

CDX Newsletter

Regulatory Update Q3/2023

Agenda

PFAS	2
EPA's Finalizing of PFAS Reporting and Recordkeeping Rules under TSCA.....	2
EU POP Regulation - PFHxS Regulation Amendment	2
Welcome to the PFAS Declarable Substance List	2
Other topics	3
North America.....	3
United States.....	3
H.R.4443 Aims to Counter China's Exploitation and Child Labor in the DRC Mining Industry	3
OEHHA Prioritizes the Development of Safe Harbor Levels under Proposition 65	3
California Proposes Listing Three Substances as Carcinogens under Prop 65	4
Three Chemicals Added to California Proposition 65 Substance List	4
Navigating Changes in California Proposition 65 with CDX	4
Canada	5
Expanding the Domestic Substances List with 10 new chemicals	5
Canadian Department of Environment's 2023 CMP: Data Collection for Toxic Substances	6
Europe	6
Great Britain	6
UK Extends CE Mark Recognition Indefinitely.....	6
Introducing UK REACH SVHC Regulation in CDX	6
European Union	7
EU's Drive to Expand Regulation of Persistent Organic Pollutants.....	7
ECHA's Partnership with the European Commission in Battery Regulation.....	8
New EU Battery Regulation Takes Over from the EU Battery Directive.....	8
CDX: Powering Your EPR and Battery Regulation Compliance	9

Exemptions for Mercury and Lead Added to Annex IV of the EU RoHS Directive	9
Streamlining Compliance: CDX's Solution for EU RoHS Directive Exemptions	9
EU's Proposal for ELV Regulation Overhauls the Automotive Industry	9

PFAS

EPA's Finalizing of PFAS Reporting and Recordkeeping Rules under TSCA

[The Environmental Protection Agency \(EPA\)](#) is in the process of finalizing the regulations concerning the reporting and recordkeeping requirements associated with per- and polyfluoroalkyl substances (PFAS) under the framework of the Toxic Substances Control Act (TSCA). In compliance with the obligations stipulated by TSCA, as amended by the National Defense Authorization Act for Fiscal Year 2020, the EPA is mandating that individuals or entities engaged in the manufacturing (including importation) or those who have undertaken manufacturing of these chemical substances at any point since January 1, 2011, must furnish the EPA with comprehensive information regarding the various aspects of PFAS, including their uses, production quantities, byproducts, disposal methods, potential exposures, and any existing data pertaining to their environmental or health effects.

Beyond simply adhering to the statutory mandates outlined in TSCA, the objective of this regulation is to empower the EPA to gain a more thorough understanding of the origins and volumes of PFAS manufacturing within the United States. If you have, at any time since January 1, 2011, been involved in the commercial manufacturing of PFAS, this regulatory action may pertain to your operations. It is essential to note that this final rule will come into effect on November 13, 2023.

EU POP Regulation - PFHxS Regulation Amendment

In a recent development, [the European Commission introduced a significant amendment to the EU POP Regulation](#), targeting the regulation of perfluorohexane sulfonic acid (PFHxS), its salts, and related compounds. The new law, effective from August 28, 2023, imposes strict limits on these substances, particularly in firefighting foams.

The key points of the amendment include:

- A limit value of 0.025 mg/kg for PFHxS and its salts in substances, mixtures, and articles.
- A limit of 1 mg/kg for the sum of concentrations of all PFHxS-related compounds in substances, mixtures, and articles.
- Higher concentration limits of 0.1 mg/kg for PFHxS, its salts, and related compounds in firefighting foams, with a review planned by August 28, 2026.

The measure is part of an effort to align the EU with a global ban on PFHxS, without exceptions, as agreed by the Stockholm Convention on persistent organic pollutants (POPs) last year. Additionally, the EU is preparing a comprehensive proposal for the restriction of all per- and polyfluoroalkyl substances (PFAS), a category to which PFHxS belongs.

