

# QUALITY MANUAL

## 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**

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Document Author	Approved By	Original	Revision
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## 1. Environmental Policy

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

We acknowledge our role in protecting the environment and our policy is to develop and implement environmental strategies within the Environmental Management System that provides the systematic structure and methodology for achieving this policy.

The policy is to develop and implement environmental strategies within the Environmental Management System.

- Are site and/or area and/or product/service specific
- 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 our environmental performance
- Ensure that all members of staff are kept fully aware of environmental matters that have an impact on our business of delivering consultancy and training in business and management matters.

We will measure that current level of performance through an environmental impact audit and set clear, realistic and specific targets of improvement each year. The targets will be set by the Board in association with Consortium directors and the system will have an appropriate strategy which satisfies all the required objectives, has clear responsibilities and is effectively resourced. Performance will then be measured and reviewed on a regular basis to ensure the effectiveness of the Environmental Management System.

Overall responsibility for environmental performance rests with the Senior Director who is charged with the legal role. For the contracts that we service for our Clients, responsibility for the Environmental performance shall be 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. Our employees are responsible for their role of supporting the environmental stance of the consortium within the constraints and positioning of our business.

## 2. Introduction to RoHS

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

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

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

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**Certification**

Case Communications certifies to its knowledge that their products conform to the requirement of the European Unions 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) document<sup>2</sup>, last updated on 12 December 2012, from the official working group 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 cables permanently attached to EEE),
- 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 only becomes in 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 1<sup>st</sup> 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. As of 16<sup>th</sup> June 2014 EHCA had identified 155 “candidate” Substances of Very High Concern (SVHC). Based on our own 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.

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The same take-back policy will apply where Case supply a like-for-like/new replacement.

A producer is classified as a;

- Manufacture EEE and place it on the UK market under the Case Communications brand
- Rebrand EEE manufactured by someone else and place it on the UK market
- Imported EEE from outside the UK and place it on the UK market

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

## 5. Case Communications responsibilities

### 5.1 As a producer

**As a producer** - there are several requirements Case Communications are required to meet:

- Case Communications fund the collection, treatment and recycling of WEEE
- Case Communications mark their products with a crossed out wheelie bin, a producer identification mark and a date mark
- Case Communications keep records of the EEE we have put on the market
- Case Communications provide information about their 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). Producer Registration Number: WEE/HB0043SY

### 5.2 As a retailer

**As a retailer** Case Communications has the following responsibility

Case Communications as a retailer or "distributor" under the WEEE regulations where we sell Electrical or Electronic Equipment (EEE) to end-users in the UK, however we sell them, e.g. through retail facilities, by mail or internet order etc do not have any financial responsibilities for ensuring WEEE is collected, recycled or treated, unless we are supply EEE to households, when we have the following responsibilities

- We must 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

## 6. Approved Collection Centres

As part of the initiative a number of approved collection centres will be established throughout the UK. As of August 2008 these centres had not been established even though the government stated there are no plans to establish them before July 2007, they still do not exist even as of 2014..

## 7. Statement of Compliance

Case Communications issue 'Statements of Compliance', which outlines the following activities

- What products we had returned to us as End of Life
- How we disposed of that equipment
- How we will continue to dispose of End of Life equipment

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**8. Draft sample of statement of compliance**

The next page provides a draft sample of a 'Statement of Compliance' for Case Communications WEEE compliance

## Sample - Statement of Compliance Waste Electrical and Electronic Equipment

**Items received July 2007 – December 2008**

Case Communications have received the following equipment during the period July 2007 to December 2007. 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 2008	Item	Qty	M	R	Where disposed of
July	Multi-Access Routers	25	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 4600	1	Y	Y	Returned to base repair for removal of components before being shipped to PCS
October	No items received				
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 20014-2015**

Case Communications intend following the same procedures for waste disposal of their electrical and electronic equipment during 2014 and 2015

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