



## HP's Compliance with restriction of Hazardous Substances (EU RoHS and other) Legislation

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HP is committed to compliance with all applicable laws and regulation, including any new material restriction requirements than may be adopted under the European Union Recast RoHS Directive, otherwise known as EU RoHS 2, and the EU REACH Regulation, inter alia, Directive (EU) 2015/863, RoHS like legislations in other jurisdictions e.g. China's Management Methods for Restricted Use of Hazardous Substances in Electrical and Electronic Products, otherwise known as China RoHS 2, the European Union's restriction of PAHs in Annex XVII and HBCDD in Annex XIV of the EU REACH Regulation.

HP believes that legislation, like the EU RoHS Directives, plays an important role in promoting industry-wide transition to restrict substances of concern. In general, the restriction of any substance should take into account the following key items:

- Global harmonization of the legislation content and implementation requirements
- Substance risk assessment, including a clear understanding of the environmental impacts of alternative substances
- Clear identification of what substances (vs. broad classes or categories) are to be restricted
- Clear identification of when alternative technologies are proven and readily available
- Appropriate lead time to allow the industry to transition
- Substances that are not used or found in final products should not be included in the restrictions
- Material application exemptions should be allowed for the use of restricted substances in applications where current substitution is not technically feasible
- Inclusion of maximum concentration values setting de minimis levels below which the relevant substances may be present

HP believes other substances should be considered for inclusion in future RoHS legislation. This includes the restriction of polyvinyl chloride (PVC) and brominated flame retardants (BFRs) from electrical and electronic products (EEE). HP believes PVC and BFRs should be the focus for the restriction of chlorine (Cl) and bromine (Br) from electrical and electronic products, where technically feasible. HP's reasons for focusing on PVC and BFRs are:

- PVC and BFRs cover 99% of the uses for Cl and Br in electronics;
- Given the high percentage usage, these substances have the highest impact;
- Restriction of these substances where technically feasible would substantially accomplish the goal to eliminate Cl and Br from electronic products



HP began proactively eliminating substances of concern in the early 1990s. Phasing out phthalates, BFRs, and PVC remain key focus areas. All HP Elite and Pro Desktop, All-in-One, and Business Notebook products, and 60% of other personal systems product groups introduced in 2015, are classified as low halogen.<sup>[1]</sup> All disk drives, application-specific integrated circuits (ASICs) and memory modules are also low halogen.<sup>[2]</sup> The company also started transitioning to low-halogen printed circuit boards for certain HP LaserJet printers in 2015.<sup>[3]</sup> HP Inc. will further advance these product improvements for our personal systems and printers moving forward.

In order to make these material transitions in all the many types of products in the industry, HP believes restriction under RoHS legislation is possible. However some critical issues would need to be overcome or addressed by specific exemptions, including technical issues for certain applications, availability of environmentally preferable alternatives, and ability to maintain high recycled content as substances are restricted.

HP proactively evaluates materials in our products and supply chain, taking into account published lists of substances of concern, new and upcoming legal requirements, and customer preferences, as well as scientific analysis that reveals a potential impact to human health or the environment. When replacing substances of concern, we provide guidance to suppliers on commercially viable alternatives with lower potential impact. In assessing viable alternatives we look for materials that meet performance and cost standards while reducing the risk of human health and environmental impacts. Our continued internal voluntary goal is to apply the EU RoHS 2 substance and exemption requirements outside the EU (and EFTA) on a worldwide basis within 6 months of each of the EU's various legal compliance dates for virtually all HP branded new products in the scope of EU RoHS 2, except where it is widely recognized that there is no technically feasible alternative (as indicated by an exemption under the EU RoHS Directive). This was achieved for 2013.

In early 2003, a company-wide RoHS team was formed to manage all aspects of HP's global response to all the RoHS legislations around the world. HP's initiative to address the RoHS legislations is part of the company's Design for Environment program, which includes using materials more efficiently, finding alternatives for designated materials, designing for energy efficiency, and designing products that can be easily recycled.

HP continues to plan for further "RoHS like" legislations in other jurisdictions and will meet any additional requirements that arise. HP complies with the requirements of all the RoHS legislations currently in effect (including those specifically listed under Compliance Status below). HP's Compliance Verification is based on our risk analysis of restricted substances entering the supply chain and includes technical documentation outlined in the European Union's EN 50581:2012 standard.