Welcome to the PFAS Declarable Substance List

In recent years, Per- and Polyfluoroalkyl Substances (PFAS) have garnered increased attention due to their adverse effects on human health, wildlife, and the environment. Regulatory bodies in the United States and the European Union have taken significant steps to address the pressing concerns surrounding PFAS. In response to these developments, CDX is delighted to announce the release of the "PFAS Declarable Substance List." While specific PFAS regulations are still in development, our unwavering commitment to environmental responsibility has led to the development of this comprehensive list. It is curated based on insights gathered from various global governmental PFAS lists and national inventories. Count on CDX as your dependable source for staying informed about commercially relevant PFAS data, empowering you to make environmentally conscious decisions.

With CDX, you can proactively gather crucial information about PFAS from your supply chain, ensuring that you are well-prepared for the rapidly growing regulatory requirements.

Other topics

North America

United States

H.R.4443 Aims to Counter China's Exploitation and Child Labor in the DRC Mining Industry

On June 30th, 2023, the House of Representatives saw the introduction of H.R.4443, the "Countering China's Exploitation of Strategic Metals and Minerals and Child and Forced Labor in the Democratic Republic of the Congo Act" by Rep. Christopher H. Smith. This significant legislation has garnered support from 18 co-sponsors.

The proposed bill responds to the recent suspension of cobalt mining operations in Idaho by Jervois Global, an Australian battery metals producer. Jervois Global attributed its decision to falling cobalt prices driven by competition from China and the Democratic Republic of the Congo (DRC).

If enacted, the Act would prohibit the import of products containing metals or minerals, with a particular focus on cobalt and lithium and their derivatives, if these materials have been mined, produced, smelted, or processed, wholly or in part, using child labor or forced labor in the DRC. The Act also reserves the right to include other minerals and metals in this prohibition.

Beyond addressing the critical issue of child labor, the Act encourages the development of alternative sources for the supply and production of rare minerals and metals in both the United States and the DRC. Affected companies and industries encompass all entities engaged in the importation of "goods, wares, articles, or merchandise containing metals or minerals, especially cobalt and lithium and their derivatives, if these have been mined, produced, smelted, or processed, wholly or in part, by child labor or forced labor in the DRC."

This legislative proposal aims to protect human rights and promote responsible sourcing of vital materials, while simultaneously fostering self-sufficiency and ethical practices within the minerals and metals industry.

CDX Extended Materials Declaration Supports Ethical Sourcing Verification for H.R.4443

Companies can take proactive steps to ensure compliance with these regulations by leveraging the CDX Extended Materials Declaration (EMD). This module enables businesses to collect comprehensive information about cobalt and mica, with a focus on smelter traceability throughout their supply chains. By utilizing the EMD Module, companies can proactively monitor and verify the ethical sourcing of these critical materials, further contributing to the objectives outlined in H.R.4443.

In order to learn more about the CDX Extended Minerals Module and its pricing details, please visit our [website](#).

OEHHA Prioritizes the Development of Safe Harbor Levels under Proposition 65

The Office of Environmental Health Hazard Assessment (OEHHA) has devised [a priority list for the development](#) of new or revised [No Significant Risk Levels \(NSRLs\)](#). Presently, this list exclusively features antimony trioxide, ethylene oxide, and 1-bromopropane. It is important to note that exposure levels and discharges to drinking water sources that fall below the safe harbor levels are exempt from the requirements of Proposition 65.

OEHHA's strategy for NSRL development is rooted in considerations of public health, close collaboration with other OEHHA programs responsible for establishing cancer potency values, and the accessibility and quality of scientific data. This priority list will be routinely updated as NSRLs are finalized or as new substances take precedence.

Whenever OEHHA proposes an NSRL for incorporation into the regulatory framework, a Notice of Proposed Rulemaking will be made available on [the OEHHA website](#). This demonstrates OEHHA's steadfast commitment to the effective establishment and communication of safe harbor levels, ultimately contributing to the safeguarding of public health.

