

## **Directive (EU) 2011/95/EC & 2015/863** **RoHS (2) Regulations & Compliance**

EU directive 2011/95/EC came into force in July 2011. Specific to the Restriction of use of certain Hazardous Substances (RoHS), this legislation requires manufacturers of electrical and electronic equipment (EEE) to exclude six restricted substances from the materials contained within their products. The Directive applies to EEE that is dependent upon electric or electromagnetic fields in order to work properly, and also includes certain categories of equipment for the generation, transfer and measurement of such currents and fields and designed for use with a voltage rating not exceeding 1,000 volts for a/c and 1,500 volts for d/c. Unless your products are specifically listed as one of the exemptions, with time it will apply to every manufacturer of EEE. There are 3 new Categories, with phased introductions to cover the rest of this EEE.

The Recast RoHS (2) Directive is now a CE-marking Directive. What this means is that if you manufacture an electrical/electronic component, device or equipment, you can no longer CE-mark in accordance with just the Medical device, Machinery, EMC or Low Voltage Directive. Compliance with the RoHS Directive is required before you can place the CE mark on the product.

The initial six restricted substances are:

- Cadmium (Cd): 0.01%
- Mercury: 0.1%
- Lead (Pb) : 0.1%
- Hexavalent chromium (Cr6+) : 0.1%
- Polybrominated biphenyls (PBB): 0.1 %;
- Polybrominated diphenyl ethers (PBDE): 0.1 %

As an alloying element, Lead is allowed in the following metals from which components may be made: Steel 0.35% weight, Aluminium 0.4% weight and Copper Alloys 4.0% weight. At the time of writing, these exemptions can still be applied, with a current expiry date of July 21<sup>st</sup> 2021. Specifically, we apply exemptions 6(a) "Lead as an alloying element in steel (EU/509)" and 6(c) "Lead as an alloying element in copper (EU/511)"

Article 6 of the Directive proposed a REACH based methodology for identifying new substances for restriction, and goes some way to aligning RoHS (2) with other Directives. RoHS (2) provides for the broader scope to be phased in over a long period and aims to align RoHS with REACH chemical

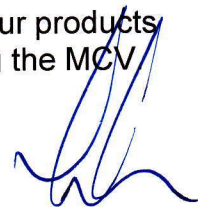
policy ensuring a science based approach to Substance restriction. In line with this revised methodology, on 4 June 2015, the EU commission published a new Directive (EU) 2015/863 to amend Annex II to EU RoHS 2 (Directive 2011/65/EU) to add the following 4 phthalates onto the list of restricted substances:

- Bis(2-Ethylhexyl) phthalate (DEHP): max 0.1%
- Benzyl butyl phthalate (BBP): max 0.1%
- Dibutyl phthalate (DBP): max 0.1%
- Diisobutyl phthalate (DIBP): max 0.1%

This brings the total number of currently restricted substances to 10. DEHP, BBP, DBP and DIBP are primarily used as plasticisers to soften plastics. They will be restricted from 22 July 2019 for all EEE apart from Category 8 (medical devices) and Category 9 (monitoring and control equipment) which will have an additional two years to comply by 22 July 2021. Some EEE products are outside the scope of EU RoHS (2). Military equipment, large-scale stationary industrial tools, large-scale fixed installations; active implantable medical devices, and photovoltaic panels are excluded, as are batteries and package materials since they are subject to different directives.

As a Components manufacturer, G&B Projects does not fall under the jurisdiction of the Directive. The Directive does not cover components or sub-assemblies; moreover, the equipment producers are obliged to take their own steps to ensure that all parts and materials used in their products do not contain restricted substances. However, G&B Projects is committed to comply with the Directive to ensure the continuity of availability of suitable product for our customers. We remain in close contact with our suppliers, and as such we have requested that they inform us in writing and without delay, of any products supplied to us that contain Restricted Substances in concentrations exceeding the MCV.

According to our current information, we assume that none of our products contain any Restricted Substances in concentrations exceeding the MCV



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