# BOMcheck

Making an RCD Regulatory Compliance Declaration

**SIEMENS**

# 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.
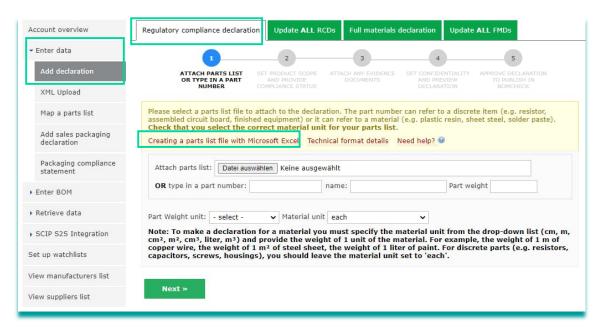
If the supplier chooses to provide a Regulatory Compliance Declaration (RCD), then the supplier is required to work through the list of restricted and declarable substances on BOMcheck and indicate whether any of these substances are found in their parts above the threshold values. The BOM checklist 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, klick on «Enter Data» and then «Add declaration».
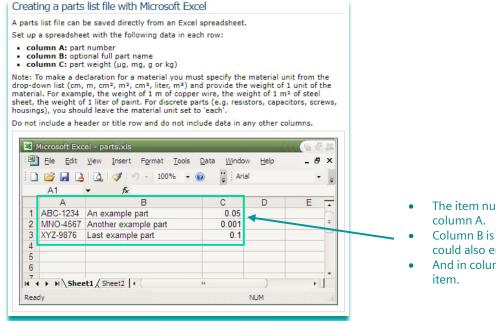


Then select RCD (Regulatory compliance declaration).

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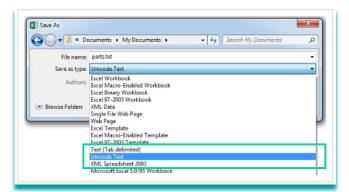
In this way, one could create entire families of products or multiple products containing the same material, declare at the same time, without having to declare them one by one.

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».
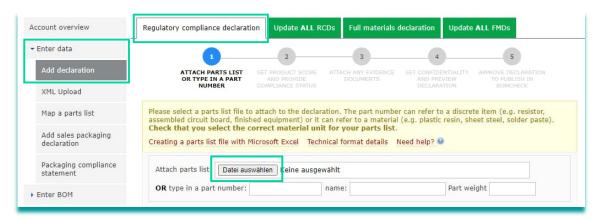


- The item numbers are given in column A.
- Column B is optional, but you could also enter the item name
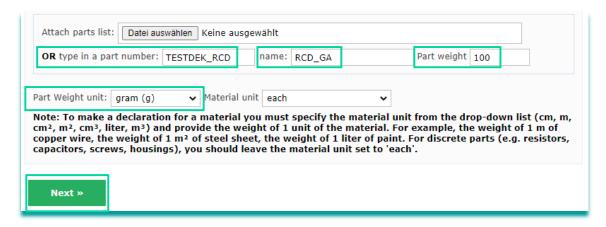- And in column C, the weight of the item.

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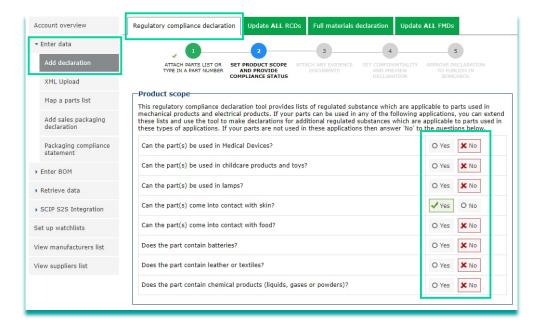Can the part be used in lamps? No
Can the part come into contact with skin? Yes, let us assume that
Can the part come into contact with food? No
Does the part contain batteries? No
Does the part contain leather or textiles? No
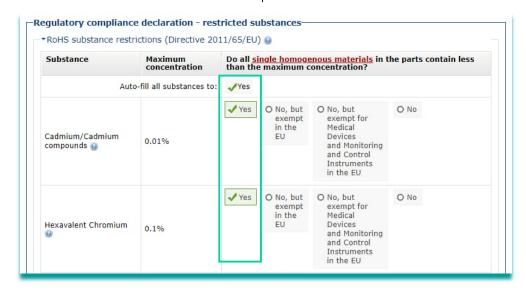Does the part contain chemicals products? (Could be liquid, gas, or powder) No

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.
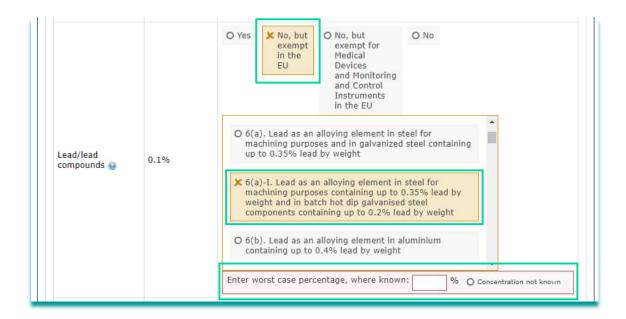


Select «Auto-fill all substances» to: «Yes» if the part contains less than the maximum concentration.