California Proposes Listing Three Substances as Carcinogens under Prop 65

[California's Office of Environmental Health Hazard Assessment \(OEHHA\) has announced](#) its intention to designate coal-tar pitch, fluoro-edenite fibrous amphibole, and silicon carbide whiskers as substances known to cause cancer within the state. If this proposal is finalized, it would mandate companies to issue warnings when exposing the public to any of these substances, unless the exposure levels are deemed low enough not to pose a significant risk of cancer.

This regulatory action is being proposed under the "Labor Code" listing mechanism, and it is based on research findings from the International Agency for Research on Cancer (IARC), which has concluded that these substances may be carcinogenic. According to [IARC's assessment](#), there is sufficient evidence of carcinogenicity in both humans and animals for coal-tar pitch and fluoro-edenite fibrous amphibole. For silicon carbide whiskers, IARC found sufficient evidence of carcinogenicity in animals (IARC, 2017).

Three Chemicals Added to California Proposition 65 Substance List

As of August 11, 2023, [the Office of Environmental Health Hazard Assessment \(OEHHA\) has expanded California's Proposition 65 regulated substances list by introducing three additional chemicals](#). These chemicals have been identified as substances known to cause cancer under California's Safe Drinking Water and Toxic Enforcement Act of 1986, commonly known as Proposition 65. The newly added chemicals are Anthracene (CAS RN 120-12-7), 2-bromopropane (CAS RN 75-26-3), and dimethyl hydrogen phosphite (CAS RN 868-85-9).

The decision to include these chemicals in the Proposition 65 regulated substances list was based on the findings and recommendations outlined in a [public notice published in the June 16, 2023](#) issue of the California Regulatory Notice Register (Register 2023, No. 24-Z).

California law mandates the listing of chemicals identified by the International Agency for Research on Cancer (IARC) as known carcinogens. [The IARC recently classified these chemicals as follows](#):

- **2-Bromopropane (CAS RN 75-26-3):** Classified as "probably carcinogenic to humans" (Group 2A) due to sufficient evidence for cancer in experimental animals and strong mechanistic evidence in experimental systems, supported by suggestive mechanistic evidence in exposed humans.
- **Anthracene (CAS RN 120-12-7) and Dimethyl Hydrogen Phosphite (CAS RN 868-85-9):** Classified as "possibly carcinogenic to humans" (Group 2B) based on sufficient evidence for cancer in experimental animals and limited or inadequate mechanistic evidence.

The inclusion of these chemicals in Proposition 65 underscores the commitment to public health and safety in California.

Navigating Changes in California Proposition 65 with CDX

Changes in substances and No Significant Risk Levels (NSRLs) within California Proposition 65 bring immediate responsibilities for affected companies. Compliance with these obligations necessitates a thorough understanding of the chemicals present in their products or used within their business locations, as well as their potential exposure to the California public.

Impacted companies are mandated to proactively inform Californians about potential exposure to substances featured on the Proposition 65 chemicals list before such exposure occurs. Violations of California Prop 65 can lead to penalties as high as \$2,500 per violation, per day.

To identify chemicals at risk of public exposure, businesses must diligently gather data about the substances found in the products they offer to the California public or use within their California-based business operations.

Webinar | December 14

California Proposition 65 Evolution & Updates: What's New & What's on the Horizon

[Register Now](#)



Join us for our upcoming webinar, 'California Proposition 65 Evolution & Updates: What's New & What's on the Horizon'. In this informative session, our Regulatory Compliance Expert Monika Kotkowska will delve into the regulation's history, recent developments in 2023, and what to expect in 2024. Don't miss out – register here:

<https://public.cdssystem.com/en/web/cdx/events>

Canada

Expanding the Domestic Substances List with 10 new chemicals

On July 21, 2023, The Minister of the Environment and the Minister of Health [issued Order 2023-112-08-01](#), which entailed an evaluation of ten chemicals. This assessment led to the determination that these chemicals satisfy the criteria for inclusion in the Domestic Substances List, as outlined in the Canadian Environmental Protection Act, 1999 (CEPA). Consequently, these ten substances have been officially incorporated into the Domestic Substances List.

