

POLICY DOCUMENTS

Section 1010

Environmental Policy

Waste Electrical & Electronic Equipment WEEE

Restriction of Hazardous Substances RoHS

And

Registration Evaluation Authorisation and

Restriction of Chemical Substances (REACH)

Case Communications WEEE Registration WEE/HB0043SY

Un-Controlled Document

This Quality Manual is the property of Case Communications Ltd and may not be copied in whole or part without the prior consent of the Directors, in writing.

This document does not form part of any contract and is not intended to imply any representations or warranty. Case Communications Ltd reserves the right to amend its procedures from time to time in order to comply with individual contract requirements.

QA Man	Owner	Case Communications Policy Manual	Original	Rev	Rev Date	Page
1010	J. Corbett	Environmental Policy	10.9-09	1.3	March_2020	1 of 9

Para	Contents	Page
1	Environmental Policy	2
2	Introduction to RoHS	3
1	Introduction to REACH	5
4	Introduction to WEEE	6
5	Case Communications responsibilities	
	5.1 As a Producer	7
	5.2 As a Retailer	7
6	Approved Collection Centres	7
7	Statement of Compliance	7
	Draft Sample of Statement of Compliance	9

1. Environmental Policy

QA Man	Owner	Case Communications Policy Manual	Original	Rev	Rev Date	Page
1010	J. Corbett	Environmental Policy	10.9-09	1.3	March_2020	2 of 9

Case Communications commitment and approach to environmental issues is demonstrated in the following policy statement.

Case Communications acknowledges its role in protecting the environment. It is company policy to develop and implement effective environmental protection strategies within the Environmental Management System (EMS) which:

- are specific to site and/or area, and/or product/service.
- conform to the environmental policies in force at the client location
- promote the reduction of any adverse impact on the environment arising from the direct and indirect activities of the business meet, and where practicable, exceed, all relevant statutory requirements seek to continually improve environmental performance ensure that all staff are kept fully aware of environmental matters that have an impact on the business of delivering products and training.

Case Communications measures performance through an environmental impact audit, and sets clear, realistic and specific targets for improvement each year. Targets are set in association with Consortium directors who are responsible for ensuring required objectives are adequately resourced with clear accountabilities defined. Performance is measured and reviewed regularly to ensure the effectiveness of the Environmental Management System.

Case Communications places overall responsibility for environmental performance upon a Senior Director who is charged with ensuring compliance to legally binding requirements.. For Client contracts, responsibility for the Environmental performance is vested in the Programme Managers who have day to day responsibility for Environmental matters on their project(s), including implementation of measures that are required at a variety of disparate locations. Employees are responsible for supporting the environmental stance of the consortium within the constraints of their individual roles within the business.

2. Introduction to RoHS

The new RoHS Directive 2011/65/EU (RoHS 2) became effective on 3 January 2013.

QA Man	Owner	Case Communications Policy Manual	Original	Rev	Rev Date	Page
1010	J. Corbett	Environmental Policy	10.9-09	1.3	March_2020	3 of 9

RoHS 2 deals with the same hazardous substances and the same maximum concentration limits as Directive 2002/95/EC (RoHS 1). Therefore, all products meeting the substance restrictions of RoHS 1 remain compliant to the substance restrictions of RoHS 2.

The scope of RoHS 2 expanded to phase in the previously excluded categories of medical devices and monitoring & control instruments, as well as certain cables. In addition, RoHS 2 requires, for finished EEE1, the use of the CE mark to demonstrate compliance with the Directive. The commentary below provides more detail related to Case Communications (Case) approach to ensure compliance to RoHS 2. The substances banned under RoHS II are

- Hexavalent Chromium (Cr +6)
- Polybrominated diphenyl
- Polybrominated biphenyl (PBB)
- Lead (Pb)
- Cadmium (Cd)
- Ether (PBDE)
- Mercury (Hg)

Certification

Case Communications certifies to its knowledge that their products conform to the requirement of the EU Restriction on the Use of Hazardous Substance in EEE RoHS II Directive, 2011 / 65 / EU which may or may not include exemptions in the directive

Awareness and Focus

Case Communications is fully aware of RoHS 2, which entered into force on 21 July 2011 and requires Member States to transpose the provisions into their respective national laws by 2 January 2013. Case has continued to monitor the developing implementation guidelines and national transpositions.

The Case implementation of RoHS 2 is based also on the Frequently Asked Questions (FAQ) document², last updated on 12 December 2012, from the official working group

QA Man	Owner	Case Communications Policy Manual	Original	Rev	Rev Date	Page
1010	J. Corbett	Environmental Policy	10.9-09	1.3	March_2020	4 of 9

established by the Commission and Member States at the 2011 RoHS/WEEE Technical Adaptation Committee meeting.

Expansion of Scope

RoHS 2 expands the scope of products covered by phasing in EEE categories 8 (medical devices) and 9 (monitoring and control instruments) which were previously excluded under RoHS 1.

Most Case products that are used in equipment falling into these categories are already compliant and we expect no issues in providing compliant versions of any remaining products well before the respective phase in dates.

The expanded RoHS 2 scope also includes certain cable assemblies used to connect EEE or to provide power to EEE. Per the RoHS 2 FAQ version of 12 December 2012, the following cable assembly types are considered to be ‘out of scope’:

- Optical cables
- Cables internal to EEE (this includes permanently attached cables)
- Cables with a rated voltage greater than or equal to 250 volts.

