Manufacturers of products and their supply chains are faced with ever-growing, complex and seemingly endless changes to regulatory and customer requirements concerning energy consumption, material choices and chemical substance use, responsible sourcing and durability/recyclability which can directly impact product design and drastically affect costs and delivery if not properly managed.

Services

- Expert knowledge of requirements concerning hazardous substances, ecodesign, conflict minerals and end-of-life
- Ascertaining if your products are in scope of directives and regulations
- Simple explanations of new requirements and legal obligations
- Gap analysis and developing cost-effective compliance strategies
- Conformity assessment support (e.g. technical file preparation) under CE marking legislation
- Identification of likelihood of substances contained within products e.g. REACH SVHCs, RoHS, Biocides
- Development of supply chain management processes – how to communicate and collect essential data to be assured of compliance
- Testing for substances
- Obsolescence identification, substitution advice and coordination of testing
- Training courses (webinars, site visits and at RINA offices)

Project experience

- European Commission - study of case for inclusion of medical devices, and monitoring and control instruments in the RoHS 2 Directive
- European Commission - ecodesign preparatory studies - hobs, ovens and furnaces, Working Plan 3
- Many trade associations (international, EU and UK) and individual companies - development of RoHS exemption cases for equipment from medical imaging equipment, industrial and instrumentation, consumer electronics, IT and many more
- BEIS (UK government) - impact assessments - RoHS Directive
- Compliance and Risks - providing expert commentary for their C2P compliance tool
- European Commission - part of research and evaluation teams supporting the implementation of the EU’s conflict minerals regulation
Capability

RINA has extensive capabilities in the area of environmental regulatory compliance, including:

- Hazardous substances (RoHS, REACH, CLP, biocides, batteries, POPS, California Proposition 65, ELV)
- Ecodesign and energy labelling
- Responsible sourcing (conflict minerals)
- Material sustainability
- End-of-life (WEEE, batteries, ELV)
- International legislative requirements

Examples of areas where RINA can help you include:

RoHS Directive
The recast RoHS Directive requires Conformity Assessment (including CE Marking) and broadens the scope of products included. Banning more substances is also being considered. RINA keeps close track of these developments enabling us to define compliance requirements and develop strategies for implementation by our clients. RINA’s consultants develop cases for RoHS exemption requests drawing on a background in assessing such evidence for the European Commission.

REACH Regulation and SVHCs
Identification and reporting on over 200 Substances of Very High Concern (SVHCs) is a key requirement for all suppliers of hardware and components. RINA maintains a database of substances, recording their uses in manufacturing and in final products. This enables clients to precisely target supply chain communications based on the likelihood of an SVHC occurring. RINA also advises on all other aspects of REACH such as Restrictions and Authorisation impacts, Authorisation applications, Notification requirements and the SCIP database. RINA has developed a three-step process for substance assessment enabling limited budgets to be targeted at areas of highest risk. This programme uses both RINA internal and external analysis facilities.

Responsible sourcing / Conflict minerals
The US SEC Rule arising from the Dodd-Frank Act, Section 1502, means that many companies are being asked for evidence that their activities do not support violence and exploitation in their supply chain. The EU’s own Responsible Sourcing Regulation and association measures has further driven the need for companies to conduct substantive due diligence in their supply chains. RINA advises on what companies can do to respond, how to interact with their supply chains and how to assess responses.

Ecodesign regulations
Many product specific regulations have arisen from the Ecodesign Directive. RINA has carried out several preparatory studies for the European Commission and keeps in close contact with policy makers. This places our consultants in an excellent position to advise on current and upcoming compliance requirements.

Global Obligations
Many countries outside the EU have environmental legislation which RINA closely monitors, allowing us to provide accurate and current advice on a territory-by-territory basis.

Training
Getting to grips with new and complex requirements, understanding what they mean for your business and how to respond is very difficult and can be prone to error. It is all too easy to do too much at an unnecessarily high cost or not do enough and fail to comply. RINA runs training courses and workshops all round the world. We tailor our events to meet the practical needs of the audience and focus on practical examples applicable to your business.

Conference
RINA organises an annual conference covering all aspects of compliance relevant to product supply from an environmental and ethical perspective. Our eminent speakers come from EU and national product policy development, market surveillance, industry, and technical experts.

productregulation@rina.org
rina.org