
IDEMA Guideline Guideline for REACH compliance

1. Introduction

1.1. Scope

1.1.1. Abstract

This document establishes the following guidelines for complying with the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulations within the Hard Disk Drive (HDD) industry:

- Suppliers should report any known content of any SVHC identified for authorization or any published SVHC candidate material.
- Suppliers must report when any SVHC is contained per the EU REACH definition.
- Reporting should be made at the part level.
- Chemical analysis is not required to demonstrate the absence of SVHCs.

These are the minimum reporting recommendations. Individual manufacturers may make additional requirements.

1.1.2. Legal Notice

Users are reminded that the text of the REACH regulation (see 1.3.1 References) is the ultimate legal reference, and the information in this document does not constitute legal advice. IDEMA does not accept any liability with regard to the contents of this document.

1.2. Document Administration

1.2.1. Originating area & Responsibility

This document was prepared by the IDEMA REACH Working Group.

1.3. Related Documentation

1.3.1. References

- REACH Regulation (EC) No 1907/2006 of European Parliament and of the Council of 18 December 2006
http://echa.europa.eu/legislation_en.asp
- Guidance on requirements for substances in articles
http://guidance.echa.europa.eu/docs/guidance_document/articles_en.htm?time=1268027401
- Substances of Very High Concern (SVHC)
http://echa.europa.eu/consultations/authorisation_en.asp

Remark: These documents are available on ECHA web sites. http://guidance.echa.europa.eu/index_en.htm

2. Contents

2.1. Background

The HDD industry strives to improve its manufacturing processes and products so that materials of environmental concern are minimized or eliminated where feasible. The industry has invested considerable time and resources to comply with the existing European Union (EU) Restriction on the Use of Hazardous Substances (RoHS) Directive while its full technical, social and cost implications are still being determined.

On 1 June 2007, REACH entered into force to streamline and improve the former legislative framework on chemicals of the European Union (EU), and REACH was established separately from RoHS. This guideline is the proposed response to this newer regulation.

2.2. Minimum requirements for REACH compliance

2.2.1. Overview

An HDD is classified as an "Article" under REACH. As such, no notification is required if the content of any SVHC is less than 0.1 wt%. If any SVHC exceeds 0.1% weight content, manufacturers must inform the downstream supply-stream, and importers of record must fulfill their notification obligations if the total amount of this SVHC which they import into any single European entity exceeds the established threshold at the time of importing. This threshold is 1000 metric tons after November 30, 2010, and gradually reduces to 100 metric tons after May 31, 2013, and 1 metric ton after May 31, 2018.

2.2.2. REACH risk-mitigation activity

At their discretion, HDD manufacturers may request parts suppliers to exclude or limit the presence of any SVHC. SVHCs to be excluded or limited can be found in the following lists.

- REACH regulation, Annex XIV (Authorisation List)
http://echa.europa.eu/chem_data/authorisation_process/annex_xiv_rec_en.asp
- The Candidate List of Substance of Very High Concern for Authorisation
http://echa.europa.eu/chem_data/authorisation_process/candidate_list_en.asp
- Draft recommendation of substances for inclusion within the list of substances subject to Authorisation, Annex XIV
http://echa.europa.eu/consultations/authorisation/draft_recommendations/recommendations_en.asp

IDEMA GuidelineGuideline for REACH compliance

HDD manufacturers will retain all the parts information they require to fulfill their REACH obligations.

2.2.3. Information on substances in parts

HDD manufacturers expect that parts suppliers provide the SVHC substance information they need to use in the parts appropriately. Information may be provided via data sheets and/or relevant SVHC information. The information shall include:

- The identity of the SVHC with its CAS registry number or EC number.
- The concentration and amount of SVHC in a part
- The classification of the substance
- A brief description of the use of the substance in the part
- Material Safety Data Sheet (MSDS) if applicable
- The registration number of the substance, if available

Chemical Analysis to demonstrate the absence of any SVHC is not required.

2.2.4. Requesting information up the supply chain

Suppliers are obligated to inform HDD manufacturers when an SVHC content exceeds 0.1 wt% per part. IDEMA recommends, however, that any known SVHC content in a part be disclosed, such as intentional additions, impurities, or residues from processing. In case the information supplied is insufficient, the HDD manufacturer should make more pro-active requests of the supply chain.

2.2.5. Chemical analysis for SVHCs

While chemical analysis is not required to demonstrate the absence of SVHCs, it may be an option when other methods for information gathering fail.

2.2.6. Information of HDD

HDD manufactures provide HDD level SVHC information to downstream users through the supply chain or through direct notification if they are an importer of record into the European Union.