

Frequently Asked Questions

1. What is REACH?

Regulation (EC) No. 1907/2006 of the European Parliament and of the Council of 18 December 2006 is commonly referred to as REACH. REACH stands for the Regulation for Registration, Evaluation, Authorization, and Restriction of Chemicals. The REACH Regulation entered into force on 1 June 2007 to streamline and improve the former legislative framework for chemicals of the European Union (EU) and European Economic Area (EEA) countries.

2. What is the ECHA?

REACH created the European Chemicals Agency (ECHA) which has a central coordination and implementation role in the overall regulation process. ECHA is located in Helsinki, Finland and manages the registration, evaluation, authorization and restriction processes for chemical substances to ensure consistency across the countries in which REACH applies.

3. What is the main objective of REACH?

The main objective of REACH is to improve protection of human health and the environment from the risks of chemicals.

4. Why is Fulham offering REACH compliant articles to its customers?

Fulham has implemented a REACH compliance program to address the legislation initiated by regulatory groups around the world who have called for companies to make changes to manufacturing processes and components so as to address these health and environmental concerns. Fulham is committed to meeting the requirements of all applicable REACH laws and regulations.

5. Is REACH compliance mandatory throughout the world?

REACH compliance is only mandatory on products produced in or shipped into the European Union (EU) and member countries. However, since many other jurisdictions have similar or pending legislation and manufacturers' products may eventually find their way into the EU, REACH compliance is having a global effect.

6. Is Fulham impacted by REACH pre-registration obligations?

Fulham does currently neither manufacture nor import any chemical substances into the EU on their own or in articles in quantities of 1 ton or more per year. In addition, imported Fulham articles do not contain chemical substances intended to be released during the normal and reasonably foreseeable conditions of the product's use, or disposal, as defined by the REACH regulation and existing guidance. Thus, Fulham does not currently have a direct REACH obligation to pre-register substances.

7. Who does REACH regulation apply to?

Any organization producing, importing, using or placing a substance, mixture or article on the EU market will be responsible for ensuring that it is in compliance with REACH regulations. The legislation covers EU manufacturers, including chemical suppliers, distributors and downstream users, as well as any EU companies importing products to the EU market.

8. Is Fulham working in conjunction with the electronics industry to offer REACH products compliant to the REACH regulation?

Fulham works in concert with several industry consortia, forums and our suppliers in an effort to offer REACH compliant product alternatives. Fulham is implementing processes and procedures with its suppliers and customers to offer REACH compliant components and assemblies.

9. Where can I find the current REACH legislative information and technical guidance?

You can find additional information about REACH legislative and regulation from the sources listed below.

ECHA - European of Chemical Agency
EEA - European Environment Agency
EUR-Lex - European Law

10. How is the REACH legislation organized?

The REACH legislative text is organized into fifteen Titles. The first eight Titles refer to registration, evaluation, authorization and restriction processes. The remaining seven Titles detail the administrative elements of REACH, such as the establishment of a European Chemicals Agency, confidentiality of data, and enforcement issues. A

number of annexes detail the technical obligations. Technical guidance documents supplement the text and annexes.

11. What is a Substance?

The term “substance” refers to all chemicals, including metals. REACH applies to substances in mixtures, as well as certain substances contained in articles (Components and Assemblies).

12. What are substances of very high concern (SVHC)?

Substances of very high concern (SVHC) are substances identified by the European of Chemical Agency (ECHA) as having hazardous properties. These substances must be regulated because the effects they have on the environment and humans are serious and often irreversible. The SVHC include substances which are carcinogenic, mutagenic or toxic according to the criteria in Annex XIII of the REACH regulation.

13. What is the Candidate List?

The Candidate List is a list of substances of very high concern (SVHC) that are identified as potential targets to be regulated for use within the EU by the process of authorization. This is the letter “A” in the acronym REACH. Substances are added to the Candidate List by ECHA. Any substance included on the Candidate List may ultimately be added to Annex XIV of the REACH regulation by decision of the European Commission. The identification of a substance as a SVHC and its inclusion in the Candidate List is the first step of the authorization procedure.