Substances that are absent from the Domestic Substances List are considered novel to Canada and are thus subject to notification and evaluation requirements. CEPA, in conjunction with these regulations, ensures that any new substances introduced into the Canadian market undergo a thorough assessment to identify potential risks to both the environment and human health. Additionally, appropriate control measures are implemented, if necessary.

Under this particular order, eight substances have been appended to Part 1 of the DSL, while two substances have been included in Part 3 of the DSL.

In Part 1:

- 6920-22-5 N (1,2-Hexanediol)
- 18297-63-7 N (1,3-Bis(trimethylsilyl)urea)
- 51728-26-8 N (Pentaerythritol, ethoxylated, esters with acrylic acid)
- 71868-15-0 N (Difunctional alpha hydroxy ketone)
- 141091-65-8 N-P (2-Propenoic acid, 2-ethylhexyl ester, polymer with ethenylbenzene and 2-methyl-2-[(1-oxo-2-propen-1-yl)amino]-1-propanesulfonic acid, 2,2'-(1,2-diazenediyl)bis[2-methylbutanenitrile]-initiated)
- 2102038-87-7 N-P (2-Propenoic acid, 2-methyl-, polymer with butyl 2-propenoate, cyclohexyl 2-methyl-2-propenoate, ethenylbenzene, 1-propene, and 2-propenoic acid, tert-Bu peroxide-initiated)
- 2135769-70-7 N-P (No name available)
- 2803749-89-3 N-P (No name available)

In Part 3:

- 19667-5 N-P (Poly(oxyalkanediyl), α -hydro- ω -hydroxy-, polymer with methylenebis[isocyanatocycloalkane], alkenenoic acid, hydroxy-, alkyl ester-blocked)
- 19668-6 N-P (Fatty acids, polymers with polyethylene glycol and succinic anhydride polyalkylene derivs)

Notably, CEPA does not mandate a public comment period before the addition of substances to the Domestic Substances List. Consequently, no consultation period was deemed necessary for these orders.

It is essential to recognize that the inclusion of these ten substances in the Domestic Substances List is primarily an administrative procedure. These orders do not impose any regulatory obligations on businesses.

Canadian Department of Environment's 2023 CMP: Data Collection for Toxic Substances

[In a Government Notice dated June 24, 2023, the Canadian Department of the Environment](#) has initiated an important step under the Chemicals Management Plan. This involves the assessment of 850 substances as listed in Schedule 1 of the notice to determine their toxicity or potential to become toxic.

The data collection process encompasses not only substances manufactured within Canada but also substances imported. Specific thresholds apply to the reporting of imported quantities of these substances when present in mixtures or products at or above a concentration of 0.1% by weight. This extends to various consumer items such as furniture, flooring, and toys, all of which are included within the scope of this requirement.

All necessary information must be submitted by no later than January 17, 2024. It's important to note that this information requirement applies to all individuals involved in manufacturing any of the listed substances or importing mixtures, products, or manufactured items containing these substances. The reporting obligations differ based on the specific manufacturing or importing scenarios, with varying thresholds in place.

Europe

Great Britain

UK Extends CE Mark Recognition Indefinitely

On August 1, [the United Kingdom announced](#) a significant development by extending the indefinite recognition of the CE Mark. This decision offers businesses the flexibility to opt for either the CE Mark or the UKCA Mark when selling products within the UK. It's worth noting that earlier, a transition to the UKCA Mark was mandatory by December 2024.

As mentioned earlier, the UK has committed to recognizing the CE Mark for 18 product categories. However, this list does not encompass all regulated product categories, resulting in substantial uncertainty, particularly in sectors such as construction, rail products, marine goods, and others. The UK government has assured that specific plans for these excluded products will be communicated in due course.

