



Tip_8 – How to respond to the supplier that asks for a PO number from your last purchase?

I have talked to a supplier that does this. The reason stated is they are at legal risk for responding to material content inquiries from manufacturers who indirectly source your products.

Not sure if there is any real liability. If the product was purchased before the declaration approval data then the current declaration does not apply. The approval or implementation date of the declaration is very important, as is the date of the updates. If an OEM substituted your declaration for another supplier's, than it certainly doesn't apply, and the OEM has to be responsible for their actions. If your declaration to the OEM indicated non-compliance and the OEM used the part, there may be some contract issues, but per the regulations the OEM is responsible for compliance of their product, and you delivered correct data.

Another point of interest. If there are alternate parts on an OEM BOM and you are the only supplier that has declared, the OEM will need to shift to your part to remain compliant. This is independent of costs, delivery dates, prior purchases, distributors or parties in between the OEM and you. So there is a potential advantage from responding to all requests for declarations. Some suppliers have taken this concept even further and post their declarations on their web site or web sharing application, which avoids all of the burdens of emailing declarations.

If it has been sometime since you have looked at applications or benchmarked yourself against others, this would be a good time to find out how you are doing. The regulations are not going away, that is clear.

Provided by RoHS Ready LLC, at RoHS@RoHSReady.org, published 5/6/2015