



# **BOMcheck**

Making an RCD

Regulatory Compliance  
Declaration

# Introduction

The Regulatory Compliance Declarations (RCD) tool includes expert regulatory guidance on all substances which are restricted or declarable for hardware products by regulations in North America, Europe, and Asia Pacific. BOMcheck provides detailed practical guidance on where these substances can be found in materials or parts of hardware products, and any exemptions that apply. If you make an RCD, then you will need to update the RCD every 6 months when more substances are added to the REACH Candidate List and other regulatory requirements.

If the supplier chooses to provide a Regulatory Compliance Declaration (RCD), then the supplier is required to work through the list of restricted and declarable substances on BOMcheck and indicate whether any of these substances are found in their parts above the threshold values. The BOM checklist of restricted and declarable substances and threshold values is published at:



<https://app.demo.bomcheck.com/de/suppliers/restricted-and-declarable-substances-list>

# Guidance for RCD

After login, on the left, click on «Enter Data» and then «Add declaration».

Then select RCD (Regulatory compliance declaration).

If you have several parts that contain exactly the same material and substances, but differ only from the Shape or electrical value, you have the possibility to create a list of all parts and then upload directly to BOMcheck.

In this way, one could create entire families of products or multiple products containing the same material, declare at the same time, without having to declare them one by one.

The prerequisite is that all substances contained are identical.

The description of how you can do this can be found here -> «[Create an item list with Microsoft Excel](#)».

**Creating a parts list file with Microsoft Excel**

A parts list file can be saved directly from an Excel spreadsheet.

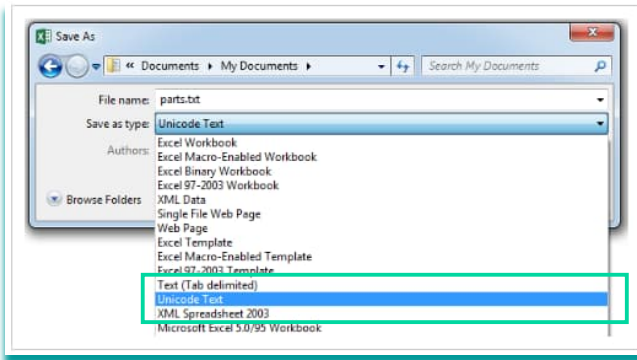
Set up a spreadsheet with the following data in each row:

- **column A:** part number
- **column B:** optional full part name
- **column C:** part weight (µg, mg, g or kg)

Note: To make a declaration for a material you must specify the material unit from the drop-down list (cm, m, cm<sup>2</sup>, m<sup>2</sup>, cm<sup>3</sup>, liter, m<sup>3</sup>) and provide the weight of 1 unit of the material. For example, the weight of 1 m of copper wire, the weight of 1 m<sup>2</sup> of steel sheet, the weight of 1 liter of paint. For discrete parts (e.g. resistors, capacitors, screws, housings), you should leave the material unit set to 'each'.

Do not include a header or title row and do not include data in any other columns.

- The item numbers are given in column A.
- Column B is optional, but you could also enter the item name
- And in column C, the weight of the item.



Save the prepared EXCEL list as «Unicode Text» and upload it into BOMCheck.

«Select file» (Datei auswählen) and upload.

However, if you only want to declare one article, you can first enter the article number (Your own article number), the name and weight of the item.

Select the weight unit and the material.

Click on «Next»

And then you come to the «Product scope», where the use of the product is defined.

- Can the part be used in Mechanical Devices? No
- Can the part be used in childcare products and toys? No
- Can the part be used in lamps? No
- Can the part come into contact with skin? Yes, let us assume that
- Can the part come into contact with food? No
- Does the part contain batteries? No
- Does the part contain leather or textiles? No
- Does the part contain chemicals products? (Could be liquid, gas, or powder) No

