>Documentation must be provided to satisfy Technical Documentation requirement.</p> <p>In anticipation of upcoming Pb exemption expirations, Elo no longer accepts 6c,7a,7c-1,7c-II exemptions.</p> <p>All new designs supplied to Elo should strive to eliminate use of these exemptions. For any existing design supplied to Elo that does use these exemptions, supplier is required to provide an exemption phase-out plan for Elo to review.</p>	<a href="https://eur-lex.europa.eu/eli/dir/2011/65/oj">https://eur-lex.europa.eu/eli/dir/2011/65/oj</a>	2023/9/1
2	UK	RoHS	2012 No.3032	The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012	X		X	<p>For finished electrical and electronic goods, requires UKCA mark.</p>	<a href="https://www.gov.uk/guidance/rohs-compliance-and-guidance">https://www.gov.uk/guidance/rohs-compliance-and-guidance</a> <a href="https://www.legislation.gov.uk/uksi/2012/3032/contents/madp">https://www.legislation.gov.uk/uksi/2012/3032/contents/madp</a>	2021/2/16
3	Europe	REACH	Regulation EC No 1907/2006	Concerning the Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH)	X		X	<p>Requires CE mark</p> <p>Of particular importance to Elo is Article 67 (Annex XVII restrictions)</p>	<a href="https://eur-lex.europa.eu/eli/reg/2006/1907">https://eur-lex.europa.eu/eli/reg/2006/1907</a>	2024/10/10
4	Europe	REACH SVHC	Regulation EC No 1907/2006 Article 33 (ECHA's Substances of Very High Concern)	Concerning the Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH)		X		<p>Article 33 requires disclosure of any SVHC in an article above 0.1% w/w. REACH has a very specific definition of an article.</p>	<a href="https://echa.europa.eu/candidate-list-table">https://echa.europa.eu/candidate-list-table</a>	2025/1/21 (247 substances)
5	UK	REACH	2020 No. 1577	UK Registration, Evaluation, Authorisation & restriction of Chemicals (REACH)	X		X	<p>It's basically similar to EU REACH, the key principles of the EU REACH Regulation have been retained.</p>	<a href="https://www.hse.gov.uk/reach/index.htm">https://www.hse.gov.uk/reach/index.htm</a> <a href="https://www.legislation.gov.uk/ukdsi/2020/9780348213300/introduction">https://www.legislation.gov.uk/ukdsi/2020/9780348213300/introduction</a>	2020
6	Europe	Waste Framework Directive (WFD)	Directive 2008/98/EC	on Waste and Repealing certain Directives		X	X	<p>Elo products may fall under Annex III definitions of hazardous substances. Article 9.1i (Prevention of Waste) instructs us to report SVHC in article information to ECHA starting Jan 5, 2021. The reporting is done in ECHA's "SCIP" database. Elo's suppliers can enter information into SCIP database themselves, or they need to provide the detailed information Elo requires to enter into SCIP.</p> <p>Many EU member states have transposed this EU directive into national law. For example, Germany has codified this into their Waste Management Act (KrWG). KrWG codifies different regulations for different types of waste including ELV (AltfahrzeugV), batteries (BatterieG), and EEE (ElektroG).</p>	<a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02008l0098-20180705">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02008l0098-20180705</a>	2018/7/5
7	Europe	POP	EU Regulation 2019/1021 and all amendments (including EU Regulation 2020/784)	on Persistent Organic Pollutants (recast)	X			<p>Of particular importance to Elo is Article 3, which says that substances listed in Annex I or Annex II shall not be present. Recent 2024 amendments include:</p> <ul style="list-style-type: none"> <li>-Reducing HBCDD limit from 100 ppm to 75 ppm in certain products</li> <li>-Adding Methoxychlor to Annex I Part A</li> </ul>	<a href="https://eur-lex.europa.eu/eli/reg/2019/1021">https://eur-lex.europa.eu/eli/reg/2019/1021</a>	2024/10/17
8	Europe	Greenhouse Gases	Regulation No 517/2014	on Fluorinated Greenhouse Gases	X	X		<p>Part of Europe's implementation of the Montreal Protocol. Places restrictions on certain products with GHGs, leakage of GHG, and reporting requirements. Easiest way (which should not be difficult for Elo products) is to not contain any of the Annex I or Annex II substances.</p>	<a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2014.150.01.0195.01.FRG">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2014.150.01.0195.01.FRG</a>	2014/6/16
9	Canada	PCBs	SOR/2008-273	PCB Regulations	X			<p>Effectively bans PCBs in products (see Article 6c)</p>	<a href="https://laws-lois.justice.gc.ca/eng/regulations/SOR-2008-273/">https://laws-lois.justice.gc.ca/eng/regulations/SOR-2008-273/</a>	2015/1/1

Source Number	Geography	Substance Category	Regulation/Standard Number	Regulation/Standard Title	Effect on Elo product			Comments	Internet link to standard/regulation	Date/revision of standard/regulation last reviewed
					Substance Restriction (Whether in Product or Packaging)	Declaration/Notification of Substance (Whether to Customer, Carrier, Manufacturer, or Shipping/Logistics provider)	Labelling (Whether Product, Packaging, or Product Documentation)			
10	Norway	Hazardous substances	Norway Regulation FOR-2004-06-01-922	Restrictions In Using Environmentally Hazardous Chemicals and Other Products	X			Chapter 2: PCBs, lead shot, mercury, octylphenol substances, methacrylamide substances for sealing water leaks, PFOS in fire foam, textiles with PCP or formaldehyde, chrome-plated wood, detergents, heavy metals in packaging, batteries with >=5ppm Hg, portable batteries with >20ppm Cd, battery labelling, ELV, petrol & diesel quality, GHG in fuel, VOCs in paints and varnish, sulfur in marine fuel, ethylene glycol in antifreeze, REACH Annex XVII, asbestos, pacifiers Chapter 2a: Norway implementation of EU RoHS Chapter 3: biofuels Chapter 4: Norway implementation of EU POP Chapter 5: hazardous substance reselling Chapter 6: Norway implementation of EU ODS Chapter 7: Norway implementation of EU GHG Most of the regulations listed are harmonized to EU standards. There are some unique-to-Norway requirements in Chapter 2. After Elo review, those Norway-specific requirements that might apply to Elo products are the ban on PCBs and chrome-plated wood.	<a href="https://lovdata.no/dokument/SF/forskrift/2004-06-01-922">https://lovdata.no/dokument/SF/forskrift/2004-06-01-922</a>	2020/7/2
