

Are You RoHS 2 Compliant?

What is RoHS & RoHS 2?

The *Restriction of Hazardous Substances* is a directive created by the European Union in 2003 and first implemented in 2004. The purpose of said directive is to restrict the usage of six hazardous materials—lead, cadmium, mercury, polybrominated diphenyl ether, polybrominated biphenyls, and hexavalent chromium—in any part or material included in the construction of the following:

- ⤴ Both Large and Small Household Appliances
- ⤴ IT and Telecommunications Equipment
- ⤴ Consumer Equipment
- ⤴ Lighting Equipment (Including Lightbulbs)
- ⤴ Electronic and Electrical Tools
- ⤴ Toys, Leisure, and Sports Equipment
- ⤴ Automatic Dispensers
- ⤴ Semiconductor Devices

As part of the RoHS 2 Directive, in July of 2011, the European Union removed exemptions for two additional categories:

- ⤴ Medical Devices
- ⤴ Monitoring and Control Instruments

RoHS 2 officially went into effect on January 1, 2014.

How do these directives affect manufacturers?

Any product manufactured in—or imported into—the EU that falls in the above categories *must be certified according to RoHS and RoHS 2 standards*. Further, every process involved in the manufacturing of that product (including additive processes such as painting, coating, or finishing, for example) must also be certified as compliant. In fact, many manufacturers are unaware of the many hidden processes in subcontracted manufacturing of parts, and the impact RoHS and RoHS 2 have on each of them.

Do these directives apply to passivation as well?

YES! The passivation process is intended to increase stainless steel's rust resistance. This is achieved by removing particles of free iron left over from the machining process. Baths of either nitric acid or citric acid have been approved to use for passivation, according to ASTM standards. However...

Does your contracted finishing company utilize a Nitric Acid bath for passivation?

Nitric acid isn't picky; it will remove free iron, but it will also remove particles of *other* metals as well, including chromium, which is restricted in the RoHS Directive. In other words, many nitric acid baths are unknowingly contaminated with chromium. Citric acid, on the other hand, is extremely picky. It *only* removes free iron.

At RP Abrasives, we use a proprietary Citric Acid passivation process that not only meets ASTM A-967 and AMS 2700 industry standards, but also GUARANTEES RoHS & RoHS 2 compliance.

Therefore, for each and every process involved in the creation of each and every product, the European Union requires full documentation, all testing results, and sign-off by the Company Officer. Without the proper documentation, your parts will find themselves in customs limbo, and you'll run the dangerous risk of losing customers.

No one wants that.

What if you don't manufacture parts, or provide services, for products headed to EU countries?

In this day of increased environmental awareness, there are a number of "copycat" regulations being passed all over the world. China, most notably, has established its own. Within US borders, California is the first state to begin implementing these copycat regulations, and large manufacturers like IBM and HP have begun to, also.

Who's next?

Can the company you are now using certify you for RoHS and RoHS 2? **RP Abrasives** can.
And will.

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