



# Material Declaration Webinar

## *Risk Assessment and Mitigation*

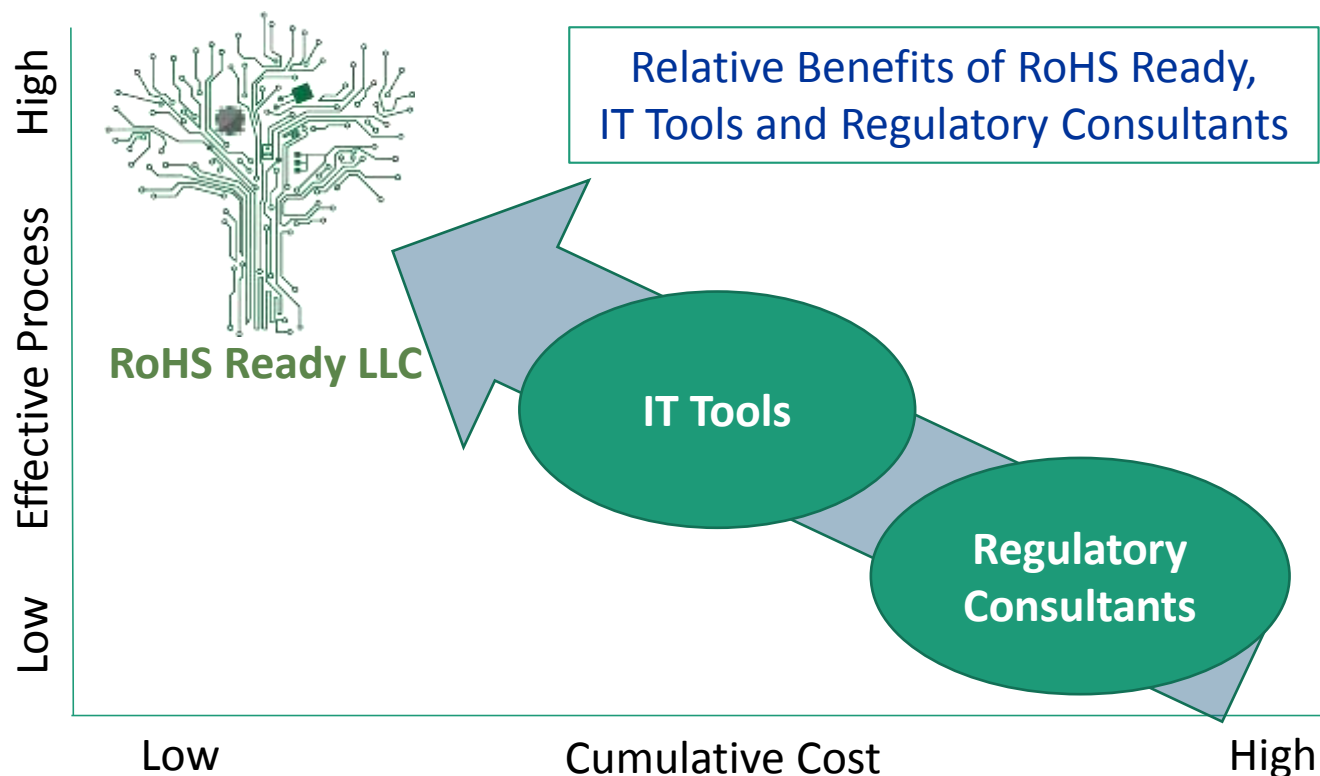
*This material adds risk assessment and mitigation perspective to RoHS Ready training module:*

*#300 – Project Management Techniques*

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RoHS Ready provides Clients assistance to implement timely, and cost effective substance compliance projects, for RoHS, REACH, Battery, Packaging, & Conflict Minerals.





# Jim Kandler

## Managing Director - RoHS Ready LLC



Led the GE Healthcare Sourcing effort to collect data for 250,000 parts

Worked with business team members to set up company-wide procedures.

Started team that collected 150,000 declarations from 6,000 suppliers

Utilized tools: BOMcheck , PTC InSight, Dassault ENOVIA MCC, Gensuite PCC

Efforts included RoHS, REACH, and Packaging

Member of IPC-1752A Committee to further develop the IPC-1752A Standard.

