

Frequently Asked Questions

Rev C

REACH Compliance

1. What is REACH?

Regulation (EC) No. 1907/2006 of the European Parliament and of the Council of 18 December 2006 is commonly referred to as REACH. REACH stands for the Regulation for Registration, Evaluation, Authorization, and Restriction of Chemicals. The REACH Regulation entered into force on 1st June 2007 to streamline and improve the former legislative framework for chemicals of the European Union (EU) and European Economic Area (EEA) countries.

2. What is the ECHA?

REACH created the European Chemicals Agency (ECHA) which has a central coordination and implementation role in the overall regulation process. ECHA is located in Helsinki, Finland and manages the registration, evaluation, authorization and restriction processes for chemical substances to ensure consistency across the countries in which REACH applies.

3. What is the main objective of REACH?

The main objective of REACH is to improve protection of human health and the environment from the risks of chemicals.

4. Why is Ecliptek offering REACH compliant articles to its customers?

Ecliptek Corporation has implemented a REACH compliance program to address the legislation initiated by regulatory groups around the world who have called for companies to make changes to manufacturing processes and components so as to address these health and environmental concerns. Ecliptek is committed to meeting the requirements of all applicable REACH laws and regulations.

5. Is REACH compliance mandatory throughout the world?

REACH compliance is only mandatory on products produced in or shipped into the European Union (EU) and member countries. However, since many other jurisdictions have similar or pending legislation and manufacturers' products may eventually find their way into the EU, REACH compliance is having a global effect.

6. Is Ecliptek impacted by REACH pre-registration obligations?

Ecliptek does currently neither manufacture nor import any chemical substances into the EU on their own or in articles in quantities of 1 tonne or more per year. In addition, imported Ecliptek articles do not contain chemical substances intended to be released during the normal and reasonably foreseeable conditions of the product's use

as defined by the REACH regulation and existing guidance. Thus, Ecliptek does not currently have a direct REACH obligation to pre-register substances.

7. Who does REACH regulation apply to?

Any organization producing, importing, using or placing a substance, mixture or article on the EU market will be responsible for ensuring that it is in compliance with REACH regulations. The legislation covers EU manufacturers, including chemical suppliers, distributors and downstream users, as well as any EU companies importing products to the EU market.

8. Is Ecliptek working in conjunction with the electronics industry to offer REACH products compliant to the REACH regulation?

Ecliptek is working in concert with several industry consortia and forums in an effort to offer REACH compliant product alternatives. Ecliptek is implementing processes and procedures with its suppliers and customers to offer REACH compliant components and assemblies.

9. Where can I find the current REACH legislative information and technical guidance?

You can find additional information about REACH legislative and regulation from the below sources.

[ECHA - European of Chemical Agency](#)

[EEA - European Environment Agency](#)

[EUR-Lex - European Law](#)

10. How is the REACH legislation organized?

The REACH legislative text is organized into fifteen Titles. The first eight Titles refer to registration, evaluation, authorization and restriction processes. The remaining seven Titles detail the administrative elements of REACH, such as the establishment of a European Chemicals Agency, confidentiality of data, and enforcement issues. A number of annexes detail the technical obligations. Technical guidance documents supplement the text and annexes.

11. What is a Substance?

The term “substance” refers to all chemicals, including metals. REACH applies to substances in mixtures, as well as certain substances contained in articles (Components and Assemblies).

12. What are substances of very high concern (SVHC)?

Substances of very high concern (SVHC) are substances identified by the European of Chemical Agency (ECHA) as having hazardous properties. These substances must be regulated because the effects they have on the environment and humans are serious and often irreversible. The SVHC include substances which are carcinogenic, mutagenic or toxic according to the criteria in Annex XIII of the REACH regulation.

13. What is the Candidate List?

The Candidate List is a list of substances of very high concern (SVHC) that are identified as potential targets to be regulated for use within the EU by the process of authorization. This is the letter "A" in the acronym REACH. Substances are added to the Candidate List by ECHA. Any substance included on the Candidate List may ultimately be added to Annex XIV of the REACH regulation by decision of the European Commission. The identification of a substance as a SVHC and its inclusion in the Candidate List is the first step of the authorization procedure.

14. What is Annex XIV of the REACH regulation?

Substances on the Candidate List may subsequently become subject to authorization. The Annex XIV of the REACH regulation is a list of authorized substances. This list of authorized substances means companies using or importing these substances into the EU must be authorized by the regulators for their particular use.

15. How many substances were initially placed on the Candidate List?

Effective October 28, 2008, fifteen (15) substances were initially placed on the [Candidate List](#).

16. Will new substances be added to the Candidate List?

The [Candidate List](#) published on the ECHA website is regularly updated when more substances are identified as SVHC by the ECHA.

17. What is Ecliptek's definition of an Article?

Ecliptek's definition of an article is a Component or Assembly.

18. What is Ecliptek's definition of a Component?

Ecliptek's definition of a component applies to quartz crystal resonator devices.

19. What is Ecliptek's definition of an Assembly?

Ecliptek's definition of an assembly applies to oscillator devices (MEMS Oscillator, XO, VCXO, TCXO, or OCXO).

