


DOCUMENT NUMBER: 147301	TITLE: Eng. Standard, Fabricated Part Substance Compliance	
REVISION: M EC12130888	DOCUMENT CLASSIFICATION: 03-Work Instructions	

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1 PURPOSE

The purpose of this document is to define the material substance requirements for Brooks Automation parts, assemblies and products referencing this document.


2 SCOPE

This document applies to all Brooks Automation custom fabricated parts referencing this document.

3 REFERENCE DOCUMENTS, FORMS

External Document References (If applicable)	
Document Number	Document/Form Name
None	

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Internal Document References (If applicable)	
Document Number	Document/Form Name
QMS101170	Quality Manual
SCM100022	Workmanship Standard
QMS100856	Certificate of Compliance For ROHS, and REACH Form
STD-000-0004-03	Design Standard Notes

4 DEFINITIONS

List definitions of terms or abbreviations	
Term	Definition
Authorization List	Listing of substances in REACH that require authorization prior to importation
Candidate List	List of substances in REACH that are candidates to be added to the Authorization list
CMRT	Conflict Minerals Response Template
CRT	Cobalt Response template
RCOI	Reasonable Country of Origin Inquiry for conflict minerals
Restrictions list	Annex XVII restrictions on putting products onto the market in the EU if they have certain substances in them
RMI	Responsible Minerals Initiative, see http://www.responsiblemineralsinitiative.org/
RoHS	Refers to the Restriction of Hazardous Substances European Union Directive 2011/65/EU and its amendments
REACH	Refers to the Registration, Evaluation, Authorization and Restriction of Chemicals European Regulation (EC) No. 1907/2006.
SVHC	Substance of very high concern, a member of the Candidate list
TSCA	US EPA Toxic Substances Control Act


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5 RESPONSIBILITIES

List all the participating roles and summarize their responsibilities related to the procedure	
Role	Responsibility
Brooks Automation	For Brooks Automation drawings that reference this document, Brooks Automation is responsible to understand the status of the materials and parts specified as they relate to the substance requirements of section 6.
Manufacturer	<p>The manufacturer of parts referencing this document shall:</p> <ul style="list-style-type: none"> • Ensure that Brooks Automation specified materials and parts are used. • Ensure that unspecified materials and parts used in the construction of the completed part meet the substance requirements of section 6, and that any SVHC substances in the unspecified materials and parts greater than 0.1% weight of the part or assembly provided are reported to Brooks along with the % weight of each. • Provide certificates of conformance to the substance requirements of section 6 for unspecified materials and parts used in the construction of the completed part, or provide a materials declaration indicating conformance in the IPC1752A class C or IEC 62474 format. An XML file is preferred. Certificates &/or Declarations must be provided along with FAI (First Article Inspection) documentation. • Allow Brooks to ensure ongoing compliance per SCM100022 (Section 4) through the use of audits of the manufacturer's quality system, and by chemical analysis of the parts as needed.

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6 SUBSTANCE REQUIREMENTS


- 6.1 All parts that use Conflict Minerals as defined in the “Dodd-Frank Wall Street Reform and Consumer Protection Act” section 1502(e)(4) shall be disclosed. The vendor shall also respond to Brooks annual RCOI (reasonable country of origin inquiry) covering both all parts that contain Gold, Tantalum, Tin, or Tungsten (3TG) and Cobalt with the RMI (responsible mineral initiative) CMRT (conflict minerals response template) and CRT (cobalt response template).
- 6.2 All parts shall comply with the requirements of DIRECTIVE 2011/65/EU and its amendments, and not contain RoHS restricted substances above the limits specified in Annex II of unless the part is used in an application (Annex I) exempted from the restriction per Annex III of RoHS, in which case the exemption as described in Annex III of RoHS shall be disclosed to Brooks.
- 6.3 All parts shall comply with the latest revision, including amendments, of REACH. Vendors shall not supply parts to Brooks that contain a substance on the Authorization list. All parts supplied to Brooks that contain a substance that is subject of an Annex XVII restriction shall be disclosed by contacting product.substance@brooks.com. All parts that contain a Candidate list SVHC must be disclosed (substance, CAS#, and wt%) to product.substance@brooks.com per REACH article 33 requirements.
- 6.4 All parts shall comply with TSCA and be free of asbestos (all forms), PCB (poly chlorinated biphenyls) and section 6h PBTs (persistent, Bioaccumulative and toxic).
- 7 In addition to the above substance restrictions, Brooks requires disclosure of the following substances:
- 7.1 Antimony and its compounds
 - 7.2 Arsenic and Arsenic compounds
 - 7.3 Beryllium and Beryllium compounds
 - 7.4 Bismuth and Bismuth compounds
 - 7.5 Brominated Flame Retardants (other than PBBs and PBDEs)
 - 7.6 Ortho-Phthalates (other than RoHS banned)
 - 7.7 Selenium and Selenium compounds
 - 7.8 Vinyl Chloride Polymer (PVC)

Disclosure can be made by emailing product.substance@brooks.com with the Brooks part number, mass or weight of the part, substance name, CAS# and wt% of the substance.

8 REFERENCE INFORMATION

Reference information regarding the RoHS Directive, REACH Regulation, and Conflict Minerals law is available on the Brooks website page shown below. Here you will find detailed information to help you understand the requirements of each, and how they affect parts supplied to Brooks Automation. The reference information contained within this website page is for reference only and is intended as an aid. The latest official revisions of RoHS, REACH, and the Conflict Minerals law supersede any information on this website page.

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The requirements set forth by RoHS, REACH, and the Conflict Minerals law are always subject to change. In fact, the REACH SVHC list is currently updated every 6 months. It is important to keep up to date with the latest requirements.

The website page also contains QMS100856 Certificate of Compliance for ROHS, and REACH Form, a sample template certificate Use of this certificate will ensure you are including all of the necessary information in the certificate you supply to Brooks. However, IPC1752A class C or IEC 62474 format as an XML file is preferred.

Reference Information can be found by going to:
<http://www.brooks.com/supplier-environmental-compliance>

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9 RECORD RETENTION

The following records are generated from this process.		
TYPE OF RECORD	ABBREVIATION	WHERE RETAINED
None		
For Control and Retention of Quality Records, see QMS101517		

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