Account overview

Regulatory compliance declaration

Update ALL RCDs

Full materials declaration

Update ALL FMDs

Enter data

Add declaration

XML Upload

Map a parts list

Add sales packaging declaration

Packaging compliance statement

Enter BOM

Retrieve data

SCIP S2S Integration

Set up watchlists

View manufacturers list

View suppliers list

1 ATTACH PARTS LIST OR TYPE IN A PART NUMBER

2 SET PRODUCT SCOPE AND PROVIDE COMPLIANCE STATUS

3 ATTACH ANY EVIDENCE DOCUMENTS

4 SET CONFIDENTIALITY AND PREVIEW DECLARATION

5 APPROVE DECLARATION TO PUBLISH IN BOMCHECK

**Product scope**

This regulatory compliance declaration tool provides lists of regulated substance which are applicable to parts used in mechanical products and electrical products. If your parts can be used in any of the following applications, you can extend these lists and use the tool to make declarations for additional regulated substances which are applicable to parts used in these types of applications. If your parts are not used in these applications then answer 'No' to the questions below.

Can the part(s) be used in Medical Devices?	<input type="radio"/> Yes	<input checked="" type="radio"/> No
Can the part(s) be used in childcare products and toys?	<input type="radio"/> Yes	<input checked="" type="radio"/> No
Can the part(s) be used in lamps?	<input type="radio"/> Yes	<input checked="" type="radio"/> No
Can the part(s) come into contact with skin?	<input checked="" type="radio"/> Yes	<input type="radio"/> No
Can the part(s) come into contact with food?	<input type="radio"/> Yes	<input checked="" type="radio"/> No
Does the part contain batteries?	<input type="radio"/> Yes	<input checked="" type="radio"/> No
Does the part contain leather or textiles?	<input type="radio"/> Yes	<input checked="" type="radio"/> No
Does the part contain chemical products (liquids, gases or powders)?	<input type="radio"/> Yes	<input checked="" type="radio"/> No

The «Product Scope» already selects many substances that could be present in the material based on the information provided.

The various regulations and directives, the global and European ones such as RoHS, are displayed.

**Regulatory compliance declaration - restricted substances**

RoHS substance restrictions (Directive 2011/65/EU)

RoHS substance restrictions amendment 1 (Directive 2011/65/EU, as amended by Directive (EU) 2015/863 of March 2015)

REACH Article 67 substance restrictions which may be found in articles (Regulation 1907/2006)

Substances restricted or declarable by other legislation

**Regulatory compliance declaration - declarable substances**

REACH candidate list substances (Regulation 1907/2006)

Proposition 65 substances which may be found in mechanical and electrical products

**Compliance declaration - Industry restricted and declarable substances**

Industry restricted and declarable substances

Select «Auto-fill all substances» to: «Yes» if the part contains less than the maximum concentration.

**Regulatory compliance declaration - restricted substances**

RoHS substance restrictions (Directive 2011/65/EU)

Substance	Maximum concentration	Do all <u>single homogenous materials</u> in the parts contain less than the maximum concentration?			
Auto-fill all substances to: <input checked="" type="radio"/> Yes					
Cadmium/Cadmium compounds	0.01%	<input checked="" type="radio"/> Yes	<input type="radio"/> No, but exempt in the EU	<input type="radio"/> No, but exempt for Medical Devices and Monitoring and Control Instruments in the EU	<input type="radio"/> No
Hexavalent Chromium	0.1%	<input checked="" type="radio"/> Yes	<input type="radio"/> No, but exempt in the EU	<input type="radio"/> No, but exempt for Medical Devices and Monitoring and Control Instruments in the EU	<input type="radio"/> No

Select «No» if the part contains more than the maximum concentration.  
For example, «lead». All applicable exceptions for lead are available in the picklist.

You can select a suitable one, for example:

6(a) – Lead as an alloying element in steel or 6(a)-I.

Specify the maximum percentage if known, otherwise select «Concentration not known».

Next the 4 «phthalates» of the RoHS regulation.

Select «Yes» if the part contains less than the maximum concentration, otherwise select «No», if the part contains more than the maximum concentration.

Substance	Maximum concentration	Do all <b>single homogenous materials</b> in the parts contain less than the maximum concentration?
Auto-fill all substances to:		
Bis(2-ethylhexyl) phthalate (DEHP)	0.1%	Yes
Butyl benzyl phthalate (BBP)	0.1%	Yes
Dibutyl phthalate (DBP)	0.1%	Yes
Diisobutyl phthalate (DIBP)	0.1%	Yes



REACH Article 67 (Annex XVII). This is about restricted or prohibited substances.

