



# Lehigh-Armstrong Inc.

*Fastener Specialists*

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Dear Valued Customer,

Lehigh-Armstrong Inc. supports the European Union ROHS directive and considers it to be good business practice to proactively address issues with our partners. The purpose of this communication is to inquire if RoHS and ELV compliance will be a requirement for your products. If so, Lehigh-Armstrong Inc. is committed to work together with you to establish both short term and long term plans to achieve compliance for the parts we supply to you. The first step is to respond to Lehigh-Armstrong Inc. and let us know whether or not compliance will be required.

## **What are RoHS and ELV?**

**Restriction of Hazardous Substances (EU Directive 2002/95/EC)** and **End of Life Vehicles (EU Directive 2000/53/EC)** are European Directives aimed to control and eliminate the use of certain substances in Electrical and Electronic Equipment (EEE) and "Vehicle" manufacturing. (See *EU Directives WEEE EU 2002/96/EC and ELV 2000/53/EC*). While RoHS/ELV are European Union directives, other countries/US States are drafting similar legislature which parallels and/or exceeds these requirements. The present deadline for RoHS compliance is July 1, 2006, while the ELV deadline for compliance is variable

## **What are the Restricted Substances?**

- 1.) Lead (Pb)
- 2.) Mercury (Hg)
- 3.) Hexavalent Chromium (Cr6)
- 4.) Cadmium (Cd),
- 5.) Poly Brominated Bipheynl flame retardants (PBB)
- 6.) Poly Brominated Dipheynl Ether flame retardants (PBDE).

## **RoHS 2 Directive - 2011/65/EC**

On July 1, 2011 the updated RoHS Directive (Directive 2011/65/EU) was published in the Official Journal of the European Union and entered into force on July 21, 2011.

The updated directive introduces the new requirements of CE marking and the declaration of conformity requirements. This requires manufacturers, importers, and distributors who place electrical and electronic equipment on the European market to ensure that a conformity assessment procedure is conducted. This assessment must align with module A of Annex II, part of Decision No 768/2008/EC in which a CE marking must be affixed to the finished product.



The updated scope of the directive includes all electrical and electronic equipment and as of July 2014, includes medical devices, monitoring and control instruments.

### **What is the Purpose of these Directives?**

The scientific community has concluded that refuse that enters landfills containing these "hazardous substances" will result in long term negative effects to humans and the environment. Because EEE and "vehicles" have relatively short life cycles, these products enter landfills at a very high rate, and therefore have been specifically targeted.

### **Does your product require RoHS/ELV Compliance?**

It is not possible for Lehigh-Armstrong Inc. to determine whether your products require compliance. This determination needs to be made by our customers. Therefore we suggest that your company conduct a thorough review of these EU Directives and determine if compliance is required.

### **Are Fasteners and Electronic Hardware affected by RoHS/ELV?**

**Yes!** If fasteners are specified with an electroplating of zinc, zinc & yellow, zinc & black or cadmium these parts may not be in compliance. Cadmium is used on fasteners because of its conductivity and corrosion resistant properties and Hexavalent Chromium (Cr6) is used in electroplating zinc as a conversion coating that enhances corrosion resistance. There are alternate finishes and processes which are available but these must be reviewed by your engineering departments for performance and cost impacts. Tin-lead is also used in some electronic hardware for solderability purposes. Many manufacturers are releasing new versions of products that specify lead free solderable platings.

### **How Should You React?**

After you have determined that compliance will or will not be an issue, the most important action your company can take is to communicate, in writing, to your Lehigh-Armstrong Inc. salesperson of your need for RoHS/ELV compliance.

### **Our Action Plan**

Once Lehigh-Armstrong Inc. has been informed of your need for RoHS/ELV compliance, we can identify all compliant and non-compliant part numbers currently in use. We will work with your Engineering department to identify the most effective, feasible, and compliant alternatives. Once compliant alternatives have been decided upon, we must cooperatively develop a reporting and transition plan that may include rework of current inventories to meet your specific deadline for compliance. Our main goal is to keep your assembly lines moving and to avoid supply chain delays. In order to be successful, we need your input. Please respond in writing to your Lehigh-Armstrong Inc. sales representative. Being proactive today will save time and money tomorrow.

Sincerely,



Mark Dalaklis  
Operations Manager  
Lehigh-Armstrong Inc.