

RoHS, REACH, SCIP, Conflict minerals...

General description of the routine / instruction and its purpose

This policy aims to make clear who owns the responsibility of monitoring the material list (BOM) and assembly processes according to EU environmental directives.

Revision	Beskrivning	Signatur	Datum
A	Initial release	TM	2021-12-17

Background:

Placing a product on the market in EU means that the product shall comply with relevant standards and directives. Many of them tend to evolve and change or extend their scope over time, especially in the environmental area, when new chemical substances are added to REACH, SVHC list. This policy aims to make clear who owns the responsibility of monitoring the material list (BOM) and assembly processes against these regulations.

Below are some environmental regulations, the list can be made longer but these are a collection of the most common.

REACH: 1907/2006

RoHS 3: 2015/863

Conflict minerals: 2017/821

POP's 2019/1021

SCIP: Registration of products containing a component with >0,1% Weight of a substance on the REACH SVHC list.

Responsibilities:

1. Electrum does not perform any of the above activities on products without exercising the full product ownership.
Electrum assumes that material specified by the customer in article lists (BOM) are in accordance with the regulations.
2. Possible deviations from the product owner's BOM are subject to authorization of the product owner.
Process material typically not listed in the customer article list added by manufacturing process are under supervision and responsibility of Electrum, such as Printed circuit boards, solder paste, flux and coating material as some examples.
3. In cases where Electrum has accepted and performed design related tasks on product owner's product, Electrum is responsible for, at the time of design, ensuring the specification of compliant material.
4. For the continued compliance it is recommended that the product owner by himself, a 3rd party or in cooperation with Electrum purchase such as service.
5. For products developed and fully owned by Electrum, Electrum assumes the full responsibility for the relevant EU environment legalization at the time of sale.

On all purchase orders, Electrum specifies 100% compliant products according to RoHS & REACH