

RoHS 2015/863 (“ROHS3”) Status:

Pickering is aware that RoHS 2015/863 (“RoHS3”) became active in 22nd July 2019 and it has superseded RoHS Directive 2011/65/EU (“RoHS2”). Pickering acknowledges the following changes due to the revised directive :-

- 4 more restricted substances (DEHP, BBP, DBP and DIBP) are included; bringing the total number to 10.
- Equipment categories # 8 (medical devices including in-vitro medical devices) and # 9 (monitoring and control equipment) became active under “RoHS2” but remain exempt until 22nd July 2021
- An additional equipment category (# 11 “catch all products”) has been added to cover all equipment not previously covered by the other 10 categories

The 4 additional restricted substances are on the candidate list of Substances of Very High Concern so refer to our compliance statement for REACH Regulation (EC) No. 1907/2006.

The new restrictions do not affect the use of cables and spares for repairing, updating and upgrading of products placed on the market before 22 July 2019 and before 22 July 2021 for category # 8 and # 9 equipment respectively.

Pickering products are primarily designed for use in equipment categories # 8 and # 9 and are supplied with this intention.

Our products are sold to resellers, distributors or integrators that in turn sell to the end user. Therefore, we cannot be sure of their application or market, the equipment category and whether any product applications apply. Our immediate customers do not disclose this information due to data protection and non-disclosure agreements.

We expect the end user to carry out the necessary due diligence regarding which category their product is used in and whether any product or material exemptions may apply.

We expect all suppliers to carry out their own diligence which includes informing Pickering in advance when they can no longer comply to the revised directive.

Pickering acknowledges CE marking still needs to be considered under “RoHS2”.

Pickering shall continue to reserve the right to use material exemptions in accordance to RoHS 2011/65/EU. Some switching components may contain up to 20mg of mercury or alloy containing more than 85% lead by weight, see annex IV #16 and annex III #7(a) respectively.

Pickering acknowledges that “lead” has since been added to the candidate list of Substances of Very High Concern for REACH however only “lead alloy” is used and encapsulated. Therefore, no lead remains in its raw state or is released.

Pickering acknowledges exclusions still remain in force under “RoHS2” for example :-

- Military equipment, large-scale stationary industrial tools and large-scale fixed installations
- R&D and space equipment.
- Active implantable medical devices, and photovoltaic panels
- Battery cells, (not external wiring) and package materials since they are subject to different directives.
- Transportation vehicles (except 2-wheeled electric vehicles) and non-road mobile, railway, waterway and construction machinery
- Fixed-location photovoltaic panel installations, active Implantable Medical Devices, pacemakers, implanted defibrillators and insulin pumps
- Compact fluorescent light bulbs/lamps