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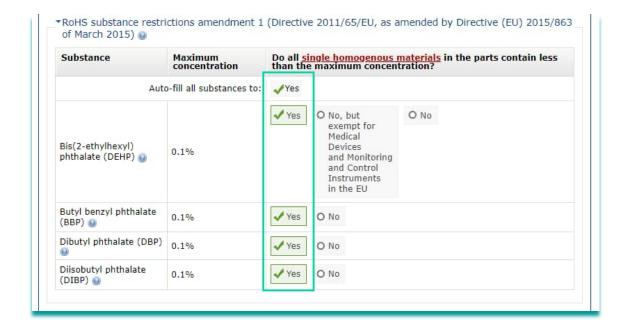For example, «lead». All applicable exceptions for lead are available in the picklist.

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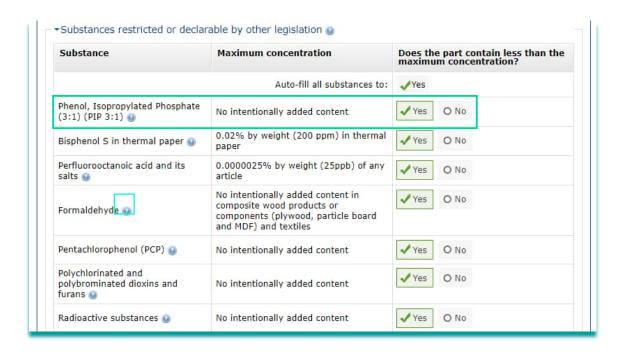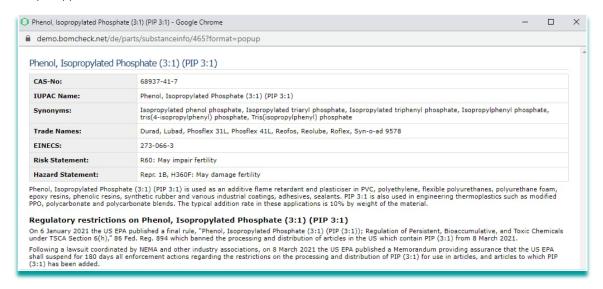
REACH Article 67 (Annex XVII). This is about restricted or prohibited substances.



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.

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



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).



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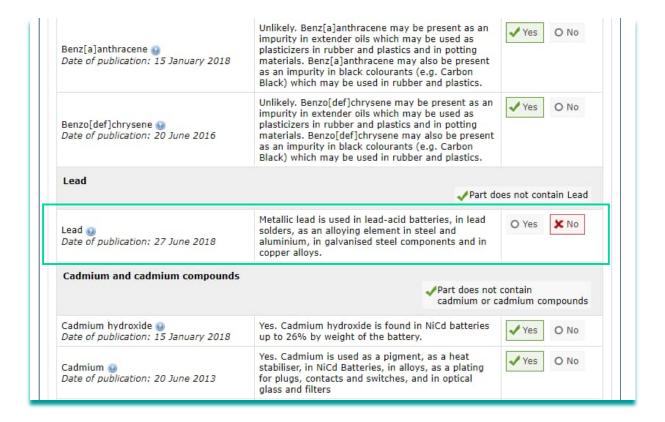
This also applies to the SCIP database, which is mandatory in Europe since 2021.

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



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

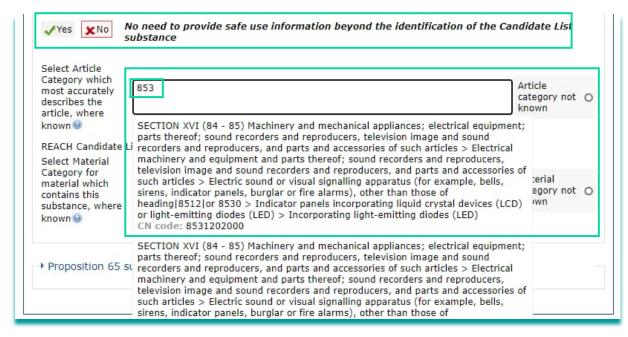For example, if «lead» is above the limit value, so set it to «No».



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».



