

Public Consultation on the RoHS Evaluation

Fields marked with * are mandatory.

Introduction

The rise in the production and usage of electrical and electronic products, such as mobile phones, computers and kitchen appliances, has resulted in an increasing volume of electrical and electronic waste.

During the collection, treatment and disposal of the waste, the products may release harmful (hazardous) substances such as lead, mercury and cadmium. These hazardous substances may even be released during the use of the product.

To address such challenges, EU legislation restricts the use of certain hazardous substances in electrical and electronic equipment (the RoHS Directive (2011/65/EU)). Currently, it restricts the use of ten substances: lead, cadmium, mercury, hexavalent chromium (chromium (VI)), polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE), bis(2-ethylhexyl) phthalate (DEHP), butyl benzyl phthalate (BBP), dibutyl phthalate (DBP) and diisobutyl phthalate (DIBP). All products with an electrical and electronic component, unless specifically excluded, have to comply with these restrictions.

The legislation protects human health and the environment. It also contributes to the free movement of goods within the EU, encourages development of innovative products and technologies, and inspires non-European countries to pass similar laws.

The purpose of this consultation is to gather views of consumers, civil society and other organisations on how the restriction of hazardous substances in electronic products works in practice.

The views will help the Commission in assessing what works well, what not and why.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian

- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

* Surname

* Email (this won't be published)

* Scope

- International
- Local
- National
- Regional

Please specify whether you are primarily involved in

- The implementation of the RoHS Directive
- The enforcement and/or monitoring of the RoHS Directive
- Both of the above
- Other

If other, please specify:

* Organisation name

255 character(s) maximum

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Please specify whether your annual turnover is

- ≤ 2 million euros
- ≤ 10 million euros
- ≤ 43 million euros
- > 43 million euros
- I prefer not to disclose this information

Please specify whether you are primarily involved as or represent:

- Raw material supplier
- Manufacturer of components to be integrated into finished electrical and electronic equipment
- Manufacturer of finished electrical and electronic equipment
- Distributor/ Importer
- Waste manager
- Other

* If other, please specify:

Please specify which of the following RoHS categories of electrical and electronic equipment you deal with (maximum of three choices):

- Large household appliances such as refrigerators, microwaves, washing machines or air conditioner appliances
- Small household appliances such as vacuum cleaners, irons, electric knives or appliances for hair-cutting, hair drying or tooth brushing
- IT and telecommunications equipment such as printers, computers, telephones or other products or equipment transmitting sound, images or other information by telecommunications
- Consumer equipment such as radios, televisions, video cameras or audio amplifiers
- Lighting equipment such as straight fluorescent lamps, compact fluorescent lamps, high intensity discharge lamps or low pressure sodium lamps

- Electrical and electronic tools such as drills, saws, sewing machines or tools for mowing or other gardening activities
- Toys, leisure and sports equipment such as electric trains, hand-held video game consoles or sports equipment with electric or electronic components
- Medical devices such as radiotherapy equipment, dialysis, cardiology or laboratory equipment
- In vitro diagnostic medical devices
- Monitoring and control instruments such as smoke detectors, heating regulators or thermostats
- Industrial monitoring and control instruments such as control panels
- Automatic dispensers such as for hot drinks, solid products or money
- Other equipment not covered by any of the categories above

* If other, please specify:

Please specify whether your organisation primarily works in the field of...

- Health
- Environment
- Other

* If other, please specify:

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

* **Country of origin**

Please add your country of origin, or that of your organisation.

