

EU 法院對於 REACH 規範下成品認定

敬啟者,

歐盟法院已於 2015/09/10 針對 REACH 規範下”成品”做出釋義，針對 SVHC 於濃度計算時以成品計算之部分，這裡所謂的成品乃指零部件成品(component article)，並非組裝好的產品如手機、滑鼠或者電腦螢幕。

依據 ECHA 回信，公佈新規定執行時間是立即生效，因此 SGS 消費品及零售事業群—電子電器禁限用物質將會依照新規定(component article)計算濃度、檢測並下結論。

請注意：

任何不依照上述規定之檢測方式，例如：數個零部件成品混測或者數個複雜成品混測，SGS 消費品及零售事業群—電子電器禁限用物質將只會提供 SVHC 測試數據，不會提供任何測試需求或者測試結論，因為該檢驗方式已不合法規之要求。更多資訊有關報告是否下測試需求及結論請參閱如下：

測試樣品	取樣	升級服務	測試項目	提供結論與測試需求
零部件成品* ¹ (component article)	零部件成品	有提供	SVHC 候選清單	提供
複雜的成品* ² (complex article)	依照材質大類拆解	無提供	SVHC 候選清單	不提供
複雜的成品* ² (complex article)	挑選高風險零部件	無提供	SVHC 候選清單	提供
複雜的成品* ² (complex article)	挑選高風險零部件	無提供	SVHC 高風險清單	提供

備註：

*1. 零部件成品：意指符合 REACH 規範下 Article 3(3)之定義，例如：螺絲等等。

*2. 複雜的成品：意指由多個零部件組成之物件，例如：手機、電腦等等。

敬祝 商祺



姚賜福

消費品及零售事業群—電子電器禁限用物質服務
副總

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EUROPEAN COURT OF JUSTICE RULES ON SVHCS IN ARTICLES

To whom it may concern,

On September 10, 2015, the Court of Justice of the European Union (CJEU) made its judgment regarding the concept of an “article” under the EU Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals (REACH).

Towards the calculated concentration level is based on an article, which shall be interpreted as component article in light of the Court such as screw, spring and so on.

In accordance with ECHA’s reply, the new rules come into force immediately.

SGS CRS-EE-RSTS is going to follow and adopted the new rules (component article) to implement the SVHC test and make the conclusion only.

Please note:

Any of other customised testing ways requested by clients against the abovementioned new rules, for example: a mixed test of many component articles or many complex articles, SGS CRS-EE-RSTS will only provide test results without issuing any test requested and conclusion.

More details are summarised as follows.

Sample	Sampling	SVHC testing upgrade service	Test items	Test requested and conclusion
component article ^{*1}	Component article	Yes	SVHC candidate list	Yes
complex article ^{*2}	Based on 6 different material groups	No	SVHC candidate list	No
complex article ^{*2}	High Risk component article	No	SVHC candidate list	Yes
complex article ^{*2}	High Risk component article	No	SVHC high risk list	Yes

Remark:

*1. Component article means the object meets the definition of Article 3(3) of REACH regulation.

*2. Complex article is made up of a number of manufactured objects meeting the criteria as article of REACH regulation.

Yours faithfully,



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