

Electronic components and assemblies

SCIP IT user group meeting

28 February 2020

Telmo Jorge VIEIRA PRAZERES



SiA Guidance example 21: printed circuit board



'A printed circuit board consists of a plain layered board with printed wires, capacitors, resistors, transistors, inductors, diodes, microprocessors, microchips, fans, screws, among other objects. These objects are often mounted together by using substances/mixtures (e.g. solders, adhesives). Both the printed circuit board and the added articles and substances/mixtures consist of a series of different materials. e.g. rigid and soft plastics, metals, ceramics, glass etc.

...

The applicability of the substances in articles requirements under REACH must be assessed for all of these articles separately.

...

A printed circuit board comprises a large number of articles and complex objects. Hole-mounted capacitors are examples of such complex objects within a circuit board. The **hole-mounted capacitors** are soldered or glued onto printed circuit boards by the producer of the printed circuit boards. A capacitor is made from e.g. conductors, the dielectric, connectors, wires and the casing.

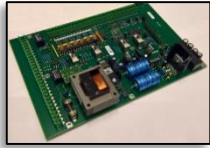
...

In order to comply with communication and notification obligations regarding the **capacitor**, the EU importer or the EU producer of the printed circuit board should get information on the presence of Candidate list substances above 0.1% w/w in the articles incorporated in the capacitor in accordance with the principles set out in chapter 3.

...

What was above described for the capacitor is applicable to any other complex object(e.g. transistor, microprocessor, fan) in the printed circuit board.'

SiA Guidance example 21: printed circuit board



CARACAL 27, 27 June 2018

Doc. **CA/54/2018**

Author: ECHA

'Member State Competent Authorities and observers are invited

...

- to provide views on whether there is **a need to develop specific solutions on how the suppliers of electronic components and assemblies can comply with Art 33 requirements**, and if so, indicate interest in participating in the expert group developing such guidance'

...

5. Do electronic components and assemblies deserve further attention?

Based on the contributions received so far electronic components and assemblies may require further attention and development of practical solutions on how to implement Art 33 (and 7) obligations. This would support all sectors which have electronic components incorporated in their products, e.g. automotive, medical technology, aerospace and defence, home appliances, industrial machinery, DIY tools and toys sectors.

Proposal:

If MSCAs are of the opinion that electronic components and assemblies indeed **may warrant some specific practical solutions for the implementation of Article 33**, a group of (experts from) MSCAs and interested sector associations could be established **to further analyse the needs, scope and conditions of such solutions**. The group could in particular look at what information different actors in supply chains – including actors at the waste stage - need on electronic assemblies for ensuring their safe use, and how such information should be made available.'

No follow-up taken by ECHA on the proposal as a result of the discussion and level of interest indicated by MSCAs.

SiA Guidance example 21: printed circuit board

- How do you plan to deal with electronic components and assemblies in line with example 21 of the SiA Guidance for SCIP notifications?

Subscribe to our news at
echa.europa.eu/subscribe

Follow us on Twitter
[@EU_ECHA](https://twitter.com/EU_ECHA)

Follow us on Facebook
Facebook.com/EUECHA