

Some of our customers ask from time to time after a RoHS certificate. In our Declaration of Compliance (DOC) we don't refer to RoHS. Below I will show how you can verify it yourselves.

Method:

1. Look into DOC for the current article.
2. Find section **BfR - Bundesinstitut für Risikobewertung**.
3. Find out if the pigments fulfil BfR chapter IX.
4. If the pigments fulfil BfR, chapter IX - then the article fulfil the RoHS Directive.

Explanation:

1. We don't use PBB or PBDE at all in our company. It is forbidden since many years.
2. Limits for the four heavy metals in BfR are lower than RoHS. Keep in mind that we maybe use 20% of pigment in our formulations and you as customer normally use 2-3% of that in your process.

Table, Relation BfR, chapter IX and RoHS 2011/65/EU:

BfR Chapter X, Purity of colorants			RoHS, Directive 2011/65/EU	
		Limit		Limit
Point 1	Lead	0.01 %	Lead	0.10 %
	Arsenic	0.01 %		
	Mercury	0.01 %	Mercury	0.10%
	Selenium	0.01 %		
	Barium	0.01 %		
	Chromium	0.10 %	Hexavalent chromium	0.10%
	Cadmium	0.01 %	Cadmium	0.01%
	Antimony	0.05 %		
Point 2	Primary aromatic amines (PAA)	0.05%	Polybrominated biphenyls (PBB)	0.10%
			Polybrominated diphenyl ethers (PBDE)	0.10%

The 31 of March 2015 was Annex II amended with Directive 2015/863. **The member states shall apply those provisions from 22 July 2019.**

Four substance were added to the list, all four are listed on Substance of Very High Concern (SVHC) since several years:

CAS no	Description	Date of inclusion
117-81-7	Bis (2-ethylhexyl)phthalate (DEHP)	2008-10-28
85-68-7	Benzyl butyl phthalate (BBP)	2008-10-28
84-74-2	Dibutyl phthalate (DBP)	2008-10-28
84-69-5	Diisobutyl phthalate (DIBP)	2010-01-13

The information obligations around substances listed on SVHC is:

EU or EEA suppliers of articles which contain substances on the Candidate List in a concentration above 0.1% (w/w) have to provide sufficient information to allow safe use of the article to their customers or upon request, to a consumer within 45 days of the receipt of the request. This information must contain as a minimum the name of the substance.

(Extract from ECHA)

We declare absence of substances listed on SVHC on our Declaration of Compliance at header SVHC.

Regards,



Mats Larsson
Quality & Regulatory affairs