▼ REACH Article 67 substance restrictions which may be found in articles (Regulation 1907/2006) ⓘ

Substance	Maximum concentration	Does the part contain less than the maximum concentration?	
Auto-fill all substances to:		✓ Yes	
Sum of perfluorocarboxylic acids containing 9 to 14 carbon atoms ⓘ	0.0000025% by weight (25ppb) of any article	✓ Yes	<input type="radio"/> No
Bisphenol A in thermal paper ⓘ	0.02% by weight (200 ppm) in thermal paper	✓ Yes	<input type="radio"/> No
Sum of Selected Phthalates Group 1 (DIBP, BBP, DBP, DEHP) ⓘ	0.1% by weight (1 000 ppm) in plasticized material	✓ Yes	<input type="radio"/> No
Asbestos fibres ⓘ	No intentionally added content	✓ Yes	<input type="radio"/> No
<b>Heat stabilisers</b>			
		✓ Part does not contain heat stabilisers	
Dibutyltin (DBT) compounds ⓘ	0.1 % by weight of tin in a material	✓ Yes	<input type="radio"/> No

Select «Yes» if the part contains less than the maximum concentration, otherwise select «No», if the part contains more than the maximum concentration.

«Other Legislation» contains substances of several global regulations e.g., North America, Asia Pacific and Europe.

▼ Substances restricted or declarable by other legislation ⓘ

Substance	Maximum concentration	Does the part contain less than the maximum concentration?	
Auto-fill all substances to:		✓ Yes	
Phenol, Isopropylated Phosphate (3:1) (PIP 3:1) ⓘ	No intentionally added content	✓ Yes	<input type="radio"/> No
Bisphenol S in thermal paper ⓘ	0.02% by weight (200 ppm) in thermal paper	✓ Yes	<input type="radio"/> No
Perfluorooctanoic acid and its salts ⓘ	0.0000025% by weight (25ppb) of any article	✓ Yes	<input type="radio"/> No
Formaldehyde ⓘ	No intentionally added content in composite wood products or components (plywood, particle board and MDF) and textiles	✓ Yes	<input type="radio"/> No
Pentachlorophenol (PCP) ⓘ	No intentionally added content	✓ Yes	<input type="radio"/> No
Polychlorinated and polybrominated dioxins and furans ⓘ	No intentionally added content	✓ Yes	<input type="radio"/> No
Radioactive substances ⓘ	No intentionally added content	✓ Yes	<input type="radio"/> No

Click on the [question mark](#) for substance details.  
(scope, application, CAS, in which materials it could occur...)

Phenol, Isopropylated Phosphate (3:1) (PIP 3:1)

<b>CAS-No:</b>	68937-41-7
<b>IUPAC Name:</b>	Phenol, Isopropylated Phosphate (3:1) (PIP 3:1)
<b>Synonyms:</b>	Isopropylated phenol phosphate, Isopropylated triaryl phosphate, Isopropylated triphenyl phosphate, Isopropylphenyl phosphate, tris(4-isopropylphenyl) phosphate, Tris(isopropylphenyl) phosphate
<b>Trade Names:</b>	Durad, Lubad, Phosflex 31L, Phosflex 41L, Reofos, Reolube, Reflex, Syn-o-ad 9578
<b>EINECS:</b>	273-066-3
<b>Risk Statement:</b>	R60: May impair fertility
<b>Hazard Statement:</b>	Repr. 1B, H360F: May damage fertility

Phenol, Isopropylated Phosphate (3:1) (PIP 3:1) is used as an additive flame retardant and plasticiser in PVC, polyethylene, flexible polyurethanes, polyurethane foam, epoxy resins, phenolic resins, synthetic rubber and various industrial coatings, adhesives, sealants. PIP 3:1 is also used in engineering thermoplastics such as modified PPO, polycarbonate and polycarbonate blends. The typical addition rate in these applications is 10% by weight of the material.

**Regulatory restrictions on Phenol, Isopropylated Phosphate (3:1) (PIP 3:1)**

On 6 January 2021 the US EPA published a final rule, "Phenol, Isopropylated Phosphate (3:1) (PIP (3:1)); Regulation of Persistent, Bioaccumulative, and Toxic Chemicals under TSCA Section 6(h)," 86 Fed. Reg. 894 which banned the processing and distribution of articles in the US which contain PIP (3:1) from 8 March 2021.

