

UK RoHS Conformity Assessment Group Protocol

1 Background and Intent

- 1.1 The United Kingdom (UK) Restriction of Hazardous Substances (RoHS) Conformity Assessment Group (URCAG) comprises a group of parties interested in ensuring RoHS conformity for products comprising or integrated into Electrical and Electronic Equipment (EEE) which is intended for entry into the UK or wider European markets.
- 1.2 It is the intent of the URCAG to recognise a number of certification bodies as RoHS Conformity Assessment Bodies.
- 1.3 The intent of this document is to define the guiding principles, for such parties providing assessment for RoHS compliance, considered by URCAG.

2 Role and Duties of RoHS Conformity Assessment Bodies

- 2.1 Each URCAG RoHS Conformity Assessment Body shall follow these guidelines when establishing and operating RoHS Conformity Assessment schemes under this protocol.
- 2.2 Each URCAG RoHS Conformity Assessment Body shall make available to the National Weights and Measures Laboratory (NWML) or other European Enforcement Authority, on request, the relevant information concerning the definition and operation of their RoHS Conformity Assessment scheme(s), and relevant RoHS assessments.
- 2.3 URCAF RoHS Conformity Assessment Bodies will on request from NWML, or other Member States agency, use their best endeavours to and with the consent of clients, provide information describing the status of identified clients to the RoHS Conformity Assessment scheme.

3 Content of Schemes

- 3.1 Each URCAG RoHS Conformity Assessment Body shall operate a defined RoHS Conformity Assessment scheme able to meet the requirements of this document.
- 3.2 The scope of their RoHS Conformity Assessment scheme(s) should cover, as a minimum, the requirements of the current UK Statutory Instruments relating to the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations (UK Regs), or other Member State implementation.
- 3.3 Each RoHS Conformity Assessment scheme should meet or exceed the requirements for accredited Product (process) certification schemes by a European Accreditation (EA) Body under Guide 65, EN 45011.
- 3.4 Each RoHS Conformity Assessment scheme should be based on (but not necessarily invoke) the requirements of a suitable management system (e.g. ISO 9001: 2000).
- 3.5 The normal audit requirements (frequency, length, depth, sampling basis) should be specified but may be varied as appropriate to the particular applicant's or registered organisation's implementation and maintenance of their management system.

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- 3.6 Each RoHS Conformity Assessment scheme shall define the on-going surveillance requirements and any special management system change control measures they require to be observed.
- 3.7 The arrangements for handling non-conformities and RoHS specific complaints (e.g. criticality, required response times) shall be specified.

4 Requirements for RoHS Conformity Assessment Bodies

An URCAG RoHS Conformity Assessment Body shall:

- 4.1 Hold an accreditation for their RoHS Conformity Assessment scheme(s) from the United Kingdom Accreditation Service (UKAS) or another EA Body to EN 45011 for product certification.
- 4.2 Have a mechanism to review changes to the RoHS Directive (2002 / 95 / EC), the UK Regs, or other Member State implementation and this document and implement appropriate modifications to their RoHS Conformity Assessment scheme(s).
- 4.3 Use qualified, experienced and trained auditors. The RoHS Conformity Assessment Body must be able to demonstrate that the auditor (or audit team) has sufficient qualifications, experience or training to perform their assessment. Their experience and / or training shall include:
 - a. Management systems auditing;
 - b. The RoHS Directive and national regulations; and
 - c. Relevant technical knowledge.
- 4.4 Maintain the level of knowledge required by RoHS Conformity Assessment Body by participating in URCAG activities or other AE Body acceptable mechanism and disseminate the information to the staff employed in the RoHS Conformity Assessment scheme(s) delivered by the RoHS Conformity Assessment Body.
- 4.5 Mutually recognise other RoHS Conformity Assessment schemes operated by other URCAG RoHS Conformity Assessment Bodies for the purposes of information passed up and down the EEE manufacturing supply chain.
- 4.6 Provide transparent and equitable access to their RoHS Conformity Assessment scheme(s) to all interested applicants globally and shall not require any additional services to be contracted.
- 4.7 Not make use of additional services to obtain undue benefit with respect to their RoHS Conformity Assessment scheme.

5 Management Systems Requirements to be included in a Product Scheme

- 5.1 Principally, all the requirements of a suitable management system assessment scheme should be assessed as part of an approval for RoHS management, but specifically document control, design control, procurement, process validation, measurement and calibration, records, preventive and corrective actions.
- 5.2 The organization's management system should contain in particular, an adequate description of the following inasmuch as they apply to the particular management system implementation:

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- a. The quality objectives and the organisational structure, responsibilities and powers of the management with regard to RoHS;
- b. The processes and procedures that will be used to ensure that the requirements of the, UK Regs, or other Member State implementation, that are current at the time of product supply will be met. In particular the process for supplier evaluation including RoHS specific risk assessment and materials traceability shall be addressed;
- c. The controls on all relevant sub-contract and procurement processes, in particular the provision of information to and from suppliers (as appropriate) at the procurement stage with specifications concerning the restricted hazardous substances shall be addressed;
- d. The design control and design verification techniques, processes and systematic actions that will be used when designing and specifying the products; in particular the following shall be addressed:
 - o Review of the applicability of RoHS to the particular product implementation and intent (e.g. product exclusions and materials exemptions);
 - o Identification and maintenance of lists of restricted hazardous substances and relevant user applications; and
 - o Establishment of procedures to control the use of restricted hazardous substances and to review the opportunities to substitute or eliminate them;
- e. The manufacturing, quality control and quality assurance techniques, processes and systematic actions that will be used, in particular the following shall be addressed:
 - o Establishment of process planning to prevent contamination, mixing, or excess use of restricted hazardous substances (e.g. by pre-dilution);
 - o Establishment of procedures for inspection, identification and measurement of restricted hazardous substances, as appropriate;
 - o Segregation of non-conforming products or supplies / precursors; and
 - o where necessary, a process for notification to end users or those up the supply chain;
- f. The examinations and tests that may be carried out before, during and after manufacture, and the frequency with which they may be carried out;
- g. The means by which it is ensured that the test and examination facilities respect the appropriate requirements for the performance of the necessary test;
- h. Records, to demonstrate product compliance such as supplier produced information, inspection reports and test data, calibration data, etc; in particular the product compliance evidence retained for a minimum period appropriate for the regulatory jurisdiction.
- i. The qualification records of personnel concerned with critical processes with respect to RoHS conformity;

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- j. The means to monitor the achievement of the required design and product quality; and
- k. The means to monitor the effective operation of the management system with respect to RoHS conformity.