- | | | | |
|--------------------------------------|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |

- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago

- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

*** Please select the statement(s) that best apply to you**

(Your choice(s) will define the parts of the survey that you have access to):

- You are a citizen with a general interest in hazardous substances in electrical and electronic equipment
- You have specific knowledge in the domain of hazardous substances in electrical and electronic equipment and/or Directive 2011/65/EU

Questionnaire for citizens with a general interest in the domain of hazardous substances in electrical and electronic equipment

1. Has the legislation helped to reduce the use of hazardous substances in electrical and electronic equipment?

- Yes
- No
- I don't know

2. Has the legislation helped to ensure the free movement of electrical and electronic equipment throughout the EU?

- Yes
- No
- I don't know

3. Do you know what it means when an electrical or electronic equipment is marked with the symbol below?

- Yes
- No



When you buy a new phone, computer or another electrical or electronic product, you may find the CE marking on them. This label means that the product has been assessed by the responsible economic operator to meet the high safety, health and environmental protection requirements imposed by EU law and can be sold throughout the European Economic Area (EU Member States and Norway, Iceland and Liechtenstein).

500 character(s) maximum

4. Do you feel informed about the potential dangers of hazardous substances in electrical and electronic equipment to human health and the environment?

- Very well informed
- Informed
- Not at all informed
- Don't know

5. Where do you generally find information about the potential dangers of hazardous substances in electrical and electronic equipment?

- Through companies that produce or sell the products
- Through NGOs or consumer organisations
- In the media
- On the internet
- Through public authorities
- Through family, friends or relatives
- Other
- Don't know

If other, please specify:

500 character(s) maximum

6. In your opinion, is any additional type of information needed to increase the awareness of the potential dangers of hazardous substances in electrical and electronic equipment?

500 character(s) maximum

7. When purchasing electrical and electronic equipment, how important is it to you that they do not contain hazardous substances such as lead, mercury or cadmium?

- Very important
- Important
- Not important at all
- Don't know

8. Do you think restrictions on hazardous substances in electrical and electronic equipment are necessary in order to protect **the environment?**

- Yes
- No
- Don't know

If yes, even if such restrictions might result in higher prices of electrical and electronic equipment for you?

- Yes
- No
- I do not know

If yes, how much more are you willing to pay for electrical and electronic equipment to ensure that this equipment is not harmful to the environment?

- I am willing to pay up to 5 % more
- I am willing to pay between 5 % and 10 % more
- I am willing to pay more than 10 % more
- Don't know

9. Do you think the restrictions on hazardous substances in electrical and electronic equipment are necessary in order to protect human health?

- Yes
- No
- I do not know

If yes, even if such restrictions result in higher prices of electrical and electronic equipment for you?

- Yes
- No
- I do not know

If yes, how much more are you willing to pay for electrical and electronic equipment to ensure that this equipment is not harmful to human health?

- I am willing to pay up to 5 % more
- I am willing to pay between 5 % and 10 % more
- I am willing to pay more than 10 % more
- Don't know

10. To what extent do you agree with the following statements:

	STRONGLY AGREE	AGREE	DISAGREE	STRONGLY DISAGREE	I DO NOT KNOW
EU rules on hazardous substances in electrical and electronic equipment help reduce damage to the environment	<input type="radio"/>				
EU rules on hazardous substances in electrical and electronic equipment at a European level help reduce damage to human health	<input type="radio"/>				
EU rules on hazardous substances in electrical and electronic equipment at a European level help ensure the environmentally-friendly collection and treatment of electrical and electronic waste	<input type="radio"/>				

11. Are you aware of any recent incident(s) in your country where hazardous substances in electrical and electronic equipment had negative impacts on human health or the environment?

- Yes
- No

If yes, please describe what you know about the recent incident(s):

1000 character(s) maximum

12. Do you feel safe using electrical and electronic equipment that was produced

	VERY SAFE	SAFE	NOT SAFE AT ALL	I DO NOT KNOW
In the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Outside the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

13. Compared with 10 years ago, do you think that the chemical safety of electrical and electronic equipment produced and sold in Europe has...

