



27 APRIL 2020

DIGITALEUROPE initial views on the revision of the EU RoHS Directive

By July 2021, the European Commission, if appropriate, will publish their proposal for the revision of the European Union RoHS Directive (“EU RoHS”) as one of the key deliverables of the European Green Deal’s New Circular Economy Action Plan. EU RoHS is a global benchmark and remains the most prominent sector-specific legislation on the restriction of the use of certain hazardous substances in electrical and electronic equipment. DIGITALEUROPE members have been key contributors to EU RoHS since its inception. As such, we look forward to continuing to share views, experiences and concrete recommendations with all stakeholders, to jointly explore opportunities for improvements to EU RoHS as well as regulatory simplification to the benefit of all. We want EU RoHS to continue being a global success. Our initial views and recommendations for the revision process are outlined below.



Introduction

The digital technology industry provides the backbone for the future of the EU. Our sector will help the Von der Leyen (“VDL”) Commission to deliver on each of its [six core priorities](#). As the coronavirus (COVID-19) remains with us, technology continues to play a crucial role. For example, artificial intelligence and high-performance computing are expediting scientific research, robotics are helping medical professionals care for patients while keeping them safe from infection, and ICT-enabled teleworking continues to play an important role in our society and will be fundamental to sustainable economic recovery.

EU RoHS is helping to advance the strategic interests of the EU in the world. It has created a global level playing field as European companies, as well as companies importing product into the European Economic Area (EEA), have to conform to the same requirements, reducing hazardous substances in electronics. It should be a blueprint of what the VDL Commission wants to achieve. Indeed, as stressed in

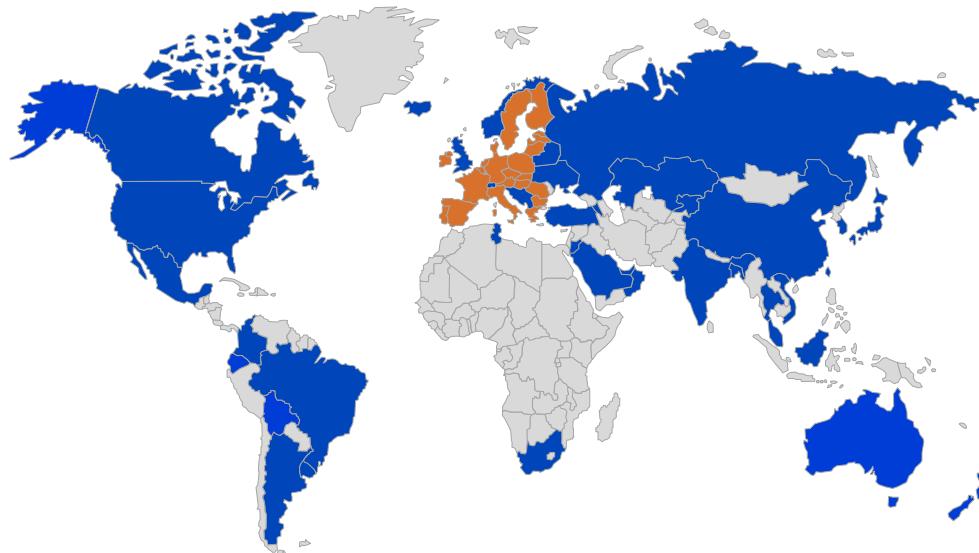
the [Joint Industry's Statement on the Commission's Roadmap for the EU RoHS Review: considering the global dimension](#), RoHS-type laws have been introduced, or are being introduced, in approximately 50 other jurisdictions around the world.

DIGITALEUROPE has been involved since the inception of EU RoHS in the mid-1990s. The digital technology industry and its complex global supply chains have embedded the law in its processes and mechanisms. Based on our experience, we are convinced that EU RoHS works well and continues to deliver on its objectives. DIGITALEUROPE welcomes the EU RoHS Review in the context of the [European Green Deal](#) and the [New Circular Economy Action Plan](#), and the opportunity to work with all stakeholders to update the legal framework and devote more resources to manage this important piece of strategic legislation.



EU RoHS, a global success story

EU RoHS has become a global benchmark and remains the most prominent sector-specific legislation on the restriction of the use of certain hazardous substances in electrical and electronic equipment. It has stimulated a global change in hazardous substance reduction and has prevented thousands of tonnes of banned substances from being disposed of and potentially released into the environment. It has also stimulated innovation, driven technical substitution, led to important changes in the design of electrical and electronic products worldwide, and facilitates the recovery of many valuable substances and materials used in electronics. Over the years, EU RoHS has in fact served as a model for similar laws introduced in approximately 50 other jurisdictions around the world.



