



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. Soetjijto	Initial release
B	ECO-13-0425	July 2, 2013	C. Soetjijto	<ul style="list-style-type: none"> - Update to new Elo logo. - Inclusion of: <ul style="list-style-type: none"> - 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. Soetjijto	<ul style="list-style-type: none"> Updated: <ul style="list-style-type: none"> -Coming into force of Danish Restriction on Phthalate DEHP, BBP, DIBP, and DBP to December 1, 2016. Included: <ul style="list-style-type: none"> -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. Soetjijto	Update to latest SVHC list
E	ECO-14-0825	July 14, 2014	C. Soetjijto	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. Soetjijto	<ul style="list-style-type: none"> -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. Soetjijto	<ul style="list-style-type: none"> 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. Soetjijto	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. Soetjijto	<ul style="list-style-type: none"> 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. Soetjijto	<ul style="list-style-type: none"> 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. Soetjijto	<ul style="list-style-type: none"> 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. Soetjijto	<ul style="list-style-type: none"> 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. Soetjijto	<ul style="list-style-type: none"> 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. Soetjijto	<ul style="list-style-type: none"> 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
AL	CO-25-1488	5-Aug-25	V. Pallaver, S.Zhu, A. Cheng	Annex 1: Update REACH SVHC; 3 substances added on June 2025 for total of 250 substances Revise the comments of China RoHS, adding the requirement of Tic-tac-toe definition in user manual (Item 35) Delete the original PPWR proposal and updated related weblink and comments given the officially released PPWR (Item 92) Revise the comments and revision date on EU PoPs Add the following new Applicable Standards: 96 Per- & Poly-flouroalkyl Protection Act 97&98 Safer Products Restrictions and Reporting 99 Industrial Chemicals Environmental Management (Register) Instrument 2022 Annex 2: Add Maryland Environment - Packaging and Paper Products - Producer Responsibility Plans Add Canada FPR

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, Government/Regulating Body, 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. All new designs supplied to Elo should strive to eliminate use of these exemptions.</p> <p>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>	http://eur-lex.europa.eu/eli/dir/2011/65/2011/65	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	For finished electrical and electronic goods, requires UKCA mark.	https://www.gov.uk/guidance/rohs-compliance-and-guidance https://www.legislation.gov.uk/ukdsi/2012/3032/contents/mad&_	2021/2/16
3	Europe	REACH	Regulation EC No 1907/2006	Concerning the Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH)	X		X	Requires CE mark Of particular importance to Elo is Article 67 (Annex XVII restrictions)	https://eur-lex.europa.eu/eli/reg/2006/1907	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		Article 33 requires disclosure of any SVHC in an article above 0.1% w/w. REACH has a very specific definition of an article.	https://echa.europa.eu/candidate-list-table	2025/6/25 (250 substances)
5	UK	REACH	2020 No. 1577	UK Registration, Evaluation, Authorisation & restriction of Chemicals (REACH)	X		X	It's basically similar to EU REACH, the key principles of the EU REACH Regulation have been retained.	https://www.hse.gov.uk/reach/index.htm https://www.legislation.gov.uk/ukdsi/2020/9780348213300/introduction	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.</p> <p>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>	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02008L0098-20180705	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"> -Reducing HBCDD limit from 100 ppm to 75 ppm in certain products -Adding Methoxychlor to Annex I Part A <p>on 15 July 2025, the European Commission published Regulation (EU) 2025/843, to amend the EU POPs Regulation (EU) 2019/1021 to restrict the substance UV-328. The restriction shall enter into force and apply from 4 August 2025.</p> <p>But, UV-328 in triacetyl cellulose film in polarisers, shall be allowed until 4 August 2030.</p>	https://eur-lex.europa.eu/eli/reg/2019/1021	2025/7/15
8	Europe	Greenhouse Gases	Regulation No 517/2014	on Fluorinated Greenhouse Gases	X	X		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.	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ11_2014_150.01.01.95.01.ENG	2014/6/16