- Improved
- Stayed more or less the same
- Declined
- Don't know

14. Do you bring your electrical and electronic waste to recycling/collection points?

- Yes, always
- Yes, but only large equipment (any external dimension more than 50 cm)
- Most of the time
- Rarely
- No, never

15. How important is it to recycle electrical and electronic waste?

- Very important
- Important
- Not important
- Don't know

16. How important is it to try to repair electrical and electronic equipment rather than buying it new?

- Very important
- Important
- Not important
- Don't know

17. Which of the following product(s) you would try to have repaired before buying a new product:

- Mobile phone
- Computer
- Television
- Washing machine
- Refrigerator
- Vacuum cleaner
- Hair dryer
- Earphones
- Other
- Don't know

If other, please specify:

500 character(s) maximum

18. Please indicate the main reasons for buying a new electrical or electronic product rather than trying to repair it first:

- Spare parts are difficult to find
- Spare parts are too expensive
- Repair services are difficult to find
- Repair services are too expensive
- I want to replace my old product with the latest version on the market
- Other
- Don't know

If other, please specify:

500 character(s) maximum

19. Who do you think should ensure the chemical safety of electrical and electronic equipment in the EU?

- Authorities of the European Union
- National authorities
- Manufacturers themselves
- Don't know
- Other

If other, please specify:

500 character(s) maximum

20. Without EU law, if measures had been taken at national level only, what do you think it would be like in your country in terms of:

	MUCH BETTER	BETTER	THE SAME	WORSE	MUCH WORSE	DON'T KNOW
Protecting human health	<input type="radio"/>					
Protecting the environment	<input type="radio"/>					

Questionnaire for stakeholders and individuals with special knowledge in the domain of hazardous substances in electrical and electronic equipment

Effectiveness

The following questions aim to evaluate the effectiveness of the Directive by determining to what extent its objectives have been achieved as well as by identifying the factors that contribute to or stand in the way of reaching such objectives. The questions furthermore aim to determine if any unexpected or unintended effects linked to the Directive have occurred.

Human health and environment

1. Has the RoHS Directive helped to reduce the use of hazardous substances in electrical and electronic equipment placed on the market?

	Yes	No	Don't know
Electrical and electronic equipment produced and sold in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Electrical and electronic equipment produced in the EU and sold outside the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Electrical and electronic equipment produced outside the EU and sold in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If yes, please indicate the strength of the reduction for the relevant substance (s):

	STRONG	LIMITED	NO EFFECT	DON'T KNOW
Lead	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mercury	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cadmium	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hexavalent chromium	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Polybrominated biphenyls (PBB)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Polybrominated diphenyl ethers (PBDE)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bis(2-ethylhexyl) phthalate (DEHP)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Butyl benzyl phthalate (BBP)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dibutyl phthalate (DBP)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Diisobutyl phthalate (DIBP)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. Has the RoHS Directive helped to protect human health?

- Yes
- To a limited extent
- No
- Don't know

What factors contributed to or stood in the way of protecting human health?

500 character(s) maximum

3. Has the RoHS Directive helped to reduce damage to the environment?

- Yes
- To a limited extent
- No
- Don't know

What factors contributed to or stood in the way of reducing damage to the environment?

500 character(s) maximum

4. Has the RoHS Directive helped to ensure the free movement of electrical and electronic equipment throughout the EU?

- Yes
- To a limited extent
- No
- Don't know

Please elaborate:

500 character(s) maximum

5. Has the RoHS Directive facilitated the environmentally sound collection and treatment of electrical and electronic waste?

- Yes

- To a limited extent
- No
- Don't know

What factors contributed to or stood in the way of facilitating the environmentally friendly collection and treatment of electrical and electronic waste?

500 character(s) maximum

6. In terms of collecting and recycling electrical and electronic waste, to what extent do you agree with the following statements

	STRONGLY AGREE	AGREE	DISAGREE	STRONGLY DISAGREE	DON'T KNOW
I know what to do with electrical and electronic waste	<input type="radio"/>				
It is easy to recycle electrical and electronic waste	<input type="radio"/>				

7. In terms of collecting and recycling electrical and electronic waste, to what extent do you agree with the following statements