More detailed information can be found at: [www.hp.com/sustainability](http://www.hp.com/sustainability)

[Sustainability Report](#)

[Design for environment](#)

[Compliance Verification](#)

[General Specifications for the Environment](#)

[Eco Declarations](#)

### **HP's Compliance Status to EXISTING RoHS Legislation:**

#### India

- HP products <sup>[4]</sup>including print cartridges comply with the material restrictions of India's legislation "E-waste Management Rules, 2016", otherwise known as India RoHS which came into effect on October 1, 2016.

#### European Union

- HP products in-scope and put on the market in the EU and EFTA Member States comply with the changes to exemptions required as of January 1, 2013 in Annex III of EU RoHS Directive (2011/65/EU) of 8 June 2011 and earlier Commission Decisions withdrawing exemptions.

#### Korea

- HP products <sup>[4]</sup>comply with Korea's legislation "The Act for Resource Recycling of Electrical/Electronic Products and Automobiles", otherwise known as Korea's RoHS 2 which came into effect on January 1, 2013. You can find HP's Korean RoHS declarations at: <http://www8.hp.com/us/en/hp-information/environment/msds-specs-more.html>.

#### Vietnam

- HP products <sup>[4]</sup>comply with Vietnam's legislation "Circular 30/2011/TT-BCT: Temporarily regulating the permitted limits for a number of hazardous substances in electric and electronic products", otherwise known as Vietnam RoHS which came into effect on December 1, 2012. You can find HP's Vietnam RoHS declarations at: <http://www8.hp.com/us/en/hp-information/environment/msds-specs-more.html>

#### Serbia

- HP products <sup>[4]</sup>comply with Serbia's WEEE and RoHS "Regulations on the List of Electrical and Electronic Products, Measures Banning and Restricting the Recovery of Electrical and Electronic Equipment Containing Hazardous Materials, and the Methods and Procedures for Managing Waste from Electrical and Electronic Products" that entered into force on January 4, 2011. RoHS restrictions apply to equipment placed on the market on or after July 1, 2011.

#### Ukraine

- HP products <sup>[4]</sup>comply with the substance restrictions in Ukraine's "Technical Regulation on restrictions as to the use of some dangerous substances in electric and electronic devices", otherwise known as Ukraine RoHS which came into effect on 1 January 2011.



#### New Jersey

- HP products <sup>[4]</sup> comply with New Jersey's "Electronic Waste Recycling Act" (Senate Bill 2144), otherwise known as New Jersey RoHS which came into effect on 1 January 2011.

#### Turkey

- HP products <sup>[4]</sup> comply with Turkey's "Regulation on the Restriction of the use of Certain Hazardous Substance in Electrical and Electronic Equipment", otherwise known as Turkey RoHS which came into effect on March 30, 2009.

#### China

- HP products <sup>[4]</sup> comply with China's, "Management Methods for Restricted Use of Hazardous Substances in Electrical and Electronic Products", otherwise known as China RoHS2 which came into effect on July 1, 2016.

#### California

- HP products <sup>[4]</sup> comply with California's, "Electronic Waste Recycling Act of 2003 (Senate Bill 20) substance restrictions", otherwise known as California RoHS which came into effect on January 1, 2007.

#### Worldwide

- HP continues to achieve its internal voluntary goal to meet the substance restrictions of the EU RoHS legislation on a worldwide basis, except where it is widely recognized that there is no technically feasible alternative (as indicated by an exemption under the EU RoHS Directive), for virtually all HP branded products in scope of the directive.

#### Japan

- HP products <sup>[4]</sup> comply with the labeling requirements set out in Japan's "The Marking of Presence of the Specific Chemical Substances for Electrical and Electronic Equipment" (JIS-C-0950), otherwise known as J-MOSS which came into effect on July 1, 2006. You can find HP's J-MOSS declarations at <http://www8.hp.com/us/en/hp-information/environment/msds-specs-more.html>

#### Notes:

[1] The low-halogen standard = <900 ppm chlorine, <900 ppm bromine, <1,500 ppm chlorine+bromine in any homogeneous material in the products.

[2] HP designed ASICs.

[3] The following HP LaserJet printers meet the EPEAT criteria 4.1.6.2 to eliminate or reduce BFR/CFR content of printed circuit board laminates, so all circuit boards are low halogen: HP LaserJet Enterprise M506dn (U.S. SKU only), HP LaserJet Pro M402dn (U.S. SKU only), HP LaserJet Enterprise Flow MFP M527c, HP LaserJet Managed Flow MFP M527cm, HP LaserJet Enterprise Flow MFP M527z (U.S. SKU only).

[4] HP products that are both in scope and put on the market in the given jurisdiction.

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