

SPP 74
Product Marking and Documentation Requirements



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1. Introduction

Various global requirements exist for proper marking of products and information in associated documents to help identify materials and substances used within the product that are of health and environmental concern. The markings and documentation are also used for subsequent recycling, reuse, or disposal of the item.

1.1 Purpose

The purpose of this document is to present X-Rite's general requirements for product marking and information in documents in order to comply with global health and environmental concerns. These general requirements are *in addition to* product specific markings and information that are typically included on a devices' nameplate and/or contained in the accompanying product user documentation.

1.2 Scope

The requirements in this document apply globally to all X- Rite business units and X- Rite suppliers.

Implementation of these requirements is mandatory for new product designs after the release of this document.

In the case of a discrepancy between this document and the referenced regulations, the referenced regulations in effect at the time of application take precedence unless the requirements specified herein are stricter.

2. References

- China - Management Methods for Controlling Pollution by Electronic Information Products
- China - SJ/T 11364-2006 Marking for Control of Pollution Caused by Electronic Information Products
- China - SJ/T11363-2006 Requirements for Concentration Limits for Certain Hazardous Substances in Electronic Information Products
- China - SJ/T11365-2006 Testing Methods for Hazardous Substances in Electronic Information Products
- China – Waste Electrical and Electronic Equipment (WEEE) Law State Environmental Protection Administration Order No. 40 Management Measures for the Control of Environmental Pollution by Electronic Waste
- EU – Directive 2002/96/EC of the European Parliament and of the Council of 27 January 2003 on waste electrical and electronic equipment (WEEE).

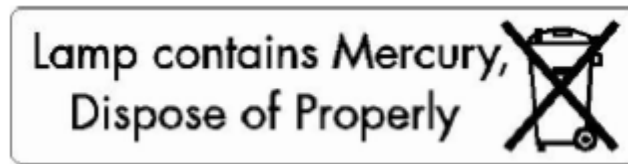
3. Requirements

3.1 North America

3.1.1 Mercury Containing Product Label

Any products containing elemental mercury that are sold in North America shall be labeled with a mercury warning label. Examples include LCD displays, Notebook PCs with LCD displays, integrated PCs with LCD displays, digital projector lamps, fluorescent light fixtures (including those sold as replacement parts), printers, multifunction imaging products, and scanners.

Note: Products with mercury-containing backlights for LCD displays with a screen size less than 7 inches diagonal do not have to be labeled (on the product).



The text portion of the label – “Lamp contains Mercury, Dispose of Properly” should be placed in close proximity (below or to the side of the crossed out CENELEC compliant WEEE wheeled bin label/symbol) as shown in the above figure.

3.1.2 Mercury Documentation Notice

User literature for products containing mercury (such as display backlight lamps containing mercury) sold in the United States shall include the following user information statement:

(Note: Only relevant bulleted items, such as those shown in the below list, should be included in the statement.)

“Materials disposal

This X-RITE product contains the following materials that might require special handling at end-of-life:

- *Mercury in the fluorescent lamp in the display LCD.*
- *Mercury in the user replaceable fluorescent lamp.*

Disposal of mercury can be regulated because of environmental considerations. For disposal or recycling information, please contact your local authorities or the Electronic Industries Alliance (EIA) (<http://www.eiae.org>).”

3.1.3 California Rechargeable Battery Take-back Notice

For products sold in California containing rechargeable batteries, product user documentation shall include the following notice: *X-Rite encourages customers to recycle used electronic hardware and rechargeable batteries.*

3.1.4 California Perchlorate Material Notice

For products sold in California containing perchlorate chemistry (CR type button cells -such as are used for PC memory or real-time clock backup), the following English language notice shall be incorporated into product user information. Hard or soft copy is acceptable.

Perchlorate material - special handling may apply See

<http://www.dtsc.ca.gov/hazardouswaste/perchlorate/>

This product's real-time clock battery or coin cell battery may contain perchlorate and may require special handling when recycled or disposed of in California.