It's crucial to highlight that the indefinite extension of CE Mark recognition does not encompass medical devices or IVDs. The Medicines and Healthcare products Regulatory Agency (MHRA) has reaffirmed this stance in a subsequent announcement, reiterating its existing plan to continue recognizing the CE Mark for medical devices and IVDs until 2028 and 2030, respectively. After these deadlines, manufacturers will be obligated to employ the UKCA Mark.

The UK government's initiative is geared toward streamlining regulatory processes and fostering economic growth by simplifying administrative requirements and minimizing bureaucratic hurdles.

Source: [UK Government to Recognize CE Marks Indefinitely \(other than for Medical Devices and IVDs\)](#) by Seán Finan, Sarah Cowlishaw & Daniel Spivey on August 16, 2023.

Introducing UK REACH SVHC Regulation in CDX

We are thrilled to announce the integration of the UK REACH Substances of Very High Concern Candidate List in CDX. This update has been diligently implemented to meet the evolving needs of our customers who place products on the UK market.

What is the UK REACH Candidate List?

The UK REACH Candidate List mirrors its EU counterpart, featuring SVHCs that may be prioritized for inclusion in the Authorisation List (Annex 14) of UK REACH. Initially, when UK REACH was established on January 1st, 2021, all substances listed on the EU REACH Candidate List were automatically incorporated into the UK REACH Candidate List. As of today, the UK

Candidate List remains unchanged, encompassing the same SVHCs as the EU Candidate List up to December 2020. However, it's crucial to note that the UK Candidate List is expected to evolve over time.

Responsibilities for Importers, Producers, and Suppliers:

In line with EU REACH requirements, importers and producers of articles must notify the Health and Safety Executive (HSE) if:

- The substance is present in those articles in quantities totaling more than 1 tonne per producer or importer per year.
- The substance is present in those articles above a concentration of 0.1% w/w.

Furthermore, suppliers of articles containing a substance appearing on the UK SVHC Candidate List in a concentration above 0.1% w/w are legally obligated to provide recipients with sufficient information to ensure the safe use of the article, as mandated by Article 33 of REACH. This information should, at the very least, include the name of the substance. Equally important, this information must be made available to consumers (the general public) upon request and should be provided within 45 days of receiving such a request.

Utilize CDX for Seamless Compliance:

To ensure your compliance as both a manufacturer and supplier with the UK REACH Candidate List, we strongly recommend using CDX for sending requests and gathering SVHC data from your supply chain. Keeping your customers informed about the presence of SVHCs in your products is not just good practice, it's a legal requirement. You can achieve this by leveraging our "Where to Use" tool to assess the presence of SVHC substances in your products, particularly when they exceed the specified threshold.

European Union

EU's Drive to Expand Regulation of Persistent Organic Pollutants

The European Commission has launched three initiatives with the goal of incorporating methoxychlor (CAS No. 72-43-5), dechlorane (CAS No. 13560-89-9), and UV-328 (CAS No. 25973-55-1) into Annex I of the European Union's (EU) persistent organic pollutants (POPs) regulation. Regulation (EU) 2019/1021 serves as the instrument for the implementation of the EU's international commitments in alignment with the Stockholm Convention. Article 3 of this regulation dictates that the production, introduction to the market, and utilization of substances listed in Annex I to Regulation (EU) 2019/1021 are categorically forbidden, regardless of whether they are employed independently, as components of mixtures, or as constituents of articles. Exemptions do exist for substances used in laboratory-scale research, as reference standards, and in cases of unintentional trace contamination. Specific exemptions for each substance are meticulously outlined within Annex I.

In light of recent additions to Annex A of the Stockholm Convention, the EU is proposing the inclusion of the following substances into Annex I of its POPs regulation:

- Methoxychlor, primarily used as a pesticide.
- Dechlorane Plus, a flame retardant routinely incorporated into plastic applications, including those used in motor vehicles, industrial machinery, and medical devices.
- UV-328, a UV absorbent commonly employed as a plastic additive in various applications, such as motor vehicles, industrial machinery, and medical devices.

