

Servomex products and the WEEE Directive

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1 Introduction

This document provides rationales for the inclusion/exclusion of Servomex transducers, gas analysers and gas analyser systems from the scope of the WEEE Directive (2002/96/EC)(1) and SI 2006 No. 3289 (2) which implements the Directive in the United Kingdom.

The conclusions given in Section 2 have been reached using the Frequently Asked Questions (FAQ) guidance on and Directive 2002/96/EC provided by the European Commission (3) and guidance on SI 2006 No. 3289 provided by UK Department of Trade and Industry (3), as described in Appendices I and II.

2 Conclusions

Using the rationales given in Appendix II the following conclusions have been reached regarding the status of Servomex products and the WEEE Directive:

Fixed analyser systems	EXCLUDED from the scope of the WEEE Directive
Portable/transportable gas sampling systems	INCLUDED in the scope of the WEEE Directive
All Transducers	EXCLUDED from the scope of the WEEE Directive
Pura Tx and Easidew Tx moisture transmitters	EXCLUDED from the scope of the WEEE Directive
KK 650 Hydrogen in chlorine analyser	EXCLUDED from the scope of the WEEE Directive
K1550 Thermal conductivity analyser	EXCLUDED from the scope of the WEEE Directive
RBT zirconia oxygen analyser	EXCLUDED from the scope of the WEEE Directive
JNOX – T/V 96 converter	EXCLUDED from the scope of the WEEE Directive
244, 262A, 570A, 571, 572, 574, 575 portable gas analysers	INCLUDED in the scope of the WEEE Directive
Power supply units (578, 579, 2821-4511, 2821-4580, 2821-4535, 2821-4542)	INCLUDED in the scope of the WEEE Directive
1440D general purpose gas analyser	INCLUDED in the scope of the WEEE Directive

1450D food pack gas analyser	INCLUDED in the scope of the WEEE Directive
1660 general purpose gas analysers	EXCLUDED from the scope of the WEEE Directive
1800, 1900 series analysers	EXCLUDED from the scope of the WEEE Directive
1910, 1920 Series	EXCLUDED from the scope of the WEEE Directive
2200 series oxygen analysers (2210, 2213 control units and 2222, 2223 transmitters)	EXCLUDED from the scope of the WEEE Directive
2400 SpectraScan	EXCLUDED from the scope of the WEEE Directive
2500 series process analysers	EXCLUDED from the scope of the WEEE Directive
2700 series combustion gas analyser	EXCLUDED from the scope of the WEEE Directive
2700 hazardous area purge panel	EXCLUDED from the scope of the WEEE Directive
2730 utility panel	EXCLUDED from the scope of the WEEE Directive
2800 Hazardous area combustion analyser	EXCLUDED from the scope of the WEEE Directive
2900 Laser series cross stack monitors, comprising 2930 (LaserSP), 2940 (LaserCompact), 2950 (LaserExact)	EXCLUDED from the scope of the WEEE Directive
4000 series gas analysers (4100, 4200, 4900)	INCLUDED in the scope of the WEEE Directive
4995 sample conditioning panel	INCLUDED in the scope of the WEEE Directive
5100 Series portable gas analyser (5110, 5111, 5120)	INCLUDED in the scope of the WEEE Directive
5200 portable bench top gas analysers (5210, 5220, 5230, 5240)	INCLUDED in the scope of the WEEE Directive
5311 OxyDetect	INCLUDED in the scope of the WEEE Directive
5400 MultiExact series of gas analysers	INCLUDED in the scope of the WEEE Directive

5500 MonoExact series of gas analysers	INCLUDED in the scope of the WEEE Directive
1000 ServoPro FID (K1000), 2001 ServoPro Plasma (K2001), 4400 ServoPro Chroma (K4000) series of gas analysers (Comprising: Master (4400), Slave – TCD/Plasma (4440), Slave- FID (4460), Auxiliary oven (4470), Stand alone PC (4430)), 4416 NanoChrome	INCLUDED in the scope of the WEEE Directive
GSS-100 (1004), GP-200 (2004)	INCLUDED in the scope of the WEEE Directive
DF-100E series (DF-110E, DF-140E, DF 150E)	INCLUDED in the scope of the WEEE Directive
DF-310E	INCLUDED in the scope of the WEEE Directive
DF-320E, DF-340E, DF-370E	EXCLUDED from the scope of the WEEE Directive
DF-500E series (DF-550E, DF-560E)	INCLUDED in the scope of the WEEE Directive
DF-700E series (DF-730, DF-740, DF-745, DF-745SG, DF-749, DF-750, DF-760E)	INCLUDED in the scope of the WEEE Directive

