REACH/SCIP - RoHS – TSCA 6(h) Compliance

Supplier Training

Options for Supplier Compliance Declarations

As of 01/23/2025

Viasat

RoHS Verification

RoHS: Restriction of Hazardous Substances

- Requires compliance at the homogenous material level for the following substances and part per million (PPM) reportable levels in parts or products
  - **Lead** (Pb) >1000 PPM)
  - **Mercury** (Hg) >1000 PPM
  - **Cadmium** (Cd) >100 PPM
  - **Hexavalent Chromium** (CrVI) >1000 PPM
  - **Polybrominated Biphenyls** (PBB) >1000 PPM
  - **Polybrominated Diphenyl Ether** (PBDE) >1000 PPM

ROHS 2 Substances

Per Directive 2011/65/EU

- **Bis(2-ethylhexyl) Phthalate** (DEHP) >1000 PPM
- **Butyl benzyl Phthalate** (BBP) >1000 PPM
- **Dibutyl Phthalate** (DBP) >1000 PPM
- **Diisobutyl Phthalate** (DIBP) >1000 PPM

4 new Substances

Per ROHS 2 Directive 2015/863 addendum (referred to as ROHS 3)

Required by July 22, 2019

REACH Verification

REACH: SVHCs (Substances of Very High Concern)

- 247 substances (01-21-2025)
- SVHCs must be reported if any substance comprises 0.1% wt/wt of any article/component *(once an article always an article ruling)*
- EU REACH is updated every 6 months with new chemicals added to create a "new" current list
  - SVHC https://echa.europa.eu/candidate-list-table
  - ECHA Guidance on requirements for substances in Articles
    - https://echa.europa.eu/documents/10162/23036412/articles_en.pdf/cc2e3f93-8391-4944-88e4-efed5fb5112c

Note to Suppliers: If a SVHC is above 0.1% wt/wt in any parts/articles/components then SCIP information is required. See slide 9 for SCIP information requirements.

TSCA 6(h) Verification

- TSCA 6(h) substances (listed below) are not permitted in materials and products supplied to Viasat:
  - Decabromodiphenyl ether (DecaBDE)
  - Phenol, isopropylated phosphate (3:1) (PIP (3:1))
  - 2,4,6-tris(tert-butyl)phenol (2,4,6-TTBP)
  - Hexachlorobutadiene (HCBD)
  - Pentachlorothiophenol (PCTP)
- US EPA Guidance on TSCA 6(h)
  - https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/persistent-bioaccumulative-and-toxic-pbt-chemicals

REACH/RoHS Compliance Options

There are 3 methods for certifying REACH/RoHS compliance: Material Declaration Statement, Viasat Self-Certification Declaration, Full Material Disclosure.

For the two methods below, REACH and RoHS compliance both must be asserted separately, but the methods are similar. The third method involves providing a full material list down to the component/parts material levels.

Unless otherwise specified, suppliers are free to choose whichever method is most convenient.

- Material Declaration Statement
  - Build Declaration into a template on the CoC
  - Only need to verify compliance for shipping part numbers
  - Removes potential hold-ups at receiving

- Viasat Self-Certification Declaration (note: only used for process materials)
  - Fill out one form (for REACH and another for RoHS) per year
  - Must include all part numbers
  - Must build to a Viasat Bill of Material Structure
  - Rejection holds approval on all hardware until resolved

REACH Declaration Statement Requirements

- Supplier Name

Reference to the date of certification (IE “Per the current SVHC list as of cert date 11/14/24”)

Or

Reference to the specific REACH release certified to: (IE “Per the EU REACH level ‘242’ SVHCs, list released 11/14/2024”).

Statement that no SVHCs are in product, and that all components are REACH compliant.

Or

Statement of the specific SVHCs that are present in the product list with product weights and SVHC percentage ranges or weights. SCIP is required in this case. See slides 6 and 7 for SCIP requirements

- Reference to the part number(s) being certified with part weights
- Signature of compliance certifier

- *Option to use Viasat REACH declaration form PR002603 or* PR002754 *for this method.*
- *If building to a Viasat Bill of Material structure, supplier can make statement that they did not add any SVHCs during their processing (or state the SVHCs that they did introduce). They do not have to declare the status of the overall product, just their additive processes.*
  - **If supplier has authoritative choice of finishing options for the fabrication of a part, they must claim against the entire product**