# Todd Riley

## Partner-Consultant - RoHS Ready LLC



Developed the training for global company colleagues and Suppliers to enable data collection

Managed team overseas that collected 150,000 declarations from 6,000 suppliers and loaded into PTC insight and Dassault MCC.

Developed simplified templates and processes for Suppliers to utilize for data collection

Expert at assessment and triage for data collection campaigns



# Risk Assessment & Mitigation

This guidance will help you acquire recommended methods for reviewing and managing risks for your Material Declaration collection project

Key Topics:  
Risk Areas  
Risk Assessment  
Risk Mitigation



# Risk Assessment & Mitigation

Two key goals of these methods:

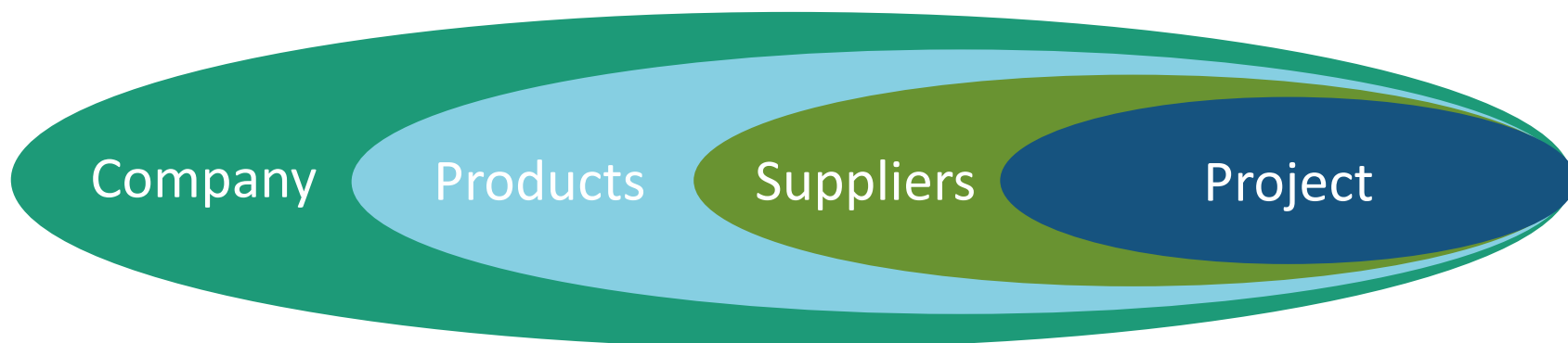
- 1) Identify and mitigate Risk to enable successful execution of your material compliance project
- 2) Integrate Risk Assessment processes with formal procedures for compliance  
(e.g. EN 50581 – Section 4.3)

