



TECHNICALLY SPEAKING

OCTOBER 2005

VOLUME 4

NUMBER 10

New Insight Into RoHS: Things Get More Complex

ITW Chemtronics
8125 Cobb Center Drive
Kennesaw, GA 30152

Tel: 800-645-5244 x166

Fax: 770-423-0748

Technical Support:

800-TECH-401

or

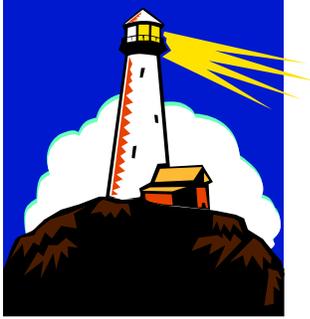
mwatkins@chemtronics.com

Website:
www.chemtronics.com

In the February 2005 Volume 4 Number 2 issue of Technically Speaking I talked about the upcoming European regulations that are driving the push for “Lead-Free” soldering products. The new European regulations (EC2002/95/EC and 2002/96/EC) prohibit the use of six substances (lead, mercury, cadmium, hexavalent chromium, poly-brominated biphenyls and poly-brominated diphenyl ethers) in the manufacture of printed circuit boards used in electronics. Even though there are no such regulations pending in the US (at least at the Federal level), American manufacturers who wish to continue doing business in Europe will have to comply with the new regulations.

To help our customers and sales personnel answer the question, “Is this Chemtronics product in compliance with the new European RoHS Directives?”, our regulatory administrator Susan Max has prepared Compliance Certificates for the major Chemtronics product categories. These certificates have been placed on the Chemtronics website and can be downloaded at any time. These signed documents, certify that the products included in the particular Chemtronics product category (i.e cleaner degreasers, flux removers, conformal coatings, etc.) do not contain any of the six proscribed substances listed on the certificate and therefore are in compliance with the current RoHS directive. The situation with regard to RoHS compliance would seem to be resolved, but new regulatory efforts have clouded a once clear picture. In the push to achieve “green manufacturing” many state regulatory agencies are examining all waste that could possibly end up in local landfills and promulgating laws that prohibit the use of not only the six proscribed RoHS substances, but an even larger list of chemicals, and ban the use of these substances not only in the finished product itself but also in the product packaging as well! The goal here is to eliminate these chemical compounds from public landfills so that these chemicals do not contaminate ground water aquifers.

With the development of the Model Toxics in Packaging legislation in 1989, which is currently adopted by nineteen states, there are now three separate list of chemical substances that are either banned from use products and product



TECHNICALLY SPEAKING

OCTOBER 2005

VOLUME 4

NUMBER 10

ITW Chemtronics
8125 Cobb Center Drive
Kennesaw, GA 30152

Tel: 800-645-5244 x166

Fax: 770-423-0748

Technical Support:

800-TECH-401

or

mwatkins@chemtronics.com

Website:
www.chemtronics.com

packaging materials or are reportable with regard to various regulatory criteria. This interest from the states is generating concern with manufacturers, who suspect that Federal level regulations cannot be far off. Many companies have already start compliance efforts by asking Chemtronics to certify our products and packaging under the expanded list of proscribed substances.

List 1A carries banned substances that cannot be contained in manufactured products or used in their manufacture. Along with the six substances already banned by the EU community, this list also prohibits the use of asbestos, azo dyes, formaldehyde, CFCs and HCFCs, and other specific types of chemical compounds, which can involve their own lengthy list of specific chemical substances. The permissible limits for each listed substance may be lower than the current EEE Directive sets for the primary six substances.

List 1b details those substances that must be reported to regulatory authorities because they are considered to be hazardous waste, are of significant health, safety or environmental interest, have economic value for end-of-life management or have a negative impact on end-of-life management. Many of the substances named on List 1B are heavy metal compounds or brominated and chlorinated flame retardants.

List 2 constitutes those chemicals and substances that cannot be contained in packaging materials or used in their production. In this list the total of these substances in packaging materials cannot exceed 100 PPM. For the purpose of these regulations packaging materials are taken to be trays, reels, sticks, bags, cushions, staples, sheets, wraps, tapes, labels, corrugated cardboard, wooden frames, pallets, vinyl ties, and any inks or paints used in printing..

To comply with the extended requirements of these regulations, ITW Chemtronics is requiring that our vendors of packaging materials, chemicals, and any other items used in or in the production of our products certify in writing that the materials they supply to us do not contain any of the substances listed on the three list, at quantities greater than those allowed by the



OCTOBER 2005

ITW Chemtronics
8125 Cobb Center Drive
Kennesaw, GA 30152

Tel: 800-645-5244 x166

Fax: 770-423-0748

Technical Support:

800-TECH-401

or

mwatkins@chemtronics.com

Website:
www.chemtronics.com

regulation. Once we are certain that we are supplied with raw materials that meet the regulatory criteria, we can certify to our customers that all Chemtronics products meet the new standards, as we do not add any of these substances to our products ourselves.

If you receive questions regarding the compliance of ITW Chemtronics products or product packaging components from your customers, that require information for substances other than the six substances listed on our current RoHS Certificates please have the customer make the inquiry in writing to: Ms. Susan Max,

Director of Research,
ITW Chemtronics
8125 Cobb Center Drive
Kennesaw, GA #0152.

Sue can also be contacted by e-mail at smax@chemtronics.com.

Until the local, state, federal and foreign regulations stabilize, and we have final clarification of which lists of banned substances should be used, we will be unable to prepare a simple certification form similar to the ones we currently issue.

Michael Watkins
October 2005