9	Canada	PCBs	SOR/2008-273	PCB Regulations	X			Effectively bans PCBs in products (see Article 6c)	https://laws-lois.justice.gc.ca/eng/regulations/SOR-2008-273/	2015/1/1

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					Substance Restriction (whether in Product or Packaging)	Declaration/Notification of Substance (whether to Customer, Government/Regulating Body, 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, methylolacrylamide 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 reeling 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.	https://lovdata.no/dokument/SF/fnrskrift/2004-06-01-922	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)	https://eur-lex.europa.eu/eli/reg/2017/852/oj	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	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02006L0066-20180704	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.	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31994L0062-20180704	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)	http://data.europa.eu/eli/dir/2012/19/2024-04-08	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.	http://www.epeat.org/wEEE-registration/Netherlands_WEEE_management_decree_200409_engelsevernalng_heslur_elektrapp.pdf	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	https://law.justia.com/codes/connecticut/2012/title-22a/chapter-446m/	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.	https://oehha.ca.gov/proposition-65 https://oehha.ca.gov/proposition-65/proposition-65-list	2025/1/3
18	USA - Washington	PBDE	Washington (USA) Revised Code of Washington Chapter 70.76 - Polybrominated Diphenyl Ethers - Flame Retardants	Washington (USA) Revised Code of Washington Chapter 70.76 - Polybrominated Diphenyl Ethers - Flame Retardants	X			Bans the use of polybrominated diphenyl ethers (PBDEs). Note that this is stricter than RoHS PBDE requirements.	http://apps.leg.wa.gov/rcw/default.aspx?cite=70.76	/

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19	USA - Louisiana	Mercury	Louisiana Mercury Risk Reduction Act of 2006	Louisiana Mercury Risk Reduction Act of 2006	X	X	X	Restricts mercury content of fluorescent bulbs to <=10mg after July 1 2014 (unless exemptions granted) Restricts mercury in all other fabricated products to 1000 mg. Requires manufacturer to notify Louisiana of any mercury-added product (copies of IMERC reports suffice) Requires product labelling and packaging labelling of mercury-added products. Requires manufacturer to submit a plan for collection system for any products with >10mg Hg.	https://deg.louisiana.gov/page/mercury-initiative https://deg.louisiana.gov/assets/docs/Water/8 AMercuryRiskReductionAct.pdf	
20	USA - Rhode Island	Mercury	Rhode Island Mercury Reduction and Education Act	Rhode Island Mercury Reduction and Education Act	X	X	X	Requires manufacturer to notify RI of any mercury-added product. Restricts mercury in fluorescent lamps to <=100mg Hg after Jan 1, 2010 Restricts mercury in all other products except button cell batteries to <10mg Hg after July 1 2009 (button cell batteries are exempted from the limits) Requires product and package labelling Requires mercury-containing lamps and products (except button cell batteries) to be properly recycled after Jan 1, 2020 Requires manufacturer of mercury-containing products and lamps (except button cell batteries) to have collection programs.	http://webserver.nril.state.r.i.us/Statutes/title23/23-24.9/INDEX.HTM	
21	USA - Maine	PBDE	Maine Public Law Title 38 Chapter 16 Section 1609 - Restrictions on sale and distribution of brominated flame retardants	Maine Public Law Title 38 Chapter 16 Section 1609 - Restrictions on sale and distribution of brominated flame retardants	X			Limits penta-BDEs and octa-BDEs to 0.1% (similar to RoHS) Limits deca-BDE in electronic plastic housing to 0.1% (still similar to RoHS) Bans deca-BDE in shipping ballets	http://legislature.maine.gov/legis/statutes/38/title38sec1609.html	
22	Austria	Formaldehyde	Austria BGB I 1990/194	Austria Formaldehyde	X	X		Restricts formaldehyde in "wood-based materials placed on the market" (with special test method) to 0.1 ppm. There is a question whether wood pallets would come in scope, presumably the answer is no, but worth mentioning as formaldehyde is widely regulated otherwise. Requires labelling of detergents and cleaning agents with >0.1% formaldehyde Requires labelling of textiles with >0.15% formaldehyde	https://www.bmfsf.at/bmfsf/eng/eng/Bundesgesetzblatt/BGBl_1990_III_10011	2020/3