EU RoHS continues to rapidly evolve, including on-going and forthcoming policy and regulatory developments requiring continued enhanced leadership, engagement and collaboration across stakeholders at large, including but not limited to public authorities and businesses in the EU and worldwide. As foreseen in EU RoHS, and the recently released New Circular Economy Action Plan, key upcoming actions include, among other, the EU RoHS Review and guidance to clarify its links with REACH and Ecodesign requirements. The Commission is expected to present a report to the European Parliament and the Council accompanied by a legislative proposal no later than 22 July 2021.

Within that context, preparatory work is already underway and DIGITALEUROPE has been, and continues to be, a strong advocate of EU RoHS. In addition, we strongly encourage the EU to continue to lead on RoHS both within the EU and beyond. At the same time, we consider there is need for further due consideration to improve specific EU RoHS processes (see Annex I) and dedicate to it appropriate additional resources. Amongst other aspects, the current EU RoHS exemptions' process and methodology should be carefully considered. In addition, as described in the Commission's Communication on the European Green Deal, DIGITALEUROPE very much looks forward to jointly exploring with stakeholders at large how to potentially use better the EU's agencies and scientific bodies (e.g. in the context of EU RoHS substance and exemption assessments). We would also welcome the EU devoting more resources to ensure further alignment of emerging/developing RoHS-type laws across geographies around the globe as and when required.



DIGITALEUROPE, your trusted partner for the EU RoHS Review

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies. DIGITALEUROPE ensures industry participation in the development and implementation of EU policies.

DIGITALEUROPE and its members have been key stakeholders and contributors in the development and shaping of EU RoHS since its inception, individually and/or as part of industry groupings (e.g. the RoHS Exemptions Umbrella Industry Project, currently involving 65+ associations globally), including by supporting targeted adaptations where warranted, to everyone's benefit. Furthermore, we are

long-standing supporters of efforts to streamline legislation, remove red tape and lower costs without compromising policy objectives, contributing to a clear, stable, and predictable regulatory framework supportive of growth and jobs.

Representing a large part of the community regulated by EU RoHS, we have a thorough understanding of the legislative framework, as well as of the various different challenges and opportunities that stakeholders are facing with the Directive in the EU, in addition to RoHS-type laws across the globe. Therefore, we strongly believe that we are well positioned to assist decision-makers and other stakeholders to make EU RoHS fit for the future.

DIGITALEUROPE wants EU RoHS to continue being a global success. We contributed, as a trade association as well as many of our members individually, to the consultations managed by Ecorys & Ramboll, and we look forward to working with stakeholders at large in the different stages of the EU RoHS Review and beyond, in order to make RoHS fit for the future. Recognizing the nature and breadth of this complex task, we look forward to continuing sharing experience and concrete views, and jointly exploring opportunities for regulatory simplifications and improvements to EU RoHS to everyone's benefit.

EU RoHS Strengths

Indicative EU RoHS significant strengths include but are not limited to:

- 1. EU RoHS levels the playing field.** There are several aspects to levelling the playing field. Firstly, from a global perspective, EU RoHS applies to both imported products as well those manufactured in the EEA, affecting EEA manufacturers and non-EEA manufacturers equally. Secondly, within the EEA, EU RoHS substance restriction requirements have been harmonized, both in terms of restrictions and exemptions. In addition, rules for demonstrating compliance have been harmonized. This has resulted in equal requirements across all EEA countries, thus facilitating free movement in the EEA. Thirdly, EU RoHS is necessary to prevent barriers to trade and distortion of competition in the EEA, which could be generated by disparities between the laws or administrative measures if these were adopted individually by EEA countries. Finally, EU RoHS effectively contributes to the protection of human health and the environment, including the environmentally sound recovery and disposal of Waste Electrical and Electronic Equipment ("WEEE");
- 2. EU RoHS leadership with a global impact.** EU RoHS has become the benchmark for the design of electronics in the EEA and across the world.

