Dell Implementation on China ROHS Legislation

戴尔就中国ROHS要求的理解及执行

Dell   WWRCE/EA   戴尔 全球法规与环境事务部

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Content
目录

China RoHS Phase I Requirements
中国ROHS第一阶段要求

- China RoHS Phase I requirements:
  - China RoHS labeling and documentation
  - Packaging labeling

- Phase I requirements were applicable to all Dell hardware products sold in China on and after March 1, 2007

- Key part with Phase I:
  - EPuP (Environmental Protection Use Period) (e.g. # of years)
  - Product Documentation Requirements (e.g. format, language)
  - Packaging recycling logo requirements (e.g. format, internationalization)

- 中国ROHS第一阶段要求：
  - 中国ROHS标识和文件
  - 包装标识

- 第一阶段要求适用于戴尔所有的在2007年三月在中国销售的硬件产品

- 关键点（第一阶段）：
  - 环保使用期限具体时间
  - 产品说明文件的要求， 诸如格式、描述方式等。
  - 包装回收标识的要求 ，诸如格式以及国际化等。

Policy Activities
政策参与

- Dell has been actively participating in industry discussions and working groups since 2004 (TA, USITO,ECFIC, MIIT China RoHS WG).

- Worked with industry to promote industry positions on China RoHS requirements, which had a positive influential effect on MIIT's decision making process.

  – Discussions on EPuP numbering

  – China RoHS substance disclosure table format

- 从2004年，戴尔积极参与业界和各种工作组的讨论（如：TechAmerica、USITO,ECFCI和工信部污染防治标准工作组等）.

- 协同业界一起提出有关中国ROHS的意见和建议，对工信部的政策决策产生了积极的影响。

Interaction with Supplier
对供应商政策信息传递

- External bulletins on China RoHS updates were sent to the supply base to enhance their awareness of this regulation and their obligations to satisfy it.

- China RoHS position statement and updates were posted on Dell.com

- Conducted multiple supplier trainings

- 给供应商发布针对中国ROHS最新通告，使其知晓相应政策，了解其责任去满足法规要求。

- 在戴尔官方网站Dell.com公示戴尔针对中国ROHS的立场。

- 开展供应商的相应培训。

The Study of Product Labeling
产品标识制度的研究

- Decision on EPuP Numbering (based on regulatory and industry guidance)

- Labels are in black or white

- Labels must be at least 5mm X 5mm

- Label is placed directly on the product

- 根据有关法规及业内指导意见制定环保标识期限

- 采用黑白标识

- 标识需大于5mm X 5mm

- 在产品上直接标识

Examples of Product Categories 产品种类例表	EPuP Number环保期限标识
Inks and toners cartridges 墨盒 Rechargeable Battery Packs 可充电电池	5
Desktops, notebooks, workstations, monitors, printers, scanners, projectors and most peripherals (e.g. keyboards, mouse, external drives…)台式机、笔记本、工作站、显示器、打印机、扫描仪、投影仪及其大部份周边产品（如：键盘、鼠标、外置设备等）	10
Servers, Storage, Switches/Networking 服务器、存储器、交换器、网络设备	20

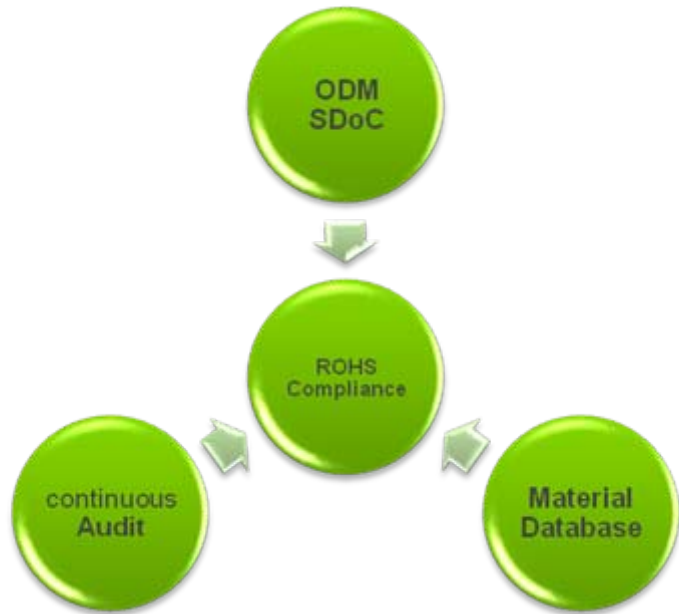# The Implementation of Product Labeling
产品标识制度的执行

- Finalized EPuP number for Dell products   Early Sept 06
- Updated Dell's Environmental Marking Spec   Sept 06
- Implementation：   Sept 06 – Nov 06
  - Worked with Logistics to implement labeling on all Print-On-Demand Labels   Sept 06 - Nov 06
  - Worked with Regulatory team to implement label for:
  1) Pre-Printed Labels
  2) Engage OEM vendor
  - Worked with Service team on service parts labeling
- Compliance verification   Dec 06 – Mar 07
- Contingency Plans   Dec 06 – Feb 07

- 制定产品环保使用期限数值   -- 06年9月初
- 更新戴尔产品环境标识条列   – 06年9月
- 应用：   -- 06年9月- 11月
  - 协同物流部门规划完成量产印制铭牌标识的变更
  - 协同法规认证部完成标识：
  1) 提前印制铭牌的标识
  2) 通告培训OEM供应商
  - 协同售后服务部门完成售后服务配件的标识工作
- 完成确认   06年12月 – 07年3月
- 应急计划   06年12月 – 07年2月

Dell ROHS Compliance Control Program
戴尔ROHS符合性管控

- ODM sDoC: Require sDoC for all parts/components.

- Material Database: Establish Healthy Material Database to track parts status, effective sDoC and implement latest legal rules.

- Continues Audit: Through regular ROHS audit (internal and external) program to make sure continuous ROHS compliance.

- 工业商自我声明：对所有物料、元器件要求均要求供应商提供ROHS符合性自我声明书。

- 物料数据库：建立完善的物料数据库去跟踪物料状态、保持自我声明书的有效性，以及导入和检查最新法规的符合性。

- 持续稽核管理：通过内部和外部的ROHS稽核程序来监控ROHS的持续符合性