

Supplier Instruction : WEEE & RoHS Legislation

This UNIFE fact sheet sets out to what extent products from its member companies come within the scope of the "Waste Electrical and Electronic Equipment" (2002/96/EC, "WEEE") and the "Restriction of the use of certain Hazardous Substances in electrical and electronic equipment (2002/95/EC, "RoHS") European Directives. The objectives of these Directives are to preserve, protect and improve the quality of the environment and to control the volume and composition of the electrical and electronic equipment waste stream.

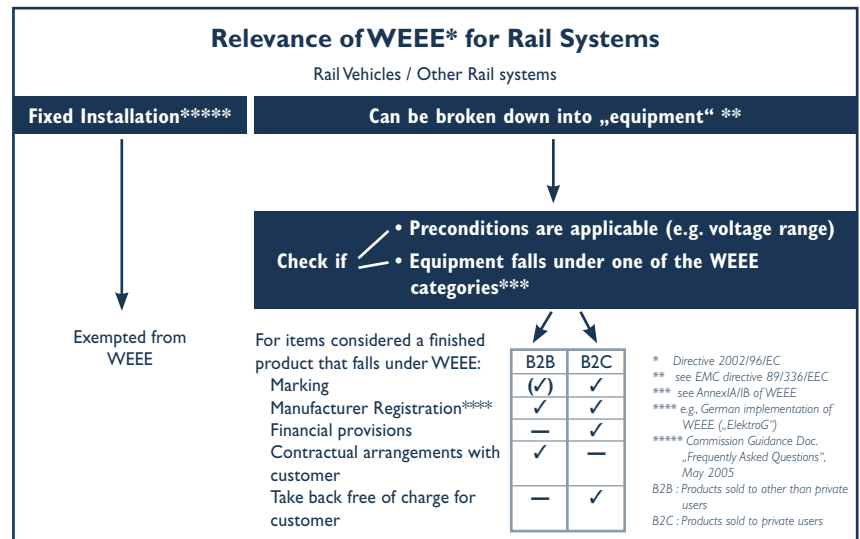
The UNIFE position is that most equipment, in particular items that are specifically designed to be installed in rail systems, is exempted.

UNIFE member companies request that suppliers of such equipment that is covered by one of the directives comply with the legislation and mark their equipment accordingly and that the quality standards of supplied equipment are being maintained.

1. Large household appliances
2. Small household appliances
3. IT and telecommunication equipment
4. Consumer equipment
5. Lighting equipment
6. Electrical and electronic tools (with the exception of large-scale stationary industrial tools)
7. Toys, leisure and sports equipment
8. Medical devices (with the exception of all implanted and infected products)
9. Monitoring and control equipment
10. Automatic dispensers

Information about the Directives

WEEE (2002/96/EC) covers electrical and electronic equipment specified for voltages below 1000 Volt AC and 1500 Volt DC and falling into one of the categories listed on the left hand side.



Requirements may differ between the Member States depending on the national implementing legislation. Common elements of implementations are that producers shall mark and register their equipment in the country where it is put on the market. They shall meet recycling targets and – in case of consumer (B2C) products - make financial provisions or – in case of B2B products (not intended for private users) - contractual arrangements (take-back) with regard to end-of-life treatment.

Rail systems, in particular vehicles as such, do not fall under one of the WEEE categories. Furthermore, there is a clause in the Directive which states that the

Directive does not cover equipment that is part of another type of equipment which is not listed. A common interpretation is however that when the equipment can be easily removed and operated independently from the bigger system it is not considered to be “part of ...” and therefore may be covered by WEEE. On the contrary, when the “bigger” equipment can be regarded as a fixed installation it is exempted from WEEE.

“Fixed installation” in its broadest sense is defined as a “combination of several equipment, systems, finished products.... installed by authorized personnel at a given place to operate together in an expected environment to perform a specific task, but not intended to be placed on the market as a single functional or commercial unit.”¹

This means that the relevance of WEEE for rail systems is limited to the few products that belong to one of the categories mentioned above and are

- not fixed to rail systems (as defined before) and that are not specifically designed for rail systems and which can be operating independently from the train or the infrastructure system.

