



# **Hewlett Packard Enterprise's Compliance with Restriction of Hazardous Substances (RoHS) Legislation**

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Hewlett Packard Enterprise (HPE) is committed to compliance with all applicable laws and regulations, including substance restriction requirements under the European Union Recast RoHS Directive, otherwise known as EU RoHS 2, the restriction of phthalates and further restriction on lead exemptions, applicable restrictions under Annex XVII of the EU REACH Regulation and China's Management Methods for Restricted Use of Hazardous Substances in Electrical and Electronic Products, otherwise known as China RoHS 2.

RoHS Directive 2015/863/EU amends Directive 2011/65/EU that added four substances to the current six restricted substances, specifically:

- Diisobutyl Phthalate (DIBP)
- Bis (2-ethylhexyl) phthalate (DEHP)
- Butyl benzyl phthalate (BBP)
- Dibutylphthalate (DBP)

Hewlett Packard Enterprise is compliant with RoHS Directive 2015/863/EU.

Our continued internal voluntary goal is to meet all substance restrictions of the EU RoHS legislation outside the EU (and EEA) within 6 months of each of the EU's various legal compliance dates on a worldwide basis for virtually all Hewlett Packard Enterprise branded new products, except where it is widely recognized that there is no technically feasible alternative (as indicated by an exemption under the EU RoHS Directive).

Hewlett Packard Enterprise believes that legislation, like the EU RoHS 2 Directive, plays an important role in promoting industry-wide transition to

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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

Hewlett Packard Enterprise 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 equipment (EEE). HPE believes PVC and BFRs should be the focus for the restriction of chlorine (Cl) and bromine (Br) from electrical and electronic equipment, where technically feasible. HPE'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.

By July 2007, all PVC and BFRs were restricted<sup>[1]</sup> from the external case plastics in HPE branded products. When technically feasible, we will continue to phase out other uses of brominated flame retardants (BFRs) and polyvinyl chloride (PVC) to meet market demands and customer expectations, taking into account product life cycles.

Hewlett Packard Enterprise is taking a proactive approach to evaluating materials in its products to assess environmental, health or safety risks. HPE may restrict substances because of customer or legal requirements, or because HPE believes it is appropriate based on a precautionary approach. HPE strives to replace legally permitted materials when

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scientific data have established a potential health or environmental risk and lower-risk, commercially and technically viable alternatives are available. At HPE, the evaluation of alternative materials is a continuous process.

In early 2003, a company-wide RoHS team was formed to manage all aspects of Hewlett Packard Company's global response to all the RoHS legislations around the world. Since the separation of Hewlett Packard Company and the creation of Hewlett Packard Enterprise, HPE has continued this approach. HPE's initiative to address the RoHS legislations is part of the company's Design for Environment program, which includes using materials more efficiently, finding alternatives for designated materials, designing for energy efficiency, and designing products that can be easily recycled.

Hewlett Packard Enterprise continues to plan for further "RoHS-like" legislation in other jurisdictions and will meet any additional requirements that arise. HPE complies with the requirements of all the RoHS legislations currently in effect (including those specifically listed under Compliance Status below). HPE'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.

More detailed information can be found at the following references:

- [Living Progress Report](#)
- [Compliance Verification](#)
- [General Specifications for the Environment](#)
- [Eco Declarations](#)

## **Hewlett Packard Enterprise's Compliance Status to existing RoHS Legislation:**

### **European Union**

HPE products in-scope and put on the market in the EU and EEA Member States comply with the requirements of EU RoHS Directive (2011/65/EU) including Commission Decisions withdrawing exemptions and the EU RoHS 2 Directive 2015/863/EU.

### **Serbia**

HPE products<sup>[2]</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

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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**

HPE products<sup>[2]</sup> comply with Turkey’s “The Regulation on Waste Electrical and Electronic Equipment Regulatory Control of Waste Electric and Electronic Equipment”, otherwise known as Turkey RoHS which came into effect on May 22, 2012.

#### **Ukraine**

HPE products<sup>[2]</sup> comply with the substance restrictions in Ukraine’s “Technical Regulation on Restriction of Certain Hazardous Substances in Electrical and Electronic Equipment”, otherwise known as Ukraine RoHS 2 which came into effect on 22 September, 2017.

#### **China**

HPE products<sup>[2]</sup> comply with China’s, “Management Methods for Restricted Use of Hazardous Substances in Electrical and Electronic Products”, otherwise known as China RoHS 2 which came into effect on July 1, 2016.

#### **India**

HPE products<sup>[2]</sup> comply with the material restrictions of India’s legislation “India E-waste (Management) Rules, 2016”, otherwise known as India RoHS, which came into effect on October 1, 2016.

#### **Japan**

Japan’s “The Marking of Presence of the Specific Chemical Substances for Electrical and Electronic Equipment” (JIS-C-0950), otherwise known as J-MOSS came into effect on July 1, 2006. At present, no HPE-brand products are in scope of J-MOSS.

#### **Korea**

In Korea, “The Act for Resource Recycling of Electrical/Electronic Products and Automobiles”, otherwise known as Korean RoHS came into effect on January 1, 2008. Korea’s RoHS 2 came into effect on January 1, 2013. At present, no HPE-brand products are in scope of Korea RoHS 2.

#### **Taiwan (BSMI) RoHS**

HPE products<sup>[2]</sup> comply with Taiwan’s CNS 15663 standard, otherwise known as BSMI RoHS, which is a guidance to reduce the restricted chemical substances used in electrical and electronic products. This standard was released on July 30, 2013 and applies to servers placed on

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the market on or after July 1, 2017 and other products placed on the market on or after January 1, 2018.

### **Vietnam**

HPE products<sup>[2]</sup> comply with Vietnam's legislation "Circular 30/2011/TT-BCT: 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 HPE's Vietnam RoHS declarations at:

<https://www.hpe.com/us/en/about/environment/msds-specs-more.html>

### **California**

California's, "Electronic Waste Recycling Act of 2003 (Senate Bill 20) substance restrictions", otherwise known as California RoHS came into effect on January 1, 2007. At present, no HPE-brand products are in scope of California RoHS.

### **New Jersey**

New Jersey's "Electronic Waste Recycling Act" (Senate Bill 2144), otherwise known as New Jersey RoHS came into effect on 1 January 2011. At present, no HPE-brand products are in scope of New Jersey RoHS.

### **Worldwide**

HPE has an internal voluntary goal to meet the substance restrictions of the EU RoHS legislation outside the EU (and EFTA) within 6 months of each of the EU's various legal compliance dates on a worldwide basis for virtually all HPE branded new products in scope of the Directive, except where it is widely recognized that there is no technically feasible alternative (as indicated by an exemption under the EU RoHS Directive).

### **Notes:**

<sup>[1]</sup> See [HPE's General Specification for the Environment](#) Identification Numbers: 041210-80 and 070905-88.

<sup>[2]</sup> HPE products that are both in scope and put on the market in the given jurisdiction.