

Come January 2, 2013, the European Union will replace its original RoHS law with a new recast version known as RoHS 2. This new version will expand coverage to all electrical and electronic equipment, require special marking of finished goods and more compliance documentation, and increase penalties for non-compliance. So what stays the same and what is different?

What's the same

Currently in-scope (covered) products are not allowed to be placed on the market if they contain a RoHS substance in an amount exceeding the established maximum allowable concentration value? Current in-scope products are product categories 1 through 7 and 10.

What's different?

All electrical and electronic equipment (EEE) will be covered until July 2019 unless specifically excluded. All current RoHS exemptions will automatically expire unless renewed. A review of scope and further exclusions to category 11 will be published by July 2014.

New categories will be covered at different times over a 6.5 year period:

July 2014 -- Categories 8 (medical devices) and 9 (consumer monitoring/control instruments) will be covered.

July 2016 -- In-vitro diagnostic medical devices will be covered.

July 2017 -- Industrial monitoring/control instruments will be covered.

July 2019 -- Category 11 (all other EEE not previously covered) will be added.

All finished goods will require a CE mark and a reference to RoHS 2 in the product's declaration of compliance (DoC). Manufacturers must submit technical documentation (of compliance status) on request, and retain such documentation for 10 years after a covered product is placed on the market.

Additional items now covered:

Components and spare parts to be inserted into (used in the manufacture, repair, or upgrade of) a covered product are considered part of that product. They must be RoHS 2 compliant but will not require a separate CE mark or DoC. Cables must be RoHS 2 compliant. They may or not require a CE mark and DoC depending on their intended use. Cables that are considered finished goods (i.e., cables with connectors at both ends sold to end users and not OEMs) will require a CE mark and DoC. Cables that are specially designed for use in a covered product are considered part of that product and do not require a separate CE mark or DoC.

General purpose items (like semiconductor development kits) that simply plug into other equipment to make them work are considered finished goods by all EU member state enforcement authorities. They must be RoHS compliant, and will require a CE mark and DoC.

RoHS liability is increasing. Violation of CE mark and technical file requirements can result in product being withdrawn from sale and fines.

Additional RoHS hazardous substances may be added in the future. Four new priority substances will be considered in July 2014 (using the REACH methodology for substance restriction).

Summary

Nobody gets out of RoHS any longer. If an electrical or electronic product isn't currently covered, it will be. Obligations and liability for non-compliance are increasing. You can't afford to be non-compliant.

This statement is periodically reviewed to ensure that it remains as accurate as it can be.

Date	Change History
Current November 2018	C001, C014,

This compliance statement relates to Glenair UK Limited only