In addition, EU RoHS has stimulated a global change in hazardous materials reduction: several third countries/non-EEA jurisdictions have developed and implemented RoHS-type regulations, which build on EU RoHS. Further, it has also led to the European Standard for demonstrating compliance (EN 50581:2012; EN IEC 63000:2018) to become the International standard (IEC 63000:2016). The requirements and standards are often replicated in non-EEA legislation, which helps trade, as well as with demonstrating compliance specifying the technical documentation that the manufacturer needs to compile in order to declare compliance and providing presumption of conformity with the EU RoHS substance restrictions;

- 3. EU RoHS contributes to the Circular Economy.** EU RoHS addresses the highest priority of the waste hierarchy, which is waste prevention. Waste prevention is defined, inter alia, as measures that reduce the content of hazardous substances in materials and products. The decrease of hazardous substances in WEEE benefits WEEE management as a result. This type of prevention promotes the reuse of products and the recycling of used materials, thus promoting the circular economy in the sector. In addition, the possibility to repair a product placed on the EU market with a view to reusing or reselling it (“*repair-as-produced*” principle) underpins EU product legislation, including EU RoHS. In order to continue the useful life of products, in alignment with a circular economy vision, spare parts are essential. The re-use, refurbishment and extension of lifetime of products is beneficial for the protection of the environment. Spare parts therefore need to be available. In this respect, EU RoHS ensures exceptions for the repair, the reuse, the updating of functionalities or upgrading of capacity of products placed on the market. The repair-as-produced principle is fundamental to prevent premature obsolescence of equipment on the EU market and beyond;
- 4. EU RoHS has well defined processes.** EU RoHS has well defined processes to add restrictions and request exemptions where needed. It provides for phase-in of new requirements and the phase-out of expiring exemptions, whilst also recognising the unique requirements of medical devices and monitoring and control instruments. This is fundamental to our global supply chains. It articulates which chemical substances or substances groups are restricted, and to what level (Maximum Concentration Values), which is key for effective supply chain communication and compliance execution;
- 5. EU RoHS is efficient.** The efficiencies built into EU RoHS are several¹. Firstly, EU RoHS is embedded within the EU's New Legislative Framework

¹ Particularly efficient provisions and aspects of EU RoHS include: Presumption of Conformity & Harmonised Standards (Art.16, EN 50581:2012; EN IEC 63000:2018; IEC 63000:2016); Repair-as-

(“NLF”) for products and ‘CE’ marking scheme. It is based on self-declaration and presumption of conformity, whereby manufacturers self-declare compliance on the basis of European harmonized standards². This is a much more efficient and less trade restrictive approach than any other conformity assessment procedure across the globe diverging from EU RoHS. It ensures adequate protection, whilst allowing for innovation, reducing costs and minimising the time required to place products on the market, facilitating trade and free circulation of products to a globalised market. Secondly, exemptions exist and are obtained on behalf of the entire industry. Thirdly, as described above and below, the ‘repair as produced principle’ allows for re-use, refurbishment and extension of lifetime of products. Manufacturers across the supply chain have established robust mature processes and invested in IT systems based on EU RoHS and its harmonized standards;

6. **EU RoHS contributes to innovation:** innovation and the search for viable substitutes are an integral part of EU RoHS, including of its exemption system. Under the current system, exemptions are temporary and granted, renewed or revoked based on prescribed criteria. Unless renewal is applied for, they automatically expire (both within specified timeframes). Continued applicability of specified criteria needs to be thoroughly justified for exemptions, or parts thereof, in order for these to be renewed over time. Furthermore, the process allows exemptions to be challenged, while at the same time, ensuring that substitution does not stifle innovation. Similarly, the EU RoHS Research and Development scope exclusion allows for materials research and innovation.

produced (Art.4.4, spare parts in Annexes II&III); Existence of: i) Exemptions (Art.4.6, Annexes III&IV), ii) Scope Exclusions (Art.2.4), iii) Transition Periods for exemptions (Art.5.6) & iii) Business Continuity provisions (Art.5.5); Consideration of substitute availability, socioeconomic & innovation impacts (Art.5.1.a); Documents & procedures aimed at clarifications, transparency & stakeholder engagement.

² In the absence of evidence to the contrary, Member States presume that products bearing the CE marking comply with EU RoHS, along with the relevant requirements of all other directives and regulations which require the CE mark. Materials, components and products assessed in accordance with harmonised standards, the references of which have been published in the Official Journal of the European Union, are presumed to comply with EU RoHS requirements. The Member States then verify via market surveillance measures if/where warranted.



Concluding remarks

EU RoHS review

EU RoHS is a fundamental piece of sector-specific legislation driving technical substitution of hazardous substances and setting the global regulatory bar. DIGITALEUROPE endorses the EU RoHS Review to focus on effectiveness, efficiency, relevance and coherence with other regulations and directives (such as EU REACH and Ecodesign). The EU RoHS Review presents an excellent opportunity to stakeholders at large to collectively improve the legal framework and make it fit for the future. DIGITALEUROPE therefore calls upon stakeholders at large to support the EU RoHS Review. By building on its strengths whilst addressing some areas requiring further consideration, we can continue to raise the bar for substance management in electrical and electronic equipment.