3.2 China RoHS Requirements

The Chinese Ministry of Information Industry "Management Methods for Controlling Pollution Caused by Electronic Information Products Regulation" spells out Chinese policy on the Restriction of Hazardous Substances (RoHS) used in Electronic Information Products.

This document defines requirements for product labeling and hazardous substance level disclosure. The following three separate industry standards were developed to describe the requirements:

- Labeling - SJ/T11364-2006 "Marking for Control of Pollution Caused by Electronic Information Products"
- Maximum concentration levels - SJ/T 11363-2006 "Requirements for Concentration Limits for Certain Hazardous Substances in Electronic Information Products"
- Testing methods - SJ/T 11365-2006 "Testing Methods for Hazardous Substances in Electronic Information Products"

The primary product marking requirements from this regulation is the China RoHS Environmental Protection Use Period (EPUP) label as described below.

3.2.1 Labeling

Products that are in scope of the China RoHS labeling requirements include all main products (units), accessory and option products, and spare parts sold for revenue outside of warranty coverage. Blank CD/DVD media are considered electronic products and must follow these requirements. Accessory or option products that do not carry electrical current, such as a carrying case or a monitor stand with no electrical connections, are considered out of scope.

3.2.2 Labeling Exceptions

Products that are of irregular shape (which does not have a flat surface large enough to accommodate the EPUP label; such as a USB cable) or have a surface area less than 50 cm² may place the EPUP label in documentation that accompanies the product rather than on the product itself.

Individual components of a product, such as a memory module that is part of a PC, are not required to bear the EPUP label when they are sold as part of another product. They are required to bear the EPUP label if they are sold as a stand-alone accessory.

3.2.3 EPUP Label

The EPUP label contains a number that identifies a “Environmental Protection Use Period”, measured in years, from the date of production. Unless otherwise stated, the EPUP number for X-Rite designed product (manufactured internally or by a contract manufacturer) is “20”.

The EPUP logo shall not be colored any shade of green. The labeling requirements are defined by SJ/T 11364-2006. The minimum label diameter is 5 mm. Contrasting colors are acceptable. If the label is molded into plastic, contrasting colors are not required.



3.2.4 Date Code

A product Date Code label is required on an exterior surface of the product for any products containing any Lead (Pb), Cadmium (Cd), Hexavalent Chromium (Cr6), Mercury (Hg), Polybrominated Biphenyls (PBB), and Polybrominated Diphenyl Ethers (PBDE) in concentrations over 1000 ppm and (100 ppm for Cd) measured at the homogenous material level.

Any product requiring an EPUP label, also requires a Date Code label that represents the date of production or the date of packaging on either the exterior of the product or the product carton.

Products that do not contain RoHS materials over threshold levels have no unique date code requirements.

3.2.5 e Label on Products and User Documentation

Electronic products that do not contain any of the China RoHS materials above the threshold levels may bear the “e label” on the product as shown.



Electronic products that do not contain any of the China RoHS materials above the threshold levels must bear the e label in product documentation that accompanies the product when shipped.



China RoHS —e label notice:

This product does not contain any of the RoHS materials above the applicable threshold levels and is therefore eligible for the China RoHS “e” label:

Exception: This product documentation requirement does not apply if the product is physically labeled with the "e" label.

3.2.6 China RoHS Material Content Disclosure

All products that are within scope of China RoHS shall include a notice in the product care and use manual according to the requirements specified below.

Products that are required to be labeled with the EPUP label shall include a China RoHS Hazardous and Toxic Substance Disclosure Table. The declaration must be published in simplified Chinese. Other languages are not required, but publishing in English may be recommended as it simplifies dialog with X-Rite customers (OEMs) who may re-ship X-Rite products into China and desire to visually confirm compliance with China RoHS.

The table (see example below) discloses hazardous substance concentration values above or below the limit requirements defined in SJ/T 11363-2006. An "X" or "O" in the table row identifies whether a hazardous substance is present for each major component of the product.

