Proposal for inspection requirements including marking of the presence conditions of the restricted substances on the legal inspection for Hot Cathode Fluorescent Lamp and AC Supplied Electronic Ballasts Products

By the Bureau of Standards, Metrology and Inspection (BSMI), Ministry of Economic Affairs MOEA

Introduction:

In order to enhance the consumer protection and encourage industries to reduce the using of the restricted chemical substances in electrical and electronic equipments and to control the restricted chemical substances in each stage of the supply chain and life cycle of electrical and electronic equipments, also to promote the awareness of consumers on effective utilization of resources and reduction of environmental burden, the BSMI proposes the manufacturers or importers shall adopt the revised standards of CNS 691 and CNS 13755 and follow the requirements stipulated in Section 5 “Marking of presence” of CNS 15663 and clearly mark “the presence conditions of the restricted substances” (i.e. Marking of Presence) on the body, packages, stickers, or the instruction books of the Hot Cathode Fluorescent Lamp and AC supplied electronic ballasts (hereinafter referred as “the commodities”).

Proposed date of implementation:

The date of publication

Table of the commodities (HS/CCCN codes) covered and their applicable inspection standards:

Description of Goods	Inspection Standards	C.C.C. Code (the first 6 digits are the same as HS Code)(reference)	Conformity Assessment Procedures
Hot Cathode Fluorescent Lamp	CNS 691 (2014.9), Section 5 "Marking of presence" of CNS 15663 (2013.7)	8539.31.00.00.7A	RPC Scheme (Module II+III) or TABI Scheme
AC supplied electronic ballasts	CNS 13755 (2014.9), Section 5 "Marking of presence" of CNS 15663 (2013.7)	8504.10.00.00.3A	RPC Scheme (Module II+III) or TABI Scheme

The two kinds of conformity assessment schemes for the commodities are as follows:

1. Registration of Product Certification (RPC) Scheme (Module II+III)

Under this scheme, domestic manufacturers or importers must have their products type-tested in advance (Module II) by the BSMI or BSMI-recognized testing laboratories before applying for registration of their products. Manufacturers or importers will also be required to ensure by declaration (Module III) that all products whether made at their manufacturing facilities or imported are in conformity with the prototypes submitted for type test at Module II stage.

Products will be allowed to use the Commodity Inspection Mark with the letter ‘R’ and the identification number given by the BSMI, after they are certified and registered with the BSMI. These products can then pass through customs directly without any further inspection if not be sampled by RPC border check procedure. The application fee and annual fee for RPC are both NT$5,000(about US$170) for each certification, and the RPC certifications are valid for three years. If there are any serial products, the extra NT$3,000(about US$102) of application fee is needed for every application in each certification.

The fees for type testing vary by products and depend on the fee schedule of the testing laboratories.

2.Type-approved Batch Inspection (TABI) Scheme

Under this scheme, manufacturers or importers shall have their products type-tested by the BSMI or BSMI-recognized testing laboratories, and then file an application for type approval with the BSMI or its branches.

After manufacturers or importers have obtained a type-approval certificate, they are still required to file an application for batch inspection with the BSMI each time before their products arrive at the port of entry. The BSMI will then perform inspection with simplified procedures. Additional samples may be required for further testing if it is deemed necessary. Products will be allowed to use the Commodity Inspection Mark with the letter 'T' and the identification number given by the BSMI, after they have passed the inspection. The application fee for a type approval is NT$3,500, and a type approval certificate is generally valid for three years.

The fees for type testing vary by products and depend on the fee schedule of the testing laboratories.

Further information about the two schemes is also available on the BSMI web site at http://www.bsmi.gov.tw/wSite/ct?xItem=8673&ctNode=811&mp=2

Related requirements:

1. The inspection requirements of the commodities have been amended and will come into force from the date of announcement. The original inspection requirements (without Section 5 "Marking of presence" of CNS 15663) will be valid till July 1 2017.

2. The certificate holders of the commodities shall follow the content stipulated in Section 5 "Marking of presence" of CNS 15663 and clearly mark "the presence conditions of the restricted substances" on the body, packages, stickers, or the instruction books of the commodities. For those who utilize website as a means to announce "the presence conditions of the restricted substances" of the commodities shall also clearly mark the website address on the body, packages, stickers, or the instruction books of the commodities.