*Proactive Action for Success*

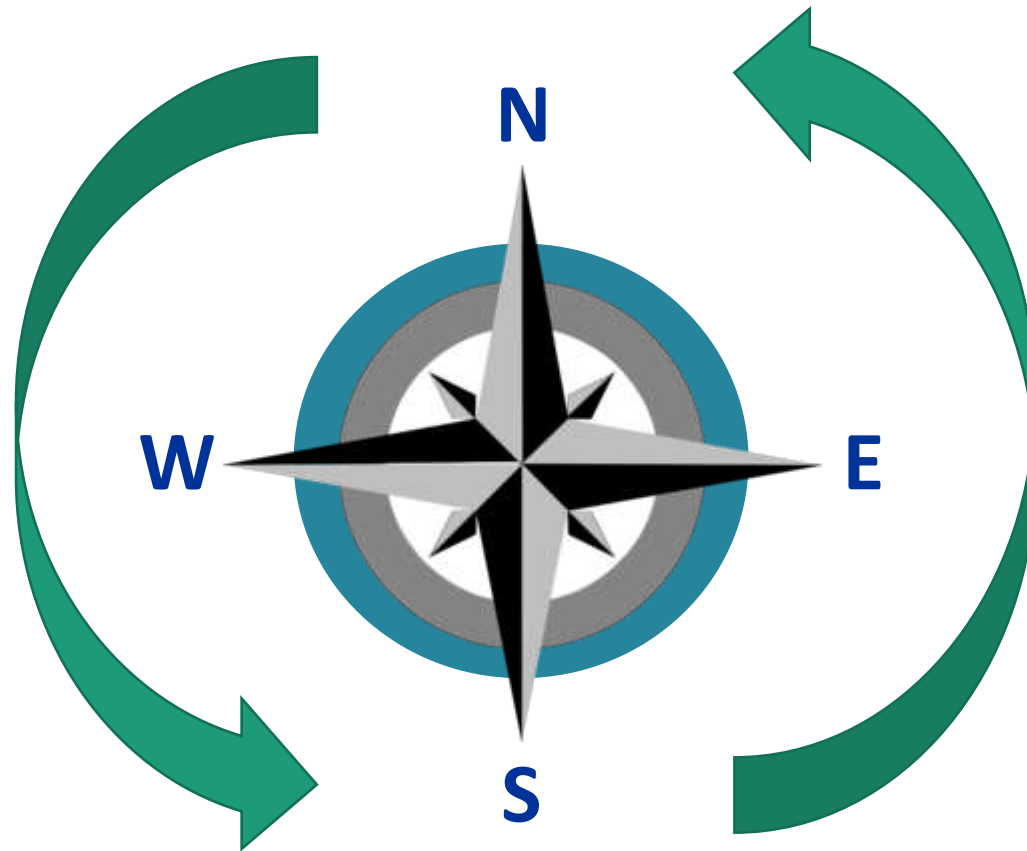


# Risk Areas

- Company
- Products
- Suppliers
- Project



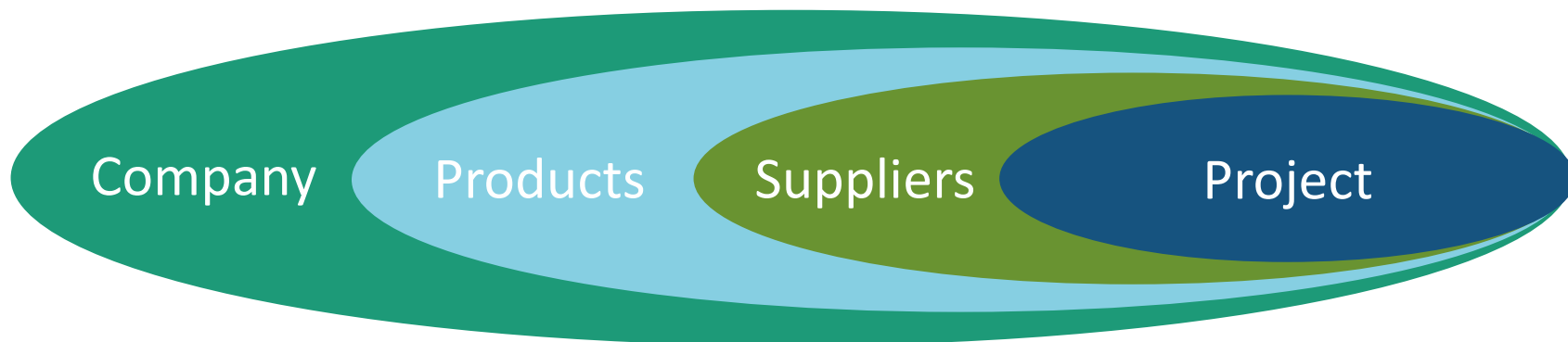
# Dependencies and Integration







# Key Risk Assessment and Mitigation Actions across the Risk Areas



Company

Products

Suppliers

Project



# Company Risk Assessment

- Is there commitment to implement and meet material compliance requirements ? (Willing)
- Is there understanding of requirements for material compliance ? (Knowledgeable)
- Are there resources available and committed to conduct the material compliance project work (Enabled)
- Are there business processes and tools to support successful implementation and execution ? (Enabled)

Company

Products

Suppliers

Project



# Company Risk Mitigation Actions

- Engage leadership to close any gaps in commitment, support or budgeting for company plan
- Develop and execute training for requirements, deliverables, processes and tools where needed  
Ref - <http://rohsready.org/training.html>
- Test resource plan – close any gaps  
Ref- [http://rohsready.org/files/Declaration Collection Planning Sheet.xlsx](http://rohsready.org/files/Declaration%20Collection%20Planning%20Sheet.xlsx)
- Develop or improve company processes and tools to properly enable project work – Ref: Module #300



# Product Risk Assessment

- Are there RoHS, REACH or other regulated substances are present within your product(s) ?
- Are the design definitions and controls appropriate for the materials and substances within your product(s) ?
- Can your supply chain provide required material / substance content declarations and control ?



