

Dear Customer

Edwards Policy on REACH and RoHS compliance

The following outlines each of these requirements and their implications for Edwards with our policies on compliance.

REACH Regulation (EC) 1907/2006 covers the Registration, Evaluation, Authorisation and Restriction of Chemicals with the objective of protecting human health and the environment by regulating chemicals and their safe use. Restrictions result from risk based assessment of detailed research into the impact of a Substance through its entire lifecycle.

REACH has limited implications for Edwards as a downstream end user and equipment manufacturer. We do not produce “substances” or “preparations” but have a rigorous supplier selection process and work closely with our supply chain to ensure the compliance of procured substances and articles used within our products and supplied to our customers.

As a supplier of articles, our policy is to provide products which do not contain Substances of Very High Concern (SVHC) above the 0.1% weight threshold specified by REACH. When substances already in use are added to the Candidate List we comply with the Article 33 requirements and initiate work to identify, validate and implement alternatives while maintaining product performance.

At this time we have a limited number of thermal abatement systems (e.g.: Atlas, eZenith) which contain Refractory Ceramic Fibres (RCF) which are fully enclosed within the product and which we are actively working to remove.

We use compact lithium coin cell batteries which contain 1,2-dimethoxyethane in all electronic equipment with real-time equipment monitoring capability. The battery was selected for its long life and reliability characteristics and contains the substance, essential to the performance of the battery with no known alternatives, in the electrolyte sealed inside the battery case. We are actively monitoring battery technology developments to identify a suitable replacement.

As a distributor we ensure that appropriate and current safety information is available to our end users and our Safety Data Sheets are available on our website. Our Safety Data Sheets are regularly reviewed in addition to any updates resulting from the receipt of new information from our suppliers.

EU RoHS Directive 2011/65/EU is a CE Mark Directive designed to reduce toxic electronic waste by prohibiting the use of specified hazardous substances above a defined level, unless a Material Exemption (listed in Annex III) applies, in certain Categories of electrical and electronic equipment (EEE). The scope of this Directive is expanding, culminating in the inclusion of a new Category - all electrical and electronic equipment not previously categorised - by July 2019.

It is our policy to voluntarily comply with EU RoHS for ethical reasons in advance of any legal requirement. Most of our products are already compliant, with minimal reliance on Material Exemptions, as indicated in the product’s Declaration. We are actively working on compliance with the requirements of Delegated Directive (EU) 2015/863, adding new material restrictions to Annex II, which will be phased in from July 2019 with new medical devices and control and monitoring equipment coming into scope from July 2021.

China RoHS2 Chinese regulatory requirement on the Management Methods for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products Order No. 32, unlike EU RoHS, does not currently prohibit the use of restricted substances. A Material Declaration is required when substances are present above the defined limits, with a defined Environmentally Friendly Usage Period (EFUP), indicating the safe working life of the product under normal use.

All Edwards’ electrical and electronic products are in scope of the revised requirement. Material Declarations are included in the instruction manuals for all products where required and include the details of the EU RoHS Material Exemptions.

We recognise that our customers may be concerned about the status of products which are not themselves subject to RoHS but are used in equipment which is in scope. Material declarations (in English) are available on request for these products, for example vacuum fittings, to support customers in their own RoHS compliance activities.

For further information please refer to the Environmental section of our Corporate Responsibility website at www.edwardsvacuum.com or get in touch with us via your usual local Edwards contact. In if doubt about how to contact us, details can be found using the Contact Us listing on our website.

A handwritten signature in black ink, appearing to read 'Ian Stones', written over a light blue horizontal line.

Ian Stones
Vice President, Technology