SCIP Information Requirements

Only required if SVHCs according to REACH are present above 0.1% wt/wt in an article/component

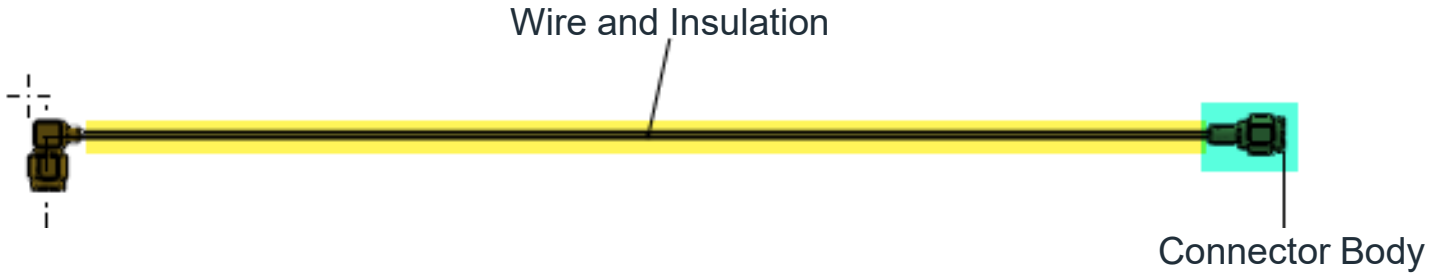
Two methods are acceptable. Self-certification containing the required information below or use Viasat's PR002754 form. Acceptable data example on next slide

Article/Part number Data	
Article* Name	Name of the article or complex object, could be used as alias for military products
Primary Article* Identifier Type	EAN; GTIN; GPC; SCIP number; part number (EAN Number is required for consumer products)
Primary Article* Identifier Value	Value based on the Identifier Type chosen
Article* Category	TARIC Code – EU Customs Code (10 Digits) - See SCIP Format - ECHA (europa.eu) Picklists: October 2020 for full list of options)
Other Article Identifier	Model # etc. – Means to further identify a product or provide alias for military products
Article Weight	Weight of the part and any lower level articles
Material and SVHC Data	
Substance of Very High Concern (SVHC) that is present	Identify the SVHC that is present in the article and its respective CAS and EC numbers if applicable
Material SVHC is present in	Identify the material within the article that the SVHC is present in
Material Weight or Percentage	The material weight or the percentage of the article is the material
Concentration range or weight of SVHC	Concentration range the SVHC is present at in the material
Material category	Identify the category of the material the substance is in (elastomer, metal, etc.) Full list of options is available in PR002754
Mixture category	Identify the category of the mixture the substance is in (paints, coatings, adhesives, epoxies etc.) Full list of options is available in PR002754

Note to Suppliers: If you have submitted a dossier to ECHA and have a SCIP number. We will accept the SCIP number, and no other SCIP information is required. This does not cover RoHS. REACH Viasat reporting requirements are also still required until the EU public-facing SCIP database is released.

SCIP Example – Cable Assembly

Example of required SCIP data for supplier reference – SVHC contained in the Connector Body



Data for the Article with the SVHC	
Article* Name	Connector Body
Primary Article* Identifier Type	Part Number
Primary Article* Identifier Value	123456789
Article* Category	TARIC Code 8536301090
Other Article Identifier	Model # etc.- Means to further identify or provide alias for products (optional)
Article Weight	Cable Assembly 5 grams and Connector Body 1 gram
Data for the Material and the SVHC it contains	
Substance of Very High Concern (SVHC)	Lead (7439-92-1)
Material SVHC is present in	Copper Alloy Connector Body
Material Weight or Percentage	95% of the Connector Body
Concentration range or weight of SVHC	1.0% - 10.0% Lead in Copper Alloy Connector Body
Material category (The Aluminum Alloy Connector Body is a Material not a Mixture)	metal > copper (and alloys of, except bronze and brass)
Mixture category	Copper Alloy Connector Body is not a mixture, so this field is N/A

RoHS Declaration Statement Requirements

- Supplier Name
- Reference to the RoHS Directive 2011/65/EU and amendment Directive (EU) 2015/863
- Reference to the part number(s) (Viasat and supplier) being certified with part weights
- Statement that no RoHS substances are in the product above limits
- If there are any RoHS technical exemptions used, list them, and if there are no exemptions, state there are no exemptions
- Signature of compliance certifier