For most cable assemblies, the timeline for being in scope is related to the timeline of the EEE with which they are used. Bulk cable comes into scope as of 2019. Note that the majority of Case cable products already comply with the substance restrictions as a result of our efforts under RoHS 1.

3. Introduction to REACH

REACH EC 1907 /2006 is the European Community Regulation on chemicals and their safe use. This legislation deals with the registration, Evaluation and Authorisation and restriction of Chemical substances. The law entered into force on 1st June 2007. REACH obligates manufacturers to ensure specified chemical usage is registered with the European Chemicals Agency (ECHA) in Helsinki, Finland. Registration includes supplying data such as chemical types and uses, volumes per annum and test data results.

QA Man	Owner	Case Communications Policy Manual	Original	Rev	Rev Date	Page
1010	J. Corbett	Environmental Policy	10.9-09	1.3	March_2020	5 of 9

As of 16th June 2014 EHCA had identified 155 “candidate” Substances of Very High Concern (SVHC). Based on internal analyses, supplied analyses, and / or material certifications of the raw materials used in the manufacturer f Case Communications products, we declare that all products and their packaging do not contain any of these SVHC’s in concentration above 0.1%. A full list of banned substances is available at this link <http://echa.europa.eu/web/guest/candidate-list-table>

4. Introduction to WEEE

The WEEE Regulations are intended to transfer the responsibility (and the cost) of dealing with electrical and electronic equipment (EEE) at the end of its life, from the user to the producer.

Case Communications operates an end-of-life take-back policy, whereby any WEEE product placed on the market on or after 13th August 2005, and that carries the Case Communications identification mark, may be returned to the Case offices for re-cycling/reuse in an environmentally sound way.

The same take-back policy will apply where Case Communications supplies a like-for-like/new replacement. A producer is classified as a company that:

- Manufactures EEE and places it on the UK market
- Rebrands EEE manufactured 3rd party products on the UK market
- Imports EEE from outside the UK and places it on the UK market

Case Communications falls into all three categories and therefore must comply with the WEEE directives.

5. Case Communications responsibilities

5.1 As a Producer

QA Man	Owner	Case Communications Policy Manual	Original	Rev	Rev Date	Page
1010	J. Corbett	Environmental Policy	10.9-09	1.3	March_2020	6 of 9

Case Communications is required to meet following requirements as a Producer:

- Case Communications funds collection, treatment, recycling of WEEE
- Case Communications marks its products with a crossed out wheelie bin, a producer identification Mark and a date mark
- Case Communications keeps records of the EEE placed in to the market
- Case Communications provides information about its products to recyclers to enable safe and effective treatment at the end of its life.

In order to comply with current WEEE legislation, Case Communications is registered on the UK Environment Agency National Packaging Waste Database (NPWD) and Producer Registration Number is WEE/HB0043SY.

5.2 As a Retailer

Case Communications is required to meet several requirements as a Retailer or "distributor" under the WEEE when it supplies Electrical or Electronic Equipment (EEE) directly to households (howsoever these are sold, e.g. through retail facilities, by mail or internet order etc) in the UK:

- provide information to customers on the environmental aspects of the products when they become waste (RoHS)
- provide information on the facilities available to consumers for the separate collection of household WEEE in their area
- facilitate the take-back of household WEEE

Where Case Communications does not sell to end-users, it does not have any responsibilities for ensuring WEEE is collected, recycled or treated.

6. Approved Collection Centres

As part of the initiative a number of approved collection centres were to be established throughout the UK. These are as yet to be fully established.

7. Statement of Compliance

QA Man	Owner	Case Communications Policy Manual	Original	Rev	Rev Date	Page
1010	J. Corbett	Environmental Policy	10.9-09	1.3	March_2020	7 of 9

The Case Communications ‘Statement of Compliance’ outlines the following activities

- which products are to be returned as End of Life
- how these products are to be disposed of

8. Draft Sample of Statement of Compliance

A draft sample of a ‘Statement of Compliance’ for Case Communications WEEE compliance is provided below.

QA Man	Owner	Case Communications Policy Manual	Original	Rev	Rev Date	Page
1010	J. Corbett	Environmental Policy	10.9-09	1.3	March_2020	8 of 9

Sample - Statement of Compliance Waste Electrical & Electronic Equipment

Items received July 2019 – December 2019

Case Communications have received the following equipment during the period July 2019 to December 2019. The columns indicate the following

Month – The Month the items were received back into Case Communications

Item – A brief description of the items

Qty – The number of items received back into Case Communications

M – Whether originally manufactured by Case Communications ‘Y’/Yes, ‘N’/No

R – Whether the item was Rohs compliant or not

Disposal – Where the item was disposed of

Month in 2012	Item	Qty	M	R	Where disposed of
July	Multi-Access Routers	35	Y	Y	PCS
August	Ethernet Switches	2	N	Y	PCS
September	Modems	25	Y	N	Returned to component Forum for removal of components before being sent to PCS
	XLR 564	1	Y	Y	Returned to base repair for removal of components before being shipped to PCS
October	No receipts				
November	X.25 Pads	5	Y	N	Processor chips removed before being shipped to PCS
December	KMX TDM	3	Y	N	Metalwork recovered and sent to SCR in Barnsley, electrical and electronic components to PCS

Statement of Intention for 2020-2021

Case Communications intends following the same procedure for waste disposal of end of life electrical and electronic equipment during 2020 to 2021.

QA Man	Owner	Case Communications Policy Manual	Original	Rev	Rev Date	Page
1010	J. Corbett	Environmental Policy	10.9-09	1.3	March_2020	9 of 9