	STRONGLY AGREE	AGREE	DISAGREE	STRONGLY DISAGREE	DON'T KNOW
Presence of hazardous substances hinders the recycling of electrical and electronic waste	<input type="radio"/>				
The information on presence of hazardous substances in electrical and electronic waste is sufficient	<input type="radio"/>				
The way in which electrical and electronic waste is recycled reduces risks to the environment	<input type="radio"/>				
The way in which electrical and electronic waste is recycled reduces risks to human health	<input type="radio"/>				
The information available on the results of electrical and electronic waste treatment is sufficient	<input type="radio"/>				

8. The following hazardous substances hinder environmentally sound treatment of waste electrical and electronic equipment (WEEE)

	STRONGLY AGREE	AGREE	DISAGREE	STRONGLY DISAGREE	DON'T KNOW
Lead	<input type="radio"/>				
Mercury	<input type="radio"/>				
Cadmium	<input type="radio"/>				
Hexavalent chromium	<input type="radio"/>				
Polybrominated biphenyls (PBB)	<input type="radio"/>				
Polybrominated diphenyl ethers (PBDE)	<input type="radio"/>				
Bis(2-ethylhexyl) phthalate (DEHP)	<input type="radio"/>				
Butyl benzyl phthalate (BBP)	<input type="radio"/>				
Dibutyl phthalate (DBP)	<input type="radio"/>				
Diisobutyl phthalate (DIBP)	<input type="radio"/>				
Other	<input type="radio"/>				

If other, please specify:

500 character(s) maximum

9. To your knowledge, has the Directive contributed to the decrease of the following hazardous substances in waste electrical and electronic equipment (WEEE)?

	Yes	No	Don't know
Lead	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mercury	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cadmium	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hexavalent chromium	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Polybrominated biphenyls (PBB)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Polybrominated diphenyl ethers (PBDE)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bis(2-ethylhexyl) phthalate (DEHP)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Butyl benzyl phthalate (BBP)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dibutyl phthalate (DBP)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Diisobutyl phthalate (DIBP)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10. Please specify to which specific stream of WEEE your answers apply.

500 character(s) maximum

11. To your knowledge, has the decrease of the listed hazardous substances in WEEE influenced waste treatment operations?

- Yes
- No
- I do not know

Please specify in what manner were the waste treatment operations influenced:

500 character(s) maximum

12. Is the RoHS Directive enforced by the responsible authorities in your country?

- Yes, fully
- To some extent
- Not at all
- Don't know

Please elaborate:

500 character(s) maximum

13. Are there differences in the enforcement of the RoHS Directive across EU countries?

- Yes
- No
- Don't know

Please elaborate:

500 character(s) maximum

14. Has there been any effect of the RoHS Directive on innovation?

- There has been a positive effect
- There has been a negative effect

- There has been no effect
- Don't know

Please provide an example highlighting the positive or negative effect of the Directive on innovation.

500 character(s) maximum

15. Has the RoHS Directive had any effect on your expenditure on research and investment?

- There has been a positive effect
- There has been a negative effect
- There has been no effect
- Don't know

Please provide an example highlighting the positive or negative effect of the Directive.

500 character(s) maximum

16. What has been the overall impact of the RoHS Directive in the EU on exports from the EU to a third country?

- Exports increased
- Exports decreased
- There has been no effect on exports to third countries
- Don't know

17. What has been the overall impact of the RoHS Directive in the EU on imports to the EU from a third country?

- Imports increased
- Imports decreased
- There has been no effect on imports from third countries
- Don't know

18. Are there specific examples that illustrate the effect of the Directive on trade?

500 character(s) maximum

19. Beyond the main objectives of the RoHS Directive, have there been any unexpected negative or positive changes as a result of this Directive?

500 character(s) maximum

Efficiency

The following questions aim to evaluate the efficiency of the Directive by identifying the main costs and benefits of implementing it. More importantly, this section aims to assess to what extent the benefits of the restriction on the use of hazardous substance justify the costs of the Directive. Furthermore, the aim of these questions is to obtain information and data to assess if there have been significant differences in costs and benefits between Member States as well as identifying if there was any possibility to increase efficiency. These questions aim at understanding whether the Directive has led to unnecessary burden or made the system unnecessarily complex.

