

IQinVision RoHS and WEEE Position Statement

Subject: European Union's Waste Electrical and Electronic Equipment (WEEE) - Directive 2002/96/EC.
European Union's Restriction of Hazardous Substances (RoHS) – Directive 2002/95/EC.

Background:

As a global leader in the design and manufacture of high-performance, intelligent video processing platforms, IQinVision is committed to taking an active role in protecting the environment. IQinVision is dedicated to maintaining controlled business, design and manufacturing processes that allow us to competitively service our world-wide customer base while meeting or exceeding government regulations and international standards.

August 2004 saw two directives passed into law by the European Union. These two directives commonly referred to as WEEE and RoHS were designed to complement each other and to move forward a more comprehensive plan of reducing environmentally hazardous waste within the European Union member states.

Directive 2002/96/EC, Waste Electrical and Electronic Equipment (WEEE), encourages and sets specific criteria for the collection, handling and recycling of electric and electronic waste. The Directive: 1) sets requirements for the amount of WEEE Collection; 2) requires WEEE to be treated; 3) holds resellers/producers accountable for providing WEEE returns, free of charge (according to the directive, the company that imports the products in each EU country [the "Producer"] is responsible for the recycle collection of products); and 4) requires manufacturers to mark EEE product with the WEEE symbol. All applicable products in the EU market after August 13, 2005 must pass WEEE compliance.

Directive 2002/95/EC, Restriction of Hazardous Substances (RoHS) restricts the use of six environmentally hazardous materials that can be found in electrical and electronic products. This includes: 1) Lead, Pb; 2) Mercury, Hg; 3) Cadmium, Cd; 4) Hexavalent Chromium, Cr+6; 5) Polybrominated Biphenyl, PBB; and 6) Polybrominated Diphenyl Ether, PBDE. All applicable products in the EU market after July 1, 2006 must pass RoHS compliance.

Compliance:

IQinVision has programs underway to evaluate and understand the myriad issues surrounding the WEEE and RoHS directives. We are currently working with our suppliers and manufacturing partners to bring our products into compliance with these directives by the established deadlines.

There are significant challenges for manufacturers complying with the RoHS directive. Among these are: 1) different interpretations of the directive; 2) no standard survey format; 3) no standard reporting format; and 4) Lack of standardization in material declaration forms. Suppliers are using many different reporting formats and documentation forms which makes it difficult for manufacturers such as IQinVision to implement a harmonized system for demonstrating compliance.

IQinVision will obtain assurances from our suppliers that individual component pieces comply with the RoHS directive. We will also obtain assurances from our manufacturing partners that the processes and materials utilized for assembly of our products comply with the directive. These assurances will take different forms depending on the supplier and their own individual procedures. IQinVision will maintain records of these assurances for presentation to enforcement authorities to demonstrate that reasonable steps have been taken to comply with the directive.

Summary:

For some of the reasons outlined above, and despite IQinVision's planning to date, it is inevitable that the transition to RoHS compliance will create some confusion with manufacturers worldwide. In spite of these difficulties, IQinVision remains committed to its role as an environmentally responsible organization and will strive for compliance with existing as well as new worldwide environmentally safe practices and directives.