REFERENCES

- 1 European Union. Directive 2002/96/EC on Waste Electrical and Electronic Equipment. (27 January 2003).
- 2 Statutory Instrument 2006 No. 3289. Environmental Protection. The Waste Electrical and Electronic Equipment Regulations 2006.
- 3 European Commission. Frequently asked questions on Directive 2002/95/EC on the Restriction of the Use of certain Hazardous Substances in Electrical and Electronic Equipment (RoHS) and Directive 2002/96/EC on Waste Electrical and Electronic Equipment Directive (WEEE).
- 4 Department of Trade and Industry (DTI). WEEE Regulations, Government Guidance Notes. URN 07/619. (February 2007).

Appendix I Servomex product groups and the scopes of the WEEE Directive (1) and SI 2006 3289 (2)

All Servomex products considered in this document are dependent for their operation upon electricity at voltages below 1000 Vac/1500 Vdc.

All Servomex products considered in this document are specified and intended for use in laboratories and/or industrial or marine environments. They are not sold to, or intended of use in, private households. From their definition of intended use and instructions included in their manuals, Servomex products are only intended for use and installation by professional personnel. Consequently, they cannot be considered as being likely to be used by 'private households'.

AI.1 Transducers

- Are supplied to OEMs (original equipment manufacturers) for use as component sensors in other types of electrical and electronic equipment.
- Will not operate as intended by the manufacturer without the connection of additional electrical components. These may take the form of non-standard power supplies and signal conditioning and display circuits.

AI.1.1 Relevant guidance and its interpretation in respect of the Servomex products

From Guidance Notes (4), SI 2006 3289 (2) only applies to finished products and not to components and sub-assemblies that are supplied for further manufacture or assembly.

AI.1.2 Conclusion

Servomex transducers are **EXCLUDED** from the scope of Directive (1) and SI 2006 3289 (2).

AI.2 Bench or rack mounted mains powered analysers

- Electrical power input is applied via a standardised plug and socket connectors that do not require the use of a tool to assemble.
- Sample gas I/O connections can be readily assembled and disassembled without the use of a tool.
- Will function as intended by the manufacturer without any other optional external electrical connections being made.

AI.2.1 Relevant guidance and its interpretation in respect of the Servomex products

Directive (1), SI 2006 3289 (2), FAQ (3) and Guidance Notes (4) all make it clear that these products are identifiable electrical and electronic equipment falling within the scopes of either Category 8 or 9 of Annex IB. Further, they can be made to operate as intended through the application of only simple connections. Consequently, irrespective of the location in which they are used, they have a direct function outside of it.

AI.2.2 Conclusion

Servomex bench or rack mounted mains powered analysers are **INCLUDED** in the scope of Directive (1) and SI 2006 3289 (2).

AI.3 Portable battery powered analysers

- Electrical power input is applied during charging of internal batteries via a standardised plug and socket type connector that does not require the use of a tool to assemble.
- Will function as intended by the manufacturer without any other optional connections being made.

AI.3.1 Relevant guidance and its interpretation in respect of the Servomex products

As with the products considered in Section AI.2, these products are identifiable electrical and electronic equipment falling within the scopes of either Category 8 or 9 of Annex IB.

AI.3.2 Conclusion

Servomex portable battery powered analysers are **INCLUDED** in the scope of Directive (1) and SI

2006 3289 (2).

AI.4 Fixed permanently installed mains or low voltage powered process analysers

- Are intended to be used in process plant. With the appropriate certifications, product variants may also be used on board ships.
- Require professional installation to ensure safe operation.
- Electrical connections: To function as intended by the manufacturer, the analysers must be permanently wired in to the local mains electrical supply, or locally provided DC source, and low voltage data transmission networks using specially prepared cables passing through installer assembled cable glands or other types of cable support. All electrical connections to the analysers are made using screw type connectors that cannot be assembled without the use of a tool.
- Sample gas connections: The sample gases specified for use with the analysers are potentially toxic, flammable or asphyxiant. Consequently, the pipes that carry them to and from the analyser are connected to the process plant using the appropriate permanently connected fittings. These require a tool to assemble.