Example China RoHS Disclosure Table

Component Name	Toxic or Hazardous Substances and Elements					
	Lead (Pb)	Mercury (Hg)	Cadmium (Cd)	Hexavalent chromium (Cr ⁶⁺)	Polybrominated biphenyls (PBB)	Polybrominated diphenyl ethers (PBDE)
Printed circuit card assembly	X	O	O	O	O	O
Metal enclosure	X	O	O	X	O	O
Etc.						

O: Indicates that the toxic or hazardous substance contained in all of the homogeneous materials for this part is below the limit requirement.

X: Indicates that the toxic or hazardous substance contained in at least one of the homogeneous materials used for this part is above the limit requirement.

3.3 European Union Requirements

3.3.1 User Information for the Disposal of WEEE

The Waste Electrical and Electronic Equipment (WEEE) Directive applies to all products placed on the EU market that depend on electric currents or electromagnetic fields to function properly or products for

the generation, transfer, and measurement of such currents and fields. It does not apply to printing supplies or to batteries. The labeling and user information requirements do not apply to spare parts or upgrade parts intended to be incorporated into and made part of the main product.

The following statement must be included with the product in either the printed or electronic user instruction literature:

RoHS/WEEE X-Rite products meet the European Union – Waste Electrical and Electronic Equipment (WEEE) Directive 2002/96/EC. Please refer to www.xrite.com for more information on X-Rite's compliance with the WEEE directive.



3.3.2 Battery User and Service Manual Statements

The EU Battery Directive applies to all products put on the market in EU countries. The specific user and service manual statements appearing here must be provided for all products put on the EU market on or after September 26, 2008.

For all products that contain rechargeable, AA, AAA, or coin cell batteries intended to be replaced by the end user, the following user manual statements apply. (This requirement does not apply to batteries that are permanently affixed to ensure a permanent connection for data integrity reasons.)

- Product documentation must describe or depict how the user can safely remove and replace the battery pack.
- Product manual must alert the user to any hazardous material if such materials are present.

For all products that contain rechargeable, AA, AAA, or coin cell batteries intended to be replaced or serviced by a service technician the following service manual statements apply.

- Product service manual must describe or depict how the service provider can remove and replace the battery pack
- Service manual must alert the service provider to any hazardous material if such materials exist
- Batteries that are required for data integrity reasons (are permanently affixed) or are nonhazardous are exempt from requiring statements in user or service documentation.



4. Product End of Life Declarations

Product Disassembly Instructions are encouraged for all X-Rite products to address product recycling, reuse, disposal and treatment and to identify components, materials, and the locations of identified hazardous substances. Product Disassembly Instructions are to be developed for the highest practical level of products sold (the model or model series). All X-Rite partners and suppliers are encouraged to provide these disassembly instructions for all the articles they provide. In some cases, such instructions may be mandated by X-Rite customers. It is also likely that such instructions will eventually be required by various regional regulations.

The following categories of parts are to be identified in the disassembly documentation:

- a) Printed circuit boards with a surface greater than 10 square centimeters
- b) Liquid crystal displays (LCDs) with a surface greater than 100 square centimeters
- c) Batteries (all types)
- d) Capacitors or condensers that contain polychlorinated biphenyl or polychlorinated terphenyl (PCB or PCT)
- e) Electrolytic capacitors or condensers that measure greater than 25 mm in diameter or height
- f) Components that contain mercury
- g) Plastics that contain brominated flame retardants weighing > 25 grams (not including PCBs or PCAs already listed as a separate item above)
- h) Chlorofluorocarbons (CFC), hydrochlorofluorocarbons (HCFC), hydrofluorocarbons (HFC), hydrocarbons (HC)
- i) Gas discharge lamps
- j) External electric cables and cords
- k) Components that contain asbestos
- l) Components, parts, and materials that contain refractory ceramic fibers
- m) Components, parts, and materials that contain radioactive substances

Revision History

Revision	Change
A, June 18 2009	SJW - Initial release