11	Europe	Mercury	EU Regulation 2017/852	On Mercury, and repealing Regulation No 1102/2008	X			Article 5 sets mercury export/import/manufacturing restrictions in Annex II (for types of products and effective dates). Article 8 allows EU RoHS limits. Of particular note to Elo in Annex II restrictions are: -batteries with >5ppm Hg -CCFLs for electronic displays (Hg restriction depends on length of bulb)	<a href="https://eur-lex.europa.eu/eli/reg/2017/852/oj">https://eur-lex.europa.eu/eli/reg/2017/852/oj</a>	2017/5/17
12	Europe	Batteries	EU Directive 2006/66/EC	On Batteries and Accumulators and Waste Batteries and Accumulators and Repealing Directive 91/157/EEC	X		X	Of particular note: Article 4 restricts batteries to less than 5 ppm Hg, 20 ppm Cd by weight Article 11 waste batteries can be readily removed by qualified professional independent of manufacturer Article 21 batteries are marked with the Annex II "wheelie-bin" symbol Article 21 batteries containing >5ppm Hg, >20ppm Cd, or >40 ppm Pb are appropriately labelled with that chemical symbol Article 21 battery capacity is indicated on battery	<a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02006l_0066-20180704">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02006l_0066-20180704</a>	2018/7/4
13	Europe	Packaging	EU Directive 94/62/EC	On Packaging and Packaging Waste	X		X	Restricts to 100ppm the sum of any lead, cadmium, mercury, and hexavalent chromium in packaging. All recyclable packaging material of products shall be labeled with the recycling symbols for EU.	<a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32004d_0062-20180704">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32004d_0062-20180704</a>	2018/7/4
14	Europe	WEEE	EU Directive 2012/19/EU	Waste Electrical and Electronic Equipment			X	Elo products would fall under Annex I Category 3 "IT and Telecommunications equipment". Regulations basically sets collection/recycling/recovery targets for many electrical goods (for which Elo products fall under the WEEE category "IT and telecommunications equipment"). Products in scope should be labelled per the "wheelie bin" symbol (with black bar, if manufactured after 2005). For the official source of the wheelie bin artwork see EN 50419 (also referenced in Annex IX)	<a href="http://data.europa.eu/eli/dir/2012/19/2024-04-08">http://data.europa.eu/eli/dir/2012/19/2024-04-08</a>	2024/4/8
15	Netherlands	RoHS	Netherlands WEEE Management Decree	Netherlands WEEE Management Decree	X			Implements EU RoHS legislation in Netherlands. Goes further than 2011/65/EU regulation by banning CFC and HCFC in refrigerators and freezers.	<a href="http://www.epeat.org/weea-registration/Netherlands_WEEE_management_decree_200409_engelseveraling_hesluit_elektrapp.pdf">http://www.epeat.org/weea-registration/Netherlands_WEEE_management_decree_200409_engelseveraling_hesluit_elektrapp.pdf</a>	2020/8/1
16	USA - Connecticut	Mercury	Connecticut Public Law 02-90	Connecticut Mercury Education and Reduction Act	X			The key restriction is in Sec 22a-617. Mercury in a product is limited to 100 milligrams	<a href="https://law.iustia.com/codes/connecticut/2012/title-22a/chapter-445m/">https://law.iustia.com/codes/connecticut/2012/title-22a/chapter-445m/</a>	2020/8/1
17	USA - California	Toxic Substances	California Proposition 65	California Safe Drinking Water and Toxic Enforcement Act		X	X	Requires businesses to notify Californians about significant amounts of listed chemicals in the products they purchase, or that are released into the environment and drinking water.	<a href="https://nehba.ca.gov/proposition-65">https://nehba.ca.gov/proposition-65</a>  <a href="https://nehba.ca.gov/proposition-65/proposition-65-list">https://nehba.ca.gov/proposition-65/proposition-65-list</a>	2025/1/3



Source Number	Geography	Substance Category	Regulation/Standard Number	Regulation/Standard Title	Effect on Elo product			Comments	Internet link to standard/regulation	Date/revision of standard/regulation last reviewed
					Substance Restriction (Whether in Product or Packaging)	Declaration/Notification of Substance (Whether to Customer, Government, or Shipping/Logistics provider)	Labelling (Whether Product, Packaging, or Product Documentation)			
28	International	Mercury	Minamata Convention on Mercury	Minamata Convention on Mercury	X			Voluntary standard that many countries are adopting into their respective regulations. Nearly identical to EU RoHS limits, for scope of Elo Components. Implemented by many member countries with their own legislation, for example, Japan with their Act No 42, 2014 Act on Preventing Environmental Pollution of Mercury, and EU Regulation 2017/852.	<a href="https://www.mercuryconvention.org/en/about">https://www.mercuryconvention.org/en/about</a>	/
29	International	POP	Stockholm Convention	Stockholm Convention on Persistent Organic Pollutants	X			Not a regulation, a voluntary standard agreed upon by many countries, and implemented by many of those countries into their own national legislation. The main example: EU Regulation 2019/1021 (POP)	<a href="http://chim.pops.int/TheConvention/ThePOPs/Default.aspx">http://chim.pops.int/TheConvention/ThePOPs/Default.aspx</a>	/
30	Canada	Toxic Substances	SOR/2012-285	Prohibition of Certain Toxic Substances Regulation	X			Most of the Schedule 1 and Schedule 2 substances are covered by EU REACH and EU POP regulation, however, some substances appear to be unique. Articles 3(3), 4(1), and 6(1) are of most impact, restriction use of Schedule 1, Schedule 2, and Schedule 2.1 substances. Note that as of December 2018 there are proposed amendments expected to take effect in Fall 2020, adding several new substances.	<a href="https://laws-lois.justice.gc.ca/eng/regulations/SOR-2012-285/index.html">https://laws-lois.justice.gc.ca/eng/regulations/SOR-2012-285/index.html</a>	2021/3/17
31	International	Phytosanitary	ISPM Publication 15	Regulation of wood packaging material in International Trade	X		X	Affects all wood packaging material (pallets, crates, dunnages, etc). Designed to prevent international spread of disease and insects through wood packaging. Requires wood >6mm thick to be debarked, heat-treated, and stamped with the 'wheat mark'	<a href="https://www.ippc.int/en/publications/640/">https://www.ippc.int/en/publications/640/</a>	2018
