



Statement on WEEE and RoHS Directives

The present situation regarding UK legislation is extremely confused, with the latest announcement from the Department of Trade and Industry delaying WEEE implementation until 2007. The latest Government announcement on UK timescales is on this URL:-

http://www.dti.gov.uk/sustainability/weee/WEEE_Review_Letter_December05.pdf

Despite this, Chronos is adopting a proactive approach to the WEEE and RoHS directives with the creation of the www.weeebrokers.com recycling service for our clients.

RoHS is not delayed and is scheduled to take effect from June 2006. However, and very important for our customers, it has now been confirmed by the Department of Trade and Industry that ***the use of lead in solder for telecommunications infrastructure use, certain military and business to business sales of electronic and electrical equipment and for all spare parts and expansion modules will be exempt.*** See this URL:-

http://www.dti.gov.uk/sustainability/weee/RoHS_Guidance_November05_Final.pdf

There is also a useful decision tree on this web site which enables a quick indication of exemption or inclusion.

<http://www.rohs.gov.uk/DecisionTree.aspx>

WEEE

The Chronos policy towards recycling is that where possible we will recycle into re-use and only as a last resort recycle to scrap. We manage recycling to scrap through our recycling partner Engelhard and further information may be obtained from our specialised recycling website www.weeebrokers.co.uk.

An extension of our WEEEBrokers service is that we will manage our clients recycling process including the careful removal and recycling of obsolete equipment.

In the case of our specialist activity of synchronisation infrastructure equipment for telecom networks we have established www.syncbrokers.co.uk to recycle into re-use. This service is available for all synchronisation equipment manufactured by and under the brands of Symmetricom, Agilent, Telecom Solutions, Datum and Oscilloquartz.

RoHS

New products shipped for non-exempt applications after the legal future deadline (when decided) will not contain more than the legally allowed maximum concentrations (when decided) of identified hazardous substances.

Extracts (in italics) from the DTI Guidance Notes RoHS REGULATIONS – November 2005 (URL above) include

Requirements (on Page 4) states that *“Certain applications (listed in Annex C) are exempt and there is also an exemption for spare parts for the repair of equipment put on the market before 1 July 2006.”*

Annex C Section 8 (Page 18). *Lead in solders for servers, storage and storage array systems, network infrastructure equipment for switching, signaling, transmission as well as network management for telecommunication.*

For the purpose of the RoHS Regulations, ‘network infrastructure equipment for telecommunication purposes’ is viewed by the Department as equipment meeting one of the two following criteria:

- 1) Any system used for routing, switching, signalling, transmission, or network management or network security; or*
- 2) Any system which can simultaneously enable more than one end user terminating equipment to connect to a network.*

It is also any such system in a network, except for end user terminating equipment such as voice terminals and facsimile machines.

This would include all servers, power suppliers, display devices and similar electronic units that are incorporated into network infrastructure equipment. It would also include all cables and cable assemblies, and all connectors and connector assemblies used to provide interconnections for network infrastructure equipment but is not intended to include desktop or notebook computers, telephones, fax machines or consumer – type modems or switches etc.

Conclusion

It is our opinion that the majority of professional network infrastructure equipment provided by Chronos Technology Ltd including specifically Symmetricom synchronisation equipment, Chronos SyncWatch and DPS Telecom remote monitoring equipment falls within the “exemptions” defined in Annex C.

Also many of our RF & Microwave components will find their way into applications which fall within Annex C, however there is a big danger that over-zealous adherence to these blanket regulations will cause unnecessary redesign of professional industrial equipment. Many older components will be unable to be redesigned to be lead free, so a careful analysis of the Decision Tree in Annex B of the DTI guidelines needs to take place to ensure redesign effort and energy is not wasted unnecessarily.

Chronos Technology Ltd will abide by whatever parts of the Directives are transposed into UK law by the Government as and when required to do so. Chronos is watching the pending legislation and will adapt business operations as required when things become clear.