  - *Option to use industry standard IPC-1752A, IPC-1754, PR002603,* PR002754, *IEC 62474 or other industry forms for this method*
  - *If building to a Viasat Bill of Material structure, supplier can make statement that they did not add any RoHS substances during their processing of the product. They do not have to declare the status of the overall product, just their additive processes.*
    - **If supplier has authoritative choice of finishing options for the fabrication of a part, they must claim against the entire product**

TSCA 6(h) Declaration Statement Requirements

- Supplier name
- Reference to the Toxic Substances Control Act, Section 6(h)
- Reference to the part number(s) (Viasat and supplier) being certified
- Statement that no TSCA 6(h) substances are in the products
- Signature of compliance certifier

- *Option to use industry standard full material disclosure (IPC-1752A, IPC-1754, IEC 62474) or PR002951*
- *If building to a Viasat Bill of Material structure, supplier can make statement that they did not add any TSCA substances during their processing of the product. They do not have to declare the status of the overall product, just their additive processes.*
  - **If supplier has authoritative choice of finishing options for the fabrication of a part, they must claim against the entire product**

Viasat Self-Certification Forms

Only applicable for Viasat Bill of Material structured products

- Available on the Viasat website, supplier portal
  - https://www.viasat.com/supplier-quality-documents
- PR002005 – RoHS Self-Certification for Manufacturer's Process Materials
- PR002006 – REACH Self-Certification for Manufacturer's Process Materials
- PR002951 – TSCA 6(h) Self-Certification for Viasat Suppliers
- Can cover all part numbers simultaneously
- Must be resubmitted yearly, due January 31

- *PR002005 and PR002006 are only certifying the Supplier's "process materials" used in the manufacturing of the Viasat part*
- *Viasat is responsible for the RoHS, REACH, and TSCA 6(h) data of items called out on the Viasat BOM structure.*

Full Material Disclosure (FMD)

The third option for compliance is to provide a full list of materials comprising the unit. This includes material lists for any components as well.

- The table below lists Viasat acceptable formats

Full Material Disclosure Form Options	
IPC-1752A	IPC Materials Declaration Management Standard– Covers REACH, ROHS, and Full Material Disclosures when available
IPC-1752B	IPC Materials Declaration Management Standard– Covers REACH, ROHS, SCIP and Full Material Disclosures when available
IPC-1754	IPC Materials Declaration Standard for Aerospace and Defense and Other Industries – Covers IAEG requirements, REACH, other various standards and Full Material Disclosures when available.
PR002603	Viasat's Excel Material Declaration Collection Form that mirrors the IPC-1752A standard – Covers REACH, ROHS, and Full Material Disclosures when available
PR002754	Viasat's Excel Material Declaration Collection Form that mirrors the IPC-1752B standard – Covers REACH, SCIP, ROHS, and Full Material Disclosures when available
IEC-62474	International Standard for the electrical and electronics industry on material declaration

- Other company or industry standard full disclosure forms are accepted upon review.
  - Note: If any substances are proprietary, a REACH statement might also be required
- Yearly re-certification is unnecessary for FMDs unless the formulation of the product changes or there are proprietary substances that require separate REACH statements.

International Aerospace Environmental Group (IAEG) Requirements

Viasat mobility customers are starting to add IAEG requirements into contracts

- Currently there are over 1500+ substances on the Aerospace and Defense Declarable Substances List ("AD-DSL")
- IAEG has adopted the IPC-1754 standard (Materials and Substances Declaration for Aerospace and Defense, and Other Industries) to meet various declarable substance list (DSL) requirements.
- Viasat prefers IPC-1754 when there is an IAEG requirement. Viasat will also accept Full Material Disclosures as listed on the FMD Slide.
  - If there is a proprietary substance in the FMD, Viasat will need additional verification that the IAEG substances are not present.

Note to Suppliers: IAEG describes their requirements and has general training located at http://www.iaeg.com/chemicalrpt/. Please reference this site for more information.

IAEG Members - Airbus, Boeing, Bombardier Aerospace, Dassault Aviation, Embraer, GE Aviation, Howmet Aerospace Lockheed Martin, Northrop Grumman, Raytheon Technologies, Rolls Royce, SAFRAN, Thales Group (Org Chart http://www.iaeg.com/elements/pdf/IAEG_Org_Chart_Jan2021.pdf)