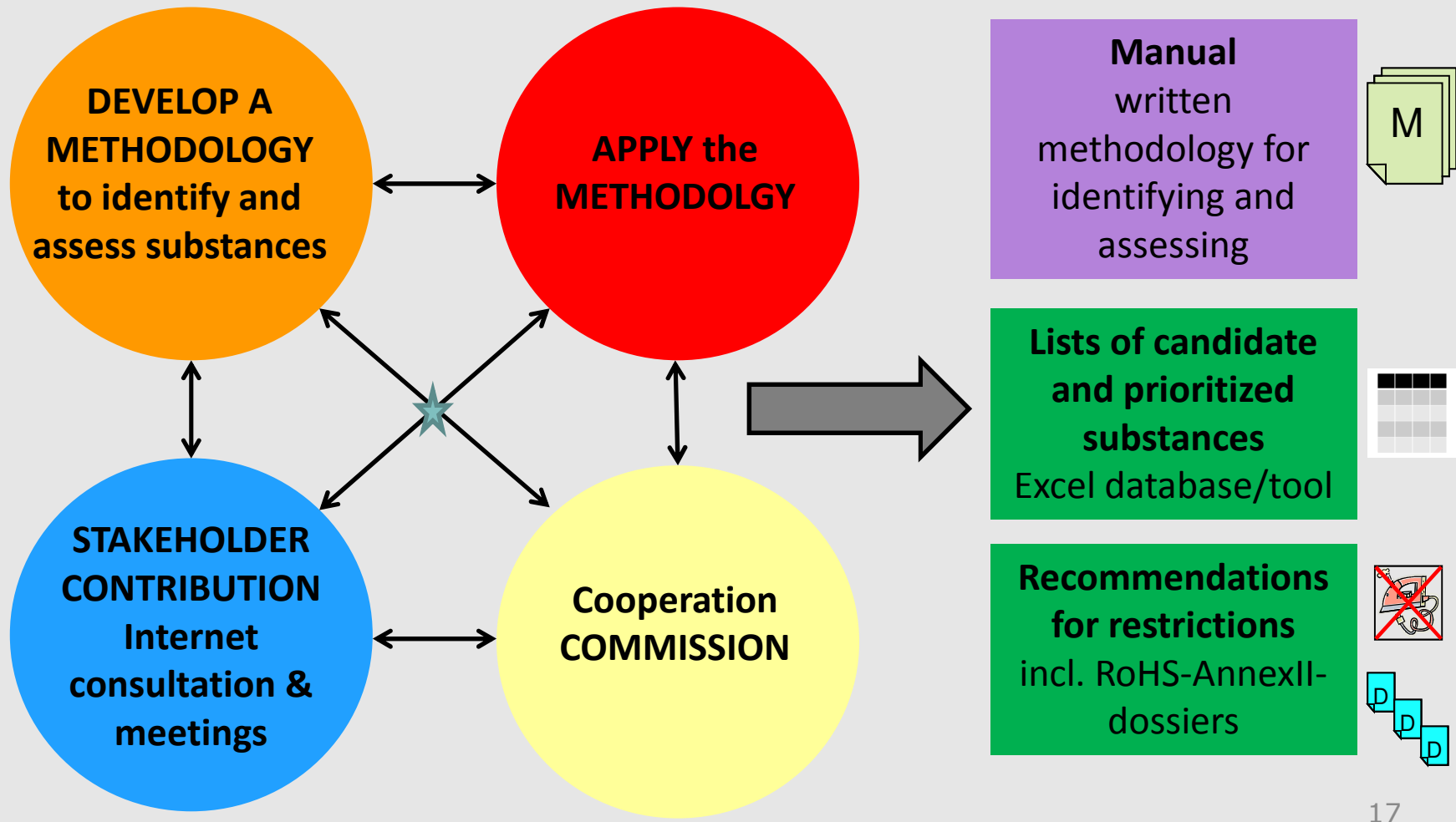
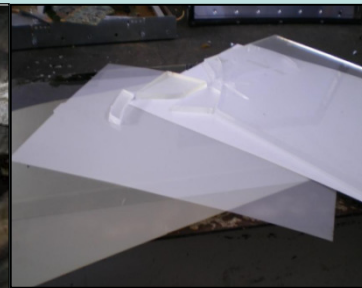
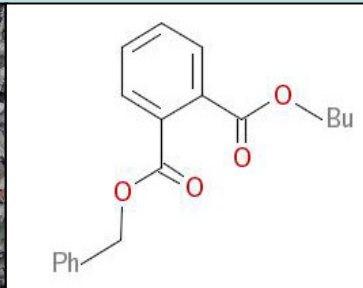


