



RoHS Compliance Statement  
February 22, 2021

Dear Valued Customer:

This letter provides the compliance status of Epoxies, Etc. products with the following directive(s) or regulation(s):

Product/Article Declaration

European Union Directive 2002/95/EC (RoHS), 2011/65/EU (RoHS 2), 2015/863 (RoHS 3)

Background

The European Union Directive 2002/95/EC (RoHS) was the initial regulation requiring heavy metals including lead, mercury, cadmium, and hexavalent chromium and flame retardants, such as polybrominated biphenyls (PBB) or polybrominated diphenyl ethers (PBDE), to be substituted by safer alternatives in electrical and electronic equipment (EEE). The Directive was published in 2002 and came into effect in 2003.

In 2011, a new RoHS directive (2011/65/EU) was introduced. This new amendment was referred to as RoHS 2. RoHS extended its' initial scope of the requirements to all EEE, cables and spare parts (to be phased in through July 2019) as well as the allowance to add new materials to the originally established listed six. In accordance with article 6(1) of the new directive (2011/65/EU), the risks to human health and the environment arising from the use of four particular plasticizing phthalates became subject to further investigation for possible future restriction. It also provided coherence with other EU legislation, such as European declaration of conformity and REACH (a general act regulating registration, evaluation, authorization and restriction of chemical substances). RoHS 2 required manufacturers, to produce documentation to ensure there are no restricted substances produced in EEE.

Directive 2015/863 was published on March 31, 2015 and becomes effective July 22, 2019. This revision officially added four additional phthalate substances to Annex II of 2011/65/EU. European interested parties, including economic operators, recyclers, treatment operators, environmental organizations, employee and consumer associations, were consulted and performed a thorough assessment concluding Bis(2-ethylhexyl) phthalate (DEHP), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP) and Diisobutyl phthalate (DIBP) can have a negative impact on recycling, human health and the environment during EEE waste management operations.

Substances

Material	Element/Acronym	Maximum Threshold Limit (%)
1. Cadmium	Cd	.01
2. Lead	Pb	.1
3. Mercury	Hg	.1
4. Hexavalent chromium	CR(VI)	.1
5. Polybrominated biphenyls	PBB	.1
6. Polybrominated diphenyl ethers	PBDE	.1
7. Bis (2-ethylhexyl) phthalate	DEHP	.1
8. Butyl benzyl phthalate	BBP	.1



Substances continued

Material	Element/Acronym	Maximum Threshold Limit (%)
9. Dibutyl phthalate	DBP	.1
10. Diisobutyl phthalate	DIDP	.1

Epoxies, Etc. Product(s)

Epoxies, Etc. does not perform analytic testing on our products to determine any presence of the above RoHS Restricted Substances. Epoxies, Etc. bases its' knowledge on information provided by third parties and believes it to be true. To the best of our knowledge, unless listed below, the above substances are not intentionally or knowingly used as ingredients in products manufactured by Epoxies, Etc. The above substances are not expected to be present above the regulated threshold limits and our manufacturing processes are not expected to introduce or create these substances.

The following Epoxies, Etc. products contain one or more substances considered by directives 2002/95/EC (RoHS), 2011/65/EU (RoHS 2) and 2015/863 (RoHS 3) to be a "restricted hazardous substance":

Epoxies, Etc. Product Designation(s)	RoHS Restricted Hazardous Substance	CAS Number
10-3050RWH	Dibutyl Phthalate	84-74-2
20-2310RBK	Dibutyl Phthalate	84-74-2
20-2310RCL	Dibutyl Phthalate	84-74-2
20-2350RBK	Dibutyl Phthalate	84-74-2
20-2350RBK35%	Dibutyl Phthalate	84-74-2
20-2350RCL	Dibutyl Phthalate	84-74-2
20-2350RFCBK	Dibutyl Phthalate	84-74-2
20-2350RWH	Dibutyl Phthalate	84-74-2
20-2353RBK	Dibutyl Phthalate	84-74-2
20-2353RCL	Dibutyl Phthalate	84-74-2
20-2353RWH	Dibutyl Phthalate	84-74-2
20-2354RCL	Dibutyl Phthalate	84-74-2
20-3048RCL	Dibutyl Phthalate	84-74-2
20-3205RBK	Dibutyl Phthalate	84-74-2

We value your business. Please let us know if we can be of service.

Jeffrey Sargeant  
Technical Director

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