AI.4.1 Relevant guidance and its interpretation in respect of the Servomex products

Directive (1) and SI 2006 3289 (2) both state that they only apply to electrical and electronic equipment falling under the categories set out in Annex IA provided that the equipment concerned is not part of another type of equipment that does not fall within the scope of this Directive. Annex IA does not include fixed installations.

Paragraph 30 of Guidance Notes (4) defines a 'fixed installation' as one in which several pieces of equipment are professionally assembled at a given place to perform a specific task. It is thus proposed that an industrial process plant formed from a multiplicity of components to process chemicals and materials can be considered to be a 'fixed installation'.

The FAQ (3) and Paragraph 31 of Guidance Notes (4) indicate that elements of a fixed installation are excluded from the scope of Directive (1) and SI 2006 3289 (2) provided they are not discernable electrical and electronic products and do not have a direct function away from that installation.

Referencing the EMC Directive, Section 1.3 of the FAQ (3) defines a product with 'direct function' as being one that fulfils the intended use specified by the manufacturer without further adjustment or connections other than simple ones that can be made by anyone not fully aware of the EMC implications.

In respect of Servomex products the following consequential interpretations will be made:

- A 'simple connection' is one that can be made by anyone without the use of a tool. This will include, for example, electrical connections made using standardised plugs and sockets and snap fit gas pipe connectors.
- Permanent electrical connections made using specially formed cables joined to screw type terminals and connections for pipes carrying potentially hazardous gases, made using fittings that require a tool to assemble, are not considered 'simple'. In the case of mains supply voltages and pipes carrying potentially hazardous gases, these cannot be safely made by persons who do not have professional knowledge of the associated safety rules.

From this guidance, Servomex analysers intended for installation in a process plant are considered to be part of that installation with no direct function outside it since:

- They must be professionally installed to ensure safe operation of the equipment.
- They are permanently connected into the mains power supply of the plant using connections that are not considered 'simple'.
- They include sample I/O pipes that are permanently connected to the plant using connections that are not considered 'simple'.

Further, when the equipment is eventually removed from the plant, this will be done by professional dismantlers and are considered unlikely to find their way into the municipal waste stream.

AI.4.2 Conclusion

Servomex analysers intended for permanent installation in process and other plant are **EXCLUDED** from the scope of Directive (1) and SI 2006 3289 (2).

AI.5 Area monitors sensing by diffusion

- Electrical power input is provided by a local supply be it low voltage or mains.
- No connections to potentially hazardous gas sample streams are required.
- May be used in laboratories and other non-certified environments.
- Size and installation/ de-installation requirements are typical of many items of household equipment and so it could be disposed of in a municipal waste stream.

AI.5.1 Relevant guidance and its interpretation in respect of the Servomex products

As with the products considered in Section AI.2, these products are identifiable electrical and electronic equipment falling within the scopes of either Category 8 or 9 of Annex IB.

AI.5.2 Conclusion

Servomex area monitors are **INCLUDED** in the scope of Directive (1) and SI 2006 3289 (2).

AI.6 Analysers certified for use on board ships

- Some types are intended for permanently installation on board a ship and fulfil functions similar to the process analysers considered in Section A.4.
- Some types are portable and certified for use on board a ship.

AI.6.1 Relevant guidance and its interpretation in respect of the Servomex products

Annex IA of Directive (1) and SI 2006 3289 (2) do not include means of transport such as ships.

For analysers permanently installed on board ships the rationale given in Section AI.4 is considered applicable.

For portable analysers that are certified for use on board ships but are capable of being carried ashore, these may find their way into the municipal waste stream. Consequently, the approach given in Section AI.3 is considered applicable.

AI.6.2 Conclusion

Servomex analysers intended for permanent installation in on board ships are **EXCLUDED** from the scope of Directive (1) and SI 2006 3289 (2).

Servomex portable analysers certified for use on board ships are **INCLUDED** in the scope of Directive (1) and SI 2006 3289 (2).

AI.7 Transmitters

- Are intended for permanently installation in a system such as considered in Section A.4.
- Will not operate as intended by the manufacturer without the connection of additional electrical components. These may take the form of non-standard power supplies and signal conditioning and display circuits.

