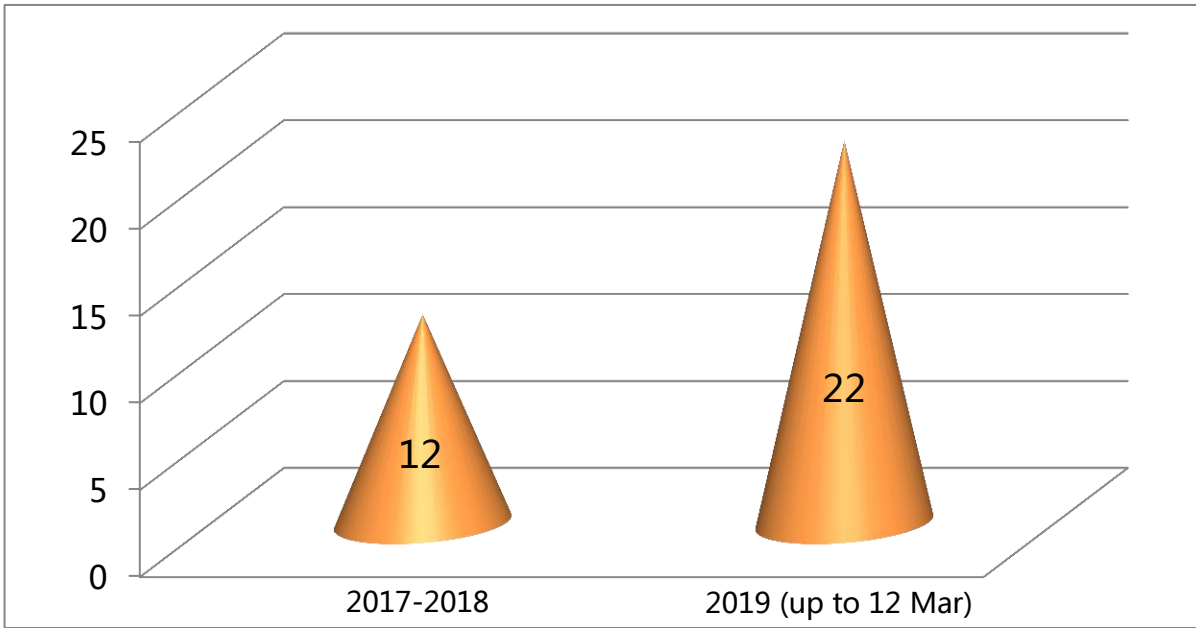




A burst in RoHS recall, phthalates restrictions are on the string?

At the beginning of year 2019, EU RAPEX (Rapid Alert System for dangerous non-food products) had notified 22 RoHS risk cases, in which 19 cases are the products made in China. RoHS recall cases are at the trend of blowout. At the same time period last year, RoHS violation recall cases were 0. Throughout 2017 and 2018, only 12 RoHS violation recall cases were notified.

RoHS recall cases in recent 3 years:



We can see that after entering year 2019, EU member states are increasing the supervision of RoHS violations. 4 phthalates restriction are on the string.

EU RoHS 2.0 important timeline:

Directive	Restriction date	Product scope	Controlled products
2011/65/EU EU/2015/863	2011/7/21	1-7,10,11	Lead, Mercury, Cadmium, Hexavalent chromium, Polybrominated biphenyls, Polybrominated diphenyl ethers
	2019/7/22	1-7,10,11	Lead, Mercury, Cadmium, Hexavalent chromium, Polybrominated biphenyls, Polybrominated diphenyl ethers, DEHP, BBP, DBP, DIBP
	2021/7/22	8,9	Lead, Mercury, Cadmium, Hexavalent chromium, Polybrominated biphenyls, Polybrominated diphenyl ethers, DEHP, BBP, DBP, DIBP
Remark: 1-7,10,11 means electrical and electronic equipment other than medical devices, monitoring and control instruments.			

RoHS 4 phthalates risk resources:



Substances	CAS No	Limit	Material application
DEHP	117-81-7	0.1%	Used as a plasticizer in plastics, PVC, synthetic rubber, ink and sponge
BBP	85-68-7	0.1%	Mostly used as a plasticizer in rubber, resin, PVC cable and ink
DBP	84-74-2	0.1%	Mostly used as a plasticizer in vinyl chloride and vinyl chloride copolymers, synthetic rubber and leather chemical paints, etc.
DIBP	84-69-5	0.1%	Mostly used as a plasticizer in nitrocellulose, cellulose ether, polyacrylate, etc.