32	International	Dangerous Goods	IATA Dangerous Goods Regulation	IATA Dangerous Goods Regulation	X		X	Voluntary standard that most air carriers require adherence to regarding shipping of dangerous goods. Of particular relevance to Elo products, imposes package limits and package labelling requirements for different kinds of lithium and lithium ion batteries.	Special guidelines for lithium ion batteries: <a href="https://www.iata.org/contentassets/05e48742b9047259b3a700bc9d429d9/iium-battery-audience-document.pdf">https://www.iata.org/contentassets/05e48742b9047259b3a700bc9d429d9/iium-battery-audience-document.pdf</a>	2023
33	International	Dangerous Goods	IMDG 2022	International Maritime Dangerous Goods Code	X		X	The IMDG Code, 2022 Edition (inc. Amendment 41-22) comes into force on 1 January 2024 and may be applied voluntarily as from 1 January 2023. Makes some package limits and package labelling requirements for different kinds of lithium and lithium ion batteries. Of particular note, there is Special Provision 188 which provides particular exceptions to the standard IMDG ADR provisions (for thresholds of lithium and aggregate lithium, UN test criteria, packaging methods, and shipment/labelling guidelines)	<a href="https://www.imo.org/en/publications/Pages/IMDG%20Code.aspx">https://www.imo.org/en/publications/Pages/IMDG%20Code.aspx</a>	2022
34	Denmark	Phthalates	Executive Order BEK No. 1113	Denmark Executive Order BEK No. 1113	X			Basically implements same limits on DEHP DBP BBP and DIBP as EU RoHS. It did take into effect four years sooner than RoHS phthalates, however.	/	/
35	China	RoHS	China RoHS 2	Administrative Measures for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products	X	X	X	Comes into force July 1, 2016. Packaging and batteries are in scope. All products manufactured or imported after November 01, 2019 must comply with the implementation guidelines published by SAMR and MIT. Implements 3 main directives: -Product must be labelled per SJ/T 11364-2014 (tic-tac-toe chart and EFUP mark, use SJ/Z-11388-2009 for EFUP rules) -Package recycling marking required if mandatory standard exists. As yet, no mandatory standard exists, but recommended standard is GB/T 18455-2010 (plastic and paper tri-arrow) -Substance restrictions and exemptions per the product catalog per GB/T 26572-2011. The first catalogue, containing 12 categories of EEE (which Elo products are in scope), came into force on March 15, 2019. -Requires product/product family registration to China government compliance website, after which the GCP logo can be used on packaging, product manuals and online marketing. Registration valid for 10 years. - On June 29, 2024, GB/T26572-2011 Amendment No.1 was published, four Phthalates in Electrical and Electronic products were new added and restricted, which will be mandatory since Jan 1, 2026. SJ/T 11364-2024 for labeling was promulgated on Dec 25, 2024 and should be implemented from April 1, 2025.	GB/T 26572-2011: <a href="http://www.gb.com.cn/standard/GB26572-2011.pdf">http://www.gb.com.cn/standard/GB26572-2011.pdf</a> Exemption list: <a href="http://www.gb.com.cn/standard/GB26572-2011-ExemptionList.pdf">http://www.gb.com.cn/standard/GB26572-2011-ExemptionList.pdf</a> Amendment No.1 to GB/T 26572-2011: <a href="http://www.gb.com.cn/standard/GB26572-2011-1.pdf">http://www.gb.com.cn/standard/GB26572-2011-1.pdf</a>	2024/12/25
36	China	Heavy Metals in Packaging	GB/T 16716.1-2018	Packaging and the environment—Part 1: General rules	X			Restricts to 100ppm the sum of any lead, cadmium, mercury, and hexavalent chromium in packaging	<a href="http://openstd.sam.gov.cn/bask/basknew?info?no=CCBCEC469F11404F17FA762A0E7B1AD">http://openstd.sam.gov.cn/bask/basknew?info?no=CCBCEC469F11404F17FA762A0E7B1AD</a>	2018



Source Number	Geography	Substance Category	Regulation/Standard Number	Regulation/Standard Title	Effect on Elo product			Comments	Internet link to standard/regulation	Date/revision of standard/regulation last reviewed
					Substance Restriction (whether in Product or Packaging)	Declaration/Notification of Substance (whether to Customer, Carrier, or Shipping/Logistics provider)	Labelling (whether Product, Packaging, or Product Documentation)			
37	Taiwan	RoHS	CNS 15663	Guidance to Reduction of the Restricted Chemical Substances in Electrical and Electronic Equipment			X	Taiwan implementation of RoHS regulations. Currently only covers the original 6 RoHS substances. Does not prevent prohibit marketing/selling products in excess of the thresholds. User manual of consumer-purchased finished electrical/electronic products shall include diagram that discloses the applicability of RoHS exemption, and the presence of RoHS hazardous substances above threshold levels for different product components.	/	/
38	USA - California	RoHS	California RoHS law	CA Electronic Waste Recycling Act (Health and Safety Code sections 25214.9-25214.10.2)	X			This is the text of the law implementing CA RoHS. For the most part, it redirects to regulations put forth by CA DTSC.	<a href="https://law.justia.com/codes/california/2021/code-hsc/division-20/chapter-6-5/article-10-3/">https://law.justia.com/codes/california/2021/code-hsc/division-20/chapter-6-5/article-10-3/</a>	2021
39	USA - California	RoHS	California RoHS regulations	CA CCR Title 22, Section 66260.202	X			Regulations administered by CA Department of Toxic Substances Control. Regulations are written to mirror original EU RoHS (6 substances).	/	/
40	USA - various states	Heavy Metals in Packaging	Toxics in Packaging Clearinghouse Model Legislation	Toxics in Packaging Clearinghouse Model Legislation	X			A voluntary clearinghouse regulation that basically implements the same limits and exemptions as EU heavy metal in packaging regulation. 9 US States (WA, CA, MN, IA, NY, RI, CT, NH, NJ) are members of the TPCH and have enacted legislation along these lines. 10 US States (WI, IL, MO, FL, GA, VA, PA, ME, VT, MD) are not members of the TPCH but have enacted the model legislation anyways. There are slight differences in the 19 different state legislations and the TPCH model legislation, none of which affect Elo.	<a href="https://toxicsinpackaging.org/">https://toxicsinpackaging.org/</a>	Jul-12