20. What are the benefits of the Directive for the economy? Please select all that apply:

- Increased a level playing field for economic operators;
- Increased legal certainty regarding hazardous substances;
- Creation of jobs in customs, inspections
- Creation of jobs in electrical or electronic equipment waste treatment and recycling;
- Creation of jobs in R&D for electrical and electronic equipment
- Easier identification of whether electrical and electronic equipment are legally placed on the market through the CE mark;
- Trading costs are reduced when selling electrical and electronic equipment to a different Member State
- No benefits
- Other

* If other, please specify:

500 character(s) maximum

21. What are the benefits of the Directive for the environment? Please select all that apply:

- Led to a larger number of product designs of electrical and electronic equipment that are more circular in nature;
- The substance restrictions provided manufacturers with incentives to find alternatives to hazardous substances;
- Avoided emissions of hazardous substances into soil, air and water streams through reduction of use of hazardous substances in producing electrical and electronic equipment;
- Avoided emissions of hazardous substances from electrical or electronic equipment waste into soil, air and water streams;
- Avoided clean-up of emissions of hazardous substances from waste illegally dumped into the environment;
- Improved recyclability of electrical and electronic equipment;
- No benefits;
- Other

* If other, please specify:

500 character(s) maximum

22. What are the benefits of the Directive for the society? Please select all that apply:

- Avoided negative health effects on consumers from emissions of hazardous substances from electrical or electronic equipment waste;
- Avoided negative health effects on workers due to exposure to hazardous substances from production, use or end-of-life phase of electrical or electronic equipment;
- Avoided health costs to workers due to exposure to hazardous substances from production, use or end-of-life phase of electrical or electronic equipment;
- No benefits;
- Other

* If other, please specify:

500 character(s) maximum

23. Do your company/ the companies you represent have the obligations of a manufacturer under the RoHS Directive?

- Yes
- No
- Don't know

If it is not clear, please specify why:

500 character(s) maximum

24. What aspects of the RoHS Directive do you have to comply with? Please tick all that apply

- Restrictions
- Declaration of Conformity
- CE marking
- Other

If other, please specify:

500 character(s) maximum

24.1 How long does it take to complete a declaration of conformity?

- Less than one working hour
- Less than half a working day
- Less than a working day
- More than a working day

Don't know

24.2 How often do you have to update the declaration of conformity for a given product, please specify?

500 character(s) maximum

25. In your experience, what are the costs for your company/ the companies you represent triggered by the RoHS Directive (please consider both monetary and non-monetary costs)?

Please indicate from a scale of 0-10 the significance of the following costs:

Costs related to training and information measures;	
Costs of collecting and reviewing information;	
Costs related to a dedicated IT system to manage all required pieces of information;	
Costs related to the technical documentation;	
Costs related to the conformity assessments;	
Costs related to purchasing standards;	
Costs related to exemption procedures;	
Costs related to the adaptation to amendments to Annexes;	
Costs for complying with the rules for the CE mark;	
Getting supply chain information;	
Monetary losses related to RoHS 2 compliance;	

Capital expenditure;	
R&D expenditure;	
Operating expenditure;	
Other	

If other, please specify:

500 character(s) maximum

26. How many full time equivalent (FTE) employees do you have working on the RoHS compliance per year?

- None
- Less than 0.25
- Less than 0.5 FTE
- Less than 0.75 FTE
- Less than 1 FTE
- Less than 2 FTEs
- Less than 3 FTEs
- More than 3 FTEs
- Other
- Don't know

If other, please specify:

500 character(s) maximum

27. Have you made any initial investment to comply with RoHS?

- Yes
- No
- Don't know

Please express the initial investment costs due to RoHS compliance in percentage:

28. Has your operational costs/ the operational costs for the companies you represent increased due to the compliance with RoHS?