The EU RoHS Review provides an excellent opportunity to address some areas requiring further due consideration (see Annex I for more specific comments and recommendations). From our perspective, some of these issues could be resolved by devoting more resources to EU RoHS and its processes. Indicative areas include the exemptions' process and mechanism, establishing a periodical basis for the review of restricted substances, and fully applying the Commission's Common Understanding paper between REACH and RoHS.

The EU RoHS Review and the EU chemical's strategy for sustainability

Moreover, we consider that the EU RoHS Review also provides an opportunity to address some additional topics as an important part of the chemical's strategy for sustainability. When it comes to substance risk and disclosure management of products, we consider sectorial approaches to be the way forward. We invite the European Commission and other stakeholders to consider the existing instruments per sector to address downstream chemical issues.

Firstly, given the global dimension that EU RoHS has attained, we should collectively continue to support those jurisdictions which are developing and/or enacting their RoHS-type laws, and promote regulatory alignment where needed.

It is essential that regrettable substitutions are avoided in electrical and electronic equipment. In order to avoid regrettable substitutions, manufacturers need greater predictability on the substances that will be restricted, and those that will not be restricted. The way forward is not only to have future proof restrictions but also future proof substitutions. This means that the substitute substance will need to be safer from a human health and environmental perspective (therefore will not require to be restricted at a later stage) and also provide the same or better product quality, performance and reliability.

Finally, regarding transparency on substances in electrical and electronic equipment, measures should be driven by requirements that are meaningful for the waste sector and are cognisant of the practices and reality in how EEE is recycled. Such measures must be proportionate to their needs and accept the limitations of continuously changing materials supply chains. Considerations about requesting additional information should always be carefully made to ensure that the information provided is helpful and leads to the intended results. Overload of information should be avoided. It should also be taken into account whether the information is available or can be gathered. For EEE, among others, information in the International Electrotechnical Commission (IEC)'s 62474 Declarable Substances database, the disclosure due to the WEEE directive, as exemplified through the successful cross-industry collaboration "Information for Recyclers – I4R" platform, information available based on REACH's Duty to Communicate Information on Substances in Articles and other already provides the necessary information to recyclers.



ANNEX I: EU RoHS Aspects requiring further due consideration & Recommendations

The EU RoHS Review provides an excellent opportunity to address some areas requiring further consideration. From our perspective, some of these issues could be resolved by devoting more resources to EU RoHS and its processes. Indicative areas include the exemptions' process and mechanism, establishing a periodical basis for the review of restricted substances, and fully applying the Commission's Common Understanding paper between REACH and RoHS.

Based on our experience to date, positive elements and aspects requiring further consideration include, but are not limited to:

EU RoHS elements requiring further due consideration	Our Recommendation
Repair-as-produced (Art.4.4, spare parts in Annexes II & III)	<p>DIGITALEUROPE members welcome Repair-as-produced provisions in EU RoHS. Re-use, refurbishment and extension of the lifetime of products, enabled by durable design and the availability of spare parts, is beneficial for the protection of the environment. Secondary market operations for EEE, which involve repair, replacement of spare parts, refurbishment, reuse and retrofitting, should continue to be facilitated to continue promoting a circular economy in the EU and beyond. The Repair-as-produced provisions need to be maintained in EU RoHS</p>
Transition Periods for exemptions (Article 5.6)	<p>DIGITALEUROPE members welcome provisions in EU RoHS pertaining to transition periods and transitional measures when exemptions are not renewed or revoked. Transitional measures should continue to be explicitly recognized in EU RoHS, however, longer transitional measures are needed before the exemption effectively expires in case exemptions are not renewed or revoked beyond the currently existing 12 to 18 months after the date of the decision. Changes to RoHS Exemptions affect industry and other stakeholders at large, including but not limited to businesses and public authorities, worldwide. The amount of time and resources required to effectively disseminate and execute changes globally and to allow stakeholders at large to take appropriate action globally should not be underestimated.</p>