41	USA	Batteries	Mercury-Containing Rechargeable Battery Management Act	42 USC 14301-14336	X		X	Restricts mercury in batteries (with the exception of 25mg in button cell alkalines). Provides for the labelling (with three chasing arrows or comparable recycling symbol) and recycling of rechargeable nickel cadmium, small sealed lead-acid, and other rechargeable batteries in used consumer products.	<a href="https://www.epa.gov/sites/production/files/2016-03/documents/p1104.pdf">https://www.epa.gov/sites/production/files/2016-03/documents/p1104.pdf</a>	1996
42	United Arab Emirates	RoHS	UAE Cabinet Decision No. 10/2017	Restriction of Hazardous Substances	X	X	X	Companies with risk assessment documentation and can show full compliance can apply for a 3yr certificate (placing an Emirates Quality Mark on product). Companies without full product assessment may complete a declaration of conformity and submit product testing reports to apply for a 1yr certification. Substances, restriction levels, exemptions, and product categories follow EU RoHS.	<a href="https://www.esma.gov.ae/en-us/ESMA/Pages/Laws-and-Legislations.aspx">https://www.esma.gov.ae/en-us/ESMA/Pages/Laws-and-Legislations.aspx</a>	2017
43	Russia/EAEU	RoHS	EAEU TR 037/2016	On the Restriction of the Use of Hazardous Substances in Electrical and Radio Electronic Products	X	X	X	Effective Mar 1, 2020. Has 12 product categories (compared to EU RoHS' 10). Only original 6 substances regulated, at same limits as EU RoHS. When these requirements and all safety/EMC/etc requirements are met then the EAC mark can be applied (similar to EU's CE mark). Allows the creation of an EAEU Declaration of Conformity (which looks like it must come from an EAEU certified body, or else it can be replaced with a CoC upon request). Requires marking information and operating manuals in Russian, if required by the laws of the member states.	<a href="http://www.bels by/belstat/belstat/2019-04-10/EAEU_TR_037_2016_RoHS_BELIS_Official_eng_wsig.pdf">http://www.bels by/belstat/belstat/2019-04-10/EAEU_TR_037_2016_RoHS_BELIS_Official_eng_wsig.pdf</a>	October 18 2016
44	China	VOC	GB 30981-2020	Limit of harmful substances of industrial protective coatings	X			Comes into force December 1, 2020. Replaces GB 30981-2014. Regulates the following in industrial protective coatings: -Total VOCs -Benzene, total content of methylbenzene and xylene (including ethylbenzene) -Total halogenated hydrocarbons -Total PAH for naphthalene, anthracene -Methanol content -Total content of glycol ether and glycol ether ester solvents -Heavy metals content	<a href="http://openstd.sam.gov.cn/bqzq/bqzqDetail?treeCode=2488F23561AA88041D0F93A39F6519D">http://openstd.sam.gov.cn/bqzq/bqzqDetail?treeCode=2488F23561AA88041D0F93A39F6519D</a>	2021
45	China	VOC	GB 33372-2020	Limit of volatile organic compounds content in adhesive	X			Comes into force December 1, 2020. Replaces GB/T 33372-2016. Regulates the following in adhesives: -Total VOCs -Individual VOCs per requirements of GB 30982 or GB 19340	<a href="http://openstd.sam.gov.cn/bqzq/bqzqDetail?treeCode=5C007F961132665836A072E71C0B61">http://openstd.sam.gov.cn/bqzq/bqzqDetail?treeCode=5C007F961132665836A072E71C0B61</a>	2021
46	China	VOC	GB 38507-2020	Limits of volatile organic compounds (VOCs) in printing ink	X			Comes into force April 1, 2021. Regulates the following in printing inks: -Total VOCs -Halogenated hydrocarbons -Solvents that should not be added intentionally water-based inks, offset inks, energy curing inks, and engraving gravure inks are considered low-VOC.	<a href="http://openstd.sam.gov.cn/bqzq/bqzqDetail?treeCode=C125CF8A8830282D125E1668D0516">http://openstd.sam.gov.cn/bqzq/bqzqDetail?treeCode=C125CF8A8830282D125E1668D0516</a>	2021

Source Number	Geography	Substance Category	Regulation/Standard Number	Regulation/Standard Title	Effect on Elo product			Comments	Internet link to standard/regulation	Date/revision of standard/regulation last reviewed
					Substance Restriction (whether in Product or Packaging)	Declaration/Notification of Substance (whether to Customer, Government, or Shipping/Logistics provider)	Labelling (whether Product, Packaging, or Product Documentation)			
47	China	VOC	GB 38508-2020	Limits for volatile organic compounds content in cleaning agents	X			Comes into force December 1, 2020. Regulates the following in cleaning agents: -Total VOCs -Total content of dichloromethane, trichloromethane, trichloroethylene, and tetrachloroethylene -Formaldehyde -Total content of benzene, toluene, xylene, and ethylbenzene Water-based or semi-water-based with VOC content less than 100g/L considered as low-VOC.	<a href="http://www.ecnrd.com.cn/gb38508-2020">http://www.ecnrd.com.cn/gb38508-2020</a>	2021
48	Switzerland	Hazardous Substances	Swiss Ordinance 814.81	Ordinance on the Reduction of Risks relating to the Use of Certain Particularly Dangerous Substances, Preparations, and Articles (ORRChem)	X	X	X	Is basically a Swiss implementation of various EU regulations (Switzerland not part of EU). There are no unique requirements that are anticipated for Elo products. Has restrictions for products/articles containing substances listed in Annex 1. Has restrictions for certain products/articles containing substances listed in Annex 2. Of particular concern to Elo in Annex 2 are: -Lead restrictions in paints and varnishes -Cadmium restrictions in plastic, paints and varnishes, zinc plated articles, brazing fillers -Ban on cadmium-plated metal surfaces of articles -ODS -extender oils and various PAH in tires and plastics -PCBs in capacitors and transformers -mercury in batteries restricted to 5ppm, cadmium in portal batteries restricted to 20ppm	<a href="https://www.admin.ch/opc/en/classified-compilation/20021520/index.html">https://www.admin.ch/opc/en/classified-compilation/20021520/index.html</a>	1-Dec-20
49	Europe	Beryllium Oxide	not applicable	not applicable		X		Not restricted, but a European joint industry has decided that disclosure of Beryllium Oxide is important. It is part of IEC 62474. Many customers demand it, mostly due to its inclusion on IEC 62474	not applicable	not applicable