23	USA - Minnesota	PBDE	Minnesota Statutes Chapter 325E Trade Practices Section 386 PBDE Products	Minnesota Statutes Chapter 325E Trade Practices Section 386 PBDE Products	X			Restricts penta- and octa-bromyl-diphenyl ethers to 0.1% (similar to RoHS, with looser exemptions)	https://www.revisor.mn.gov/statutes/?id=325E	
24	USA - Oregon	PBDE	Oregon Statutes 2015 ORS Volume 11 Public Health, Housing, Environment, Section 453 Hazardous Substances; Radiation Sources, 453.085 Prohibited Acts	Oregon Statutes 2015 ORS Volume 11 Public Health, Housing, Environment, Section 453 Hazardous Substances; Radiation Sources, 453.085 Prohibited Acts	X			Restricts penta, octa, and deca-brominated diphenyl ethers to 0.1% in articles (similar to RoHS)	https://www.oregonlaws.org/ors/chapter/453	
25	USA - Maryland	PBDE	Maryland - Annotated Code of Maryland Title 6 Subtitle 12 BROMINATED FLAME RETARDANTS	Maryland - Annotated Code of Maryland Title 6 Subtitle 12 BROMINATED FLAME RETARDANTS	X			Restricts penta, octa, and deca-brominated diphenyl ethers to 0.1% (similar to RoHS)	http://www.lexisnexis.com/hottopics/mdcode/	
26	Canada	Mercury	Canada SOR/2014-254	Canada Products Containing Mercury Regulations	X	X	X	Has a RoHS-like list of restricted applications. But the limits are generally looser than EU RoHS> For example, no limit on mercury is specified for mercury vapor lamps (EU RoHS has limit of 15mg for mercury vapor lamps)	https://laws-lois.justice.gc.ca/eng/regulations/SOR-2014-254/index.html	2015/11
27	International	Ozone-depleting	Montreal Protocol	Montreal Protocol on Substances that Deplete the Ozone Layer	X	X		Restricts consumption of a great number of greenhouse gases and ozone depleting substances called out in Annexes A through F. A voluntary international agreement that has been implemented in many different countries' regulation, for example EU Regulation 1005/2009.	https://ozone.unep.org/treaties/montreal-protocol https://ozone.unep.org/treaties/montreal-protocol/montreal-protocol-substances-deplete-ozone-layer	2016 (Kigali amendment)
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 EIo 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.	https://www.mercuryconvention.org/en/about	
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)	http://chem.pops.or/TheConvention/ThePOPsListings/POPsTable4/2009/default.aspx	

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					Substance Restriction (whether in Product or Packaging)	Declaration/Notification of Substance (whether to Customer, Government/Regulating Body, or Shipping/Logistics provider)	Labelling (whether Product, Packaging, or Product Documentation)			
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.	https://laws-lois.justice.gc.ca/sng/regulations/SOR-2012-285/index.html	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'	https://www.ippc.int/en/publications/640/	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: https://www.iata.org/contentassets/05e6d8742b20417259d7a709c8d42260/02um-battery.pdf	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)	https://www.imo.org/en/publications/Pages/IMDG%20Code.aspx	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 MIIT. Implements 3 main directives: -Product must be labelled per SJ/T 11364-2024 (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 GOP 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.If product has a user manual, the Tic-tac-toe chart should be defined within it (especially for Simple Chinese version),but note that it should be filled out according to the actual RoHS status of the product,both the rows and the O/X need to be customized by product.	GB/T 26572-2011: http://www.zhongguojingji.com/ChinaRegulation/GB26572-2011.pdf Exemption list: http://www.zhongguojingji.com/ChinaRegulation/GB26572-2011-ExemptionList.pdf Amendment No.1 to GB/T 26572-2011: http://www.zhongguojingji.com/ChinaRegulation/GB26572-2011-1.pdf	2024/12/25
								- 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.If product has a user manual, the Tic-tac-toe chart should be defined within it (especially for Simple Chinese version),but note that it should be filled out according to the actual RoHS status of the product,both the rows and the O/X need to be customized by product.	China RoHS Regulation: http://www.zhongguojingji.com/ChinaRegulation/ChinaRoHSRegulation/GB26572-2011.pdf	
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	http://www.zhongguojingji.com/ChinaRegulation/ChinaRoHSRegulation/GB26572-2011-1.pdf	2018
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.	https://law.justia.com/codes/california/2021/code-hsc/division-20/chapter-6-5/article-10-3/	2021