These initiatives are currently in the preparatory phase and are anticipated to be officially adopted in the fourth quarter of 2023. Notably, there are no penalties associated with non-compliance related to this regulatory update.

For additional information concerning [methoxychlor](#), [dechlorane Plus](#), and [UV-328](#), please refer to the provided source.

ECHA's Partnership with the European Commission in Battery Regulation

In accordance [with Regulation \(EU\) 2023/1542 of the European Parliament and the Council, issued on July 12, 2023](#), addressing batteries and waste batteries, the European Chemicals Agency (ECHA) has been entrusted with a pivotal role in supporting the European Commission. This support involves the identification of substances of concern present in batteries or employed in their manufacturing processes.

Under this regulation, a comprehensive report is expected to be drafted by December 31, 2027. The report holds the potential to introduce additional restrictions on substances within batteries, surpassing the existing limitations pertaining to mercury, cadmium, and lead.

ECHA's active participation in this process ensures that any new or modified restrictions on substances in batteries will be seamlessly aligned with the REACH Regulation (EC) 1907/2006. ECHA is assigned various responsibilities related to the assessment of risks associated with substances used in battery manufacturing and usage, including pertinent considerations regarding end-of-life aspects. This allocation of tasks enhances the effectiveness of decision-making, and it facilitates the coordinated management of the associated technical, scientific, and administrative aspects outlined in the Batteries Regulation.

The Batteries Regulation marks a significant milestone as the first EU regulation to adopt a holistic life-cycle approach. This approach covers every aspect of batteries, from sourcing and manufacturing to usage and recycling. Consequently, regulatory issues linked to products and materials are increasingly integrated with concepts concerning end-of-life considerations.

New EU Battery Regulation Takes Over from the EU Battery Directive

In a significant development, the European Commission has introduced the new EU Battery Regulation, denoted as Regulation (EU) 2023/1542, which comes into effect on August 18, 2023. This regulation is set to replace the previous EU Battery Directive 2006/66/EC, which will be officially repealed on August 18, 2025.

The new EU Battery Regulation maintains a scope that aligns with the previous EU Battery Directive. It covers similar product categories, ensuring continuity in regulatory measures. However, this regulation introduces several noteworthy changes, including more stringent substance restrictions and enhanced labeling requirements.

Like its predecessor, the new EU Battery Regulation mandates that batteries shall not contain more than 0.0005% of Mercury (CAS No 7439-97-6) or its compounds by weight. Portable batteries are also subject to restrictions, with a limit of 0.002% for Cadmium (CAS No 7440-43-9) and its compounds.

Notably, the new regulation introduces an entirely new provision by restricting the usage of Lead (CAS No 7439-92-1) and its compounds in portable batteries. Starting from August 18, 2024, these batteries, whether or not incorporated into appliances, must not contain more than 0.01% of Lead by weight. Zinc-air button cells face a later restriction, commencing on August 18, 2028.

The new EU Battery Regulation maintains a continuation of the labeling requirements, but also introduces additional elements:

- Batteries containing more than 0.002% Cadmium or more than 0.004% Lead must be marked with the chemical symbol for the respective metal: Cd or Pb.
- Effective August 18, 2025, all affected products must be marked with a symbol indicating the separate collection of batteries.
- Commencing on February 18, 2027, all batteries must bear a QR code that provides access to critical information, including battery passports, declarations of conformity, reports, and waste battery management details.

Further labeling requirements are introduced:

- Starting on August 18, 2026, batteries must carry a label containing general information on batteries, including manufacturer details, battery category, and hazardous substances present, excluding Mercury, Cadmium, or Lead.
- Rechargeable portable batteries, Large Stationary Batteries (LMT), and Start, Light, and Ignition (SLI) batteries are required to display information on their capacity.
- Non-rechargeable portable batteries should carry a label indicating their minimum average duration for specific applications and are labeled as "non-rechargeable."