Following a lawsuit coordinated by NEMA and other industry associations, on 8 March 2021 the US EPA published a Memorandum providing assurance that the US EPA shall suspend for 180 days all enforcement actions regarding the restrictions on the processing and distribution of PIP (3:1) for use in articles, and articles to which PIP (3:1) has been added.

Select «Yes» if the part contains less than the maximum concentration, otherwise select «No», if the part contains more than the maximum concentration.

The first part is completed (restricted or prohibited substances).

Regulatory compliance declaration - restricted substances

RoHS substance restrictions (Directive 2011/65/EU)

RoHS substance restrictions amendment 1 (Directive 2011/65/EU, as amended by Directive (EU) 2015/863 of March 2015)

REACH Article 67 substance restrictions which may be found in articles (Regulation 1907/2006)

Substances restricted or declarable by other legislation

Regulatory compliance declaration - declarable substances

REACH candidate list substances (Regulation 1907/2006)

Proposition 65 substances which may be found in mechanical and electrical products

Compliance declaration - Industry restricted and declarable substances

Industry restricted and declarable substances

1

2

The second section refers to the Reach Candidate List (Article33) and Proposition65, which are declarable substances. These can be used above the limit value but must be declared.

This also applies to the SCIP database, which is mandatory in Europe since 2021.



If all articles contain less than 0.1% of the substance, click on «Yes».

**Regulatory compliance declaration - declarable substances**

▼ REACH candidate list substances (Regulation 1907/2006)

There are 223 Substances of Very High Concern (SVHCs) on the current REACH Candidate List published 17 January 2022. The BOMcheck Substance List Working Group has determined that 119 of these SVHCs are not normally found in concentrations > 0.1% w/w in materials or parts of Supplied Articles. If parts and materials are manufactured using conventional industry processes, then you can [rely on the BOMcheck guidance](#) and screen out these 119 SVHCs (BOMcheck will set your declaration to 'compliant' for these SVHCs). If any parts or materials are manufactured in a very unusual way (for example, using a secret process or unique ingredients) then you must address each of the 223 SVHCs individually.

Are any parts or materials manufactured in a very unusual way? ☐ Yes ☒ No

Substance	Can be found in articles?	Do all articles contain less than 0.1% of the substance?
Auto-fill all substances to:		<input checked="" type="radio"/> Yes

Otherwise select «No» if the part contains more than the maximum concentration.

For example, if «lead» is above the limit value, so set it to «No».

Benz[a]anthracene ⓘ Date of publication: 15 January 2018	Unlikely. Benz[a]anthracene may be present as an impurity in extender oils which may be used as plasticizers in rubber and plastics and in potting materials. Benz[a]anthracene may also be present as an impurity in black colourants (e.g. Carbon Black) which may be used in rubber and plastics.	<input checked="" type="radio"/> Yes <input type="radio"/> No
Benzo[def]chrysene ⓘ Date of publication: 20 June 2016	Unlikely. Benzo[def]chrysene may be present as an impurity in extender oils which may be used as plasticizers in rubber and plastics and in potting materials. Benzo[def]chrysene may also be present as an impurity in black colourants (e.g. Carbon Black) which may be used in rubber and plastics.	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>Lead</b>		
<input checked="" type="radio"/> Part does not contain Lead		
Lead ⓘ Date of publication: 27 June 2018	Metallic lead is used in lead-acid batteries, in lead solders, as an alloying element in steel and aluminium, in galvanised steel components and in copper alloys.	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>Cadmium and cadmium compounds</b>		
<input checked="" type="radio"/> Part does not contain cadmium or cadmium compounds		
Cadmium hydroxide ⓘ Date of publication: 15 January 2018	Yes. Cadmium hydroxide is found in NiCd batteries up to 26% by weight of the battery.	<input checked="" type="radio"/> Yes <input type="radio"/> No
Cadmium ⓘ Date of publication: 20 June 2013	Yes. Cadmium is used as a pigment, as a heat stabiliser, in NiCd Batteries, in alloys, as a plating for plugs, contacts and switches, and in optical glass and filters	<input checked="" type="radio"/> Yes <input type="radio"/> No

[scroll down](#)

Provide further information according to the SCIP Database requirements.