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					Substance Restriction (whether in Packaging)	Declaration/Notification of Substance (whether to local authority, Government/Regulating Body, or Shipping/Logistics provider)	Labeling (whether Product, Packaging or Product Documentation)			
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 EIo.	https://toxicsinpackaging.org/ https://toxicsinpackaging.org/state-laws/comparative-analysis/	Jul-
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.	https://www.epa.gov/sites/production/files/2016-03/documents/b1104.pdf	19
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.	https://www.esma.gov.ae/en-us/ESMA/Pages/Laws-and-Legislations.aspx	20
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.	https://www.bellin.ru/press/news/2019/04/10/EAEU_TR_037_2016_Rus%20%20%20Official_english.pdf	October 18 20
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	http://download.ssmr.gov.cn/bookUpload/news/GBstds/News-248872668AA580412DF9A9A95102	20
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	http://download.ssmr.gov.cn/bookUpload/news/GBstds/News-34037229811320683AA472F71C0D81	20
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.	http://download.ssmr.gov.cn/bookUpload/news/GBstds/News-BE7C25CF38A4B5E02D125E1668D0515	20
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, 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.	http://download.ssmr.gov.cn/bookUpload/news/GBstds/News-FE7C34A8AC8E4724065CA4DE0C31	20
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 EIo 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 EIo 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	https://www.admin.ch/opc/en/classified-compilation/20021520/index.html	1-Dec-

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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.	https://elaw.klri.re.kr/eng_service/lawView.do?hseq=49117&lang=ENG	2020
51	Japan	RoHS	JIS C 0950:2021	J-Moss (Japanese RoHS)	X		X	Totally 6 substances restrictions 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.	https://home.jeita.or.jp/eps/jmoss_en.htm	2021
52	China	Batteries	GB 24427-2021	Content limitation of mercury,cadmium and lead for zinc anode primary battery	X			/	http://wwwstd.sam.gov.cn/zhongguojibiao/biaoqizhongwen/FDCC/GB/GB24427-2021/GB24427-2021.htm	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.	https://www.meti.go.jp/policy/chemical_management/english/cscl/ Class 1 substances: https://www.meti.go.jp/chem/chemical/checklist/action?category=211&request_locale=en https://www.meti.go.jp/chem/chemical_management/english/csclimportsubstance.pdf Class 2 substances: https://www.meti.go.jp/chem/chemical/checklist/action?category=212&request_locale=en	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 www.dtsc.ca.gov/hazardouswaste/perchlorate ." in minimum 10 Arial font size	http://www.dtsc.ca.gov/hazardouswaste/perchlorate https://dtsc.ca.gov/perchlorate-fact-sheet/	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	https://webstore.iec.ch/publication/5008	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	https://www.ipc.org/TOC/TOC-IPC-4101E.pdf	2020/12/1
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	https://standards.globalspec.com/std/10284476/edec-eca-js709	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.	http://std.iec.ch/iec62474	2023/1/17
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	https://ecode360.com/27269346	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	https://www.ilga.gov/legislation/ilcs/ilcs5.asp?ActID=1585&ChapterID=36	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	http://www.ct.gov/legislation/acts/acts.htm#SB0200-0299	2021/5/1

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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.	PBT final rules: https://www.epa.gov/assessing-and-managing-chemicals-under-tsc/persistent-bioaccumulative-and-toxic-pbt-chemicals-under No action assurance on 20 high-risk substances: https://www.epa.gov/tsc-fees/information-plan-reduce-tsc-fees-burden-and-no-action-assurance	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.	https://unece.org/fileadmin/DAM/trans/danger/publ/manual/Rev5/English/ST-SG-AC10-11-Rev5-EN.pdf	2009
67	Europe	Batteries	/	European Agreement concerning the International Carriage of Dangerous Goods by Road			X	UNECE requirements for transiting batteries by road	https://unece.org/transport/dangerous-goods/adr-2021-files	2021/4/1