Examples of equipment used in rail applications that is considered in the scope of WEEE are typically portable items like:

- Laptop computers
- Computer screens (not specifically designed for rail applications)
- Keyboards (not specifically designed for rail applications)
- Mobile phones (not specifically designed for rail applications)
- Some of the kitchen equipment in bistro cars (not railway specific items)

Provisions

UNIFE member companies request their suppliers of WEEE covered equipment to mark their equipment as per EN 50419 and to make the necessary provisions in the country where the product will be operated and where the equipment likely will be disposed off in maintenance or end-of-life activities.

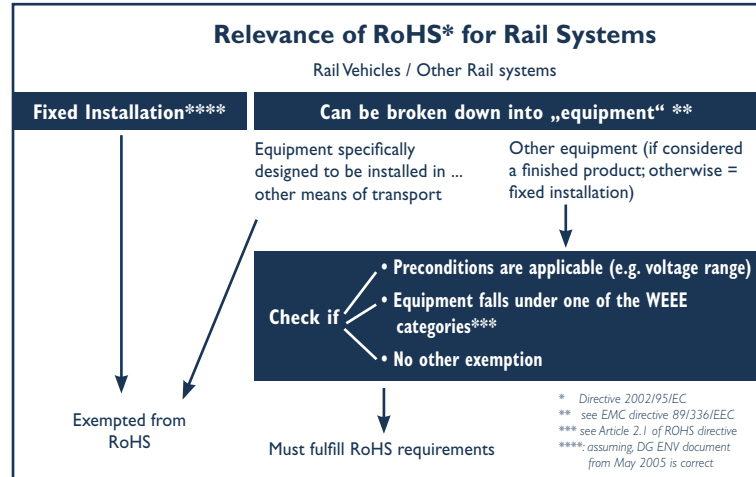
End of Life responsibility

Please note that while it is the responsibility of the owner of the rail product to make sure that the different parts are disposed off in an environmentally sound manner, i.e. handed over to licenced firms according to relevant legal obligations, or in the case of equipment falling under WEEE, to deliver such equipment to the appropriate network installed in the respective country in line with the regulations of the WEEE Directive, it is the responsibility of suppliers to facilitate this.



RoHS (2002/95/EC)

The RoHS directive restricts Pb, Cd, Hg, CrVI, PBB, PBDE (decaBDE exempted) in electrical and electronic equipment put on the market after 1st July 2006, no matter when it was developed. The equipment covered is specified for voltages below 1000 Volt AC and 1500 Volt DC and falling into one of the categories previously mentioned, except for category 8. medical devices, and category 9. monitoring and control equipment, but in addition including electric light bulbs and luminaries in households.



Exemptions

Even when equipment belongs to one of the categories mentioned, there are a number of exemptions. The Directive does not cover spare parts for keeping old equipment up and running. Especially relevant for our industry, equipment that is specifically designed to be installed in rail vehicles and other means of transport is also exempted.¹ Similar to WEEE, however, equipment that forms part of a rail vehicle or rail systems and is not to be considered to be a “fixed installation”, must fulfill RoHS when it belongs to one of the product categories that fall under RoHS.

However, going beyond legal obligations, most UNIFE members have a hazardous substances limitation strategy so that hazardous substances as the ones covered by the RoHS directive are already covered by voluntary limitation actions. Up to now these strategies have not been harmonized in the sector, but it is the intention to do so

As far as lead in soldering is concerned, the transition to lead-free soldering is complex and many different ways to achieve the technology shift exist. In safety critical applications UNIFE member companies will only introduce the new technology until it is proven to be reliable for rail applications.

To facilitate identification and repair, UNIFE member companies request from their suppliers to mark printed circuit board assemblies when produced with lead-free soldering according to JEDEC-JESD97 or IPC-I066 and will request to apply any relevant upcoming standards.

¹ Reference: Commission Document “Frequently asked questions” from May 05