If it is a product that is dangerous to use or harmful, that would have to take it into special consideration when recycling, then a «Safe Use Instruction» could be stored here.

If no document is available, leave it on «Yes».

☒ Yes ☐ No **No need to provide safe use information beyond the identification of the Candidate List substance**

Select Article Category which most accurately describes the article, where known

REACH Candidate List

Select Material Category for material which contains this substance, where known

Proposition 65 substance

853

Article category not known

SECTION XVI (84 - 85) Machinery and mechanical appliances; electrical equipment; parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles > Electrical machinery and equipment and parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles > Electric sound or visual signalling apparatus (for example, bells, sirens, indicator panels, burglar or fire alarms), other than those of heading 8512 or 8530 > Indicator panels incorporating liquid crystal devices (LCD) or light-emitting diodes (LED) > Incorporating light-emitting diodes (LED)  
CN code: 8531202000

SECTION XVI (84 - 85) Machinery and mechanical appliances; electrical equipment; parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles > Electrical machinery and equipment and parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles > Electric sound or visual signalling apparatus (for example, bells, sirens, indicator panels, burglar or fire alarms), other than those of

Select «Article Category» from the picklist which most accurately describes the article, where known.

(enter 853 as an example)

For example, «Machinery and mechanical appliances», «electrical equipment», etc.

Select «Material Category» from the picklist for material which contains this substance, where known.

e.g.: «metal > steel > stainless steel».

If the «Material Category» is not, click on «Material category not known».

REACH Candidate List substance: **Lead**

Select Material Category for material which contains this substance, where known

metal > steel

Material category not known

metal > steel

metal > steel > carbon steel (non-alloy steel)

metal > steel > stainless steel

metal > steel > alloy steel (except stainless steel)

metal > steel > containing copper

metal > steel > containing tin

Proposition 65 substance

Compliance declaration

Industry restriction

Proposition 65 is a Californian regulation. This regulation contains partly similar or identical substances as in REACH, such as «lead», but has different limit values.

Select «Yes» if the part contains less than the maximum concentration, otherwise select «No», if the part contains more than the maximum concentration.

▼ Proposition 65 substances which may be found in mechanical and electrical products

Dr Paul Goodman at RINA Consulting carried out a screening of the 900 plus substances on the Proposition 65 list and identified 108 that may be found in component parts of mechanical or electrical products (in other words, any component of a manufactured product which is not defined as a substance or preparation (mixture) under the REACH regulation). Dr Goodman's screening, supported by detailed investigations by BOMcheck (including checking relevant Proposition 65 settlements in California), shows that 40 of these substances do not require "safe harbour" warnings. This leaves 68 substances which may be found in component parts of mechanical or electrical products and may require "safe harbour" warnings.

BOMcheck has assessed Dr Goodman's screening and identified that 28 of these 68 substances are already regulated under RoHS, REACH substance restrictions, POPs regulation or REACH Candidate List in BOMcheck. In other words, if your parts are already compliant to the RoHS, REACH substance restrictions, POPs regulation and REACH Candidate List in BOMcheck then there are only 40 new substances that you need to provide compliance declarations for Proposition 65. The [BOMcheck Proposition 65 screening assessment of substances which could be found in materials in mechanical and electrical products](#) reduces your time and cost for Proposition 65 compliance by 97%. You can rely on the below detailed chemical guidance to assess if your parts could contain these 40 new Proposition 65 substances.

Substance	Maximum concentration	Does the part contain less than the maximum concentration?
Auto-fill all substances to:		
		<input checked="" type="checkbox"/> Yes
Indium tin oxide ⓘ	0.1% by weight (1 000 ppm) of any material	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Lead and Lead Compounds ⓘ	0.009% (90 ppm) of any material	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Bisphenol A (BPA) ⓘ	0.0003% (3 ppm) of any material	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Phthalate plasticisers</b>		
<input checked="" type="checkbox"/> Part does not contain phthalate plasticisers		
Diisononyl phthalate (DINP) ⓘ	No intentionally added content	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Finally, the substances defined by the electronics industry.