AI.7.1 Relevant guidance and its interpretation in respect of the Servomex products

Such devices are not considered finished products since they require additional components to function as intended by the manufacturer. Consequently, the approach given in Section AI.4 is considered applicable.

AI.7.2 Conclusion

Servomex transmitters are **EXCLUDED** from the scope of Directive (1) and SI 2006 3289 (2).

Appendix II Detailed scope review of Servomex products

Product	Conclusion in respect of the scope of WEEE	Rationale
Fixed analyser systems	EXCLUDED	Are formed from one of more gas analysers and other electrical and electronic components. Are intended to be permanently installed by skilled persons as part of an industrial process system. See AI.4.
Portable/transportable gas sampling systems	INCLUDED	Are formed from one of more gas analysers and other components. May be capable of being moved from place to place. Can be made to operate as intended using simple connections.
Transducers	EXCLUDED	See AI.1.
Pura Tx and Easidew Tx moisture transmitters	EXCLUDED	See AI.7.
KK 650 hydrogen in chlorine analyser	EXCLUDED	Is formed from a control unit and a sensor head. Both are intended to be permanently installed as part of an industrial process system. See AI.4.
K1550 thermal conductivity analyser	EXCLUDED	Is formed from a control unit and a sensor head. Both are intended to be permanently installed as part of an industrial process system. See AI.4.
RBT zirconia oxygen analyser, consisting of a detector and a converter.	EXCLUDED	Is intended to be permanently installed as part of an industrial process system. See AI.4.
JNOX – T/V 96 converter	EXCLUDED	This product is not sold as a separate product by Servomex. Instead, it may be one of the components permanently fitted in a fixed analyser system manufactured by Servomex. Since fixed analyser are considered to be excluded from the scope of the WEEE Directive, so are these converters.
244, 262A, 570A, 571, 572, 574, 575 portable gas analysers	INCLUDED	See AI.3.
Power supply units (578, 579)	INCLUDED	Power supplies sold as independent equipment are considered to be outside the scope of the WEEE Directive. However, these are sold as components of, or spares for, Servomex analysers and are not marketed as separate products. Consequently, they are considered to be within the scope of the WEEE Directive. Note: These have been replaced by Servomex part 0574935. This specifies 205548. Imported into the EU by Craftec of the UK.
Power supply units (2821-4511, 2821-4580, 2821-4535, 2821-4542)	INCLUDED	Power supplies sold as independent equipment are considered to be outside the scope of the WEEE Directive. However, these are sold as components of, or spares for, Servomex analysers and are not marketed as separate products. Consequently, they are considered to be within the scope of the WEEE Directive. Note: These have been replaced by Servomex part 0574935. This specifies 205548. Imported into the EU by Craftec of the UK. Thus they are not included on the Servomex WEEE reporting list.
1440D general purpose gas analyser	INCLUDED	Are specified for rack mounting but will function as intended by the manufacturer when placed on a bench. See AI.2.

Product		Conclusion in respect of the scope of WEEE	Rationale
1450D food pack gas analyser		INCLUDED	Are specified for rack mounting but will function as intended by the manufacturer when placed on a bench. See AI.2.
1660 general purpose gas analyser		EXCLUDED	This gas analyser is a 1440 series analyser, but is not available for sale within the EEA.
1800/1900 series analysers		EXCLUDED	Are intended to be permanently installed as part of an industrial process system. See AI.4.
1910, 1920 series analysers		EXCLUDED	Are intended to be permanently installed as part of an industrial process system. See AI.4.
2200 series oxygen analysers	2210, 2213 control units	EXCLUDED	Are intended to be permanently installed as part of an industrial process system. See AI.4.
	2222, 2223 transmitters	EXCLUDED	Are intended to be permanently installed as part of an industrial process system. See AI.4.
2400 SpectraScan		EXCLUDED	Are intended to be permanently installed as part of an industrial process system. See AI.4.
2500 series process analysers		EXCLUDED	Are intended to be permanently installed as part of an industrial process system. See AI.4.
2700 combustion gas analyser, consisting of a sensor head and a control unit.		EXCLUDED	Is intended to be permanently installed as part of an industrial process system. See AI.4.
2700 hazardous area purge panel		EXCLUDED	Forms part of the 2700 system and has no function outside that system. See AI.4.
2730 utility panel		EXCLUDED	Forms part of the 2700 system and has no function outside that system. See AI.4.
2800 series combustion gas analysers		EXCLUDED	Servomex designation of the RBT zirconia oxygen analyser. Is intended to be permanently installed as part of an industrial process system. See AI.4.
2900 Laser series cross stack monitors, comprising 2930 (LaserSP), 2940 (LaserCompact), 2950 (LaserExact)		EXCLUDED	Are intended to be permanently installed as part of an industrial process system. See AI.4.
4000 series gas analysers	4100 series gas purity analysers	INCLUDED	Are specified for rack mounting but will function as intended by the manufacturer when placed on a bench. See AI.2.