2019 (up to 12 Mar) RoHS recall cases

Alert time	Alert product	Alert country	Country of origin	Risk type	Measures taken
2019/2/22	Torch	Sweden	China	The solder contains lead (measured value up to 50% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive.	Withdrawal of the product
2019/2/22	Torch	Sweden	China	The solders contain cadmium (measured value up to 0.39% by weight) and lead (measured value up to 48% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive.	Withdrawal of the product
2019/2/22	Safety reflector	Sweden	China	The solders contain lead (measured value up to 81%) above limit values and the plastic contains short-chain chlorinated paraffins (SCCPs) (measured value up to 0.931%). The product does not comply with RoHS 2 Directive and POPS	Withdrawal of the product
2019/2/22	Headphones	Sweden	China	The solder contains lead (measured value up to 54% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/2/22	Foldable desk lamp	Sweden	China	The solder contains lead (measured value up to 71% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/2/22	Earbuds	Sweden	China	The solder contains lead (measured value up to 83% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/2/22	LED helmet light	Sweden	China	The solder in the product contains lead above limit values (measured value up to 46% by weight). The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/2/22	Toy Microphone	Iceland	The Netherlands	The solder in three different places inside the toy contains too much lead (measured value up to: 70% by weight). The product does not comply with RoHS 2 Directive	Recall of the product
2019/2/15	Toy mobile phone	Malta	China	The solders in the toy contain too much lead and cadmium (measured values up to: 51% and 0.15% by weight respectively). The	Recall of the product



				product does not comply with RoHS 2 Directive	
2019/2/15	Toy fire engine	Malta	China	Four solders in the toy contain lead (measured value up to 39.7% by weight) and cadmium (measured value up to 0.14% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/2/15	Music Keyboard	Malta	China	Four solders in the toy contain lead (measured value up to 61% by weight) and cadmium (measured value up to 0.03% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/2/15	Musical toy	Malta	China	Four solders in the toy contain lead (measured value up to 40.2% by weight) and cadmium (measured value up to 0.30% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/2/15	Ride-on toy	Malta	Italy	Four solders in the toy contain lead (measured value up to 46.6% by weight) and cadmium (measured value up to 0.11% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/2/15	Remote-controlled truck	Malta	Denmark	Four solders in the toy contain lead (measured value up to 53.3% by weight) and cadmium (measured value up to 0.18% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/2/15	Electric toy	Latvia	China	One of the four solders of the toy contains lead (measured value up to 9.5% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/2/15	Electric toy	Latvia	China	Four solders of the toy contain lead (measured value up to 85% by weight) and two of the four solders of the toy contain cadmium (measured value up to 0.17% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/2/15	Electric toy	Latvia	China	Four solders of the toy contain lead (measured value up to 36.5% by weight) and three of the four solders toy contain cadmium (measured value up to 0.08% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/2/15	Electric toy	Latvia	China	Four solders of the toy contain lead (measured value up to 74.4% by weight) and three of the four solders contain cadmium (measured value up to 0.36% by weight) in concentrations above limit values. The	Withdrawal of the product



				product does not comply with RoHS 2 Directive	
2019/2/8	Electric toy	Latvia	China	Four solders of the toy contain cadmium (measured value up to 0.24% by weight) and lead (measured value up to 55% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/2/8	Science kit	Sweden	China	Solder in one place in the toy contains lead in concentration above limit value (measured value up to 11.7% by weight). The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/2/1	Electric toy	Latvia	China	Four solders in the toy contain lead (measured value up to 44.8% by weight) and two of the four solders contain cadmium (measured value up to 0.66% by weight) in concentrations above limit values. The product does not comply with RoHS 2 Directive	Withdrawal of the product
2019/1/25	Toy gun	Sweden	China	Solder in four different places in the toy contain lead and cadmium in concentrations above limit values. The product does not comply with RoHS 2 Directive	Withdrawal of the product

Official link :

https://ec.europa.eu/consumers/consumers_safety/safety_products/rapex/alerts/?event=main.listNotifications&lng=en

HCT SOLUTIONS:

Start from 4 June 2015, EU pulished (EU)2015 / 863, amending the restrition list to RoHS 2 Derective, adding 4 phthalates to the restriction list. All the EEE products (Except medical devices, monitoring and control instruments) will need to comply with the new phthalate requirements. Before the ending of the transition period, EU suddenly increased the enforcement of RoHS, are mainly to check the market. Exporting enterprises should strictly check the compliance of the product, to avoid unnecessary risk. HCT has professional technical team and experienced in RoHS management, can help provide presonalized solutions for customers, and help enterprises to get ready for exporting.

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