Select «Yes» if the part contains less than the maximum concentration, otherwise select «No», if the part contains more than the maximum concentration.

Compliance declaration - Industry restricted and declarable substances

▼ Industry restricted and declarable substances ⓘ

Substance	Maximum concentration of substance w/w	Does the part contain less than the maximum concentration?
Auto-fill all substances to:		
		<input checked="" type="checkbox"/> Yes
Beryllium and Beryllium Compounds ⓘ	0.1% by weight (1 000 ppm) of any material	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Brominated Flame Retardants - (BFRs) declarable</b>		
<input checked="" type="checkbox"/> Part does not contain brominated flame retardants		
Brominated flame retardants (other than PBBs, PBDEs or HBCDD) ⓘ	0.1% w/w total bromine content from BFRs	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Brominated flame retardants (other than PBBs, PBDEs or HBCDD) in PWB ⓘ	0.09% w/w total bromine content from BFRs in printed wiring board laminate	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Chlorinated Flame Retardants - (CFRs) declarable</b>		
<input checked="" type="checkbox"/> Part does not contain chlorinated flame retardants		
Chlorinated flame retardants ⓘ	0.1% w/w total chlorine content from CFRs	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



Click on «Next».

Here you could store Evidence documentation, such as a RoHS test report. There are certain countries, such as UAE "United Arabian Emirates", which **require RoHS test reports**.

**Evidence documents**

You may optionally attach one or more evidence documents to support your declaration. For example, materials declarations from materials suppliers (composition information may be provided in MSDS) or test reports from accredited laboratories. If your declaration is for finished equipment then you can attach the RoHS2 Declaration of Conformity. Please ensure that the filename gives a good description of the evidence. For example, "REACH\_SVHC\_Declaration.PDF", "RoHS2 Declaration of Conformity".

Evidence documentation:  Keine ausgewählt

RoHS test report? ☒ Yes ☐ No

Test laboratory is accredited to ISO/IEC 17025? ☐ Yes ☒ No

RoHS test results confirm compliance? ☐ Yes ☒ No

Date of report:

[Attach more evidence documents](#)

RoHS test report(s) cover all of the relevant homogenous materials in the part or sub-assembly that require testing? ☐ Yes ☒ No

Select the date, enter the declaration title, and click on «Next».

**Evidence documents**

You may optionally attach one or more evidence documents to support your declaration. For example, materials declarations from materials suppliers (composition information may be provided in MSDS) or test reports from accredited laboratories. If your declaration is for finished equipment then you can attach the RoHS2 Declaration of Conformity. Please ensure that the filename gives a good description of the evidence. For example, "REACH\_SVHC\_Declaration.PDF", "RoHS2 Declaration of Conformity".

Evidence documentation:  Keine ausgewählt

RoHS test report? ☐ Yes ☒ No

[Attach more evidence documents](#)

**Declaration details**

This declaration is valid for the attached list of part numbers from: (dd/mm/yyyy)

Declaration title:

Make this declaration viewable by «All manufacturers» or «only for Siemens AG»

Click on «Preview declaration».

The declaration is displayed here.

Yellow means that the product contains declarable substances, manually applied exemptions and/or preselected exemptions from setting the «Product Scope».

green = compliant

yellow = compliant with the application of an exception

(can be no toy, no medical device, everything you have selected in the product scope)

Yellow = compliant but declarable

red = not compliant

gray = missing information

(update necessary or declaration not complete)

«Approve declaration», enter password and click «Submit declaration».

The image shows two overlapping screenshots from the BOMcheck.net interface. The top screenshot is the 'Declaration actions' form, which includes radio buttons for 'Approve declaration' (selected) and 'Cancel declaration', a password confirmation field, and two buttons: 'Previous' and 'Submit declaration' (highlighted with a red box). The bottom screenshot shows the 'Declaration Approved' notification, which includes a yellow banner with a speech bubble icon and the text 'Declaration Approved'. Below the banner is a sidebar with 'Account overview' (containing 'Enter data' and 'Enter BOM') and a main area with five green buttons: 'Respond to customer requests', 'Send requests to suppliers', 'Invite suppliers to join BOMcheck', 'View/Update declarations', and 'Your account details'.

After successful submission, this notification appears:  
«Declaration approved»