3. Certificate:

   (1) Replacement:
   Before 1 July 2017, the certificate holders shall prepare type test report in compliance with revised standards of CNS 691 and CNS 13755, documents related to the location of the marking of presence, sample of the marking of presence (see Table 1 and Table 2), and the "Declaration of the Presence Condition of the Restricted Substances Marking" to apply for replacing the certificate(s) from the BSMI or its branches. Otherwise, certificate(s) will be rescinded. After replacement of certificate(s), the expiry date of the replaced certificate is the same as that of the original certificate.

   (2) New application or extension:
   From the date of publication, applicants shall prepare type test report in compliance with revised standards of CNS 691 and CNS 13755, documents related to the location of the marking of presence, sample of the marking of presence (see Table 1 and Table 2), and the "Declaration of the Presence Condition of the Restricted Substances Marking" to apply for certificate(s). If applicants apply for certificate(s) in accordance with the original inspection standards (without Section 5 "Marking of presence" of CNS 15663), the expiry date of the replaced certificate will be valid till 30 June 2017.

4. The applicable Inspection Schemes, applicable conformity assessment modules of Registration of Product Certification(RPC), the term of validity of certificates, inspection fees of the commodities remain unchanged.

5. The inspection standards shall be the version as listed in this public notice. When the applicable standards are revised or amended, the date of applying these revised or amended standards for inspection shall be decided and announced by the BSMI.

6. The Commodity Inspection Mark:

   (1) The Commodity Inspection Mark shall be printed by the certificate holders. The identification number of the Commodity Inspection Mark consists of "The Letter(R or T)", "Designated Code (5 digits)" and "the presence conditions of the restricted substances" (e.g., RoHS or RoHS(XX,XX)).

   (2) The identification number shall be placed to the below or right of the graphic symbol and "the presence conditions of the restricted substances" shall be indicated in the second row.

(3) The size of the Mark can be applied proportionally on a prominent location of the commodities.

(4) For RPC scheme, the examples of the Commodity Inspection Mark are listed below:

(5) For TABI scheme, the examples of the Commodity Inspection Mark are listed below:

(6) "RoHS" of the identification number: indicates "the content of restricted substance(s) other than exemption" of the commodities does not exceed the reference percentage value of presence condition.

"RoHS(XX,XX)" of the identification number: indicates "the content of restricted substance(s) (element XX, element XX, …) other than exemption" of the commodities exceeds the reference percentage value of presence condition.

The restricted substances: indicates Pb, Cd, Hg, Cr^{+6}, PBB, PBDE.

Example:

- RoHS(Pb): indicates that the Pb percentage content in certain parts of the commodity exceeds the reference percentage value of presence condition.
- RoHS(Cd,Cr^{+6},PBB): indicates that the Cd, Cr^{+6}, and PBB percentage content in certain parts of the commodity exceed the reference percentage value of presence condition respectively.

Table 1. Example of markings for the presence conditions of the restricted substances exceed the reference percentage value of presence conditions

Equipment name: Hot Cathode Fluorescent Lamp, Type designation: XXX						
Unit	Restricted substances and its chemical symbols					
	Lead (Pb)	Mercury (Hg)	Cadmium (Cd)	Hexavalent chromium (Cr^{+6})	Polybrominated biphenyls (PBB)	Polybrominated diphenyl ethers (PBDE)
Cap	Exceeding 0.1 wt %	○	○	○	○	○
Tube	○	○	○	○	○	○
Filler	○	Exceeding 0.1 wt %	○	○	○	○
Electrode	○	○	○	○	○	○

Note 1: "Exceeding 0.1 wt %" and "exceeding 0.01 wt %" indicate that the percentage content of the restricted substance exceeds the reference percentage value of presence condition.

Note 2: "○" indicates that the percentage content of the restricted substance does not exceed the percentage of reference value of presence.

Note 3: The "−" indicates that the restricted substance corresponds to the exemption.

Table 2. Example of markings for the content of restricted substances other than exemption do not exceed the reference percentage value of presence condition

Equipment name: Hot Cathode Fluorescent Lamp, Type designation: YYY						
Unit	Restricted substances and its chemical symbols					
	Lead (Pb)	Mercury (Hg)	Cadmium (Cd)	Hexavalent chromium (Cr^{+6})	Polybrominated biphenyls (PBB)	Polybrominated diphenyl ethers (PBDE)
Cap	○	○	○	○	○	○
Tube	○	○	○	○	○	○
Filler	○	−	○	○	○	○
Electrode	○	○	○	○	○	○

Note 1: "○" indicates that the percentage content of the restricted substance does not exceed the percentage of reference value of presence.

Note 2: The "−" indicates that the restricted substance corresponds to the exemption.