|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| US |  | Title and Scope |  | T | The scope as written does not ensure exclusion of liquids and/or gases enclosed within products (batteries etc), except where listed in the IEC 62474 database | Change of title and scope to “definition of low halogen materials of concern used in electrical and electronics” |  |
| US |  |  |  | Ge | The definition of Low Halogen is widely accepted in the industry based on IEC 61249-2-21 and JS-709A (Joint JEDEC / ECA Standard) which are existing standards concerning "Low Halogen Materials" and specifically target Br and Cl only. There is no scientific reason to include F and I simply because they are halogens.IEC 61249-2-21 came out in November 2003, and it immediately became the worldwide standard to define “low-halogen” in CCL. This has been a standard for a long time and is well known worldwide. Many other standards organizations have based their bromine and chlorine limits based on IEC 61249-2-21. | Align IEC 63031 with these globally accepted industry definitions and remove the F and I requirements. |  |
| US |  |  |  | Ge | The requirements from the IEC PAS 63015: 2016 standard defines low halogen as Br and Cl only. | Align IEC 63031 with the PAS 63015 definitions and remove the F and I requirements. |  |
| US |  |  |  | Ge | Previously published standards should not be encompassed by this new standard as the definitions and requirements are well known and adopted across the electronics industry. | This needs to be part of the definition in IEC 63031:Currently existing IEC / ANSI/ JEDEC / IPC standards, which normatively define low-halogen, halogen-free or non-halogenated, will continue to be enforced for those particular materials (e.g., IEC 61249-2-21 for PCB Laminates, JEDEC/ECA JS-709B). |  |
| US |  |  |  | Ge | Fluoropolymers should not be the target of this standard. Fluoropolymers possess low inherent hazard and unique functionality to multiple industries, including health care, food contact applications, aerospace, chemical processing, building construction, automotive, electronics, energy, environmental protection, and outdoor and technical apparel.Substance restrictions around the world have not identified the use of all fluoropolymers (e.g., PTFE, FEP, PFA) as an area of concern.  | Remove fluoropolymers from the list. There is no scientific evidence presented to include these elements/materials. |  |
| US |  |  |  |  | Halogens are not as a group generally hazardous to the environment, so the inclusion of all halogens in the definition would create unnecessary problems for the electronics industry. | Remove fluoropolymers from the list. There is no scientific evidence presented to include these elements/materials. |  |
| US |  |  |  | T | Creating a scientifically accurate standard but not dealing with environmental aspects relevant to EEE products is not in the scope of TC 111. | Remove fluoropolymers from the list. There is no scientific evidence presented to include these elements/materials. |  |
| US |  |  |  | T | IEC 62474 contains declarable halogenated compounds that are identified to cause concerns to human health and the environment. Use IEC 62474 database as the only source of halogens that are under this low halogen definition. | Refer to the IEC 62474 database, including criteria 1, 2 & 3.  |  |
| US |  |  |  | T | Specific concerns about EEE combustion in certain confined spaces should not be used to justify broad concerns about EEE combustion in all spaces.  | A threshold limit based on the railroad industry is not a basis for a standard for EEE industry. |  |
| US |  |  |  | T | A threshold limit to be of "little concern" is generally 1000 ppm based on all global regulations currently in place with few exceptions, and is aligned to currently existing standards. There is no basis to say that 9,000ppm of any / all halogens would be considered a definition of "low halogen". | Refer to the IEC 62474 database, including criteria 1, 2 & 3 and their associated threshold limits. |  |