The EU's new Battery Regulation marks a pivotal shift in battery industry regulations. With expanded substance restrictions and enhanced product labeling requirements, businesses and manufacturers should adapt to meet the new compliance standards.

CDX: Powering Your EPR and Battery Regulation Compliance

Stay tuned with upcoming changes in CDX. Soon, we are going to introduce enhancements to the current battery regulation. This will enable you to prepare for the Battery Regulation and collect the necessary data to meet Extended Producer Responsibilities. This expansion of CDX capabilities underscores our commitment to facilitating your compliance with evolving regulations and ensuring a seamless transition into a more sustainable and responsible future.

Stay informed, stay compliant, and stay ahead with the latest updates in European battery regulations with CDX!

Exemptions for Mercury and Lead Added to Annex IV of the EU RoHS Directive

In July, the European Commission made significant updates to the EU RoHS Directive by introducing two new exemptions. These exemptions pertain to Mercury and Lead and provide specific guidelines for their usage.

On July 11, the European Commission added a new exemption, [Entry 49](#), to Annex IV of Directive 2011/65/EU. This exemption permits the use of "Mercury in melt pressure transducers for capillary rheometers operating at temperatures exceeding 300°C and pressures surpassing 1,000 bar." It is applicable to category 9 and is effective until December 31, 2025.

On July 24, another exemption, [Entry 41a](#), was introduced to Annex IV of Directive 2011/65/EU. This exemption allows the use of "Lead as a thermal stabilizer in polyvinyl chloride (PVC) utilized as a base material in amperometric, potentiometric, and conductometric electrochemical sensors, which are used in in vitro diagnostic medical devices for the analysis of creatinine and blood urea nitrogen in whole blood." Entry 41a applies to category 8 and is in effect until December 31, 2023.

Both exemptions became effective on the twentieth day following their publication.

Streamlining Compliance: CDX's Solution for EU RoHS Directive Exemptions

The EU RoHS Directive encompasses a range of exemptions, each with varying expiration dates. As these expiration dates approach, many exemptions are renewed with updated timeframes. Managing these changes and keeping track of the evolving landscape of RoHS exemptions can be a complex and time-consuming task.

Fortunately, CDX offers a solution to streamline this process. With CDX, you can effectively track your RoHS compliance and empower your suppliers to assign the relevant RoHS exemptions at the component and subcomponent levels. This tool simplifies the compliance process and ensures that you stay aligned with the latest regulatory requirements.

EU's Proposal for ELV Regulation Overhauls the Automotive Industry

The European Commission unveiled a [proposal for an ELV \(End-of-Life Vehicles\) Regulation on July 13, 2023, aimed at superseding Directive 2000/53/EC on end-of-life vehicles and Directive 2005/64/EC on the type-approval of motor vehicles](#)

[concerning reusability, recyclability, and recoverability](#). This proposal outlines strategic measures to reduce reliance on imported raw materials and foster sustainable, circular business models.

One key provision in the proposal mandates that a minimum of 25% of the plastic used in the construction of new vehicles must originate from recycled sources, with a specific requirement that 25% of this recycled plastic must be sourced from end-of-life vehicles. Furthermore, the proposal calls for a feasibility study to determine a minimum percentage of steel recycled from post-consumer steel waste that should be incorporated into the manufacturing process.

The proposed regulation primarily impacts the automotive industry and its intricate supply chain. This initiative underscores the EU's commitment to reducing environmental impact, promoting resource efficiency, and fostering the development of a circular economy within the automotive sector.

[Feedback](#) may be provided through the portal of the European Commission.

Join us for our upcoming webinar on December 14th, 'California Proposition 65 Evolution & Updates: What's New & What's on the Horizon'. Don't miss out – register here: <https://public.cdssystem.com/en/web/cdx/events>

If you would like to learn more or discuss how our solutions can help your business grow, please contact the CDX Team at: cdx-info@dxc.com.

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Your CDX Team



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