# Product Risk Mitigation Actions

- Update any gaps in design definition of materials / substances
- Carefully review defined material content of medium to high risk materials, part types, commodities
- Execute design updates or supplier changes, where required, for material compliance by design
- Define action plan for each part to confirm compliance and obtain data; Ref - EN 50581 Clauses 4.3.2 thru .4
- Mitigate risk for each Supplier to confirm and report compliance (see Supplier section)

Company

Products

Suppliers

Project



# Supplier Risk Assessment

- **Include Product and Company Risk Elements (applied to supplier) per prior slides**
- Especially apply  
Willing, Knowledgeable & Enabled to suppliers

## ***Plus***

- Do your suppliers and supply chain have the ability to flow material compliance requirements down to lowest levels of supply chain and provide accurate data back up the supply chain ?

Ref - EN 50581 Clauses 4.3.2 thru .4

Company

Products

Suppliers

Project



# Supplier Risk Mitigation Actions

- Include Product and Company actions (applied to supplier)
- Contact and confidence test suppliers early  
Ref - EN 50581 Clauses 4.3.2 thru .4
- Help suppliers where needed
- Provide easy access to training information  
Ref - <http://rohsready.org/training.html>
- Conduct continuous follow-up communication  
- Make telephone contact in addition to e-mails
- Define a company escalation process for non-cooperative / non-performing suppliers

## Goal #2



# Summary and Tie to EN 50581

- EN 50581 Standard: *“Technical documentation for the evaluation of electrical and electronic products with respect to restriction of hazardous substances”*
- Key implementations regarding the methods herein:
  - Clause 4.3.2 - Supplier and material confidence assessment
  - Clause 4.3.3 - Collect the technical documents
  - Clause 4.3.4 - Evaluate the technical documents
- Integrate risk assessment / mitigation and steps for compliance with EN 50581



## Goal #2



# Summary and Tie to EN 50581

- In support of the references to EN 50581, the link below provides access to a third-party white paper on utilization of Standard EN 50581:

<https://www.bomcheck.net/assets/docs/Guide to Using BOMcheck and EN 50581 to Comply with RoHS2 Technical Documentation Requirements.pdf>

Note - Sections 3.3 thru 3.5 of this document are the focus of references within this presentation

Company

Products

Suppliers

Project



# Project Risk Assessment

- **Include all 3 prior Area Risk elements**

## *Plus*

- Does the project team have a process to manage changes from regulation updates or additions ?
- Does the project team have the knowledge and resources to address exception issues that arise ?
- Has the project team addressed product release updates – phase out and phase in ?
- Are there processes to manage product design updates and/or supplier updates ?



# Project Risk Mitigation Actions

- Include same as all other areas, plus
- Define path for visibility to regulation updates
- Utilize metrics to measure performance & identify issues - Ref  
[http://rohsready.org/files/Essential\\_Metrics\\_for\\_Materials\\_Compliance\\_Programs.pdf](http://rohsready.org/files/Essential_Metrics_for_Materials_Compliance_Programs.pdf)
- Define escalation processes for project team
  - Predict where exception management resources needed
- Define product release plan and integrate with project
- Define processes for design or supplier change which address material compliance requirements



# Next Steps

- Work through recommended risk assessment items
- Define risk mitigation actions and plan
- Communicate to business leadership
- Obtain help where needed:
  - Knowledge
  - Resources
  - Company engagement
  - Supplier engagement
- Build a risk plan w/ periodic review and refresh



# Questions ?



# Additional Resources

Please see [www.RoHSReady.org](http://www.RoHSReady.org)  
for additional resources

