

Environmental regulation: no breathing space

At the beginning of 2013 the updated version of the EU's RoHS Directive was required to be implemented in all its Member States. The original version impacted the industry in July 2006, can we expect a similar six and a half year respite from further changes to this regulation?

Unfortunately that is not the case. The new directive specifically instructs the European Commission to review and if necessary amend the list of six substances currently under restriction before 22nd July 2014 - just over 18 months after the new version has to be implemented. An interim report has already been published giving a list of 21 additional substances worthy of consideration. Whilst many of these substances are already restricted or are in the process of being restricted, this does create a need within all organizations to monitor the review process so that strategic decisions can be taken if required.

And now at the beginning of 2014, the companion WEEE Directive update is also required to be implemented - with new UK legislation, for example, being passed in Parliament only in December 2013, just a few weeks before the deadline. Like the RoHS Directive there is a phased introduction for some of the new measures and it will also become "open scope" to include all items of electrical and electrical equipment unless explicitly excluded.

In the USA, companies are required to file their first reports with the SEC of conflict mineral usage in their products by May 2014. Meanwhile we expect the EU to issue a first draft of its own policy on conflict minerals around March 2014; UK government officials think that EU regulation similar in many respects to the USA requirements is inevitable. This is certainly a topic that is being taken very seriously, for example Intel announced in January 2014 at CES2014 that all its products are now "conflict-free."

Compliance with environmental regulation and embracing concepts around sustainability in business are of increasing importance. We assist members by responding to queries sent to us and by attending meetings and forums that are relevant; for example, we are a member organization of the UK government's Electronics Regulatory Group, which meets quarterly. We were also involved in a BBC led initiative looking at sustainability for broadcasting and connected digital media. The latter involved business and academia and developed enough momentum and interest that further collaborative efforts are already in progress for 2014.