Product		Conclusion in respect of the scope of WEEE	Rationale
	4200 series industrial gas analysers for flammable samples	INCLUDED	Are specified for rack mounting but will function as intended by the manufacturer when placed on a bench. See AI.2.
	4900 continuous emissions analyser	INCLUDED	Are specified for rack mounting but will function as intended by the manufacturer when placed on a bench. See AI.2.
4995 sample conditioning panel		INCLUDED	This equipment is intended as a component of the 4000 series analysers.
5100 Series portable analyser (5110, 5111, 5120)		INCLUDED	See AI.3 and AI.6.
5200 portable bench top gas analysers (5210, 5220, 5230, 5240)		INCLUDED	See AI.3.
5311 OxyDetect		INCLUDED	See AI.5.
5400 MultiExact series gas analysers		INCLUDED	Are specified for rack mounting but will function as intended by the manufacturer when placed on a bench. See AI.2.
5500 MonoExact series gas analysers		INCLUDED	Is a half-width MultiExact. Is specified for rack mounting but will function as intended by the manufacturer when placed on a bench. See AI.2.
1000 ServoPro FID (K1000), 2001 ServoPro Plasma (K2001), 4400 ServoPro Chroma (K4000) series of gas analysers (Comprising: Master (4400), Slave – TCD/Plasma (4440), Slave-FID (4460), Auxiliary oven (4470), Stand alone PC (4430)), 4416 NanoChrome		INCLUDED	Are specified for rack mounting but will function as intended by the manufacturer when placed on a bench. See AI.2.
GSS-100 (1004), GP-200 (2004)		INCLUDED	These products are components of the ServoPro FID (1000), ServoPro Plasma (2001), ServoPro Chroma (4000) series of gas analysers.

Product	Conclusion in respect of the scope of WEEE	Rationale
DF-100E series (DF-110E, DF-140E, DF 150E)	INCLUDED	<p>For the DF-100E and the DF-150E, mains power is applied via standard IEC connectors. For the former, this is inside the case and with the latter it is outside. The gas sample pipes are connected using standardised compression fittings. Consequently, it is considered that the analysers are covered by AI.2.</p> <p>For the DF-140E, the analyser the power connections are made by screw terminals. However, since the device is of a similar concept to the DF-100E and DF-150E it is considered appropriate to also include it in-scope. Other than the application of the relevant marking to the product, and the inclusion of WEEE disposal information in the manual, there will be no financial implications imposed on Servomex by doing this, and it will bring the product range in line with the potential requirements of WEEE II.</p>
DF-310E	INCLUDED	Mains power is applied via standard IEC connector. The gas sample pipes are connected using standardised compression fittings. Consequently, it is considered that the analysers are covered by AI.2.
DF-320E, DF-340E, DF-370E	EXCLUDED	Are intended to be permanently installed as part of an industrial process system. Mains power connections are made via screw type connectors contained within the analyser enclosure. See AI.4.
DF-500E series (DF-550E, DF 560E)	INCLUDED	Mains power is applied via standard IEC connector. The gas sample pipes are connected using standardised compression fittings. Consequently, it is considered that the analysers are covered by AI.2.
DF-700E series (DF-730, DF-740, DF-745, DF-745SG, DF-749, DF-750, DF-760E)	INCLUDED	Mains power is applied via standard IEC connector. The gas sample pipes are connected using standardised compression fittings. Consequently, it is considered that the analysers are covered by AI.2.

