


DOCUMENT NUMBER: 147301	TITLE: Engineering Standard, Commercial, Fabricated Part and Assembly Substance Restrictions	
REVISION: R DCO005056	DOCUMENT CLASSIFICATION: 03-Work Instructions	

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1 PURPOSE

The purpose of this document is to define the material substance requirements for all Brooks Automation component parts, purchased assemblies and products referencing this document.

2 SCOPE


This document applies to all Brooks Automation purchased component parts and assemblies referencing this document.

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3 REFERENCE DOCUMENTS, FORMS

External Document References (If applicable)	
Document Number	Document/Form Name
124 Stat. 1376–2223	Dodd–Frank Wall Street Reform and Consumer Protection Act
Regulation (EU) 2017/821	EU Conflict Minerals Regulation
Directive 2011/65/EU with amendment 2015/863/EU	EU RoHS,
Regulation (EU) No 1907/2006	REACH
Regulation (EU) No 2019/1021	Persistent Organic Pollutants Regulation
REGULATION (EU) 2023/1542	Battery Regulation
15 U.S.C. §2601 et seq. (1976)	Toxic Substance Control Act
CAProp65	Safe Drinking Water and Toxic Enforcement Act of 1986, AKA: California Proposition 65

Internal Document References (If applicable)	
Document Number	Document/Form Name
QMS101773	Environmental Compliance Policy
QMS101774	Environmental Compliance Business Process
QMS100856	Compliance declaration
QMS100957	Brooks Conflict Minerals Process

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4 DEFINITIONS

List definitions of terms or abbreviations	
Term	Definition
Authorization List	Listing of substances in REACH that require authorization prior to importation
Candidate List	List of substances in REACH that are candidates to be added to the Authorization list
CMRT	Conflict Minerals Response Template
EMRT	Cobalt Response template
RCOI	Reasonable Country of Origin Inquiry for conflict minerals
Restriction's list	Annex XVII restrictions on putting products onto the market in the EU if they have certain substances in them
RMI	Responsible Minerals Initiative, see http://www.responsiblemineralsinitiative.org/
RoHS	Refers to the Restriction of Hazardous Substances European Union Directive 2011/65/EU and its amendments
REACH	Refers to the Registration, Evaluation, Authorization and Restriction of Chemicals European Regulation (EC) No. 1907/2006.
SVHC	Substance of very high concern, a member of the Candidate list
TSCA	US EPA Toxic Substances Control Act


5 RESPONSIBILITIES

List all the participating roles and summarize their responsibilities related to the procedure	
Role	Responsibility
Brooks Automation	For Brooks Automation drawings that reference this document, Brooks Automation is responsible to understand the status of the materials and parts specified as they relate to the substance requirements of section 6.
Manufacturer, Commercial part	The manufacturer of commercial parts shall: <ul style="list-style-type: none"> Provide certificates of conformance to the substance requirements of section 6 or provide a materials

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	<p>declaration indicating conformance in the IPC1752A class C or IEC 62474 format. An XML file is preferred. Certificates &/or Declarations must be provided along with FAI (First Article Inspection) documentation.</p> <ul style="list-style-type: none"> • Allow Brooks to ensure ongoing compliance per SCM100022 (Section 4) through the use of audits of the manufacturer's quality system, and by chemical analysis of the parts as needed.
Manufacturer, Fabricated Part	<p>The manufacturer of Brooks Automation fabricated parts with a drawing referencing this document shall:</p> <ul style="list-style-type: none"> • Ensure that Brooks Automation specified materials and parts are used. • Ensure that unspecified materials and components used in the construction of the completed part meet the substance requirements of section 6, and that any SVHC substances in the unspecified materials and parts greater than 0.1% weight of the part or assembly provided are reported to Brooks along with the % weight of each. • Provide certificates of conformance to the substance requirements of section 6 for unspecified materials and parts used in the construction of the completed part, or provide a materials declaration indicating conformance in the IPC1752A class C or IEC 62474 format. An XML file is preferred. Certificates &/or Declarations must be provided along with FAI (First Article Inspection) documentation. <p>Allow Brooks to ensure ongoing compliance per SCM100022 (Section 4) through the use of audits of the manufacturer's quality system, and by chemical analysis of the parts as needed.</p>

