

RoHS and WEEE – HellermannTyton Statement

Summary

It is HellermannTyton's opinion that the WEEE (Waste Electrical and Electronic Equipment) regulations are not applicable to structured cabling products and as such the products are not required to comply with the requirements of the RoHS (Restriction of the Use of Hazardous Substances) regulations. Nonetheless, as a responsible and environmentally aware manufacturer, all HellermannTyton structured cabling products now meet the requirements of the RoHS regulations.

Overview

In recent years there have been moves worldwide, largely driven by the European Union, to reduce the environmental impact of manufactured products throughout their lifecycle (during manufacture, in use and at the end of their life) - so called "green" legislation. Such legislation has been in place for several years in industries such as automotive and is now extending to other areas. The Waste Electrical and Electronic Equipment Regulations (WEEE Regulations) and The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations (RoHS) are two pieces of UK "green" legislation which implement corresponding EU directives specifically aimed at electrical and electronic equipment. Similar legislation is being enacted in other parts of the world such as Japan and California.

The WEEE and RoHS regulations are related – WEEE aims to minimise the creation of waste electrical and electronic equipment and addresses who is responsible for collecting, recycling and disposal at the end of a product's useful life whilst RoHS restricts the use of certain hazardous substances in electrical and electronic equipment (eg: lead, mercury, cadmium, etc.). The scope of WEEE is defined as ten specific product categories (eg: large household appliances, electrical and electronic tools, etc.). Products covered by RoHS are drawn from WEEE and are defined as eight of the ten categories plus electric light bulbs and household luminaires.

The RoHS regulations came into effect on 1 July 2006. After several delays, the WEEE regulations were implemented in the UK on 2 January 2007 with producer's responsibilities beginning from 1 July 2007.

RoHS Directive

The RoHS regulations are the UK implementation of the European Union Directive on the Restrictions of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (2002/95/EC). The regulations restrict the use of lead, cadmium, mercury, hexavalent chromium and both polybrominated biphenyl (PBB) and polybrominated diphenyl ether (PBDE) flame retardents in various types of electrical and electronic equipment put on the market after 1 July 2006. The maximum permitted level of hazardous material is 0.01% for cadmium and 0.1% for all others. Electrical and Electronic Equipment (EEE) is defined as "equipment which is dependent on electric current or electromagnetic fields in order to work properly". Specifically, the products covered by the RoHS regulations are defined in eight broad categories and are drawn from those defined in the WEEE directive. The eight categories are:

- large household appliances
- small household appliances

- IT and telecommunications equipment
- consumer equipment
- lighting equipment (including electric light bulbs and household luminaires)
- electrical and electronic tools
- toys, leisure and sports equipment
- automatic dispensers

Certain applications which may be considered to fall within these categories are specifically exempt from the RoHS regulations.

The Implications for Structured Cabling

The relevance or otherwise of RoHS and WEEE with regards to structured cabling is not explicitly covered in the legislative documentation or guidelines issued by either the European Union or the UK Government. However, based on the available information and consultation with a variety of industry and governmental organisations, it is HellermannTyton's opinion that structured cabling products are not included within the scope of the WEEE regulations and therefore are not required to meet the requirements of the RoHS regulations. Structured cabling is considered, under a number of established definitions, to be part of the fixed infrastructure of a building and therefore not Electrical and Electronic Equipment (EEE). As the products are not EEE, the WEEE regulations do not apply and hence the demands of the RoHS regulations are not applicable.

HellermannTyton's Approach

Notwithstanding the applicability or otherwise of RoHS to structured cabling products, HellermannTyton is committed to complying with the legislation. As a responsible and environmentally aware manufacturer with ISO14001 certification, HellermannTyton is continually seeking to manage and minimise the impact of our products on the environment whilst ensuring that product quality is not compromised. In line with this approach, we have replaced our lead based solder (the principle hazardous substance of potential concern within HellermannTyton's structured cabling products) with lead free solder and have undertaken a major programme to ensure that any components used within our products are free from the hazardous substances covered by the RoHS regulations. These activities have included significant development work and testing, including independent accelerated life time testing, to ensure that our high product quality is maintained. As a result, all HellermannTyton structured cabling products now comply with the requirements of the RoHS regulations.