50	South Korea	RoHS	unknown	Act for Resource Recycling of Electrical and Electronic Equipment and Vehicles (aka Korean RoHS)	X			Same substance restrictions for EEE as EU RoHS. The 4 new phthalates expected to come into scope Jan 1 2021. Self certify. No labelling requirement.	<a href="https://elaw.kiri.re.kr/eng_service/lawView.do?hseq=49117&amp;lang=ENG">https://elaw.kiri.re.kr/eng_service/lawView.do?hseq=49117&amp;lang=ENG</a>	2020
51	Japan	RoHS	JIS C 0950:2021	J-Moss (Japanese RoHS)	X		X	Totally 6 substances restritions in J-Moss. Same substance restrictions as EU RoHS. For finished electrical and electronic goods, required to place the "content mark" on the product, packaging and catalogues, and describe the presence condition of 6 substances on the website in Japanese in accordance with JIS.	<a href="https://home.jeita.or.jp/eps/moss_en.htm">https://home.jeita.or.jp/eps/moss_en.htm</a>	2021
52	China	Batteries	GB 24427-2021	Content limitation of mercury,cadmium and lead for zinc anode primary battery	X		/	/	<a href="http://www.spsc.gov.cn/gb24427-2021">http://www.spsc.gov.cn/gb24427-2021</a>	2021
53	Taiwan	Batteries	/	Restrictions on the Manufacture, Import, and Sale of Dry Cell Batteries	X		/	/	/	/
54	USA - New York	Batteries	/	Environmental Conservation Law, Battery management and disposal	/	X	/	/	/	/
55	Japan	Hazardous substances	/	Act on the Evaluation of Chemical Substances and Regulation of Their Manufacture, etc aka Chemical Substance Control Law (CSCL)	X			Mostly deals with substances. However, the manufacturing and import of products with any of the Class 1 substances is banned. Manufacturing and import of products with any of the Class 2 substances is allowed with governmental pre-notification. Class 1 substance list has been amended several times since 2021 to add various PFOS/PFOA/PFHxS substances and compounds in various applications.	<a href="https://www.meti.go.jp/policy/chemical_management/english/cscd/">https://www.meti.go.jp/policy/chemical_management/english/cscd/</a>  Class 1 substances: <a href="https://www.nite.go.jp/chem/jcheck/ist/action?category211&amp;request_locale=en">https://www.nite.go.jp/chem/jcheck/ist/action?category211&amp;request_locale=en</a> <a href="https://www.meti.go.jp/policy/chemical_management/english/cscd/importsubstance.pdf">https://www.meti.go.jp/policy/chemical_management/english/cscd/importsubstance.pdf</a>  Class 2 substances: <a href="https://www.nite.go.jp/chem/jcheck/ist/action?category212&amp;request_locale=en">https://www.nite.go.jp/chem/jcheck/ist/action?category212&amp;request_locale=en</a>	Jan-25
56	USA - California	Perchlorates	California AB 826	Perchlorate Contamination Prevention Act of 2003			X	If product contains perchlorate (as many lithium coin cell batteries do), then there is special carton labelling required. "This warning is for California (USA) use only and applies to lithium coin cell contained in device: Perchlorate Material - special handling may apply. See <a href="http://www.dtsc.ca.gov/hazardouswaste/perchlorate">www.dtsc.ca.gov/hazardouswaste/perchlorate</a> ." in minimum 10 Arial font size	<a href="http://www.dtsc.ca.gov/hazardouswaste/perchlorate">http://www.dtsc.ca.gov/hazardouswaste/perchlorate</a> <a href="https://dtsc.ca.gov/perchlorate-fact-sheet/">https://dtsc.ca.gov/perchlorate-fact-sheet/</a>	2020/12/1
57	International	Halogenated Flame Retardants	IEC 61249-2-21	Materials for Printed Boards and other Interconnecting Structures - Part 2-21: Reinforced base materials, clad nad unclad - Non-halogenated epoxide woven E-glass reinforced laminated sheets of defined flammability, copper-clad		X		Regards BFRs other than PBBs, PBDEs, or HBCDD in printed wiring boards. Asks for disclosure above 900ppm by weight of Br, 900ppm by weight of Cl, or 1500ppm by weight of Br+Cl	<a href="https://webstore.iec.ch/publication/5008">https://webstore.iec.ch/publication/5008</a>	2003/11/12
58	International	Halogenated Flame Retardants	IPC IPC-4101	Specification for Base Materials for Rigid and Multilayer Printed Boards		X		Regards BFRs other than PBBs, PBDEs, or HBCDD in printed wiring boards. Asks for disclosure above 900ppm by weight of Br, 900ppm by weight of Cl, or 1500ppm by weight of Br+Cl	<a href="https://www.ipc.org/TOC/TOC-IPC-4101E.pdf">https://www.ipc.org/TOC/TOC-IPC-4101E.pdf</a>	2020/12/1

ANNEX 1 - APPLICABLE STANDARDS

Source Number	Geography	Substance Category	Regulation/Standard Number	Regulation/Standard Title	Effect on Elo product			Comments	Internet link to standard/regulation	Date/revision of standard/regulation last reviewed
					Substance Restriction (Whether in Product or Packaging)	Declaration/Notification of Substance (Whether to Customer, Supplier, or Shipping/Logistics provider)	Labelling (Whether Product, Packaging, or Product Documentation)			
59	International	Halogenated Flame Retardants	JEDEC/ECA JS709	Definition of "Low Halogen" for Electronic Products		X		Regards BFRs other than PBBs, PBDEs, or HBCDD in plastic material (not PWB) Asks for disclosure above 900ppm of Br from flame retardants, or above 900ppm of Cl from flame retardants, PVC, or PVC copolymers	<a href="https://standards.globalspec.com/std/10284476/jelec-ecajs709">https://standards.globalspec.com/std/10284476/jelec-ecajs709</a>	2020/12/1
60	International	Hazardous substances	IEC 62474	Material Declaration for Products of and for the Electrotechnical Industry				Consists of a curated list of restricted and declarable substances that the steering committee has decided are likely to be present in electrotechnical products. Many companies and customers only require compliance to this list. All the reference standards on this standard are covered elsewhere in this specification.	<a href="http://std.iec.ch/iec62474">http://std.iec.ch/iec62474</a>	2023/11/17
61	International	Red phosphorous	None	None	X			A non-codified industry standard requiring the ban of red phosphorous in plastic insulation materials of connector housings. Restricted not for toxicity reasons but for functionality and fire hazard reasons.	None	2020/12/1
