

# Substance compliance requirements for Vaisala parts

Substance compliance requirements concerning mechanical and electronic parts supplied for Vaisala products

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# Substance compliance requirements for Vaisala parts

Vaisala is committed to ensuring that all mechanical and electronic parts used in its products meet applicable substance-related requirements. This includes both standard commercial components and parts manufactured according to Vaisala drawings or specifications.

This document summarizes the obligations suppliers must meet to ensure their parts comply with relevant legislation and Vaisala's internal restrictions.

## 1 Purpose and Scope

The purpose of this document is to explain, in clear terms, what substance-related laws, regulations and other requirements our suppliers must follow.

These laws, regulations and other requirements can be:

- National (in one country)
- Federal (for example, USA)
- International or regional (for example, European Union)
- Internal decisions by Vaisala

This document focuses on:

- Mechanical and electronic parts used in Vaisala products
- Both standard catalogue parts and parts made to Vaisala's drawings

## 2 Substance Restrictions by Regulatory Frameworks

In the table below, we summarize the main laws and regulations that limit the use of certain substances in parts used by Vaisala.

The table gives you an overview. More detailed information, such as threshold values and CAS numbers, is provided in the regulations and on the official authority websites, and, where applicable, in the following sub-chapters.

As a supplier to Vaisala, you must ensure that your parts comply with these substance restrictions, as applicable.

Geographical Scope	Regulatory Framework	Shorthand	Restricted Substances
European Union	Restriction of Hazardous Substances	EU RoHS	<ul style="list-style-type: none"> <li>• Lead</li> <li>• Cadmium</li> <li>• Mercury</li> <li>• Hexavalent chromium</li> <li>• Polybrominated biphenyls (PBB)</li> <li>• Polybrominated diphenyl ethers (PBDE)</li> <li>• Bis(2-ethylhexyl) phthalate (DEHP)</li> <li>• Butyl benzyl phthalate (BBP)</li> <li>• Dibutyl phthalate (DBP)</li> <li>• Diisobutyl phthalate (DIBP)</li> </ul>
European Union	Registration, Evaluation, Authorisation and Restriction of Chemicals	EU REACH	<ul style="list-style-type: none"> <li>• Substances on the Candidate List of Substances of Very High Concern for Authorisation (SVHCs), up-to-date list available on ECHA's website</li> <li>• Substances restricted under Annex XVII, up-to-date list available on ECHA's website</li> </ul>
European Union	Persistent Organic Pollutants Regulation	EU POPs	<ul style="list-style-type: none"> <li>• Substances on the list of substances subject to POPs Regulation, up-to-date list available on ECHA's website</li> </ul>
United Kingdom	Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012	UK RoHS	<ul style="list-style-type: none"> <li>• See EU RoHS</li> </ul>
United States	Toxic Substances Control Act	US TSCA	<ul style="list-style-type: none"> <li>• Phenol, isopropylated phosphate (3:1) (PIP (3:1))</li> <li>• Decabromodiphenyl ether (DecaBDE)</li> <li>• 2,4,6-tris(tert-butyl)phenol (2,4,6 TTBP)</li> <li>• Hexachlorobutadiene (HCBd)</li> <li>• Pentachlorothiophenol (PCTP)</li> </ul>
European Union United States	REACH Annex XVII restriction proposal  40 C.F.R. Part 705 (TSCA § 8(a)(7))	PFAS requirements	<ul style="list-style-type: none"> <li>• Per- and polyfluoroalkyl substances (PFAS): synthetic organic chemicals, in whole or in part regulated as a group or subset, that contain at least one fully fluorinated methyl (<math>-CF_3</math>) or methylene (<math>-CF_2-</math>) carbon atom</li> </ul>

## 2.1 EU Restriction of Hazardous Substances (RoHS)

The European Union's RoHS Directive (Directive 2011/65/EU) limits the use of certain hazardous substances in electrical and electronic equipment placed on the EU market.

Under RoHS, the following substances are restricted in electrical and electronic equipment:

- Lead (0.1 %)
- Mercury (0.1 %)
- Cadmium (0.01 %)
- Hexavalent chromium (0.1 %)
- Polybrominated biphenyls (PBB) (0.1 %)
- Polybrominated diphenyl ethers (PBDE) (0.1 %)
- Bis(2-ethylhexyl) phthalate (DEHP) (0.1 %)
- Butyl benzyl phthalate (BBP) (0.1 %)
- Dibutyl phthalate (DBP) (0.1 %)
- Diisobutyl phthalate (DIBP) (0.1 %)

These limits are calculated as a percentage by weight in each "homogeneous material" (for example, plastic in a connector housing, solder on a joint, plating on a pin).