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6 SUBSTANCE REQUIREMENTS

- 6.1 All parts that use Conflict Minerals as defined in the “Dodd-Frank Wall Street Reform and Consumer Protection Act” section 1502(e)(4) and Cobalt and Mica shall be disclosed. The vendor shall also respond to Brooks annual RCOI (reasonable country of origin inquiry) covering both all parts that contain Gold, Tantalum, Tin, or Tungsten (3TG), Mica and Cobalt with the RMI (Responsible Mineral Initiative) CMRT (conflict minerals response template) and EMRT (extended mineral response template). All components supplied to Brooks are to use 3TG, Mica and cobalt sourced from RMAP (responsible mineral assurance process) conformant sources
- 6.2 All parts shall comply with the requirements of DIRECTIVE 2011/65/EU and its amendments, and shall not contain RoHS restricted substances above the limits specified in Annex II of unless the part is used in an application (Annex I) exempted from the restriction per Annex III of RoHS, in which case the exemption as described in Annex III of RoHS shall be disclosed to Brooks.
- 6.3 All parts shall comply with the latest revision, including amendments, of REACH. All parts supplied to Brooks that contain a substance that is subject of an Annex XVII restriction shall be disclosed by contacting product.substance@brooks.com. All parts that contain a Candidate list SVHC must be disclosed (substance, CAS#, and wt%) to product.substance@brooks.com per REACH article 33 requirements.
- 6.4 All parts shall comply with TSCA and be free of asbestos (all forms), PCB (poly chlorinated biphenyls) and section 6h PBTs (persistent, Bio accumulative and toxic).
- 6.5 All parts containing CAProp65 listed substances, the supplier must notify Brooks of the presence of the restricted substance.
- 6.6 All parts shall comply with the substance restrictions of the Persistent Organic Pollutants directive (Stockholm Convention). At the time of editing this document, this includes PCBs (polychlorinated biphenyls), asbestos, lead, mercury, formaldehyde, certain hexavalent chromium compounds and Persistent, Bio accumulative and Toxic substances.
- 6.7 All parts that contain a battery shall use batteries that comply with the EU Battery Regulation.

7 In addition to the above substance restrictions, Brooks requires disclosure of the following:

- 7.1 Presence of Antimony and its compounds
- 7.2 Presence of Arsenic and Arsenic compounds
- 7.3 Presence of Beryllium and Beryllium compounds
- 7.4 Presence of Bismuth and Bismuth compounds
- 7.5 Presence of Brominated Flame Retardants (other than PBBs and PBDEs)
- 7.6 Presence of Ortho-Phthalates (other than RoHS banned)
- 7.7 Presence of Selenium and Selenium compounds
- 7.8 Presence of Vinyl Chloride Polymer (PVC)
- 7.9 Presence of Radioisotopes
- 7.10 Presence of Batteries
- 7.11 Presence of PFAS

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Disclosure can be made by emailing product.substance@brooks.com with the Brooks part number, mass or weight of the part, substance name, CAS# and wt% of the substance.

8 REFERENCE INFORMATION

Reference information regarding the RoHS Directive, REACH Regulation, and Conflict Minerals law is available on the Brooks website page shown below. Here you will find detailed information to help you understand the requirements of each, and how they affect parts supplied to Brooks Automation. The reference information contained within this website page is for reference only and is intended as an aid. The latest official revisions of RoHS, REACH, and the Conflict Minerals law supersede any information on this website page.

The requirements set forth by RoHS, REACH, and the Conflict Minerals law are always subject to change. In fact, the REACH SVHC list is currently updated every 6 months. It is important to keep up to date with the latest requirements.

The website page also contains QMS100856 Certificate of Compliance for ROHS, and REACH Form, a sample template certificate. Use of this certificate will ensure you are including all of the necessary information in the certificate you supply to Brooks. However, IPC1752A class C or IEC 62474 format as an XML file is preferred.

Note: This document is available on the Supply Chain website: <http://www.brooks.com/my-brooks/suppliers/purchase-terms-and-conditions>, it must be updated whenever this document is revised.

Reference Information can be found by going to:
[Brooks Product Responsibility](#)

9 RECORD RETENTION

The following records are generated from this process.		
TYPE OF RECORD	ABBREVIATION	WHERE RETAINED
None		
For Control and Retention of Quality Records, see QMS101517		

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