EU RoHS elements requiring further due consideration	Our Recommendation
Business Continuity provisions (Article 5.5 second paragraph)	<p>DIGITALEUROPE members welcome provisions aimed at business continuity. Business continuity should continue to be ensured with market operators continuing being able to rely on an existing exemption remaining valid until a decision is taken on individual exemption applications.</p>
Provisions in the RoHS Directive requiring the Commission to provide, shortly after the receipt of an application, a timeline for the adoption of its decision on the application (Article 5.4.(ba))	<p>DIGITALEUROPE welcomes provisions aimed at contributing to better predictability for stakeholders at large. On the other hand, in accordance with recital (7) of Directive (EU) 2017/2102 of 15 November 2017, we understand the EU RoHS Review should potentially also consider the specification of realistic timelines for decisions on applications for exemptions.</p>
Consideration of substitute availability, socioeconomic & innovation impacts (Article 5.1.(a) last paragraph)	<p>DIGITALEUROPE members welcome provisions in EU RoHS ensuring consideration of availability of substitutes, socioeconomic impact of substitution and potential adverse impacts on innovation. On the other hand, these parameters remain under-represented in the exemptions mechanism, i.e. though these parameters are considered in the evaluation of an exemption and can influence the duration of exemptions and/or transitional periods if an application for renewal is rejected, they are not part of the 3 strictly defined decision-making criteria for justifying exemptions. There are significant costs associated with re-design, testing, and (re)qualification of components and products, as well as information technology and human resource costs related to the above and to supply chain management, integration and compliance work to ensure products continue to be compliant as well as functional and reliable.</p>
Consideration for typical product life cycles in relation to the current exemption mechanism	<p>Currently, there is a disjuncture between the exemption process (including but not limited to maximum validity periods, etc...) and the typical life cycle of electronics. This generates uncertainties and variety of supply chain transition, technology and reliability challenges impacting long-term investments and innovations. This needs to be given further consideration in the EU RoHS Review.</p>

EU RoHS elements requiring further due consideration	Our Recommendation
<p>Trends towards stricter detailed more application-specific exemptions (with amended wording, numbering, etc...)</p>	<p>DIGITALEUROPE members support targeted adaptations (where warranted) in accordance with RoHS criteria. However, given the current state of evolution of technology, we often have difficulty in understanding how some stakeholders' recommended changes could lead to greater protection of human health and the environment and to a clear, stable and predictable regulatory framework supportive of growth and jobs. Caution is required to avoid long, unmanageable and unenforceable lists of detailed applications for both industry and market surveillance authorities, and inadvertently deleting necessary applications. There may be a risk of the exemptions system becoming too complicated, too burdensome, and/or too bureaucratic a legislative framework without obvious additional environmental, health and consumer benefits compared to its current form. There may also be a risk of stakeholders, including but not limited to smaller businesses, not being able to fully understand and accurately follow it. This may lead to them devoting significant resources to apply the potential new rules, rather than continuing R&D where no suitable substitutes currently exist, developing or requesting the development of possible new alternatives, growing businesses and creating jobs.</p>
<p>RoHS Global Dimension</p>	<p>DIGITALEUROPE welcomes the Commission's continued support seeking workable RoHS-type laws globally, including joint efforts with the Commission's services, World Trade Organization (WTO) committee on Technical Barriers to Trade (TBT) and stakeholders outside EU promoting alignment where and when needed. On the other hand, we would welcome the EU devoting more resources to ensure further alignment across geographies where/as needed.</p>
<p>Periodical Review of the restricted substances</p>	<p>Given the constraints on resources, the Commission needs to prioritize and balance different moving parts during the lifetime of EU RoHS. If more resources are provided, a review on the restricted substances could be done on a regular basis, where DIGITALEUROPE proposes a review every 4 years which provides certainty for the electronics industry and its complex global supply chains.</p>