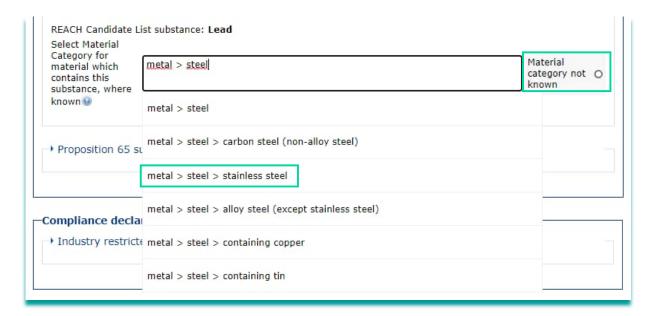Select «Article Category» from the picklist which most accurately describes the article, where known.

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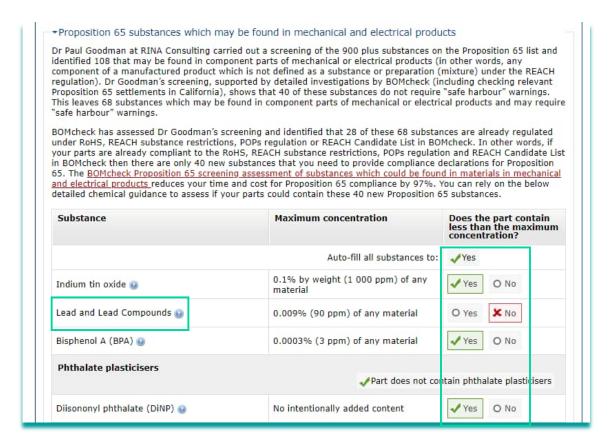
e.g.: «metal > steel > stainless steel».

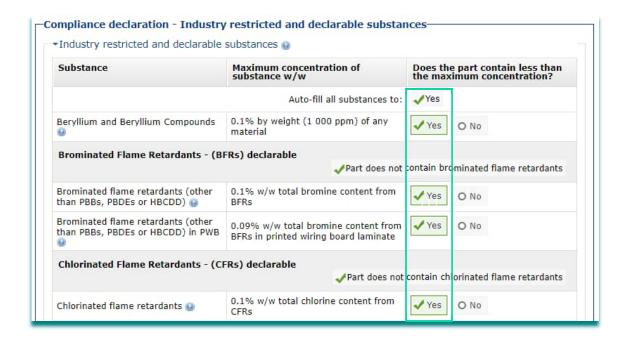If the «Material Category» is not, click on «Material category not known».

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.
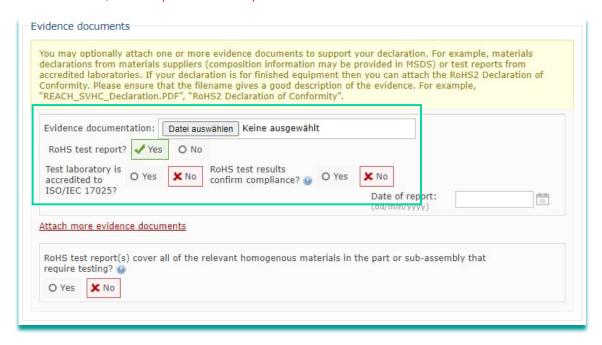


Finally, the substances defined by the electronics industry.

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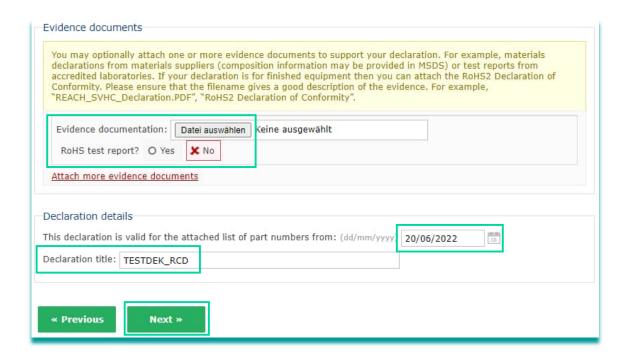
Click on «Next».

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.



Select the date, enter the declaration title, and klick on «Next».
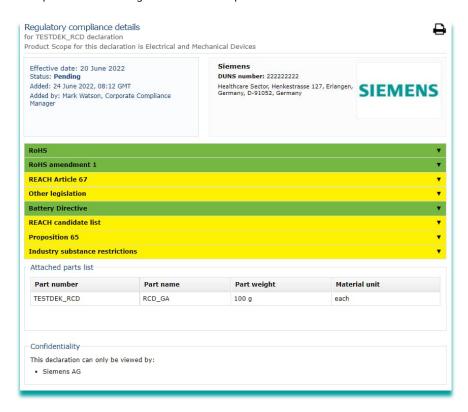
Make this declaration viewable by «All manufacturers» or «only for Siemens AG»



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».

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