



HP Inc  
1501 Page Mill Road  
Palo Alto, CA 94304-1112  
www.hp.com

## HP's Compliance with Restriction of Hazardous Substances (RoHS) Legislation in the EU and other jurisdictions

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HP is committed to compliance with all applicable laws and regulations, including material restriction requirements under the European Union Recast RoHS Directive 2011/65/EU, otherwise known as EU RoHS 2, as amended by Directive 2015/863/EU and RoHS legislation in other jurisdictions such as China's Management Methods for Restricted Use of Hazardous Substances in Electrical and Electronic Products, otherwise known as China RoHS, and the materials restriction requirements of India's E-Waste Management Rules, 2016.

HP believes that legislation, like EU RoHS 2, 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



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.

Our continued voluntary goal is to apply the EU RoHS 2 substance and exemption requirements outside the EEA (and other countries that are tracking EU compliance dates) 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).

HP began proactively eliminating substances of concern in the early 1990s. The [HP Materials and Chemical Management Policy](#) guides how we specify materials and chemicals for use in products, packaging, and manufacturing processes. For key milestones see our [Green Chemistry Timeline](#).

In early 2003, a company-wide RoHS team was formed to manage all aspects of HP's global response to RoHS legislation around the world. HP's initiative to address RoHS legislation is part of the company's Design for Sustainability program, which includes advancing materials innovation to improve environmental and human health impacts. For more information, see the materials innovation section of HP's [Sustainable Impact Report](#).

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 and the International IEC 63000:2018 standard.

More detailed information can be found at: [Sustainable Impact at HP](#)

[Sustainability Impact Report](#)  
[Sustainable Design](#)  
[Compliance Verification](#)  
[General Specifications for the Environment](#)  
[Eco Declarations](#)



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

### **Europe, Middle East and Africa**

#### European Union and European Economic Area

- HP products <sup>[1]</sup> comply with EU Directive 2011/65/EU of 8 June 2011 as amended by EU Directive 2015/863 of 31 March 2015 and including amendments to the exemptions in Annex III.

#### Switzerland

- HP products <sup>[1]</sup> comply with the Swiss Ordinance on the Reduction of Risks relating to the Use of Certain Particularly Dangerous Substances, Preparations and Articles, otherwise known as the Swiss Chemical Risk Reduction Ordinance, ORRChem, as of May 18, 2005 (as amended)

#### Ukraine

- HP products <sup>[1]</sup> comply with the substance restrictions in Ukraine's "Technical Regulation on Restriction of the use of certain hazardous substances in electrical and electronic equipment, approved by Decree of the Cabinet of Ministers of Ukraine dated 10 March, 2017 No. 139", otherwise known as Ukraine RoHS which came into effect on 22 September 2017 and repealed Technical Regulation on the restriction of the use of certain hazardous substances in electrical and electronic equipment, approved by Decree of the Cabinet of Ministers of Ukraine dated December 3, 2008 No. 1057.

#### Serbia

- HP products <sup>[1]</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.

#### Turkey

- HP products <sup>[1]</sup> comply with Turkey's "Regulation on Waste Electronic and Electrical Equipment" (WEEE) which came into effect on May 22, 2012 and incorporates the rules for the Restriction of Certain Hazardous Substances in Electrical and Electronic Equipment", otherwise known as Turkey RoHS.

#### Bosnia-Herzegovina

- HP products <sup>[1]</sup> comply with Bosnia-Herzegovina's "Regulation of Restrictions of Use of Certain Dangerous Substances in Electrical and Electronic Equipment (RoHS Regulation 50/15) was published in Official Gazette of Republic of Srpska 50/15", otherwise known as Bosnia-Herzegovina RoHS which came into effect on June 1, 2016.

#### UAE

- HP products <sup>[1]</sup> comply with UAE's "Cabinet Decision No. 10/2017 to control hazardous materials in electrical and electronic devices (RoHS) OG No. 614 of 27.04.2017 (officially published and came to power on 16.05.2017)", otherwise known as UAE RoHS which came into effect on January 1, 2018.



## Asia

### China

- HP products <sup>[1]</sup> comply with China's, "Management Methods for Restricted Use of Hazardous Substances in Electrical and Electronic Products", otherwise known as China RoHS which came into effect on July 1, 2016. And comply with "Catalog of Electrical and Electronic Products that have met the standard in Limited Use of Hazardous Substances (Batch one) which comes into effect on Nov 1, 2019.

### India

- HP products <sup>[1]</sup> 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.

### Korea

- HP products <sup>[1]</sup> comply with Korea's legislation "The Act on Resource Circulation of Electrical and Electronic Equipment and Vehicles", otherwise known as Korea's RoHS which came into effect on January 1, 2008. 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>[1]</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>

### Japan

- HP products <sup>[1]</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>

### Singapore

- HP products <sup>[1]</sup> comply with Singapore's "Environment Protection and Management Act (Chapter 94A) Environmental Protection and Management Act (Amendment of Second Schedule) Order 2016", otherwise known as Singapore RoHS which came into effect on June 1, 2017.

### Taiwan BSMI

- HP products <sup>[1]</sup> comply with Taiwan's "CNS 15663 Guidance to reduction of the restricted chemical substances in electrical and electronic equipment released by Bureau of Standards, Metrology and Inspection (BSMI), MOEA through notification dated 29 December 2015 added the requirement for RoHS labelling to BSMI certification requirement." Otherwise known as Taiwan BSMI RoHS which came into effect as of July 1, 2017.



## Americas

### California

- HP products <sup>[1]</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.

### New Jersey

- HP products <sup>[1]</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.

## 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 EU Directive 2011/65/EU as amended.

Notes:

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

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