

**EIA-CB-24**

# **EIA COMPONENT ENGINEERING BULLETIN**

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## **CHINA RoHS ENVIRONMENTAL FRIENDLY USE PERIOD (EFUP) MARKING REQUIREMENTS**

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**EIA Standards  
Electronic Components Association**

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**ACPEIP = Administration on the Control of Pollution caused by Electronic Information Products (China)**

**EIP = Electronic Information Product**

**EFUP = Environmental Friendly Use Period**

**EPUP = Environmental Protection Use Period**

**Homogenous = A uniform composition throughout the device which cannot be disjointed into different materials by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes.**

Recently there has been a lot of discussion, for passive components, in having to add an EFUP logo, also known as EPUP, to their product, in order meet China RoHS label requirements. In fact passive component manufacturers are not required to add an EFUP label and are instead required to provide the EFUP date to the EIP so the EIP can appropriately label their product accordingly, per China RoHS labeling requirements. The purpose of this bulletin is meant to briefly discuss the EFUP (Environmentally friendly use period) label and the EFUP timeframe for passive components for those devices which may or may not exceed the banned substance levels for lead (Pb), mercury (Hg), cadmium (Cd), hexavalent chromium (CrVI), polybrominated biphenyl (PBB), and polybrominated diphenyl ether (PBDE), as specified in China RoHS. The following is the position of the members of the EIA/ECA passive engineering committees.

On February 28, 2006, China publicized a law titled “Administration on the Control of Pollution Caused by Electronic Information Product (EIP)” (ACPEIP), also known as “China RoHS” [for reference please see: [www.mii.gov.cn](http://www.mii.gov.cn)]. The law requires EIP’s to be marked with a label indicating whether the EIP is fully compliant or not fully compliant with China RoHS requirements for the aforementioned 6 substances. While this law does not specifically require the component manufacturer to label their product but the component supplier is required to provide this to the manufacturer of the EIP so that EIP manufacturer can appropriately mark/label their EIP. A device is considered fully compliant if the 6 substances, in the EIP, do not exceed the levels, in Table 1, by **homogenous layer**, and may use the logo in Figure 1. A component is considered not compliant if the 6 substances exceed those in Table 1, and the EIP must use a logo such as that in Figure 2.

| <b>Material</b> | <b>Limit</b>     |
|-----------------|------------------|
| Pb              | ≤ 1000ppm (0.1%) |
| Cr VI           | ≤ 1000ppm (0.1%) |
| Hg              | ≤ 1000ppm (0.1%) |
| PBB             | ≤ 1000ppm (0.1%) |
| PBDE            | ≤ 1000ppm (0.1%) |
| Cd              | ≤ 100ppm (0.01%) |

Table 1

Initially, the China RoHS initiative will require product and packaging markings, and RoHS disclosure tables for all EIP imports.

#### **Product Marking Requirement**

In accordance with the China RoHS Marking Standard (Marking for Control of Pollution Caused by

Electronic Information Products SJ/T11364-2006), EIP's sold in China after March 1, 2007 are required to have an Environmental Friendly Use Period (EFUP) logo, see examples Figure 1 & 2 :



**Figure 1**



**Figure 2**

**Figure 1:** This logo signifies a product with none of the six substances above the MCV. Because the vast majority of electronic products today, use one or more of the EU RoHS Directive exemptions, such as lead in ceramics, high temperature solder, or component glass and contain levels of some substances in excess of China RoHS MCVs, few passive components will use this logo.

**Figure 2:** These logos are used on products with one or more of the six substances above the MCV. The number in the circle is the Environmental Protection Use Period (EFUP) as defined in Paragraph 3.5 of China RoHS SJ/T11364-2006. The EFUP number inside the circular arrows, is time in years for which hazardous/toxic substances will not, under normal operating conditions, leak out of the product, or the product will not change in such a way as to result in severe environmental pollution, injury to health, or cause damage to property. Coloring of the Logos, see figure 1 & 2, is specified in China RoHS document SJ/T11364-2006 section 5.3.

### **Exemption**

According to the Q&A published on MII website ([www.mii.gov.cn](http://www.mii.gov.cn)), and the most recent Standard on Marking SJ/T11364 , section 4, for electronic information products (EIP) that are purchased for manufacturing, e.g. passive components, suppliers need not provide the aforementioned marking, but shall supply to the purchaser all necessary information required for marking. However, information on hazardous material content has to be provided to customer. This information can hereby be provided via Internet or any other appropriate electronic or paper based version, if there is no internet access at the purchaser's location.

### **Summary**

After long and careful consideration and based upon knowledge of the materials used in passive components the member companies of the EIA/ECA decided upon an EFUP of 50 years minimum for their passive product range. Although customers may request other EFUPs determining the EFUP used on passive components remains the sole responsibility of each member company.

**Please note: The designation of 50 years EFUP is not to be equated with the durability or use-duration of the product.**

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