14. What is Annex XIV of the REACH regulation?

Substances on the Candidate List may subsequently become subject to authorization. The Annex XIV of the REACH regulation is a list of authorized substances. This list of authorized substances means companies using or importing these substances into the EU must be authorized by the regulators for their particular use.

15. How many substances were initially placed on the Candidate List?

Effective October 28, 2008, fifteen (15) substances were initially placed on the Candidate List. As of November 2017, there are more than 200 substances on the SVHC list.

16. Will new substances be added to the Candidate List?

The Candidate List published on the ECHA website is regularly updated when more substances are identified as SVHC by the ECHA.

17. What is Fulham's definition of an Article?

Fulham's definition of an article is a Component or Assembly.

18. What is Fulham's definition of a Component?

Fulham's definition of a component applies to PCB level parts and devices.

19. What is Fulham's definition of an Assembly?

Fulham's definition of an assembly applies to power supplies, emergency and exit lighting products, and light engines.

20. What are the specific amounts permissible of SVHC banned by the REACH regulation?

The permissible maximum amount of any SVHC is 0.1% (weight per article).

21. What is Article 33 of the REACH regulation?

Article 33 is a section of the REACH regulation that outlines supply chain responsibilities. In accordance with Article 33, Fulham is obligated to inform recipients of articles that contain any of the chemicals on the SVHC Candidate List that are above the 0.1% concentration.

22. When is a Fulham component or assembly classified as REACH Compliant?

A Fulham component or assembly shall be classified as REACH compliant when it does not contain specific SVHC beyond the specified concentration limits of less than 0.1% (weight by weight) as outlined in REACH 1907/2006/EU regulation.

23. How can I obtain a Fulham REACH compliance statement from Fulham?

Fulham REACH Statements of Compliance are generated upon request for customers based on specific part numbers.

24. How can a customer distinguish between a REACH compliant product and a product that is not REACH compliant?

The Fulham product specification sheet indicates if the component or assembly is classified as REACH compliant.

25. Will Fulham discontinue or change any products as a result of REACH?

Fulham has no plans to discontinue or change any product as a result of meeting the REACH regulation requirements. Products will be discontinued or changed via Fulham's standard product lifecycle processes.

26. What qualification testing has been completed to evaluate and qualify REACH compliant components and assemblies?

Fulham qualification testing is performed in conjunction with component vendors and our manufacturing operations to ensure components are REACH compliant.

27. Does Fulham have a special component or assembly marking scheme for REACH compliant products?

At present, there are no legislated REACH requirements for individual part marking to indicate REACH compliance. The marking content for all REACH compliant components or assemblies is shown on the applicable specification sheet found on our website.

28. Does Fulham have a special REACH labeling method for shipment packaging of REACH compliant products?

At present, there are no legislated REACH requirements for component or assembly packaging to indicate REACH compliance. Fulham has no special labeling method for the packaging of REACH compliant products.

29. Are there any changes required in component or assembly storage conditions of REACH compliant products?

There are no changes in the storage condition specifications. Upon receipt of Fulham products, it is always good manufacturing practice to store components and assemblies in a controlled environment so as not to expose them to extremes of humidity and temperature for extended periods of time.

30. Do I need to make any process or material changes to my PCB assembly process to use Fulham REACH compliant products?

Fulham products are only provided as assemblies and therefore do not require any special process or material changes to use our REACH products.

31. Who at Fulham is coordinating the company’s REACH compliance effort?

Fulham’s Quality Director coordinates our REACH compliance effort.

32. Who do I contact if I have additional technical questions about Fulham REACH compliance issues?

Please contact Fulham Customer Service who will connect you to the proper person for your region.

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Part 15		Part 18	
Radio Frequency Devices		Equipment designed to generate, and use locally, RF energy	
LED Lamps, SMPS		Fluorescent Lighting-Linear lamps, CFL’s, Fixtures, ballasts	
Class A	Class B		
Intentional Radiators	Unintentional Radiators		
Type A-Business, Industrial, Commercial	Type B-Business, Industrial, Commercial + residential	Type A-Business, Industrial, Commercial	Type B-Business, Industrial, Commercial + residential
“Verification” - no radio, or uses pre-approved radio; report kept by mfg & issue on request		“Declaration of Conformity” (DoC)	
“Certification” - required of all wireless devices			