62	Suffolk County NY	Bisphenol A in thermal paper	Suffolk County Code Part II Article IX	Restrictions on Receipts Containing BPA	X			Bans BPA in receipt paper	<a href="https://ecode360.com/27269346">https://ecode360.com/27269346</a>	2021/5/1
63	Illinois	Bisphenols in thermal paper	415 ILCS 5 Section 22.59	Illinois Environmental Protection Act	X			Bans BPA in receipt paper	<a href="https://www.iga.gov/legislation/ilcs/ilcs5.asp?ActID=1585&amp;ChapterID=38">https://www.iga.gov/legislation/ilcs/ilcs5.asp?ActID=1585&amp;ChapterID=38</a>	2021/5/1
64	Connecticut	Bisphenols in thermal paper	S.B. No 210	An Act Prohibiting the Use of Bisphenol-A in Thermal Receipt Paper	X			Bans BPA in receipt paper	<a href="https://www.ct.gov/sos/cwpov/server.nsf/(open)?open=SB0210.PDF">https://www.ct.gov/sos/cwpov/server.nsf/(open)?open=SB0210.PDF</a>	2021/5/1
65	USA	PBT	Toxic Substances Control Act	Toxic Substances Control Act - PBT Chemicals under Section 6(h)	X			On Jan 6, 2021, EPA issued five final rules to reduce exposure to Persistent, Bioaccumulative, and Toxic Chemicals, under authority of TSCA Section 6(h). -Bans the following five PBT substances in products: DecaBDE, PIP3:1, 2,4,6-TTBP, HCBd, and PCTP. Certain exemptions are listed in the rules for DecaBDE, PIP3:1, and HCBd  Otherwise, TSCA mostly deals with restrictions at the substance (not article/product) level. In March 2020, EPA announced "manufacturer" fees for "high-priority" substances. At the same time, they announced the first 20 "high-priority" substances. At the time they announced this new fee structure, they did not specify clearly whether importers of articles/products were affected. However, they recently announced a "No Action Assurance" for importers of articles with any of the high priority substances. Nor is Elo on the final company list for high priority substance fees.	<b>PBT final rules:</b> <a href="https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/persistent-bioaccumulative-and-toxic-pbt-chemicals-under">https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/persistent-bioaccumulative-and-toxic-pbt-chemicals-under</a>  <b>No action assurance on 20 high-risk substances:</b> <a href="https://www.epa.gov/tsca-fees/information-plan-reduce-tsca-fees-burden-and-no-action-assurance">https://www.epa.gov/tsca-fees/information-plan-reduce-tsca-fees-burden-and-no-action-assurance</a>	2021/5/1
66	International	Batteries	ST-SG-AC10-11-Rev5	Recommendations on the transport of dangerous goods			X	the classification of types of dangerous goods by united nation.	<a href="https://unece.org/fileadmin/DAM/trans/danger/publi/manual/Rev5/English/ST-SG-AC10-11-Rev5-EN.pdf">https://unece.org/fileadmin/DAM/trans/danger/publi/manual/Rev5/English/ST-SG-AC10-11-Rev5-EN.pdf</a>	2009
67	Europe	Batteries	/	European Agreement concerning the International Carriage of Dangerous Goods by Road			X	UNECE requirements for transiting batteries by road	<a href="https://unece.org/transport/dangerous-goods/adr-2021-files">https://unece.org/transport/dangerous-goods/adr-2021-files</a>	2021/4/1
68	International	Batteries	/	Lithium Battery Guidance Document			X	This document is a guidance for shipping Lithium Batteries by air.	<a href="https://www.iata.org/en/programs/cargo/dgr/lithium-batteries/">https://www.iata.org/en/programs/cargo/dgr/lithium-batteries/</a>	2021
69	USA	Conflict Minerals	Dodd Frank Act Section 1502	Dodd Frank Act, Section 1502 (Conflict Mineral provisions)		X		Requires US-publicly-listed companies to declare their supply chains' sources of tin, tungsten, tantalum, and gold from DRC or DRC's neighbors. Elo is not a US publicly listed company, but many of Elo's customers are. Disclosure is made using the Responsible Mineral Institute's CMRT form	<a href="https://www.govinfo.gov/content/pkg/COMPS-9515/pdf/COMPS-9515.pdf">https://www.govinfo.gov/content/pkg/COMPS-9515/pdf/COMPS-9515.pdf</a>	2021/8
70	International	Conflict Minerals	OECD Conflict Minerals	OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas		X		Voluntary standard, asking companies to declare their supply chains' sources of 3TG from CAHRAs. Disclosure can be made using the Responsible Mineral Institute's CMRT form.	<a href="https://www.oecd-ilibrary.org/governance/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_9789264252479-en">https://www.oecd-ilibrary.org/governance/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_9789264252479-en</a>	2016/4
71	Germany	REACH	ChemVerbotsV	Verordnung über Verbote und Beschränkungen des Inverkehrbringens von bestimmten Stoffen		X		Is Germany's implementation of the REACH directive, last codified in 2017. However, it places tighter restrictions on the following substances: formaldehyde, dioxins and furans, pentachlorophenol, and biopersistent fibres in insulation	<a href="https://www.gesetze-im-internet.de/chemverbotsv_2017/">https://www.gesetze-im-internet.de/chemverbotsv_2017/</a>	2017
72	Europe	Plastic	EU Regulation 2019/2021	EcoDesign Requirements for Electronic Displays	X		X	Annex II Part D Paragraph 2 "Marking of plastic components" lays down requirements for marking plastic components with the type of polymer and (if contained) the type of flame retardant.  These requirements apply to the regulation's tight definition of "electronic displays". Elo suppliers/manufacturers are encouraged to comply where possible, even if Elo product does not meet Regulation 2019/2021 definition of an electronic display.	<a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02019R2021-20210501">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02019R2021-20210501</a>	2021/5



Source Number	Geography	Substance Category	Regulation/Standard Number	Regulation/Standard Title	Effect on Elo product			Comments	Internet link to standard/regulation	Date/revision of standard/regulation last reviewed
					Substance Restriction (Whether in Product or Packaging)	Declaration/Notification of Substance (Whether to Customer, Carrier, Manufacturer, or Shipping/Logistics provider)	Labelling (Whether Product, Packaging, or Product Documentation)			
