



RoHS & REACH Supplier Material Declaration Collection is a Process not a Task!

I have heard many conference presenters go through their entire presentation on EU RoHS or REACH and conclude with, "... then all you need to do is collect the supplier material declarations." This sets up uninformed people for a real surprise. Their approach is to address this effort as a task to quickly complete and be done with it. This line of attack is rarely successful and most often is very discouraging, as we have seen first-hand.

The task method might work for an effort less than a hundred parts. But if you have more parts, they must be approached as a process, not a task. Tasks, most often, can be completed in a few days by one or two people. Tasks are usually well understood and are often routine.

This is seldom the case with supplier material declaration collection. The typical situation is far too complex, is far from routine, requires active participation from many different functions in a business, and lasts for an extended period. So supplier material declaration collection must be addressed as a process.

When converting your existing products or collecting material declarations from suppliers you will follow the process indicated below:

1. The first process step is extracting your part number, the supplier part number, supplier name, part description, and specified materials from the available resource for all of your parts that are in scope.
2. The second process step is locating contact information for the suppliers indicated in step 1.
3. The third process step is identifying the material declaration responsible party at the supplier and initiating communication.
4. The fourth process step is getting your list of requirements for the needed material declarations accepted by the responsible party at the supplier.
5. The fifth process step is getting material declarations returned by the responsible party at the supplier.
6. The sixth process step is successful verification of the content of the material declarations delivered by your supplier.
7. The seventh process step is integrating the good declarations into your archive and evaluating them for non-compliance to the regulations.

Throughout the process your data is required to be used as never anticipated. It is often observed that part generation and follow-on maintenance of part data was poorly executed, which results in old, outdated, obsolete, missing, incomplete, and wrong data. During execution of all of the process steps, the shortcomings of the part data will be exposed and will



need to be cleaned up. So embedded into the supplier material declaration collection effort is an associated part data remediation effort. All of the part data exceptions encountered must be addressed and resolved.

Many company suppliers are uninformed or wrongly informed about what RoHS and REACH declarations are, and what is required for a good declaration. Process steps 5 & 6 require actions by an informed party at the supplier to be successful. Adequately training is important for your suppliers and their suppliers to be successful. If material declaration responsible party at the supplier does not understand what you are asking for, you will never receive it.

As you can see there are many steps that need to be completed to perform RoHS and REACH supplier material declaration collection and product conversion. The biggest prerequisite for success is approaching this as a process not a task. This process needs to be developed and communicated to the needed functions.

Published on LinkedIn September 2, 2015