

Edwards Policy on REACH and RoHS compliance

REACH Regulation (EC) 1907/2006 on the Registration, Evaluation, Authorisation and Restriction of Chemicals is designed to protect human health and the environment from risks that can be posed by chemical substances, in any material or at any point in the lifecycle. The Regulation directly controls the manufacture and/or use of substances where very significant risks are found to exist, either in specific applications, or as a result of high levels of use across a range of industries and geographical locations. Although primarily seen as impacting the Chemical Industry, this legislation has implications for all materials and so impacts chemical and equipment manufacturing industries.

RoHS2 Directive 2011/65/EU Restriction of the use of certain Hazardous Substances in electrical and electronic equipment (EEE) is a CE Mark Directive designed to protect the workforce and reduce toxic waste by prohibiting the use of these substances above a defined level. In recognition of technological limitations, special material exemptions allow threshold levels to be exceeded in special and specific cases. These exemptions are time limited to encourage the development of existing or alternative technologies that are not reliant on hazardous substances.

China RoHS, the Management Methods for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products Order No. 32, does not prohibit restricted substances in EEE unless the equipment is listed in the Management Catalogue, instead Material Declarations and appropriate product marking are required.

Edwards is fully committed to ethical, sustainable business practices; we comply with and strive to exceed the requirements of any legislation aligned to and supporting them.

Our products comply with the requirements of EU REACH and RoHS and wherever possible do not contain REACH Candidate List Substances of Very High Concern above the threshold levels.

In support of our commitments we have a rigorous supplier selection process and work closely with our supply chain to ensure the compliance of all procured substances and articles against this and other relevant legislation.

Under REACH, the majority of our products are complex articles which are not designed for intentional substance release. Design controls prevent the inclusion of new materials containing Candidate List substances in our approved materials database and substance related risks are considered when developing the safety information in our product manuals.

We work closely with the formulators of our bespoke branded lubricants and independent chemical experts to verify REACH compliance. The software used to author our Safety Datasheets tracks changes to substance classifications as well as any changes in national legislation or standards that affect the required content of the datasheet. This ensures we provide appropriate and current safety information to our customers.

When new substances added to the Candidate List are identified as present in our manufacturing materials or supplies we comply with the Article 33(1) requirements. Product documentation is updated to identify the substance present, and the safety measures are reviewed. Materials in our approved materials database are flagged to identify the SVHC present and so restrict use in new developments, and a review of alternatives is initiated.

EU RoHS compliance is stated in the CE Declaration of Conformity. Equipment sold into China subject to China RoHS is appropriately marked. Where an Environmentally Friendly Usage Period (EFUP) applies this is indicated by the product marking and supported by a Material Declaration indicating where the substances are present. Material declarations (in English) are available on request for non-electrical product that may be used with or incorporated into EEE.

Our extended legislation declarations provide additional compliance information for our customers including compliance to Delegated Directive (EU) 2015/863 and equipment category where relevant, statements on the use of EU RoHS material exemptions and the presence of EU REACH Candidate List substances.

For more information see the Environmental section of our Corporate Responsibility website at www.edwardsvacuum.com. You can also get in touch through your normal contact or online via www.edwardsvacuum.com/contact.



Ian Stones
Vice President, Technology