

Usage of bare printed circuit boards in consideration of REACH

Purpose of this paper is to offer a guideline regarding the classification of materials according to REACH for manufacturer and downstream user of bare printed circuit boards.

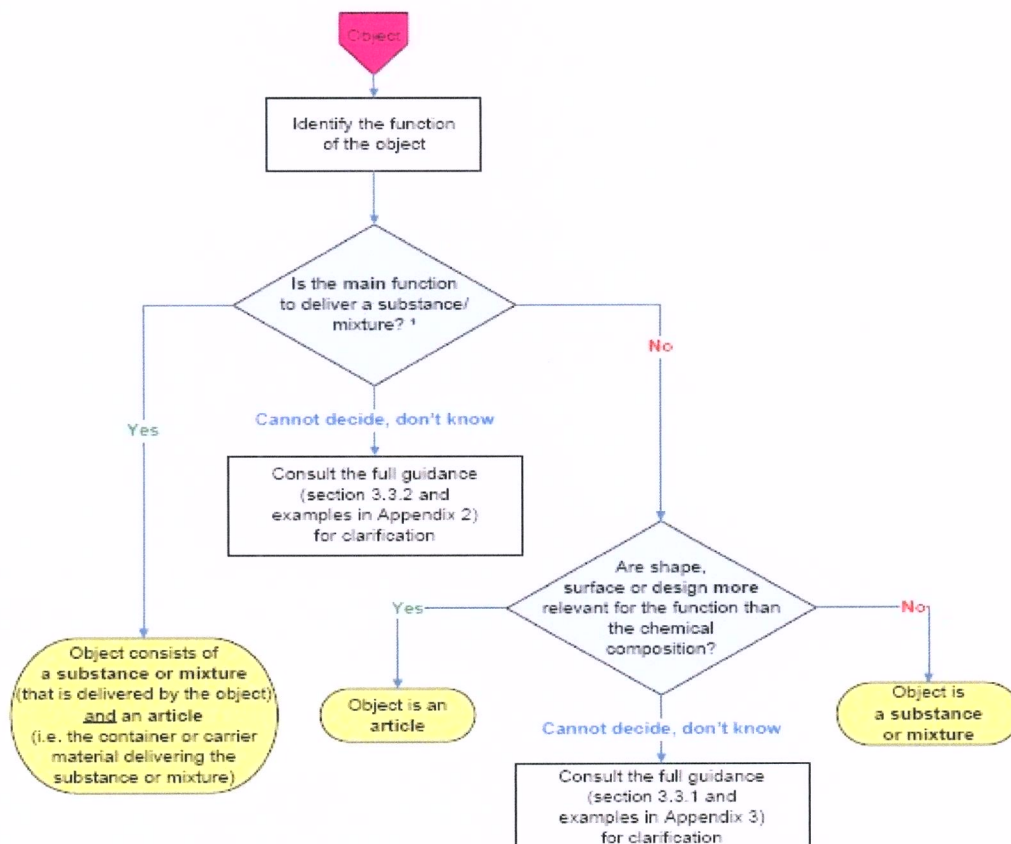
This paper is not legally binding.

In the opinion of manufacturer and downstream user of printed circuit boards those boards have to be considered as articles without intentional release of substances.

According to the definition in REACH, article 3 number 3, means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition.

This is definitely applicable to bare printed circuit boards.

Another decision support is referenced diagram below, created by the European Chemicals Agency (ECHA).



¹ In answering this question, consider the object as a whole, including a potential chemical content (like e.g. in a battery or a thermometer).

As specified in this diagram, question 1 – Is the main function to deliver a substance / mixture – has to be answered by No.

For this reason bare printed circuit boards have to be considered as articles without intentional release of substances.



Christoph Stoppok
Managing Director
ZVEI Printed Circuit Board and
Electronic Systems Division



Tina Sumann
Head Working Group Environment
ZVEI Printed Circuit Board and
Electronic Systems Division