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Date: July 12, 2021
Subject: RoHS Applicability to Hamilton Syringes

Hamilton Company has recently completed an initiative to globally align our company’s policy on the applicability of EU RoHS Directive 2011/65/EU as amended by EU RoHS Directive 2015/863/EU to Hamilton products.

Hamilton Syringes are intended to be used for accurate dispensing of liquids and gases and can be operated manually or used as a component of a Hamilton Syringe Pump.

Used without a Hamilton Syringe Pump, syringes are not considered Electrical and Electronic Equipment (EEE) per RoHS because they are manually actuated.

Used with a syringe pump, syringes are considered stand-alone components and non-EEE consumables that are not within scope of RoHS per the EU RoHS FAQ Document published 12-DEC-2012.

(<https://ec.europa.eu/environment/system/files/202101/FAQ%20key%20guidance%20document%20-%20RoHS.pdf>). A summary of the applicable sections of this guidance document and Hamilton’s rationale are summarized in Table 1.

Document Section	Document Text	Syringe Rationale
Q7.3	“Components sold as stand-alone components.....do not have to be CE marked and do not have to comply with the substance requirements.”	Syringes are sold as stand-alone components that can be used independently of the syringe pump.
Q7.4	“Only consumables with an equipment constituent meeting the now more specific definition of EEE in Article 3(1) and 3(2) such as printer cartridges are EEE and in the scope of RoHS....”	Syringes are consumables that, as an independent item, do not contain cables or electronic elements, and therefore don’t meet the definition of EEE.

Table 1: Sections of EU RoHS FAQ Document published 12-DEC-2012 pertaining to Hamilton Syringes

Based on the rationale above, Hamilton Syringes fall outside the scope of EU RoHS Directive 2011/65/EU as amended by EU RoHS Directive 2015/863/EU.

Sincerely,

Tim Zavoca
Director of Quality and Regulatory, Hamilton Reno

Sincerely,

Elena Patrut
Head of Quality Assurance, Hamilton Central Europe



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