EU RoHS elements requiring further due consideration	Our Recommendation
<p>REACH & RoHS, Resources dedicated to RoHS (role for EU's agencies)</p> <p>Horizontal legislation such as REACH and product-specific vertical legislation such as EU RoHS are complementary. The Commission and the co-legislators wanted both pieces of legislation to work together and decided they should apply without prejudice to each other. Their scopes partially overlap since REACH applies to all substances as such, in mixtures or in articles, including substances in EEE within the scope of RoHS</p> <p>The Commission's Common Understanding paper between REACH and RoHS explores how to manage regulatory action on the same chemical substances under REACH and RoHS. We strongly advocate for the use of this mechanism and that this be taken up under the EU RoHS Review</p> <p>EU RoHS exemptions and substance methodologies and decisions are respectively required not to weaken the environmental and health protection afforded by REACH but to ensure "coherence" with REACH. Such EU RoHS and REACH methodologies could potentially be further aligned in terms of assessment processes and provisions. DIGITALEUROPE very much looks forward to jointly exploring with stakeholders at large how to potentially use more efficiently the EU's agencies and scientific bodies (e.g. in the context of EU RoHS substance and exemption assessments). Having said this, we strongly advocate that European Chemicals Agency (ECHA) or any other agency or scientific EU body strictly adheres to the processes, methods and requirements enshrined in and prescribed by the RoHS Directive.</p> <p>We also welcome the Commission's intention in the New Circular Economy Action Plan to provide guidance to improve coherence with other relevant legislation such as Ecodesign.</p> <p>As far as possible, RoHS should be given priority to regulate issues pertaining to the use of substances in EEE.</p>	<p>Integrate the Commission's Common Understanding paper between REACH and RoHS into EU RoHS Review;</p> <p>Explore with stakeholders at large how to potentially use better the EU's agencies and scientific bodies (e.g. in the context of EU RoHS substance and exemption assessments);</p> <p>Guidance to improve coherence with other relevant legislation such as Ecodesign;</p> <p>As far as possible, RoHS be given priority to regulate issues pertaining to the use of substances in EEE.</p>
<p>Other</p> <p>DIGITALEUROPE welcomes documents & procedures aimed at clarifications, transparency and stakeholder engagement, including but not limited to:</p>	<p>Continue the enhanced EU policy leadership and communications on requirements,</p>

EU RoHS elements requiring further due consideration	Our Recommendation
<p>European Commission's table providing an overview of Annex III and IV exemptions, including their validity status and submitted exemption requests available in the Commission's DG Environment / Waste / RoHS in EEE website;</p> <p>RoHS 2 Frequently Asked Questions (FAQ) document, Consolidated guidance for applicants for an exemption and related harmonized format for applications pursuant to RoHS Article 5.8;</p> <p>Common Understanding paper prepared with a view to achieving coherence in relation to risk management measures, adopted under REACH and under RoHS;</p> <p>Public stakeholder consultations, the consultation of the Member States' Expert Group convened for the preparation of Delegated Acts pursuant to RoHS (including invitation to selected stakeholders to present their views at selected Expert Group meetings), notification to the WTO TBT, Interinstitutional register of delegated acts, etc...;</p> <p>We appreciate efforts towards greater transparency and the ongoing collaborative approach. On the other hand, there is need for continued, enhanced thought-leadership and communications on requirements, effectively translating regulatory complexity into simple requirements. We would also recommend enhanced stakeholder consultation and participation in the different stages of EU RoHS processes.</p>	effectively translating regulatory complexity into simple requirements. We also recommend enhanced stakeholder consultation and participation in the different stages of EU RoHS processes.
<p>Scope Exclusions (Article 2.4)</p> <p>Equipment specifically designed for the purpose of research and development, which is made available on a business-to-business basis, is excluded from the scope of EU RoHS. This is because if this type of equipment were to fall within scope, it could place a burden on research, scientific advancement, development and innovation in the EU.</p> <p>'Research and Development' (R&D) are activities which directly contribute to achieving advances in science or technology. Equipment designed to achieve these objectives and only made available on a business to business basis meets the criteria and are excluded from the scope of EU RoHS.</p>	Maintaining EU RoHS Scope Exclusions, including for R&D equipment.

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About DIGITALEUROPE

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DIGITALEUROPE Membership

Corporate Members

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National Trade Associations

Austria: IOÖ	Germany: BITKOM, ZVEI	Romania: ANIS, APDETIC
Belarus: INFOPARK	Greece: SEPE	Slovakia: ITAS
Belgium: AGORIA	Hungary: IVSZ	Slovenia: GZS
Croatia: Croatian Chamber of Economy	Ireland: Technology Ireland	Spain: AMETIC
Cyprus: CITEA	Italy: Anitec-Assinform	Sweden: Foreningen Teknikföretagen i Sverige, IT&Telekomföretagen
Denmark: DI Digital, IT BRANCHEN, Dansk Erhverv	Lithuania: INFOBALT	Switzerland: SWICO
Estonia: ITL	Luxembourg: APSI	Turkey: Digital Turkey Platform, ECID
Finland: TIF	Netherlands: Nederland ICT, FIAR	Ukraine: IT UKRAINE
France: AFNUM, Syntec Numérique, Tech in France	Norway: Abelia	United Kingdom: techUK
	Poland: KIGEIT, PIIT, ZIPSEE	
	Portugal: AGEFE	