Parts supplied for Vaisala products:

- Must not contain these substances above the RoHS thresholds, unless a valid RoHS exemption applies
- If you use a RoHS exemption for a part supplied to Vaisala, you must inform us about it (see section "Providing substance compliance information to Vaisala")
- Vaisala products belong to **category 9, industrial monitoring and control instruments**

## 2.2 EU Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

REACH (Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals) is the main EU regulation on chemicals as such, in mixtures, and in articles (products).

### 2.2.1 Candidate List of Substances of Very High Concern (SVHCs)

The Candidate List includes substances that may have serious impacts on human health or the environment. The list is updated about twice a year with new substances.

You can always find the latest Candidate List on the European Chemicals Agency (ECHA) website:

<https://echa.europa.eu/candidate-list-table>

Candidate List substances may be present in parts and materials supplied for Vaisala products. However:

- If any Candidate List substance is present above 0.1 % weight by weight in an "article" (for example, in a component or sub-assembly), you must inform Vaisala about this (see section "Providing substance compliance information to Vaisala")
- We need this information to meet our own legal duties and to inform our customers

We strongly encourage suppliers to phase out Candidate List substances from parts supplied to Vaisala whenever possible. This reduces future risks, such as new legal requirements or customer restrictions.

### 2.2.2 Annex XVII for restricted substances

Annex XVII of REACH restricts or bans the use of specific dangerous substances, mixtures, and articles in the EU.

- Each restricted substance in Annex XVII has its own “conditions of restriction,” such as where it can be used and at what maximum amounts. A substance restricted in one application may be allowed in another.

You can find the latest list of restricted substances in Annex XVII on ECHA's website:

<https://echa.europa.eu/substances-restricted-under-reach>

Parts supplied for Vaisala products:

- Must not contain substances restricted under REACH Annex XVII above the allowed substance-specific limits, when those limits apply to the part itself.
- If the conditions of restriction apply only to the end product manufactured by Vaisala, and not to the part, Vaisala is responsible for assessing that restriction.
- To enable this, Vaisala needs up-to-date information from the supplier on any Annex XVII-restricted materials used in the supplied parts (see section “Providing substance compliance information to Vaisala”).

## 2.3 EU Persistent Organic Pollutants Regulation (POPs)

The European Union's POPs Regulation (Regulation (EU) No 2019/1021) controls “persistent organic pollutants”.

These are substances that:

- Stay in the environment for a long time
- Build up in living organisms
- Can travel long distances and cause harm far from where they were used

The POPs Regulation is based on the international agreements of the Stockholm Convention and the Aarhus Protocol.

You can find the current list of substances covered by the POPs Regulation on ECHA's website:

<https://echa.europa.eu/list-of-substances-subject-to-pops-regulation>

For Vaisala:

- Parts you supply must not contain substances listed under the POPs Regulation above the allowed thresholds, unless a specific derogation (exception) applies.
- If you use such a derogation for a part supplied to Vaisala, you must inform us about it (see section “Providing substance compliance information to Vaisala”).

## 2.4 UK Restriction of Hazardous Substances (RoHS)

The United Kingdom has its own RoHS regulations: “The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012.”

These UK regulations are similar to EU RoHS and restrict certain substances in electrical and electronic equipment placed on the UK market.

Important points:

- Exemptions under UK RoHS are not automatically the same as exemptions under EU RoHS
- The UK maintains its own list of exemptions: <https://www.legislation.gov.uk/uksi/2020/1647/schedule/2/made>

At this time, it is sufficient that you:

- Inform Vaisala about any EU RoHS exemptions used for parts supplied to us (see section “Providing substance compliance information to Vaisala”)
- Vaisala will then evaluate separately how these parts relate to UK RoHS

## 2.5 US Toxic Substances Control Act (TSCA)

Under the US Toxic Substances Control Act (TSCA), certain “persistent, bioaccumulative, and toxic” (PBT) chemicals are restricted in the United States. These rules are found in federal regulations (Title 40 – Protection of Environment, Part 751). The prohibitions and restrictions concern articles in addition to chemicals and mixtures.

