

# Global Business Process

## BPGLOBAL20

### RESTRICTION of HAZARDOUS SUBSTANCES - RoHS Requirements

#### 1. PURPOSE

The commission delegated directive 2002/95/EU, RoHS, aims to improve the protection of human health through enforced restrictions of materials that can be used in products sold in the EU. This is done by the restriction on the hazardous substances commonly found in electrical and electronic equipment (EEE).

There have been a few changes to this directive, a recast (2011/65/EU) and two amendments (EU 2015/863 & EU 2017/2102). These changes have helped RoHS fulfill its aims and protect the citizens from harmful substances.

Companies who want their products on the market in the EU must keep their products compliant to RoHS. This is done by:

- Maintaining a quantity of the restricted substances below the maximum w/w within all products being put on the EU market;
- Obtaining proof of compliance and communicating this to customers;
- Receiving exemptions for products that have no alternative safer materials available for the product to perform as intended.

#### 2. SCOPE

When a product distributed by Broan is to be sold in the EU, Broan is required to comply with RoHS and provide evidence of compliance. Similarly, upon a customer request, Broan may be required to comply and provide evidence of compliance. This process will define how this is achieved.

#### 3. REFERENCES

- 3.1. [Amendment - RoHS EU 2017/2102](#)
- 3.2. [Amendment - RoHS EU 2015/863](#)
- 3.3. [Recast - RoHS 2011/65/EU](#)
- 3.4. [RoHS 2002/95/EU](#)
- 3.5. BPQA19 - PPAP Production Part Approval Process
- 3.6. GLOBALFORM19 - Global PPAP Template
- 3.7. OSF13.94 - PPAP - RoHS Supplier Certificate
- 3.8. A controlled copy can be found on Broan's website: <http://www.broan-nutone.com/supplier-manual/>

#### 4. DEFINITIONS

Term	Definition
BOM	Bill of Material, items listed that make up finished good or subassembly
Broan	All references to "Broan" include all subsidiaries and all brands
EU	European Union
DVP&R	Design Verification Plan & Report
EEE	Electrical and Electronic Equipment
RoHS	EU's program: Restriction of Hazardous Substances
Article	Any individual component within the product
w/w	Weight of restricted substance per weight of the article

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## BPGLOBAL20

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#### 5. RESPONSIBILITY

##### 5.1. Marketing:

- Determines the need for RoHS compliance according to the targeted market and sales channels
- Communicates RoHS requirement to Engineering

##### 5.2. Engineering:

- Consider RoHS restrictions during material selection
- Specifies RoHS requirement on Engineering drawings
- For finished goods manufactured by Broan, analyze and determine any items that require RoHS compliance
- Replace necessary components that do not meet the RoHS requirements (any changes shall be documented and evaluated for retesting and certifications)
- Communicate to Sales finished goods that are RoHS compliant

##### 5.3. Purchasing:

- Consider RoHS when selecting a supplier
- Provides the supplier with a drawing package
- Ensures supplier understands the RoHS Requirements  
Ensures supplier completes PPAP – RoHS Supplier Certificate

##### 5.4. Quality:

- Ensure PPAP includes verification of RoHS compliance as required
- Communicate to Engineering any items that contain RoHS restricted substances

##### 5.5. Supplier:

- Provide RoHS information
- Ensure that any RoHS specific declarations requested by Broan are provided
- As applicable, supply items with RoHS compliance and labeling

##### 5.6. Sales:

- Communicate RoHS compliance information to customers

#### 6. Process

Broan shall manage RoHS compliance through the following:

- RoHS requirement statements included on drawings.
- Complete PPAP's

For *drawings* the following note shall be included:

**MUST BE RoHS COMPLIANT PER BPGLOBAL20: YES**

**Note:** *In some instances, variations of the above note shall be acceptable provided that the information obtained by the supplier meets the intention of the RoHS directives as released.*

When RoHS statement is indicated on the drawing, the supplier or manufacturer is required to fully comply with RoHS. The supplier shall submit the following elements through the PPAP process. The supplier is expected to actively maintain and monitor all components declared as RoHS compliant. Should any changes occur to a component that would or could potentially change the declaration of

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compliance, the supplier shall resubmit the item through PPAP. The PPAP shall be completed to BOM revision level (alpha or numeric is acceptable). During an audit, the supplier must be able to demonstrate that all components of the BOMs have been tested and that all changes were communicated through Broan following the current standard. (FOLLOW AND COMPLETE ALL PPAP ATTACHED TO THIS PROCESS)

Table 1: RoHS Restricted Substances

Weight %	PPM Level	Substance
< 0.1%	< 1,000	Lead/Lead compounds (Pb)
< 0.1%	< 1,000	Mercury/Mercury compounds (Hg)
< 0.01%	< 100	Cadmium/Cadmium compounds (Cd)
< 0.1%	< 1,000	Hexavalent Chromium/Chromium compounds (Cr VI)
< 0.1%	< 1,000	Polybrominated Biphenyls (PBB)
< 0.1%	< 1,000	Polybrominated Diphenylethers (PBDE)
< 0.1%	< 1,000	Bis(2-Ethylhexyl) Phthalate (DEHP)
< 0.1%	< 1,000	Butyl Benzyl Phthalate (BBP)
< 0.1%	< 1,000	Dibutyl Phthalate (DBP)
< 0.1%	< 1,000	Diisobutyl Phthalate (DIBP)

#### 1. RoHS Labeling Requirements

All EEE produced by Broan, to be sold in the EU or upon customer request, shall have a label and CE marking (both may be printed on packaging).

- a. The label shall include:
  - i. Product number for identification
  - ii. Broan's name and address
  - iii. A single point at which Broan can be contacted
- b. CE Marking:
  - i. Shall be affixed visibly and legibly to the finished EEE or to its data plate. (when possible)
  - ii. The CE marking shall be included on the packaging as well as any accompanying documents.

*Disclosure: this only applies to products required to contain a CE marking. If no CE marking is required, this labeling is not necessary.*

#### 2. RoHS Material Declaration

- a. For all products required to be RoHS compliant:
  - i. Disclosure certifying that no RoHS restricted substances are present. Disclosure to be provided on company letterhead with signature
  - ii. Substance testing confirming RoHS restricted substances and amounts
  - iii. Determination if product is RoHS Compliant
- b. In addition, required for raw materials and preferred for all products:
  - i. Safety Data Sheets (SDS)
  - ii. Full Material Declarations

# Global Business Process

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## BPGLOBAL20

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3. Part Submission Warrant (PSW)  
When checking yes in the submission results section, the supplier is indicating that they comply with all RoHS requirements. The supplier must demonstrate compliance by providing the RoHS Material Declaration as described above. These documents shall be included with the PPAP documentation.
4. Design Records  
The supplier must show evidence that the design record utilized has the RoHS requirement clearly identified.
5. Control Plan  
When the control plan is required with the PPAP submission, the supplier shall ensure that the RoHS requirements are included as part of the control plan.
6. Performance Tests (DVP&R)  
When the DVP&R is required with the PPAP submission, the supplier shall ensure that the RoHS requirements are included as part of the DVP&R
7. Qualified Laboratory Documentation  
The supplier is responsible for managing their sub tier suppliers. When objective evidence is obtained through an external qualified laboratory, the supplier is required to include specific details identifying the qualified laboratory within the submitted PPAP. In instance where the supplier has the testing capabilities, the supplier is responsible for maintaining all required certifications.

#### 7. Revisions

REV	DESCRIPTION
00	New