# Overall approach



# Detailed Workplan



# WP1: Develop a methodology to identify and assess substances

## Task 1.1 Review and analysis of selection & assessment criteria and of restrictions

### Working Steps:

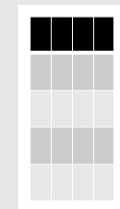
#### 1) Review and analysis of selection and assessment criteria and restrictions

##### Key data sources:

- RoHS
- REACH
- Literature, in particular *Öko-Institut 2008*

### Results:

- List of identification and assessment criteria and restrictions with short descriptions of these criteria/restrictions



## Task 1.2 Methodology for identifying candidates I

### Working Steps:

#### 1) Compilation of information on hazardous substances used in EEE; Key data sources are:

- **Subsport-database** (Substitution support portal: International Agreements, EU Regulatory lists, Governmental lists, NGO or trade unions lists, Company restriction lists)
- **RAPEX** (Rapid Alert System for non-food products posing a serious risk)
- **National and EU-studies and projects** (e.g. UBA: CMR substances in EEE, EPHECT-database on substances in consumer products etc.)
- **ZVEI Umbrella specifications**
- **Stakeholder contributions**

#### 2) Development of the methodology → APPROACH:

- 1) **Selection of substances classified as dangerous** (Dangerous Substance Dir.; CLP Regulation)
- 2) **Selection of substances being legally or voluntarily restricted** (in particular Subsport-database)
- 3) **Selection of substances being under debate to pose risks for humans or the environment**
- 4) **Exclusion of substances not used in EEE**
- 5) **Exclusion of substances already restricted legally (e.g. REACH Annex XVII)**
- 6) **Definition of stakeholder involvement in this step**

## Task 1.2 Methodology for identifying candidates II

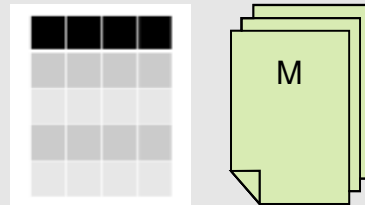
### Result:

#### ■ Identification Methodology

Implemented as a simple excel database/tool and a written manual

#### Distinction between:

- **Constant information/criteria** (e.g. published studies)
- **Information/criteria, which have to be up-dated during future reviews** (*databases, legislation, stakeholder information, new studies*)



## Task 1.3 Methodology for pre-assessment of the candidates I

### Working steps:

**1) Compilation of detailed information on substance properties, use (application and quantities), exposure, waste management issues etc., inter alia from:**

- **EU Classification and Labelling inventory** (search if no harmonized C&L available via ESIS)
- **ECHA:** European Chemicals Agency: registered substances, SVHC substances, restrictions:
- **EU Endocrine Disruption Database**
- **Literature on consumer exposure**
- **Literature on workers exposure during waste management**
- **Literature and legislation on emissions and residues from waste management processes** (e.g. quality criteria for waste derived fuels, acceptance criteria for landfilling)
- **Stakeholder contributions**

## Task 1.3 Methodology for pre-assessment of the candidates II

### 2) Development of the methodology → APPROACH:

- **Exclusion of substances posing a comparable low risk** (e.g. very low quantities used in EEE, single applications)
- **Prioritization of substances by:**
  - **Applying scores for substance properties considering their specifications**  
(e.g. ++ for mutagenic Cat 1A + 1B; + for mutagenic Cat 2....)
  - **Applying scores for evidences of enhanced workers exposure, emissions during collection, transport, storage and handling, emissions during WEEE treatment processes**  
(e.g. + for evidence of enhanced emissions during collection, ++ for evidence of enhanced emissions during collection AND formation of hazardous components during shredding etc.)
  - **Categorisation and scoring of further criteria**, e.g. quantities used, use groups
- **Definition of stakeholder involvement in this step**



## Task 1.3 Methodology for pre-assessment of the candidates III

### Result:

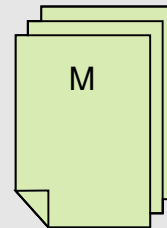
#### ■ Pre-Assessment and Prioritizing Methodology

