

Grade A information

Jim Kandler and Aidan Turnbull believe that sharing data will greatly improve the quality of RoHS and REACH declarations

Collecting substance compliance declarations for regulations governing the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS) and the EU chemicals legislation REACH is a difficult task for original equipment manufacturers (OEMs). But these need to be done to prove compliance with the RoHS Directive (2011/65/EU) or to report a substance of very high concern under the EU REACH Regulation (1907/2006).

Most OEMs and parts manufacturers will choose to collect the declarations for each part from the suppliers. However, there are many issues that occur during collection, each of which can stall or even halt efforts. It is important that OEMs acknowledge this, and are aware of what they can do to compensate for these difficulties.

Not rocket science

Difficult it may be, but collecting declarations is not rocket science. And with effective and efficient processes it can be successful. Many issues are commonly encountered, both internally and externally. Internal problems faced by those collecting the data may include:

- limited resources;
- out-of-date supplier or part data;
- ineffective tools; and
- tools that do not connect to clean data sources.

The most common external issues are:

- untrained personnel in the supply chain;
- limited resources in supplier companies;
- poor supplier policies;
- suppliers' priorities failing to align with the needs of the OEM;
- the need for action by its supply chain to enable the main supplier to correctly declare;
- frequently changing regulation;
- multiple declaration types;
- multiple interpretations of regulations; and
- staff involved in delivering declarations have different languages, geography, experience, education, motivation, and interests.



Each of these issues can cause processing problems that would cripple declaration efforts if they are not addressed promptly and effectively. The following examples illustrate where control of supplier delivery might be lost:

- What happens when the supplier does not respond to requests for declarations?
- Are suppliers allowed to propose a later delivery of the data for the declarations?
- Are requests for corrections by the suppliers followed up to confirm delivery of corrected declarations?
- Are declarations that indicate substances above the regulatory thresholds acted on?

Lack of response

It is not unusual for a request for declarations to be ignored by companies supplying parts. If there has been no declaration delivered or no reply after several requests, further attempts are unlikely to generate the information. In such circumstances supplier compliance needs to be transferred to another person or team outside the usual declaration collection team. They will need to seek help from further up the organisation until the declaration is provided or the business switches to an alternative supplier or part.

There are several reasons why a supplier might not respond to a request. The contact might have changed; the supplier might not know the part number; they are unaware of RoHS or REACH; the part is obsolete; a purchase order is required to have the part analysed; or the information is available on the supplier's website.

Each of these results will necessitate a different action or response from the OEM. But the objective is to get the declaration or move the internal processes along until it is obtained. Where the part is not known or is obsolete, the engineering department should be asked whether it can supply an alternative.

Good metrics

When declarations are not forthcoming it is important that progress is monitored. Without indicators of progress it is easy for the declarations team to expend resources but not make progress or improvements. Metrics need to be tracked and monitored regularly. Suitable metrics to use on a weekly or monthly basis are:

- cost-to-collect declarations;
- number of declarations collected;
- number of parts added;
- proportion of required declarations collected; and
- average cycle time (in days).

Knowing these metrics, you can determine whether the declarations team will meet the needs of the company or programmes within budget or by the delivery date. It will also enable the team to determine whether changes to processes are having the desired improvements. Moreover, the metrics will allow the company to benchmark its efforts against others.

If the team is asked by management to investigate the purchase of declarations, knowing their firm's own costs will enable it to decide whether the purchases will reduce overall declaration collection costs or be used only to meet the deadline for declarations.

Tools for the job

Most tools do little to facilitate collecting declarations, though they are effective at archiving and qualifying loaded declarations. BOMcheck is different. It is an industry-led, centralised online database for suppliers and manufacturers worldwide to share declarations on conflict minerals and standardised, high-quality materials declarations for millions of parts.

BOMcheck is a sharing tool that enables a declaration from one supplier to be used by several OEMs. This sharing concept adds value to the collection of declarations similar to the internet and mobile phones experience: the more that people use them the more valuable they become to the users. The same concept applies to BOMcheck. The more OEMs that use it the more it will add value for suppliers and vice versa.

BOMcheck includes supplier training so that they understand what OEMs are asking for, so reducing new user confusion and errors. Updates to regulations are issued within three weeks of new ones or amendments to existing ones.

The tool will check and verify the declaration generated by the suppliers before releasing it for distribution, so reducing the time spent sending it to and fro for correction. There are functions that enable declaration teams to request declarations from member suppliers and track responses.

There is also a programming application built in that can interface with an OEM's own internal systems. The list of suppliers is maintained by suppliers themselves, helping to minimise the effort required to identify and contact companies throughout an OEM's supply chain.

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