- Yes
- No
- Don't know

Please express the increase in operational costs due to RoHS compliance in percentage:

29. Do you think that the benefits of the Directive justify the costs of implementation?

- Yes
- No
- Don't know

30. Have you encountered problems to place an electrical and electronic on the market in the EU?

- Yes
- No
- Don't know

31. How significant are the following problems? 5 = most significant, 1 = least significant

	1	2	3	4	5
It is difficult to decide whether a product is an electrical and electronic equipment or not.	<input type="radio"/>				
It is difficult to decide whether a product is excluded from scope or not.	<input type="radio"/>				
The categories of Annex I are not well defined.	<input type="radio"/>				
Existing guidance documents are not sufficient.	<input type="radio"/>				
The rules for the CE marking are not clear.	<input type="radio"/>				
The system of exemptions is too complex.	<input type="radio"/>				
Market surveillance is acting differently in different Member States.	<input type="radio"/>				
Internet shops cannot be effectively controlled.	<input type="radio"/>				
Sanctions for non-compliance are different in different Member States.	<input type="radio"/>				
Sanctions for non-compliance are too strict.	<input type="radio"/>				
Customs authorities have to refer to the market surveillance authority in case they suspect that an electrical and electronic equipment is non-compliant. This blocks my imports.	<input type="radio"/>				
Market surveillance is not always targeting the 'bad guys'.	<input type="radio"/>				
Other	<input type="radio"/>				

If other, please specify:

500 character(s) maximum

32. Have you encountered problems to place electrical and electronic equipment on markets outside the EEA with similar legislation as the RoHS Directive?

- Yes
- No
- Don't know

If yes, please specify the country:

33. Has the Directive decreased differences in the administrative processes relating to RoHS compliance among Member States?

- Yes
- No
- Don't know

If yes, please provide examples of how has the Directive decreased differences in the administrative processes among Member States

500 character(s) maximum

34. Please specify any provision of the RoHS Directive that is particularly efficient

500 character(s) maximum

35. Please specify any provision of the RoHS Directive that is particularly inefficient

500 character(s) maximum

36. What has been the effect of the RoHS Directive on the competitiveness and comparative advantage of your company/ the companies you represent?

	INCREASED	NO EFFECT	DECREASE	DON'T KNOW
Production costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Prices for consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Margins for producers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Don't know	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

37. Are you aware of the possibility to ask for exemptions from the substance restrictions set by the RoHS Directive?

- Yes
- No

38. Has your organisation or company...

- Asked for an exemption
- Considered asking for an exemption
- Not asked for an exemption

Please specify why

- No need to ask for one
- Complex processes
- Other
- Don't know

If other, please specify

39. To which extent does the exemption system generate administrative burden?

- To a large extent
- To some extent
- To a small extent
- Not at all
- Don't know

Coherence

The following questions aim to evaluate the coherence of the Directive with other EU legislation and the internal coherence of the Directive. More importantly, this section aims to understand how the presence or lack of coherence impacts the functioning of the Directive. Additional questions seek to explore whether the Directive has influenced the development of similar legislation in jurisdictions outside the EU.

40. The RoHS Directive interacts with other EU legislation and standards. Are you aware of any unnecessary overlaps, gaps and contradictions between the Directive and the following EU legislation

	Yes	No	Don't know
Waste Framework Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste Electrical and Electronic Equipment (WEEE) Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

End-of-life vehicles (ELV) Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Batteries Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste Shipment Regulation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Classification, Labelling and Packaging (CLP) Regulation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Persistent Organic Pollutants (POP) Regulation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regulation on accreditation and market surveillance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Eco-design Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

If yes, please explain and indicate which impact this may have on the functioning of the Directive:

500 character(s) maximum

41. Are you aware of any different limit values for chemicals applying to the same products in other EU or national legislation?

- Yes
- No
- Don't know

If yes, please specify:

500 character(s) maximum

42. Have you encountered any gaps, contradictions, overlaps or missing links within the Directive?

- Yes
- No
- Don't know

Please explain and indicate which impact this may have on the functioning of the Directive:

500 character(s) maximum

43. Has the Directive had a notable influence on the development, structure and functioning of legislation concerning the restriction of hazardous substances in electrical and electronic equipment in jurisdictions outside the EU?