In support of the references to EN 50581, the below link provides access to a third-party white paper on utilization of Standard EN 50581:

[https://www.bomcheck.net/assets/docs/Guide to Using BOMcheck and EN 50581 to Comply with RoHS2 Technical Documentation Requirements.pdf](https://www.bomcheck.net/assets/docs/Guide%20to%20Using%20BOMcheck%20and%20EN%2050581%20to%20Comply%20with%20RoHS2%20Technical%20Documentation%20Requirements.pdf)

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# Material Declaration Training

## **100 Series:** Material Regulations

Regulation Overviews  
RoHS  
REACH  
Conflict Minerals  
CA Prop 65  
Canada DSL

## **200 Series:** Reporting Parts

Workflow & Examples  
Reporting Options  
Report Training & Templates  
Supplier Data Requirement  
Letter Templates  
Supporting Details

## **300 Series:** Project Management

Assessment  
Planning  
Execution  
Simplified Reporting  
Advanced Techniques  
Additional Resources

Training materials may be found in the web folder:  
<http://rohsready.org/training.html>



# Roster of Training – 300 Series

## Project Management Techniques

### **#300 – Project Management Techniques**

#301 - Metrics

#302 - Worklist Template

#303 - Data Workflow: Require, Remind, Receive, Review, Load, Archive

### **#304 - Advanced Techniques**

#305 – Simplified Reporting

This presentation complements Module #300  
The content will become part of Module #304





# Appendix

## Additional Risk Assessment Details

for each Area /  
each Risk Element



# Product Risk Assessment Details

Assess your products for material / substance content

- Affected by the material regulation(s) – if you are an importer
- Data required by Customers – if you are a supplier to importer  
Note – you can have both conditions
- Assess Risk of material / substance presence via part commodity or material family (REF)
  - Utilize design documentation wherever possible
  - Examples:
    - Stainless Steel – very low risk
    - Aluminum alloys – low risk
    - Wire insulation – medium to high risk
    - Electronic components – medium to high risk (design age related)



# Product Risk Assessment Details

Assess design definition and control to material / substance level

- Determine where company or suppliers / supply chain owns design definition
- Determine if design definition is specific, e.g. Aluminum 6061 per ASTM-xxxx, versus 'Aluminum alloy'
  - Query carefully where incomplete

Assess confidence in supply chain

- See Suppliers

Company

Products

Suppliers

Project



# Company Risk Assessment Details

## Assess commitment to compliance project

- Owners defined – overall or by product
- Leadership support – understanding and commitment to enable owners and teams to succeed
- Integrated – all business functions engaged

## Assess knowledge across company teams

- Requirements
- Deliverables
- How to accomplish

Company

Products

Suppliers

Project



# Company Risk Assessment Details

## Assess resources for compliance project

- Owners defined for resources and plan developed
- Leadership support – understanding and commitment to enable resource and budget to succeed
- Resources are acquirable

## Assess processes and tools for company teams

- Exist or need development
- Enable accomplishment of deliverables
- Assess if documented, complete, repeateable

Company

Products

Suppliers

Project



# Supplier Risk Assessment Details

Assess same elements as Product and Company, Plus Confidence – assess suppliers capability

- Supplier provide evidence of knowledge, execution and control
- Review supplier performance in other business and commercial areas as indicator of risk

Assess additional factors:

- Distributors
- Supplier provides both RoHS and non-RoHS parts / materials
- Supplier is within a country without RoHS regulation (yet)



# Project Risk Assessment Details

Same elements as Product, Company, Suppliers, Plus  
Assess ability to manage change / additions to  
regulations or Customer requirements

- Visibility and knowledge to regulation updates
- Integrate updates in advance
- Efficiently implement for lowest impact possible

Assess capacity for exception management

- Working leadership who can identify, investigate and correct
- Capacity / availability of these resources



# Project Risk Assessment Details

## Assess any product releases planned

- Understand impact of phase-out old / phase-in new
- Determine impact on service / spare parts
- Efficiently implement for lowest impact possible

## Assess ability to manage design or supplier changes

- Process steps defined for change management with respect to material compliance
- Awareness of these processes