Appendix III Product weights

Product	Weight (kg)	Notes
Transducers	N/A	Sold to OEMs only as components
Fixed analyser systems	N/A	Weight dependent on configuration requested by customer
Portable/transportable gas sampling systems	N/A	Weight dependent on configuration requested by customer
244	10	No longer on the market
262	3	No longer on the market
570, 571, 572, 574,575	4	No longer on the market
Pura Tx moisture transmitter	0.5	Purchased by Servomex from UK supplier
Easidew Tx moisture transmitters	0.15	Purchased by Servomex from UK supplier
KK 650 Hydrogen in chlorine analyser	No data	Purchased by Servomex from UK supplier
K1550 Thermal conductivity analyser	No data	Purchased by Servomex from UK supplier
RBT zirconia oxygen analyser	12	
JNOX – T/V 96 converter	12	
Power supply units (578, 579)	0.85	
Power supply units (2821-4511, 2821-4580, 2821-4535, 2821-4542)	0.5	These have been replaced by Servomex part 0574935. This specifies 205548. Purchased by Servomex from UK supplier. Given weight is an estimate based on similar units.
1440D general purpose gas analyser (single unit)	5.5	
1440D general purpose gas analyser (double unit)	12	
1450D food pack gas analyser	5.5	
1660 gas analysers	5.5	
1800, 1900 series analysers	26	1800MV, 1900MV longer on the market
1910, 1920	39	
2210	12	
2213	25	
2222	16	

Product	Weight (kg)	Notes
2223	15	
2500 series	30	The minimum weight for these analysers is 25 kg. The given weight is an estimate of the possible average for all sales.
2700 series	28	
2700 hazardous area purge panel	12	
2730 utility panel	16	
2800 Hazardous area combustion analyser	12	See RBT zirconia oxygen analyser
2930 LaserSP series cross stack monitor	17	
2940 Laser Compact series cross stack monitor	16.4	
4100 (Including FTT options)	22	
4210	22	
4900	22	
4995 sample conditioning panel	20	
5100 Series portable gas analyser (5110, 5111, 5120)	2.3	
5210	2.3	
5200 portable bench top gas analysers (5220, 5230, 5240)	3.9	
5311 OxyDetect	2	
5400 MultiExact series of gas analysers	12	
5500 MonoExact series of gas analysers	9	Will be a half-width MultiExact with one, as opposed to two, transducers. Has yet to be built and so the weight is a best-guess estimate at this stage
1000 ServoPro FID (K1000)	10	
2001 ServoPro Plasma (K2001)	14	
4400 (K4000) SERVOPRO Chroma Series - (Including 4416 NanoChrome)	25	

Product	Weight (kg)	Notes
4440, 4460, ServoPro Chroma (K4000) series of gas analysers TCD/Plasma, FID	21	
4470 Auxiliary oven (K4000)	7.5	
4430 Stand alone PC (K4000)	4.6	
GSS-100 (1004)	7	
GP-200 (2004)	2.5	
DF-110E	2.7	Compared with the other analysers in this series, it seems very low.
DF-140E	13.6	
DF-150E	6.8	
DF-310E	4.5	
DF-320E	4.5	
DF-340E	15.9	
DF-370E(Electronic R7)	22.7	
DF-370E (Sensor R7)	12.2	
DF-550E	8.1	
DF-560E	8.1	
DF-730	31	
DF-740	31	
DF-745	29	
DF-745SG	29	
DF-750	31	
DF-760E	32.6	

APPENDIX Z Revisions to this document

Date	Document issue changed	Change(s)	Made by
29 March 2010	11	Added Appendix III List of product weights	IDU
		Deleted 2830. No reference could be found in current catalogue of Servomex products	
		Changes entries for power supplies	
		Added this appendix	
08 July 2010	12	Revised the ex-Canadian product designations to reflect the given Servomex part numbers and the release of the SERVOTOUGH Laser	IDU
21 September 2011	13	Revised Laser entries to include LaserCompact (2940) and delete Neo Laser. This is not placed on the market by Servomex. Removed MSS – no longer on the market	IDU
14 November 2011	14	Modified entries to reflect current product designations. Added new products and Delta F series of analysers	IDU
18 December 2014	15	Added the following products: DF-749, 5311 OxyDetect, 2400	IDU
		Added requirements for low voltage process analysers and wall mounted diffusion sensing devices.	
23 March 2015	16	Revised Appendix I rationale for Servomex products not being considered B to C.	IDU
	17		