87	Japan	Hazardous substances	Act No. 57 of June 8, 1972	Industrial Safety and Health Act	X			No importing products with yellow phosphorous matches, benzene and its products, and benzidine and its products.(all covered by REACH Annex XVII anyways)	<a href="http://www.gpo.gov/directories/standards/act-no-57-of-june-8-1972">http://www.gpo.gov/directories/standards/act-no-57-of-june-8-1972</a>	1972
88	USA	PFAS	Toxic Substances Control Act	Toxic Substances Control Act -PFAS under section 8(a)(7)		X		The reporting rule under the Toxic Substances Control Act (TSCA) is that requires all persons that manufacture (including import) or have manufactured per- and polyfluoroalkyl substances (PFAS) in any year since January 1, 2011, to submit information to EPA regarding PFAS uses, production volumes, byproducts, disposal, exposures, and existing information on environmental or health effects.  The final rule is effective on November 13, 2023.	<a href="https://www.epa.gov/toxic-substances-control-act">https://www.epa.gov/toxic-substances-control-act</a>	2023/11/13
89	Europe	Batteries	Regulation (EU) 2023/1542	On batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC (Text with EEA relevance)	X		X	Regulation (EU) 2023/1542 is effective August 18, 2023. The previous EU Battery Directive 2006/66/EC will be repealed on August 18, 2025. Chapter II Article 6 restricts batteries to less than 5 ppm Hg, 20 ppm Cd, 100ppm Pb by weight. Chapter III Article 13 all batteries containing >20ppm Cd, or >40 ppm Pb must be marked with the chemica symbol for the metal concerned: Cd or Pb. Annex VI affected products must be marked with a symbol indicating separate collection of batteries, and all batteries must be marked with a QR code since February 18, 2027.	<a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023R1542&amp;fromDoc=32023R1542">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023R1542&amp;fromDoc=32023R1542</a>	2023/7/28
90	USA	Lead	/	Consumer Product Safety Improvement Act	X			The content of lead or lead compounds in paint and similar surface-coating materials should not be excess of 0.009 percent.	<a href="https://www.cpsc.gov/Document-List/Consumer-Product-Safety-Improvement-Act">https://www.cpsc.gov/Document-List/Consumer-Product-Safety-Improvement-Act</a>	2009
91	USA-Minnesota	PFAS	116.943	PRODUCTS CONTAINING PFAS	X			Elo no longer accepts PFAS. All new designs/products/materials supplied to Elo should eliminate use of PFAS. For any designs/products/materials supplied to Elo that do contain PFAS, supplier is required to provide a PFAS phase-out plan for Elo to review. This Minnesota regulation requires annual notification to MPCA starting January 2026 of products intentionally containing PFAS, and bans PFAS in products starting Jan 2032.	<a href="https://www.mn.gov/legislation/116.943">https://www.mn.gov/legislation/116.943</a>	2025
92	Europe	Packaging	PPWR	Proposal for EU regulation on packaging and packaging waste	X		X	FOR FUTURE REFERENCE – EXPECTED FUTURE REGULATION This proposal has been officially posted and the regulation(PPWR)was adopted by EU Parliament on Apr 24,2024, with the final text expected to enter into force toward the end of 2024,which once implemented will replace the Packaging Directive 94/62/EC. Elo product packaging are listed in the scope of Directive 94/62/EC and its amendment Directive(EU) 2018/852,so we have to concern about this new regulation.	<a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024P0001">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024P0001</a>	2024/4/24
93	USA	Leather	61 FR 51583	Guides for Select Leather and Imitation Leather Products			X	Products that are made to look like leather but aren't entirely made of leather need to be labeled accordingly. This includes imitation leather, embossed leather, ground leather, bonded leather, etc.	<a href="https://www.ecfr.gov/current/title-16/chapter-II/subchapter-B/part-24">https://www.ecfr.gov/current/title-16/chapter-II/subchapter-B/part-24</a>	1996/10/3
94	China	Leather	GB 20400-2006	Limit of Harmful Matters in Leather and Fur	X			Products with direct skin contact made of leather must contain less than 30 mg/kg of decomposable aromatic amine dyestuff and less than 75 mg/kg of free formaldehyde. Products for babies and products without direct skin contact have different concentration requirements.	<a href="http://www.sgg.com.cn/dgd/sggorg/document/sggorgs/sggorgs/sgg-qb-16f610b-200606060606-and-for-english-2006-10-10-22-12">http://www.sgg.com.cn/dgd/sggorg/document/sggorgs/sggorgs/sgg-qb-16f610b-200606060606-and-for-english-2006-10-10-22-12</a> <a href="https://www.gpo.gov/directories/standards/gb-20400-2006">https://www.gpo.gov/directories/standards/gb-20400-2006</a> <a href="http://www.ecfr.gov/current/title-16/chapter-II/subchapter-B/part-204">http://www.ecfr.gov/current/title-16/chapter-II/subchapter-B/part-204</a>	2006/4/3
95	Canada	PFAS	Canada Gazette, Part I, Volume 158, Number 30: SUPPLEMENT	Notice with respect to certain per- and polyfluoroalkyl substances (PFAS)		X		Elo no longer accepts PFAS. All new designs/products/materials supplied to Elo should eliminate use of PFAS. For any designs/products/materials supplied to Elo that do contain PFAS, supplier is required to provide a PFAS phase-out plan for Elo to review.	<a href="https://www2.gov.bc.ca/gov/content/industry/energy-environment/energy-environment/energy-environment/energy-environment">https://www2.gov.bc.ca/gov/content/industry/energy-environment/energy-environment/energy-environment/energy-environment</a>	2024/7/27

ANNEX 2 - NOT APPLICABLE STANDARDS

Source Number	Geography	Category	Regulation / Standard Number	Regulation / Standard Title	Effect on Elo product design/documentation/operations	Substance Restriction (whether in Product or Packaging)	Declaration/Notification of Substance (whether to Customer, Government, or Shipping/Logistics provider)	Labelling (whether Product, Packaging or Product Documentation)	Comments	Internet link to standard/regulation	Date/revision of standard/regulation last reviewed
	Canada	Hazardous substances	Canadian Environmental Protection Act 1999	Canadian Environmental Protection Act 1999					Applies mostly to substances, and some other provisions like vehicular emissions. Elo products not in scope.		
