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ECHA/SCIP REPORTING REQUIREMENTS AND HALO ROHS-5 AND RL SUFFIX DISCRETE MAGNETICS PRODUCT STATUS CHANGE

There are new ECHA/SCIP reporting requirements for any products sold into the EU that have more than 0.1% volume of restricted ROHS/REACH materials. This reporting requirement goes into effect in January 2021.

As a courtesy to our customers, HALO has continued to offer certain ROHS-5 and ROHS compliant parts (relying on exemption 7a). Exemption 7a, allows for high lead content in the internal solder joints which exceeds 0.1% of the product material volume. Although fully ROHS compliant, this lead will need to be reported per the requirements of SCIP. Exemption 7a is used predominantly in our older discrete transformers and CMR chokes and a few modules. These parts will have a prefix of LD, LG, TD or TG, MD, MG, MS and certain HFJs (Pin in Paste only) and have a suffix of RL. Older, ROHS-5, products will not contain any ROHS (RL, LF or NL) suffix and these also have lead exceeding 0.1%.

The RL suffix in our discrete transformers is what signifies that we are using high lead content in the internal solder joints (exemption 7a). In most, if not all, cases we offer a Lead Free version and for these, the suffix is LF or NL. It is only the RL suffix products, which rely on exemption 7a. We have been strongly suggesting that all OEM customers and HALO distributors migrate to our Lead Free (LF suffix) parts for the last 3-4 years and we believe that most of our customers and distributors have done so in most cases.

There are 2 directives to be considered, the ECHA and the SCIP.

1. The ECHA reporting directive indicates that if the supplier does not use more than 1 ton of the material in question, in this case Lead, there is no need to report. Our global usage of lead is far below this 1ton limit as so many of our products have been converted to Lead Free at our customer base. As a result, HALO does not have a reporting requirement.
2. The SCIP does not appear to have a weight limit so there is still a reporting requirement for the old ROHS-5 and RL (exemption 7a) parts. This however does not need to be done by the manufacturer and we intend to leave this responsibility to our customers and distributors, who over the last few years have chosen not to convert to our Lead Free products. We hope that this reporting requirement by the “importers of record” will help to motivate our customers and distributors to finally make the change to Lead Free, something we have been asking them to do for so long.

Effective immediately, our ROHS-5 and RL product status will become NCNR and if our OEM customers and/or distributors continue to place new orders for these parts they will not be allowed to return them. We expect that by mid 2021 we will be EOLing our ROHS-5 and RL discrete transformers, CMR chokes and most hybrid modules. We have been postponing this product status change and ultimate EOL to allow our customers and distributors ample time to make the conversion.

If our customers and/or distributors are still purchasing any ROHS-5 or RL suffix (exemption 7a) discrete magnetic products which will find their way into the EU, the OEM or distributor will need to report these parts to the SCIP. HALO will be happy to support you with the needed information to submit for the SCIP reporting. To do so, we will need a list of any and all LD, LG, TD, TG, MD, MG and MS prefix products with suffix RL or those older ROHS-5 part which do not contain a RL, LF or NL suffix. With this list we will generate the needed documents needed and also advise the correct Lead Free replacement part so that you can make this important conversion.

Sincerely,

The HALO Management Team