Implemented as a simple excel database/tool and a written manual

#### Distinction between:

- **Constant information/criteria** (e.g. published studies)
- **Information/criteria, which have to be up-dated during future reviews** (databases, legislation, stakeholder information, new studies)

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## Task 1.4 Methodology for detailed assessment of the candidates I

### Working steps:

#### 1) Development/description of the contents of a RoHS/Annex-II Dossier

##### Proposal for the content:

##### ■ 1) Identification of the substance

classification and labelling status, Identification of legal status, Identification of properties such as SVHC, PBT, CMR, Sources used for preparing the dossier, Use

##### ■ 2) Hazard assessment

Identification of hazard potential, detailed evaluation of endpoints of concern, risk to human health with focus on consumer exposure and exposure of workers in WEEE management, risk to the environment with focus on waste management, risk of secondary poisoning and bioaccumulation, availability of monitoring data: remote regions, biota, human

##### ■ 3) Rationale for Inclusion in Annex II of ROHS

available information on alternatives, reasons why Inclusion in Annex II is the appropriate instrument to protect human health and the environment)

## Task 1.4 Methodology for detailed assessment of the candidates II

### 2) Compilation of relevant information; suggested information sources:

- EU: ESIS: Risk assessment reports:
- SCOEL: Scientific Committee on Occupational Exposure Limits: Document database:
- ECOTOXicology database
- Pubmed
- SYRAUSE Environmental Fate DataBase
- eChemPortal der
- TOXNET (Toxicological Data Network) of the US National Library of Medicine
- The Carcinogenic Potency Database
- NITE DataBase
- GESTIS (Gefahrenstoffinformation)
- WHOLIS Library and information networks for knowledge database, WHO
- IPCS Inchem (International Programme of Chemical Safety)
- OECD eChemPortal
- SRC
- IARC International Agency for the Research on cancer
- ECETOC: European Centre for Ecotoxicology and Toxicology of substances:
- ATSDR: Agency of Toxic Substances and Disease Registry:

## Task 1.4 Methodology for detailed assessment of the candidates III

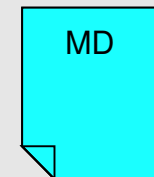
### Working steps:

#### 3) Approach for Hazard assessment:

- **Screening of available risk assessment reports**
- **In case of conflicting results: weight of evidence approach**
- **According to generally accepted rules for risk assessment**  
as detailed in the relevant REACH guidance documents and other relevant frameworks (OECD, ECETOC, UNECE, UNEP)

#### Results:

- **Master ROHS/Annex-II dossier, explaining the different topics included**



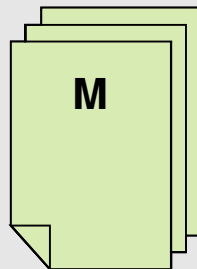
## Task 1.5 Manual for future reviews

### Working steps:

- 1) **Compilation of the methodologies developed in Task 1.2 to 1.4**
- 2) **Consideration of experiences from application (Task 2.1 to 2.3)**
- 3) **Agreement with Commission**

### Result:

- **Written manual for future reviews of Annex II of ROHS II**



## **WP2: Apply the methodology to selected substances**

## Task 2.1 Identification of candidates

### Working steps:

- **Collection of information as defined in Task 1.2**

Databases, Literature, Internet consultation of stakeholders 

- **Application of methodology for identifying candidates (Task 1.2)**

- **Discussion with stakeholders/coordination with COM**



### Results:

- **List of candidate substances (hazardous substances which are used in EEE), containing information on**

if criteria of classification as dangerous in accordance with Directive 67/548/EEC or self classification of industry met

if criteria on PBT properties are met or suspected

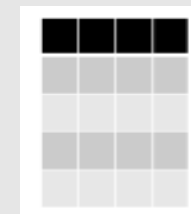
if substances meet the criteria for classification of SVHC

if substances are on the candidate list as SVHC substances

if substances are listed in Annex XIV or XVII under REACH



if substances are potential endocrine disrupters

if substances are listed as high or low production volume



## Task 2.2 Pre-Asessment

### Working steps:

- **Collection of information as defined in Task 1.3**  
Databases, Literature, Internet consultation of stakeholders 
- **Application of the pre-assessment methodology (Task 1.3)**  
Including a preliminary risk assessment
- **Discussion with stakeholders/coordination with COM** 