	Europe	DMF	2009/251						No longer in force. Suspect it is effectively superseded by EU REACH regulation.	<a href="https://eur-lex.europa.eu/legal-content">https://eur-lex.europa.eu/legal-content</a>	2013/3/15
	Europe	Greenhouse Gases	Regulation EC No 842/2006	On Certain Fluorinated Greenhouse Gases					No longer in force. Repealed by EU regulation No 517/2014		
	China	RoHS	SJ/T11364-2006						China RoHS 1 marking standard. Specifies EPUP logo and tic-tac-toe chart. Replaced by SJ/T 11364-2014		
	China	RoHS	SJ/T11363-2006						China RoHS 1 substance limits. Replaced by China RoHS 2		
	China	Packaging	GB 18455-2001						China packaging material labelling spec. Was originally called out in SJ/T 11363-2006 China RoHS 1 marking specifications, but dropped in SJ/T 11364-2014		
	International	Hazardous substances	JGPSSI JIG-101	Joint Industry Guide: Material Composition Declaration for Electrochemical Products	X	X			Replaced by IEC 62474		Edition 4.1
	International	Packaging	JGPSSI JIG-201	Joint Industry Guide: Material Composition Declaration for Packaging of Electrotechnical Products	X	X			Does not exist anymore, is no longer maintained by CTA (new name of CEA, one of the joint industry authors of JIG-201). Essentially harmonized to REACH.		Edition 1.1
	International	Radiation	several (US 10 CFR Part 20, Japan Law for the regulation of nuclear source material, Japan law concerning prevention from radiation hazards due to radioisotopes, eu directive 2013/59/euratom)						No intentionally added radioactive materials		
	Europe	VOC	Directive 2004/42/EC	On the Limitation of emissions of volatile organic compounds due to the use of organic solvents in certain paints and varnishes and vehicle refinishing products	X		X		Elo products not in scope (building paints and vehicle finishing paints are in scope)	<a href="https://eur-lex.europa.eu/legal-content">https://eur-lex.europa.eu/legal-content</a>	26-Jul-19
	South Korea	Batteries		Quality Management and Safety Control of Industrial Products Act Enforcement Rules					Repealed Jan 28, 2017. Restricted lead and cadmium in batteries (similar to EU Battery regulation)		2020
	Lithuania	Formaldehyde	Hygiene Norm HN 96:2000	Hygiene Norms and Regulations					Applies to children's textiles. Commonly cited (in IEC 62474, for example) as the basis for restricting formaldehyde in products.	<a href="https://www.e-tar.lt/portal/en/legalAct/TAR.6CC9BE7A0183">https://www.e-tar.lt/portal/en/legalAct/TAR.6CC9BE7A0183</a>	
	USA	Hazardous substances	n/a	Consumer Product Safety Act (CPSA) (including the Consumer Product Safety Improvement Act CPSIA of 2008)					EPA has specific definition of children's consumer product. Elo products are currently not within scope. Restricts lead and some phthalates in consumer products.	<a href="https://www.ecfr.gov/cgi-bin/text-idx">https://www.ecfr.gov/cgi-bin/text-idx</a>	2020
	USA	Toxic Substances	Toxic Substances Control Act	Toxic Substances Control Act		X			Listed here due to its inclusion (in restricting PCBs, and asbestos) in IEC 62474. A regulation that deals with substances. In 2020 the EPA announced "manufacturer" fees for "high-priority" substances. At the same time, they announced the first 20 "high-priority" substances. At the time they announced this new fee structure, they did not specify clearly whether importers of articles/products were affected. However, they recently announced a "No Action Assurance" for importers of articles with any of the high priority substances. Nor is Elo on the final company list for high priority substance fees.	<a href="https://www.epa.gov/tsc-a-fees/information-plan-reduce-tsc-a-fees-burden-and-no-action-assurance">https://www.epa.gov/tsc-a-fees/information-plan-reduce-tsc-a-fees-burden-and-no-action-assurance</a>	Dec-20
	Canada	Batteries	n/a	Battery Producer Responsibility					Elo's battery-containing products fit the D.C. definition of Covered Electronic Equipment, so this new DC "Battery Producer Responsibility" law does not apply	<a href="https://code.dccouncil.us/us/dc/council/code/titles/9/chapters/7/77">https://code.dccouncil.us/us/dc/council/code/titles/9/chapters/7/77</a> <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:3A02017R0821-20201119">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:3A02017R0821-20201119</a>	2021
	Europe	Conflict Minerals	Regulation (EU) 2017/821	Supply Chain Due Diligence Obligations for Union Importers of Tin, Tantalum, and Tungsten, their ores, and Gold originating from CAHRA.	X				Applies to EU importers of 3TG in mineral or metal form (see Annex 1) - Elo's products not in scope.		Feb-22
	Bulgaria	Packaging	Decree No. 271 of 30.10.2012	Ordinance on Packaging and Packaging Waste			X		Regulation has been updated, the recycling symbols requirement has been removed.	<a href="http://en.blv.bg/act/1282012">http://en.blv.bg/act/1282012</a>	2022/12/16
	France	Environmental Labeling	Decree No. 2022-748 of April 29, 2022	Environmental labeling on Consumer information on the environmental qualities and characteristics of waste-generating products	X	X			Mainly applies to all relevant producers, importers, and dealers of products intended for consumers (including through distribution channels and e-commerce). However, Elo's products are mostly sold through distribution (B2B not B2C), and the annual placement on the French market is under the threshold limit (10K units), so out of the regulation scope.	<a href="https://www.legifrance.gouv.fr/eli/decree/2022/04/29/2022-748">https://www.legifrance.gouv.fr/eli/decree/2022/04/29/2022-748</a>	2024/5/1
	EU	Deforestation	Regulation EC No 2023/1115	on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation	X				Elo products not in scope (not found in Annex I)	<a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023R1115">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023R1115</a>	Last reviewed Jan 2025 (regulation last amended May 2023)