20. What are the specific amounts permissible of SVHC banned by the REACH regulation?

The permissible maximum amount of any SVHC is 0.1% (by weight per article).

21. What is Article 33 of the REACH regulation?

Article 33 is a section of the REACH regulation that outlines supply chain responsibilities. In accordance with Article 33, Ecliptek is obligated to inform recipients of articles that contain any of the chemicals on the SVHC Candidate List that are above the 0.1% concentration.

22. When is an Ecliptek component or assembly classified as REACH Compliant?

An Ecliptek component or assembly shall be classified as REACH compliant when it does not contain specific SVHC beyond the specified concentration limits of less than 0.1% (weight by weight) as outlined in REACH 1907/2006/EU regulation. The specific SVHC for each Ecliptek component or assembly can be found on the Ecliptek REACH compliance letter.

23. How can I obtain an Ecliptek REACH compliance statement from Ecliptek?

Please request a REACH compliance statement letter from our [REACH Compliance Team](#). Please include the Ecliptek part number(s) with your request.

24. Are all Ecliptek products REACH Compliant?

Some Ecliptek component or assemblies are REACH Compliant and other Ecliptek products are not REACH Compliant.

25. When will sample and production quantities of REACH compliant products be available?

Please contact our [REACH Compliance Team](#) for availability of REACH compliant components and assemblies.

26. When will all Ecliptek components and assemblies be totally REACH compliant?

Please contact our [REACH Compliance Team](#) for the current REACH status of all Ecliptek products. Due to certain technical and commercial issues, some Ecliptek products may not be transitioned to the REACH compliant classification.

27. How can a customer distinguish between a REACH compliant product and a product that is not REACH compliant?

The Ecliptek specification sheet does not currently indicate if the component or assembly is classified as REACH compliant. A REACH compliance statement letter from Ecliptek is the only means of determining if an Ecliptek component or assembly is REACH compliant. Please request an Ecliptek REACH compliance statement letter from our [REACH Compliance Team](#). Please include the Ecliptek part number(s) with your request.

28. Will Ecliptek discontinue or change any products as a result of REACH?

Ecliptek has no plans to discontinue or change any product as a result of meeting the REACH regulation requirements. Products will be discontinued or changed via Ecliptek's standard product lifecycle processes.

29. What qualification testing has been completed to evaluate and qualify REACH compliant components and assemblies?

Ecliptek qualification testing of components and assemblies can be found in the [Qualification and Reliability Report](#) section of our website.

30. Does Ecliptek have a special component or assembly marking scheme for REACH compliant products?

At present, there are no legislated REACH requirements for individual part marking to indicate REACH compliance. The marking content for all REACH compliant components or assemblies is shown on the applicable specification sheet found on our website.

31. Does Ecliptek have a special REACH labeling method for shipment packaging of REACH compliant products?

At present, there are no legislated REACH requirements for component or assembly packaging to indicate REACH compliance. Ecliptek has no special labeling method for the packaging of REACH compliant products.

32. Are there any changes required in component or assembly storage conditions of REACH compliant products?

There are no changes in the storage condition specifications. Upon receipt of Ecliptek products, it is always good manufacturing practice to store components and assemblies in a controlled environment so as not to expose them to extremes of humidity and temperature for extended periods of time.

33. Do I need to make any process or material changes to my PCB assembly process to use Ecliptek REACH compliant products?

REACH compliant components and assemblies manufactured by Ecliptek require no special process or material changes in the customer PCB assembly process.

34. Are REACH compliant components and assemblies compatible with my existing reflow processes?

The recommended solder reflow profile for all Ecliptek REACH compliant components or assemblies can be found on the applicable datasheet on the Ecliptek website.

35. Are products classified as REACH compliant forward and backwards compatible to Lead (Pb) and Pb-free PCB reflow processes?

Solderability testing has been performed by Ecliptek to ensure both forward and backward process compatibility of REACH compliant products with various PCB assembly environments. To certify forward compatibility, solderability testing was performed using SnAgCu solder at higher temperatures (as high as 260C). In order to certify backwards compatibility, standard Tin-Lead (SnPb) solder was used at lower temperatures (as low as 215C). Ecliptek qualification test results demonstrate that products classified as REACH compliant can be successfully integrated into either RoHS (Pb-free) or traditional Tin-Lead (SnPb) PCB assembly processes.

36. If the REACH regulation only mentions a limited list of substances, why are some companies interested in concentration levels of other substances?

Some companies may have their own internal substance control requirements that exceed the REACH regulation. If your company has additional substance requirements beyond the currently published REACH SVHC substances, please contact our [REACH Compliance Team](#).

37. Who at Ecliptek is coordinating the company's REACH compliance effort?

An Ecliptek REACH compliance team has been established and meets regularly to coordinate all REACH company policy. This team coordinates all REACH tasks with respect to our manufacturing locations, qualified subcontractors, and material declarations. All customers can obtain the status of the team's on-going efforts by reviewing these FAQ's and associated links. Please contact our [REACH Compliance Team](#) if you have any questions about our program.

38. Who do I contact if I have additional technical questions about Ecliptek REACH compliance issues?

Please contact our [REACH Compliance Team](#) for REACH compliance support. We encourage you to visit the site regularly to obtain the most up-to-date REACH information.