



Zivid environmental requirements

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Zivid environmental requirements

1. Background

Zivid is committed to conducting business in a responsible and ethical manner. That includes compliance with all environmental regulations and requirements applicable for our products. An important aspect of this work, is a close collaboration with our suppliers to document the environmental performance and content of various substances in our products, based on declarations and documentation for components and sub-assemblies.

2. Compliance

Zivid request our suppliers to declare that all supplied parts/assemblies comply with the latest version of each requirement and regulation listed below.

The declaration must include the following information:

- Supplier's company name
- Date
- Name and/or number identifying the part declared
- Name identifying the person responsible for the declaration
- Requirement, regulation, directive declared according to
- Any limitation of the declaration (including any non-compliance)

For each batch shipped, the supplier is responsible for ensuring that the declaration provided to Zivid is in conformity to the latest edition of this document according to the latest version of the relevant requirements listed.

3. Environmental regulations and requirements

3.1. Overview

Below is an overview of the environmental regulations and requirements applicable for Zivid's products

Requirement	Regulation(s)	Required compliance
RoHS	(EU) 2015/863	Declaration from suppliers
REACH	(EU) 1907/2006	Declaration from suppliers
POP	(EU) 2019/1021	Declaration from suppliers
TSCA	(US) Toxic Substances Control Act	Declaration from suppliers (see cl. 3.5)
Full material declaration (FMD)		No requirement. Preferred acc to IPC-1752
Asbestos free parts		Declaration from suppliers
Conflict minerals	(EU) 2017/821 The Dodd-Frank Wall Street Reform and Consumer Protection Act , section 1502	Declaration from suppliers
PFAS	Future ban	Declaration from suppliers

3.2. RoHS

RoHS is an abbreviation for *Restrictions of Hazardous Substances* and is a directive issued by EU: [Delegated directive - 2015/863 - EN - EUR-Lex \(europa.eu\)](#)

The directive restricts the use of hazardous substances in electrical and electronic equipment to protect the environment and public health.

Compliance

Declaration must be provided based on the latest version of the directive.

3.3. REACH

REACH is an abbreviation for *Registration, Evaluation, Authorisation and Restriction of Chemicals* and is a regulation issued by EU: [EUR-Lex - 02006R1907-20240606 - EN - EUR-Lex \(europa.eu\)](#)

The directive aims to ensure a high level of protection for human health and the environment, including the promotion of alternative test methods, as well as the free circulation of substances on the internal market and the enhancement of

competitiveness and innovation. The directive covers all kinds of products (i.e. not only electronics).

Compliance

Declaration must be provided based on the latest version of the list of SVHC (Substance of very high concern), which is updated twice a year.

3.4. POP (persistent organic pollutants)

Persistent Organic Pollutants (POPs) are a group of organic compounds that have toxic properties, persist in the environment, accumulate in food chains and pose a risk to human health and the environment. Because of their persistence, these chemicals have the potential to be transported across international boundaries far from their source - through air, water and migratory species.

EU's Regulation on persistent organic pollutants: [EUR-Lex - 02019R1021-20230828 - EN - EUR-Lex \(europa.eu\)](#)

Compliance

Declaration must be provided based on the latest version of the regulation above.

3.5. TSCA

The **Toxic Substances Control Act (TSCA)** is a United States law administered by the United States Environmental Protection Agency (EPA), that regulates production, import, use and disposal of chemicals already in commerce and the introduction of new chemicals. All chemicals are listed under the [TSCA inventory](#)

TSCA regulates several substances that are deemed toxic. For the electronic producers and importers there are two rules within TSCA that are of significant impact. These are:

TSCA PFAS Reporting Rule

Under this rule EPA requires any manufacturer or importer that has entered any product on the American market since January 1st 2011, to electronically report information regarding PFAS uses, production volumes, disposal, exposures, and hazards.

Rule of the Persistent, Bioaccumulative, and Toxic (PBT) Chemicals.

This rule limits or prohibits the manufacture (including import), processing, and/or distribution in commerce for the following:

Substance	Rule
Decabromodiphenyl ether (DecaBDE)	Prohibited
Phenol, isopropylated phosphate (3:1) (PIP (3:1))	Prohibited
2,4,6-Tris (tert-butyl) phenol (2,4,6-TTBP)	Limited to 0.3% by weight
Hexachlorobutadiene (HCBD)	Prohibited
Pentachlorothiophenol (PCTP)	Limited to 1% by weight

[Persistent, Bioaccumulative, and Toxic \(PBT\) Chemicals under TSCA Section 6\(h\) | Assessing and Managing Chemicals under TSCA | US EPA](#)

Compliance

Declaration must be provided based on these two TSCA-rules and according to the table above.

3.6. PFAS

Per- and polyfluoroalkyl substances (PFAS) are a large class of thousands of synthetic chemicals that are used throughout society. However, they are increasingly detected as environmental pollutants, and some are linked to negative effects on human health.

They are regulated under both the **REACH directive** (see cl.3.3) and the **POP regulation** (see cl.3.4) in the EU. PFAS is regulated under the TSCA in the US (see cl. 3.5).

Both in EU and in the US, work is going on to ban the use of PFAS in various products.

3.7. Full Material Declaration (FMD)

Full Material Disclosure (FMD) is a concept for disclosure of all materials used in a product or service, including the concentration of each substance. The information is typically used to ensure compliance with regulatory thresholds for various substances.

The IPC-1752A Materials Declaration Management Standard, which is aligned with IPC-1751A Generic Requirements for Declaration Process Management, is widely used for material reporting of environmental hazardous substances today.

Compliance

Zivid does not require a Full Material Declaration from our suppliers, but we are promoting the idea that full transparency on material-use and -content will make it easier to document the environmental performance of the product and provide more reliable and correct information to the end-user. Hence, we see it beneficial that all parts we use, are followed by a Full Material Declaration.

3.8. Asbestos-free parts

Asbestos is a highly dangerous substance which can cause cancer and other illnesses. Since 2005, all use of asbestos in products is banned in the EU. The US government is also working for a total ban on asbestos. Asbestos can f.ex. be found in some electrical insulation.

Compliance

Considering the serious health effects from exposure to this material and the sanctions from international legislation, Zivid wants to ensure that parts and assemblies used in the product do not contain asbestos.

Declaration must be provided, stating that the supplied parts are free of asbestos.

3.9. Conflict Minerals

There is an increased awareness throughout the industry on sourcing substances from sustainable mines and smelters.

The focus is to stop profits transferred from parts of the mining industry to support of armed conflicts, human rights abuses and criminal activity in some conflict affected- and high-risk geographical areas.

Extra focus is aimed at four minerals:

- tantalum
- tin
- tungsten
- gold

When these substances are sourced from high-risk areas they are called “conflict minerals”

Various initiatives have been developed to ensure that conflict minerals are not used in the manufacturing of goods. Examples of such initiatives are:

- [OECD: Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)
- EU: [Regulation \(EU\) 2017/821](#), laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas
- US: [The Dodd-Frank Wall Street Reform and Consumer Protection Act](#), section 1502 on Conflict Minerals

Zivid is aware of our responsibility to monitor and follow the various initiatives taken in this area and to act accordingly. We work towards ensuring that our products are free of conflict minerals. This is done through:

- Mapping and understanding sources of possible conflict minerals in our supply chain, in our production process and in our products.
- Supplier - selection and - regular evaluation
- A collaborative due diligence process with our suppliers to disclose any use of minerals contained in materials or components used in our products.

Compliance

Declaration must be provided, stating that the supplied parts are free of conflict minerals and comply with the regulations listed above.

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