

Prototek Material of Concern

Prototek Digital Manufacturing (“Prototek”) is committed to eliminating or reducing the use of materials of concern in the design, manufacture, assembly and disassembly, repair and maintenance, operation and disposal of its products and services. Prototek expects suppliers to support this commitment, which includes compliance with regulatory and contractual requirements related to materials of concern.

Prototek does not maintain a list of Materials of Concern. Instead, Prototek requires suppliers to provide full materials declarations (preferred) or to comply with any/all applicable chemical substance regulations in markets served (for which Prototek may request a declaration or certificate of compliance). A non-exhaustive list of applicable regulations is provided below:

EU RoHS - 2011/65/EU
India RoHS – E-Waste (Management and Handling) Rules 2011
China RoHS – Management Methods for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products
Taiwan RoHS – CNS 15663 Guidance to reduction of the restricted chemical substances in electrical and electronic equipment (EEE)
EEU RoHS – TR EAEU 037/2016 on restricting the use of hazardous substances in electrical engineering and radio electronic products
UAE RoHS - UAE RoHS – Restriction of Hazardous Substances – Decision No. 10 of 2017
EU REACh - Regulation (EC) No 1907/2006
Korea REACh - Act on Registration and Evaluation of Chemical Substances – amendment promulgated March 2018

Turkey REACH – KKDIK – published 6/23/2017
California Safe Drinking Water and Toxic Enforcement Act aka Proposition 65
Canadian Chemicals Management Plan
US Toxic Substances Control Act
Turkey RoHS
Law for the promotion of effective use of resources (Japanese Green Procurement)
Korea RoHS
California SB20 & SB50

Proposal to include:

ITAR (International Traffic in Arms Regulations) - Controlled by the U.S. Department of State. Certain materials, alloys, and chemicals (e.g., specific titanium or beryllium alloys) may be restricted for export.

EAR (Export Administration Regulations) - Even if not ITAR-controlled, EAR controls can apply to dual-use goods, including materials and certain electronics.

Defense Federal Acquisition Regulation Supplement

DFARS 252.225-7009 / Specialty Metals Clause – Covers certain metals (like titanium, stainless steel, and cobalt alloys) used in U.S. defense contracts.

(DFARS) 223.8 - Ties environmental regulations into defense contracts (e.g., hazardous materials, MSDSs).

Conflict Minerals – Dodd-Frank Act Section 1502 - Requires disclosure of the use of tin, tungsten, tantalum, and gold (3TG) originating from conflict zones.

PFAS (Per- and polyfluoroalkyl substances) bans or restrictions – Growing globally and in the U.S. (especially by EPA and individual states).

Vietnam Chemicals Law (No. 06/2007/QH12) - Controls production, import, and use of chemicals. Includes substance registration and safety assessments. - Some treated metals, surface finishes, or coatings could involve regulated chemicals.

Vietnam RoHS – Circular 30/2011/TT-BCT - Similar to EU RoHS, applies to electrical and electronic equipment. Applies if we're importing sub-assemblies or electronics from Vietnam.

Mexico **NOM-018-STPS-2015** – System for the identification and communication of hazards and risks from hazardous chemicals - Mexico's GHS (Globally Harmonized System) implementation.

Mexico's General Law of Ecological Balance and Environmental Protection (LGEEPA) - Governs environmental protection and hazardous waste. Especially if packaging, paints, or solvents are sourced from Mexican suppliers.