

Vicor Position Statement on the Japan RoHS Law

Japan has taken a different approach to environmental legislation than other countries around the world. Japan promulgated the Law for the Promotion of Effective Utilization of Resources in June, 2000 and enforcement in accordance with the law began in April, 2001. The law seeks to establish a sustainable society based on reducing, reusing and recycling materials used in the construction of a wide range of consumer, and other types of Products. The law does not focus on a single type of Product, such as Electrical and Electronic as does the EU RoHS Directive, or on specific material to avoid, but focuses on all types of Products adding to the growing accumulation of discarded material in Japan.

The Objectives of this law are often times referred to as Design for Environment (DfE). They include:

1. Rationalize Use of Raw Materials.
2. Use recyclable resources and reusable parts.
3. Promote long term use of Products.

The law establishes the mechanism, but not the content, which is mandated to the Cabinet Minister with associated jurisdiction. As the law has progressed, a certain scope of Products has emerged. A comprehensive review of this scope strongly suggests that Vicor has no products within the scope of Japan's RoHS law. The absence of attention from Japanese Customers concerning Vicor involvement in the law attests to this position.

Effective July 1, 2006, in conjunction with EU RoHS law, Japans law has been amended to require manufacturers of eight specific types of electronic products to eliminate Lead (Pb), Mercury (Hg), Cadmium (Cd), Hexavalent Chromium (Cr+6), PBB and PBDE from these products. The eight Product of interest are:

- Computers
- Televisions
- Refrigerators
- Copiers
- Washers
- Dryers
- Microwaves
- Air Conditioners

Vicor continues to have no Product within the Scope of this Law/Amendment.

In conjunction with this law, Japan has instituted the "Japan Green Procurement Survey Standardization Initiative" or JGPSSI. This survey, for all Suppliers, regardless of type of Item being supplied, is intended to record all materials present in that particular item. An integral part of certain Procurement Activities, Vicor has completed the JGPSSI Survey on a number of occasions. The Survey is for information only, at this stage of the program. No action is required to be taken, irrespective of the results of the survey.

In Summary:

- The Japan RoHS Law, concerns itself with the reduction, reuse and recyclability of a broad range of Product, including electrical and electronic.
- A Scope of Products has emerged that the Law is concerned with.
- Vicor does not currently produce any products which would be included in the scope of the Japan RoHS Law. Consequently, all Vicor product can be legally sold in Japan, without any additional marking, testing or certification.
- The addition of the latest Amendment, which prescribes the elimination of the six EU RoHS materials from eight specific types of Electrical and Electronic Products, does not include Product which Vicor supplies.

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- The JGPSSI Survey is a compilation of material present in a particular Product, but the JGPSSI Survey requires no action be taken irrespective of the materials present. Vicor has completed this survey on a number of occasions and will continue to do so when requested.
- Vicor will continue to monitor the Japan Law for any changes which may affect Vicor in the future.