### Results:

- **List of priority substances (candidates to be assessed) incl. prioritization, containing information on:**
  - hazard potential
  - legislation
  - use and
  - other relevant remarks

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## Task 2.3 Assessment of the selected substances

### Working steps:

- **Collection of information as defined in Task 1.4**

Databases, Literature, Internet consultation of stakeholders



- **Completing the developed Master RoHS Dossier, including**

- hazard assessment,

- if possible the derivation of safe exposure levels

- assessment of exposure resulting from the use of the selected substances in EEEs

- risk characterisation

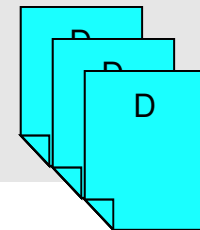
- socio-economic impact analysis

- **Discussion with stakeholders/coordination with COM**



### Results:

**Completed RoHS Dossiers for chosen priority substances**



## Task 2.4 Recommendations for future restrictions

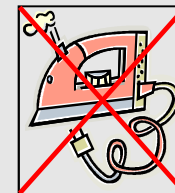
### Working steps:

- Summary of results of Task 2.3
- Internet consultation
- Discussion with stakeholders
- coordination with COM



### Result:

**Text proposal for amending ROHS II  
including a justification why the respective  
substances shall be restricted**



## WP3: Stakeholder consultation

## Task 3.1 Review of stakeholder candidates

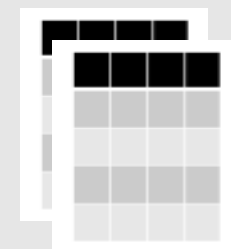
### Working steps:

- **Investigation who was involved in previous consultations on RoHS and WEEE, REACH**

RoHS Enforcement Group, TAC RoHS and WEEE, ECHA committees, stakeholders in previous projects, ...

### Results:

- **Long list of stakeholders for internet consultation**
- **Short list of stakeholders for stakeholder meetings (to be discussed)**



## Task 3.2 Stakeholder Meetings I



### Working steps - for all meetings:

#### ■ Preparation

- Concept paper (submitted to COM 1 month before meeting)
- Preparation of a draft agenda and draft list of stakeholders to be agreed with the COM
- Preparation of a draft invitation

#### ■ Conduction:

- Introductory presentation
- Background information including comments of the subsequent internet consultation

#### ■ Post-processing:

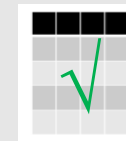
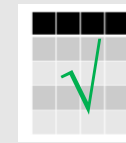
- Minutes (1 week after meeting)
- Background material published on web-site
- Conclusions: inserted in reports and published on web-sites

## Task 3.2 Stakeholder Meetings I



### Expected results:

- 1<sup>st</sup> meeting (March):  
→ **Agreed "long list" (candidate substances)**
- 2<sup>nd</sup> stakeholder meeting (May):  
**Agreed "short list" (priority substances)**
- 3<sup>rd</sup> stakeholder meeting (September/October):  
**Agreed recommendations for amendments of Annex II RoHS**



## Task 3.3 Project web-site



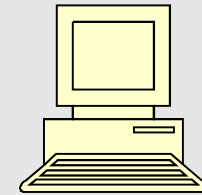
### Working steps:

- **Set-up of a web-site for publishing the results and conducting internet consultations**
- **Inclusion of the web-site in the RoHS section of the Europa website**

### Result:

- **Project web-site making available info on:**
  - Project issues
  - Work packages and tasks;
  - Time schedule;
  - Actual status of the work;
  - Materials for the internet consultation (questionnaire, background info);
  - Results.

## Task 3.3 Internet consultation



### Working steps:

- **Development of a questionnaire for gathering info as defined in WP1**
- **Publishing of the questionnaire on the web-site**
- **Publishing draft results ("long-list", "short-list", assessment results)**

### Results:

#### Support on:

- **the identification of substances** (task 1.2 and task 2.1);
- **the discussion on the draft short list of substances** (task 1.3 and 2.2);
- **the discussion on the assessment results** (task 2.3) **and the proposed adaptations of Annex II of RoHS directive** (task 2.4).