

EU's RoHS and REACH Requirements for Suppliers

Purpose:

This document outlines EnerSys and Alpha Technologies Ltd. ("ATL") requirements related to supplier compliance with Materials legislation.

Scope:

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

Definitions:

ATL: Alpha Technologies Limited. An EnerSys Company.

***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.

***REACH:** European Community Regulation on chemicals and their safe use (EC 1907/2006). It deals with the **Registration, Evaluation, Authorization and Restriction of Chemical** substances. Articles (products) containing substances of very high concern (SVHCs) on the Candidate List at a concentration above 0.1% weight by weight (w/w) placed on the EU market notified according to Article 9(1)(i) of the Waste Framework Directive 2008/98/EC.

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

Links:

*RoHS Directive (https://ec.europa.eu/environment/topics/waste-and-recycling/rohs-directive_en)

*REACH Directive (<https://echa.europa.eu/candidate-list-obligations>)

Candidate List (<https://echa.europa.eu/candidate-list-table>)

*Note: The Directives referenced here may be amended from time to time and EnerSys/ATL assumes the requirements of the latest revision shown in the Official Journal will be adhered to.

1.0 General Requirements

Suppliers shall support EnerSys/ATL's ability to meet all the requirements of:

- RoHS 2011/65/EC and amendment 2015/863/EU.
- Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC.
- including the following supplier-specific requirements:

1.1 Material Declarations

Material Declarations provided to EnerSys/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);

- Reference the REACH Regulation and declare the presence of any SVHCs (per the latest Candidate List) in supplied Articles. Articles (products) containing substances of very high concern (SVHCs) on the Candidate List at a concentration above 0.1% weight by weight (w/w) placed on the EU market notified according to Article 9(1)(i) of the Waste Framework Directive 2008/98/EC.
- Clearly identify the supplier's part codes so the part 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 the authority to sign on behalf of the company.

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

1.2 Analytical Test Results

Suppliers to EnerSys/ATL are expected to regularly be reviewing the risks of compliance to RoHS in their supply chain and operations, and periodically, use 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 EnerSys/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

EnerSys/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 EnerSys/ATL personnel at any time, upon request. Additionally, EnerSys/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 the product with respect to substance-use restrictions in electrical and electronic products"
- Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC.
- Step-by-step Guide to Using BOMcheck to Generate Technical Documentation for RoHS2 Conformity Assessment

2.0 Material Substitutions

From time to time situations may develop that make it difficult for EnerSys/ATL'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 EnerSys/ATL Engineering via a formal temporary deviation/waiver or a formal design change allowance before incorporation into any EnerSys/ATL 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 EnerSys/ATL'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 (EnerSys/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 (EnerSys/ATL finish code 108);
- parts that specify RoHS Satin Coat, followed by post-plating may be substituted with CRS plus RoHS compliant plating (EnerSys/ATL finish code 108); and
- parts that specify RoHS Satin Coat, followed by Powder Coating may be substituted with CRS plus RoHS compliant plating (EnerSys/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 EnerSys/ATL Engineering via written permission. This will then enable the supplier to generate a waiver before the parts arrive.

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