RoHS/REACH Standards for Suppliers

Purpose:

This document outlines Alpha Technologies Ltd. (“ATL”) requirements related to supplier compliance to RoHS and/or REACH legislation.

Scope:

This document applies to all suppliers who supply to ATL manufactured, fabricated or processed parts as part of meeting the contractual requirements of an ATL-issued and supplier-accepted Purchase Order. Specific requirements within this document apply as appropriate to the parts or services being supplied to ATL.

Definitions:

ATL: Alpha Technologies Limited.

CE Mark: CE marking or formerly EC mark, is a mandatory conformity marking for products sold in the European Economic Area (EEA) since 1993. It consists of the CE-Logo and, if applicable, the four digit identification number of the notified body involved in the conformity assessment procedure. The CE marking is the manufacturer's declaration that the product meets the requirements of the applicable EC directives, which includes RoHS as of January 2013.

REACH: European Community Regulation on chemicals and their safe use (EC 1907/2006). It deals with the **R**egistration, **E**valuation, **A**uthorization and Restriction of **Ch**emical substances.

RoHS: European Union Directive 2011/65/EC and its amendment 2015/863/EU which restricts the use of specific chemical compounds deemed to be hazardous.

Supplier: An organization that supplies finished goods, raw materials and/or services to ATL.

1.0 General Requirements

Suppliers shall support ATL’s ability to meet all the requirements of RoHS 2011/65/EC and its amendment 2015/863/EU including the following supplier-specific requirements:

1.1 Material Declarations

Material Declarations provided to ATL by a Supplier must:

- Contain an unambiguous statement that all ten RoHS substances are not present above the maximum concentration values, or if an exemption is claimed the statement should specify the exemption(s);
- Clearly identify the supplier’s part codes so it can be related to the Manufacturer’s list of parts for the product; and
- Must be signed by an executive officer at the supplier who has authority to sign on behalf of the company.

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ATL strongly prefers that its suppliers use BOMcheck (https://www.bomcheck.net/) for creation and management of Material Declarations.

1.2 Analytical Test Results

Suppliers to ATL should be reviewing the risks of compliance to RoHS in their supply chain and operations, and periodically, using chemical or physical analyses to confirm compliance. A useful reference to help determine what should be tested as well as appropriate methodologies for sampling is IEC/PAS 62596:2009 “Electrotechnical products – Determination of restricted substances – Sampling procedure – Guidelines”. Common risk areas for non-compliance include but are not limited to:

- Wires and cables, particularly housings, covers and insulations
- Manual rework/solder stations and contaminated solder products
- Metal fasteners, particularly those that are plated

At any time ATL may request that a component, sub-assembly, or finished good part undergo an analytical test using chemical and physical techniques such as x-ray fluorescence (XRF), electron spectroscopy, or similar.

1.3 Requirement to Retain Records

ATL Suppliers must retain sufficient records to support material declarations and analytical test results for a minimum of ten (10) years. These records may be audited by ATL personnel at any time, upon request. Additionally, ATL Suppliers must be able to fulfill any requests for records within a timely manner, typically within 24 hours.

1.4 References

- Directive 2011/65/EU of the European Parliament and of the Council of 8 Jun 2011
- Commission Delegated Directive (EU) 2015/863 of March 2015 – Amending Annex II to Directive 2011/65/EU
- Decision 768/2008/EC of the European Parliament and of the Council of 9 Jul 2008
- RoHS Guidance Producer Support Booklet (UK)
- RoHS Regulations - Government Guidance Notes (UK)
- IEC/PAS 62596:2009 “Electrotechnical products – Determination of restricted substances – Sampling procedure – Guidelines”
- IEC/TR 62476 Ed 1.0 (2010-02) “Guidance for evaluation of product with respect to substance-use restrictions in electrical and electronic products”
- Step-by-step Guide to Using BOMcheck to Generate Technical Documentation for RoHS2 Conformity Assessment

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2.0 Material Substitutions

From time to time situations may develop that make it difficult for Alpha's suppliers to obtain the specific RoHS materials dictated by the engineering documentation, and said suppliers would benefit from a substitute (albeit still RoHS compliant) material to be used. Unless explicitly detailed below, all substitutions must first be approved by Alpha Engineering via a formal deviation allowance prior to incorporation into any Alpha parts or products.

2.1 Satin Coat RoHS Compliant Steel

Low consumption of Satin Coat RoHS compliant steel (Galvannealed Steel / Zinc pre-plated process at the mill level) in North American markets makes it difficult for Alpha's qualified sheet metal fabricators to source material economically and within the required lead times. As an alternative to Satin Coat RoHS compliant steel, CRS with a Zinc post-plated process (ATL finish code 108) is an acceptable alternative, as long as the post plating process is RoHS compliant and the final part dimensions fall within the tolerance limits as specified by the part drawing.

The following specific scenarios qualify for this pre-approved substitution:

- parts that specify RoHS Satin Coat, followed by no post-finishing (i.e. bare metal) may be substituted with CRS plus RoHS compliant plating (ATL finish code 108);
- parts that specify RoHS Satin Coat, followed by post-plating may be substituted with CRS plus RoHS compliant plating (ATL finish code 108); and
- parts that specify RoHS Satin Coat, followed by Powder Coating may be substituted with CRS plus RoHS compliant plating (ATL finish code 108) plus Powder Coating.

In some circumstances the third item above (CRS plus RoHS compliant plating plus Powder Coating) may skip the intermediate plating step, but this must first be approved by Alpha Engineering via written permission. This will then enable the supplier to generate a waiver before the parts arrive.

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