- Yes
- No
- Don't know

Please explain and provide examples if relevant:

500 character(s) maximum

Relevance

The following questions aim to evaluate to what extent the issues or problems addressed by the Directive still exists and whether the objectives of the Directive are adequate to address those issues.

44. To what extent do you agree that there is still a need for EU legislation on hazardous substances in electrical and electronic equipment to achieve the following objectives?

	STRONGLY AGREE	AGREE	DISAGREE	STRONGLY DISAGREE	DON'T KNOW
Protection of human health	<input type="radio"/>				
Protection of the environment	<input type="radio"/>				
Ensuring the environmentally sound recovery and disposal of electrical and electronic waste	<input type="radio"/>				
Ensuring a well- functioning internal market	<input type="radio"/>				

45. Does the list of restricted substances (Annex II) require any modifications? Please select all that apply

- No modifications required
- It requires the listing of new substances
- It requires the de-listing of substances
- It requires the change of concentration values
- Don't know

Please describe in what manner the list of restricted substances (Annex II) requires adaptations

500 character(s) maximum

46. Annexes III and IV of the Directive provide a list of applications exempt from the restriction of Article 4. Is this list up-to-date with the most recent technical and scientific progress?

- Yes
- No
- Don't know

Please describe which elements of the list of exempted applications are not up-to-date and for which reason

500 character(s) maximum

47. To what extent do you agree that the application and assessment process for the adaptation of Annexes III and IV to scientific and technical progress (Art. 6 of the Directive) is fit for purpose?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know

Please describe which aspects of the application and assessment process are not fit for purpose and in what respect

500 character(s) maximum

48. To what extent do you agree that the obligations which the Directive lays down for the following actors are still sufficient to ensure the continued achievement of the Directive's objectives?

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know
Manufacturers of electrical and electronic equipment	<input type="radio"/>				
Authorised representatives of manufacturers	<input type="radio"/>				
Importers of electrical and electronic equipment	<input type="radio"/>				
Distributors of electrical and electronic equipment	<input type="radio"/>				

Please specify which obligation is considered insufficient and/or which additional obligations are required

500 character(s) maximum

49. Are you aware of any issues related to hazardous substances in electrical and electronic equipment that the RoHS Directive does not address?

500 character(s) maximum

EU added value

The following questions aim to compare what has been achieved through the implementation of the Directive with what could have been achieved by Member States acting at national, regional and at international levels alone. Additional questions seek to assess whether the issues addressed by the Directive continue to require action at EU level.

50. What consequences do you think would the withdrawal of the RoHS Directive have for achieving the objectives of the Directive?

	POSITIVE CONSEQUENCES	NO CONSEQUENCES	NEGATIVE CONSEQUENCES	DON' T KNOW
Protection of human health	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protection of the environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmentally sound recovery and disposal of electrical and electronic waste	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring a well-functioning internal market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

51. Are there any activities or tasks currently performed at EU level that should be performed by Member States instead?

500 character(s) maximum

52. In your opinion, who should be responsible for ensuring the safety of hazardous substances contained in electrical and electronic equipment in the EU?

- Authorities of the European Union
- National authorities
- Manufacturers themselves
- Don't know
- Other

If other, please specify

53. To what extent do you agree with the following statements concerning the EU added value of RoHS

	Agree	Do not agree	Do not know
RoHS creates a large market for the same electrical and electronic equipment.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
RoHS creates market for the same electrical and electronic equipment outside the EEA.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
RoHS simplifies the trade of electrical and electronic equipment in the EU.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
RoHS supports innovation and use of hazardous-free products.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Additional comments

If you have any further comments, please add them in the box below:

1000 character(s) maximum

If you wish to share any evidence reports, studies or position papers, please upload them here.

Please note that the uploaded document(s) will be published alongside your response to the questionnaire, which is the essential input to this online public consultation. The document is an optional complement and serves as additional background reading to better understand your position.

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