68	International	Batteries	/	Lithium Battery Guidance Document			X	This document is a guidance for shipping Lithium Batteries by air.	https://www.iata.org/en/programs/cargo/dgr/lithium-batteries/	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	https://www.govinfo.gov/content/pkg/COMPS-9515/pdf/COMPS-9515.pdf	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.	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	2016/4
71	Germany	REACH	ChemVerbotsV	Verordnung über Verbote und Beschränkungen des Inverkehrbringens	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	https://www.gesetze-im-internet.de/chemverbotsv_2017/	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.	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02019R2021-20210501	2021/5
73	Europe	Cadmium	EU Regulation 2019/2021	EcoDesign Requirements for Electronic Displays	X		X	Annex II Part D Paragraph 3 "Cadmium" logo lays down requirements to labelling the display with either the "Cadmium contained" or "Cadmium free" logo. 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.	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02019R2021-20210501	2021/5
74	Europe	Halogenated Flame Retardants	EU Regulation 2019/2021	EcoDesign Requirements for Electronic Displays	X		X	Annex II Part D Paragraph 4 "Halogenated flame retardants" bans halogenated flame retardants in the enclosure and stand. 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.	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02019R2021-20210501	2021/5
75	South Korea	REACH	Notice 2017-271	Korean Act on Registration and Evaluation etc of Chemical Substances (aka K-REACH)	X			MoE Notice 2017-271 lists 12 substances prohibited in articles in certain applications: malachite green, methyl bromide, carbon tetrachloride, tributyltin, formaldehyde, nonylphenol and nonylphenol ethoxylate, chrysotile, lead, cadmium, chromium VI compounds, trichlorethylene, and tetrachlorethylene	http://www.chemsafetypro.com/Topics/Restriction/K-REACH_Restricted_Substances_List.html	2017/3
76	International	Mica	/	None		X		If product/material contains mica, declare mica sources using Responsible Mineral Initiative's EMRT template.	https://www.responsiblemineralsinitiative.org/reporting-templates/emrt/	2021
77	International	Cobalt	/	None		X		If product/material contains cobalt, declare cobalt sources using Responsible Mineral Initiative's EMRT template.	https://www.responsiblemineralsinitiative.org/reporting-templates/emrt/	2021
78	Bangladesh	RoHS	/	Hazardous Waste (E-waste) Management Rules 2021	X		X	Totally 10 substances restrictions. Same substance restrictions as EU RoHS.	https://chemicalwatch.com/334384/bangladesh-restricts-fewer-substances-than-proposed-in-final-e-waste-rules	2021/6

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					Substance Restriction (whether in Product or Packaging)	Declaration/Notification of Restriction (whether to Customer, Government/Regulating Body, or Shipping/Logistics provider)	Labeling (whether Product, Packaging, or Product Documentation)			
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.	https://www.pca.state.mn.us/pca/pfas/pfas-116.943.pdf	2025
92	Europe	Packaging	Regulation(EU)2025/40	EU regulation on packaging and packaging waste	X		X	PPWR regulation was officially published in the EU Official Journal on Jan 22,2025, and came into effect since Feb 11,2025 and will be implemented from Aug 12,2026. Item-13 EU Directive 94/62/EC will be abolished as of Aug 12,2026(except in special circumstances) Transition period have been set for different requirements, detailed supporting regulations/rules are yet to be issued. Besides of the heavy metal related ban in PPWD(EU Directive 94/62/EC), ban on PFAS has been newly added(not applicable to Elo products)	https://eur-lex.europa.eu/eli/reg/2025/40/oj	2025/1/22
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.	https://www.ecfr.gov/current/title-16/chapter-I/subchapter-B/part-1661/subpart-1661.20	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.	https://www.gb688.cn/bulkquery/dictionary/term?code=20400-2006 https://www.gb688.cn/bulkquery/dictionary/term?code=20400-2006 https://www.gb688.cn/bulkquery/dictionary/term?code=20400-2006	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.	https://www.gazette.gc.ca/gazette/gazettedoc/2024/2024-07-27/20240727-eng.html	2024/7/27
96	USA-New Mexico	PFAS	NM HB212 2025	Per- & Poly-fluoroalkyl Protection Act	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.	https://legis.state.nm.us/legistext/2024/02/20240202_02_772/index.cfm	2025/4/8