The following chemicals are currently prohibited:

- Phenol, isopropylated phosphate (3:1) (PIP (3:1))
- Decabromodiphenyl ether (DecaBDE)
- 2,4,6-tris(tert-butyl)phenol (2,4,6 TTBP), at or above 0.3 % at product level
  - only applies to raw TTBP and oil or lubricant additives
- Hexachlorobutadiene (HCBd)
- Pentachlorothiophenol (PCTP), at or above 1 % at product level

Parts supplied for Vaisala products:

- Must not contain these substances at or above the limits set in the TSCA regulation

If you are unsure whether your products contain any of these chemicals, please check with your own suppliers or material data.

## 2.6 PFAS requirements

Per- and polyfluoroalkyl substances (PFAS) are a large group of chemicals used in many applications (for example, coatings, lubricants, and plastics). Many PFAS are under increasing regulatory and customer scrutiny.

PFAS are already regulated, or will soon be regulated, in many regions, including:

- The European Union (existing and proposed restrictions on PFAS under REACH Annex XVII)
- The United States at federal level
- Individual US states and other countries

In addition, the United States has adopted reporting and recordkeeping obligations for PFAS under Section 8(a)(7) of TSCA (40 C.F.R. Part 705).

To prepare for future restrictions and reporting duties, Vaisala must know whether PFAS are present in the parts we buy. PFAS are defined by the OECD as “any fluorinated substance that contains at least one fully fluorinated methyl (–CF<sub>3</sub>) or methylene (–CF<sub>2</sub>–) carbon atom (without any H, Cl, Br or I attached to that carbon)”.

Therefore:

- If PFAS are present in parts supplied to Vaisala, you must inform us about this when requested, and as described in section “Providing substance compliance information to Vaisala”.

# 3 Providing substance compliance information to Vaisala

In many cases, just saying “compliant” is not enough. We need specific information when:

- You use RoHS exemptions
- Your parts contain REACH Candidate List SVHCs
- Your parts contain substances restricted under REACH Annex XVII, where the restriction applies
- You use derogations under the EU POPs Regulation
- Your parts contain PFAS

In these situations, you must communicate the following to Vaisala:

- Which regulation is involved (for example, “EU RoHS exemption 6c”, “REACH Candidate List SVHC”)
- Which parts are affected (part numbers and descriptions)
- Which substances are involved and whether thresholds are exceeded or exemptions used

You can provide this information in two main ways:

1. By using the electronic Certificate of Compliance template (Annex 1 of this document), or
2. By presenting the same information clearly on your own statement template

In addition:

- You must provide signed and dated Certificates of Compliance (CoC) to Vaisala when requested
- Each CoC must clearly state:
  - Which regulations it covers
  - Which parts are covered
- Vaisala may request this documentation via third parties specifically contracted to collect this information

There is no fee for providing this information. It must be supplied free of charge.

If you do not have in-house compliance experts:

- You can often obtain necessary substance and compliance information from your raw material suppliers or component manufacturers
- Simple internal records (for example, from your ERP or purchasing system) listing which parts/products the CoC applies to are sufficient, as long as they are clear and traceable

## Notice

The laws and regulations mentioned in this document change over time. New substances may be added, and limit values or exemptions may be updated.

The requirements for parts supplied to Vaisala:

- Depend on the current laws and regulations, not on how often this document is updated

As a supplier, you are responsible for:

- Staying aware of relevant changes in the regulations that apply to your products, and
- Ensuring that the parts you supply to Vaisala remain compliant with those current regulations

Vaisala may update this document periodically to reflect major changes, but there may be delays between regulatory changes and document updates.

# Certificate of Compliance

**Company Name:**

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**Address:**

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**Contact Information:**

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## Declaration

We hereby declare that the products and materials provided by our Company to Vaisala Group companies comply with the following regulations as specified in the document *Substance compliance requirements for Vaisala parts*:

- Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS) and its amendment (EU) 2015/863
  - Exemptions apply in some/all products and materials – **list exemptions and part numbers in attachment**
- Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)
  - Specifically, the materials do not contain substances restricted under REACH Annex XVII where the conditions of restriction apply to these products and materials (alone or among others)
  - Substances of very high concern are present in some/all products and materials – **list in an attachment**
- Regulation (EU) No 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants (POPs)
- Regulation of Persistent, Bioaccumulative, and Toxic (PBT) Chemicals Under Section 6(h) of the US Toxic Substances Control Act (TSCA)

Per- and polyfluoroalkyl substances (PFAS)

- Per- and polyfluoroalkyl substances are contained in some/all products and materials – **list in an attachment**

## Application of this Declaration

- All products and materials provided by our Company comply with the above regulations
- The following products and materials/types provided by our Company comply with the above regulations:

- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

- Continued in attachment

**Authorized Signature:**

**Name:**

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**Title:**

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**Date:**

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