

RoHS

Agfa position towards the RoHS legislation

Agfa has embraced the European Union's Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment (commonly known as RoHS), and all associated laws and legislations that contribute to improving environmental standards. This is as part of Agfa's overall environmental policy. We feel that this is very important and are committed to making certain we protect our environment by ensuring our partners and ourselves employ safe, efficient manufacturing processes.

Agfa's goal is to achieve compliance on a worldwide basis, rather than where regionally mandated. Our products are already shipping with RoHS compliant parts and we will continue to further implement the RoHS requirements.

This document intends to inform our customers about the RoHS Directive and provide information on Agfa efforts that contribute to a better and cleaner environment in that respect.

RoHS - the law in brief

(Source: Department of Trade and Industry; RoHS Regulation, Government Guidance Notes. Crown copyright 2006.)

The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2006 ("the RoHS Regulations") implement the provisions of the European Parliament and Council Directive on the Restrictions of the use of certain Hazardous Substances in electrical and electronic equipment (2002/95/EC) ("the RoHS Directive").

The RoHS Regulations ban the placing on the EU market of new Electrical and Electronic Equipment (EEE) containing more than the set levels of lead, cadmium, mercury, hexavalent chromium and both polybrominated biphenyl (PBB) and polybrominated diphenyl ether (PBDE) flame retardants from 1 July 2006. There are a number of exempted applications for these substances.

Manufacturers will need to ensure that their products - and the components of such products - comply with the requirements of the Regulations by the relevant date in order to be placed on the Single Market. The Regulations will also have an impact on those who import EEE into the European Union on a professional basis, those who export to other Member States and those who rebrand other manufacturers' EEE as their own.

These Regulations do not affect the application of existing legal requirements for EEE, including those regarding safety, the protection of health, existing transport requirements or provisions on hazardous waste. In other words, existing legislation on EEE and hazardous substances must also be complied with.

Entry into force

The Regulations become enforceable on 1 July 2006.

Requirements

The main requirement of the RoHS Regulations is that from 1 July 2006 a producer (as defined in the Regulations) may not place new EEE containing lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE), in amounts exceeding the set maximum concentration values, on the market in the EU. Certain applications are exempt and there is also an exemption for spare parts for the repair and upgrade of equipment put on the market before 1 July 2006. The Regulations also do not apply to the re-use of equipment that was put on the market before the same date.

Producers must be able to demonstrate compliance by submitting technical documentation or other information to the enforcement authority on request and retain such documentation for a period of four years after the EEE is placed on the market. Agfa is able to show 'due diligence' which mean we took all reasonable steps and exercised all due diligence to avoid committing an offence.

Scope

The RoHS Regulations apply to all EEE containing hazardous substances placed on the European Union Single Market on or after 1 July 2006, which falls into any of the eight broad categories listed below - unless the equipment is part of another type of equipment that does not fall into any of these categories.

Categories of electrical and electronic equipment covered by the RoHS Regulations

1. Large household appliances
2. Small household appliances
3. IT and telecommunications equipment
4. Consumer equipment
5. Lighting equipment, (including electric light bulbs and household luminaires)
6. Electrical and electronic tools (with the exception of large-scale stationary industrial tools)
7. Toys, leisure and sports equipment
8. Automatic dispensers

Exemptions

The RoHS Regulations do not apply: -

- To large-scale stationary industrial tools. (This is a machine or system, consisting of a combination of equipment, systems or products, each of which is manufactured and intended to be used only in fixed industrial applications.)
- To spare parts for the repair of EEE placed on the market before 1 July 2006 and to replacement components that expand the capacity of and/or upgrade EEE placed on the market before 1 July 2006.
- To the reuse of EEE placed on the market before 1 July 2006.
- To the specific applications of mercury, lead, cadmium and hexavalent chromium set out in Schedule 2 of the Regulations.

Maximum Concentration Values

For the purposes of the RoHS Regulations, a maximum concentration value of up to 0.1% by weight in homogeneous materials for lead, mercury, hexavalent chromium, PBB and PBDE and of up to 0.01% by weight in homogenous materials for cadmium will be permitted in the manufacture of new EEE.

'Homogeneous material' means a material that cannot be mechanically disjointed into different materials.

The term 'homogeneous' is understood as "of uniform composition throughout", so examples of "homogeneous materials" would be individual types of plastics, ceramics, glass, metals, alloys, paper, board, resins and coatings.

The term "mechanically disjointed" means that the materials can be, in principle, separated by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes.

Using these interpretations, a plastic cover (for example) would be a 'homogeneous material' if it consisted exclusively of one type of plastic that was not coated with or had attached to it (or inside it) any other kinds of materials. In this case, the maximum concentration values of the RoHS Regulations would apply to the plastic.

On the other hand, an electric cable that consisted of metal wires surrounded by non-metallic insulation materials would be an example of something that is not 'homogeneous material' because mechanical processes could separate the different materials. In this case the maximum concentration values of the RoHS Regulations would apply to each of the separated materials individually.

A semi-conductor package (as a final example) would contain many homogeneous materials, which include the plastic molding material, the tin electroplating coatings on the lead frame, the lead frame alloy and the gold bonding wires.

Compliance

Producers must demonstrate compliance with the Regulations by providing the enforcement authority (on request) with satisfactory evidence of such compliance in the form of relevant technical documentation or information. As today most authority accept self-declaration as the basis of the compliance regime. The enforcement authority will carry out market surveillance to detect non-compliant products and may conduct tests for this purpose.

Actual status on RoHS by Agfa

For the listed equipment is Agfa's position as follows:

- AVALON LF
- AVALON LF Violet
- AVALON VLF
- ACENTO II
- PALLADIO II
- ADVANTAGE
- POLARIS
- LITHOSTAR procesors (LP82)
- AZURA Clean Out Units (C85)
- THERMAL procesors (ELANTRIX)

are exempted from the scope of the RoHS Directive, and per consequence from the EU Member States legislation, as it are to be considered large-scale stationary industrial tools. Large-scale stationary industrial tools are explicitly excluded from RoHS per the Annex 1A to the WEEE Directive (category 6: electric and electronic tools, with the exception of large-scale stationary industrial tools), which is incorporated into the RoHS Directive by reference of Article 2, paragraph 1.

However, notwithstanding the fact that Agfa equipment is not subject to the RoHS requirements, we are working on banning the 6 substances, as part of Agfa's environmental policy to contribute in environmental protection and sustainable development. For the same reason we will label our equipment with the crossed-out wheely bin, just to communicate that this type of equipment should not be disposed of in the municipal waste stream.

GRANDSHERPAMATIC and EPSON proofers will be RoHS compliant as of July 1 2006.

Contact points for further information

For further information about Agfa equipment compliance to RoHS legislation, please contact your local representative and he/she will help you further.