97	USA-Washington	Halogenated Flame Retardants	WAC 173-337	Safer Products Restriction Reporting # 112-1 Halogenated Flame Retardants in plastic enclosures of indoor/outdoor electronic products	X	X		For EEE with plastic external enclosures intended for indoor use: Most of Elo products would be in scope, halogenated flame retardants would be prohibited if intentionally added, and the restriction criteria is Bromine (Br)<1000ppm,Chlorine(Cl)<1000ppm,Fluorine(F)< 1000ppm by total amount of homogeneous materials and Phosphorus(P) < 5000ppm by homogeneous material). Effective dates and scope: -From Jan 2025, Plastic enclosures (back covers, front bezels, cable covers, EdgeConnect covers, etc) of Elo indoor electronic displays and AIO products that are >15.5" Diagonal and not open-frame monitors -From Jan 2028, Plastic enclosures (back covers, front bezels, cable covers, EdgeConnect covers, etc) of Elo basically all other indoor electronic displays and AIO products (display with a screen are <=100m2 or 15.5" Diagonal) For EEE with plastic external enclosures intended for outdoor use: Effective dates and scope Annual reports per WAC 173-337-060 starting in 2025, but no Elo products are currently in scope (Elo's 70-series outdoor open frames are exempted per subsection ii-B). Reporting thresholds same as what defined for above EEE with plastic external enclosures intended for indoor use.	https://www.wa.gov/legislative/legislation/bills-and-resolutions/2024-legislative-session/bills-and-resolutions/2024-legislative-session-bills-and-resolutions-173-337.aspx https://www.wa.gov/legislative/legislation/bills-and-resolutions/2024-legislative-session/bills-and-resolutions-173-337.aspx	2023/5/31
98	USA-Washington	Bisphenol in Thermal paper	WAC 173-337	Safer Products Restriction Reporting # 114-3 Bisphenols in Thermal Paper	X	X		Limits bisphenols to 200ppm in thermal paper starting January 2026	https://www.wa.gov/legislative/legislation/bills-and-resolutions/2024-legislative-session/bills-and-resolutions-173-337.aspx	2023/5/31
99	Australia	Hazardous substances	/	Industrial Chemicals Environmental Management (Register) Instrument 2022	X	X		The most environmentally sensitive industrial chemicals are listed in schedule 6 and 7, and all uses of the chemicals listed in schedules 6 and 7 should be banned or restricted.	https://www.environment.gov.au/chemicals/management/instrument-2022	2025

Source Number	Geography	Category	Regulation / Standard Number	Regulation / Standard Title	Effect on EIo product design/documentation/operations	Substance Restriction (whether in Product or Packaging)	Declaration/Notification of Substance (whether to Customer, Government, or Supplier/Legistics provider)	Labeling (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.	https://eur-lex.europa.eu/legal-	2013/3/1
	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 EFUP 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
	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
	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 radio-isotopes, 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)	https://eur-lex.europa.eu/legal-	26-Jul-1
	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)		202
	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.	https://www.e- sar.lt/portals/en/jsca/Acr/TAR_6CC3BF7A01B3	
	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.	https://www.ecfr.gov/cgi-bin/text-idk	202
	USA	Toxic Substances	Toxic Substances Control Act	Toxic Substances Control Act					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.	https://www.epa.gov/tsca- fees/information-plan-reduce-tsca- fees-burden-and-no-action- assurance	Dec-2
	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.	https://code.dcmunicipal.ca/cde/dcounpl/code/files/8/chapters/7E/ https://eur-lex.europa.eu/legal-	202
	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.	https://eur-lex.europa.eu/legal-	Feb-2
	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.	http://www.bzgov.bg/doclib/podpisani_zakoni/zakon_271.pdf	2022/12/1
	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.	http://www.gouvernement.fr/info/gouvernement/france-annonce-le-regime-de-l-etiquetage-environnementale-des-produits-dont-on-peut-se-liberer-gratuitement-a-la-consommation	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)	https://eur-lex.europa.eu/legal-	Last reviewed Jan 202 (regulation last amended May 2023)
	USA-Maryland	Packaging	MD SB901 2025	Environment - Packaging and Paper Products - Producer Responsibility Plans		X			Elo products not in scope	https://www.maryland.gov/government/legislation/legislation-by-topic/producer-responsibility-plans	2025/5/1
	Canada	Plastic	/	Guide for reporting to the Federal Plastics Registry – phase 1			X		With Elo not having residency in Canada it excludes Elo from needing to report, and Elo products are not destined for the " Residential Waste Stream".		