

## Compliance statement: 022revB

## **REACH & ROHS Data**

Glenair appreciates that some customers may choose/or need to collect data through the application of dedicated portals, spreadsheets or simply, statements of a products compliance to regulatory requirements. Irrespective as to how this data is collected it places a non-value adding administration cost onto Glenair. We do however appreciate the need to declare that a product is compliant to the relevant needs.

There are two key aspects of this which have to be taken into account:

## **1 Product supplied to a customer's specification**

Where a product's design/specification is not that of Glenair's it is the responsibility of the specifier to determine prior to the release of the data pack that the product is compliant with the customers' expectations. Under RoHS, an example of this would be where the spec states lead solder to be used rendering the product not RoHS compliant. If the product needs to be compliant then an alternative lead free solder should have been specified.

Glenair does not automatically evaluate data packs for compliance, however, if it is made known to us at the enquiry stage that the product needs to be compliant, this will be taken into account. Upon receipt of an order or during manufacturing, if a substance being called up renders the product not to be REACh/RoHS compliant, then we would consult the customer for a suitable alternative, supported with an authorisation to deviate from the specification.

## 2 Glenair products

We are a producer of articles all of which have elements of chemicals as part of their make-up, but no Glenair products are designed to release any SVHC's, nor do they require material safety data sheets or specific labelling in accordance with CLP.

Where substances become classed as being an SVHC under REACh or not RoHS compliant, we may choose to use them whilst they are available. Once obsolete we would specify the most appropriate alternative without the need to seek a customer's approval. Typically, surface treatment such as cadmium will continue to be used until the aerospace industry have assured themselves that suitable alternatives are available and to be proven to be airworthy. Alternatives are available and Sales should be consulted for their continued suitability.

Where products are affected under these regulatory requirements, compliance it is stated on the delivery paperwork.

As the delivery paperwork defines whether or not the product is compliant, this should be more than adequate to negate the need for completing data gathering by Glenair.

| Date                  | Change History |
|-----------------------|----------------|
| Current November 2018 | C014,          |