

Halogen free on ADI free **TSCA** A California Proposition 65

# Material Compliance

REACh

**POP** regulation

PFAS

OHS

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**Diligent Adherence to Material Compliance Requirements** 

Eichenberger Gewinde AG takes its duty of care regarding the adherence to various material compliance regulations very seriously. Our compliance is regularly reviewed through a structured process. In the following, you will find the status of our compliance review with regard to several material compliance regulations.

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100 % Swiss made



## Material Compliance: Our Commitment to Quality and Safety

- 1. REACH Regulation (EG No. 1907/2006)
- 2. RoHS und WEEE Regulations
- 3. Conflict Minerals
- 4. POP Regulation (EU 2019/1021)
- **5. PFAS Restrictions**
- 6. Toxic Substance Control Act (TSCA)
- 7. California Proposition 65 (CP65)
- 8. Contact





## Regulation (EC) No. 1907/2006 (REACH)

We hereby confirm that, to the best of our current knowledge and based on information provided by our suppliers, the products we supply to you do not contain SVHC substances whose placing on the market is prohibited under Regulation (EC) No. 1907/2006 (REACH).

We do not conduct processes that require authorization under the REACH Regulation. In accordance with Article 71 of the Swiss Chemicals Ordinance (ChemV) and in line with Article 33 of the EU REACH Regulation, we inform you that our products containing:

- Free-cutting steel (CuZn39Pb3)
- Leaded aluminum alloys (11SMnPb37), and/or
- Leaded solder alloys (CuPb15Sn),

may contain lead (CAS number 7439-92-1) in a concentration greater than 0.1% by weight. If any of our products are affected, we proactively inform our customers.

Lead is embedded as an alloying component in the products. Therefore, no special safety measures are required during proper handling of the products.

This information is based on the candidate list of substances of very high concern (SVHC list) published as of June 27, 2024, under Article 59 (10) of the REACH Regulation. We commit to continuously monitoring the development of the SVHC list and ensuring that our products comply with applicable EU regulations.

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## **RoHS and WEEE Regulations**

We confirm that, to the best of our current knowledge and based on information provided by our suppliers, the products we supply to you do not contain substances prohibited under Directive 2011/65/EU (RoHS II) and its amendments through Directives (EU) 2015/863 and (EU) 2017/2102.

In some products, we use:

- Free-cutting steel (CuZn39Pb3)
- Leaded aluminum alloys (11SMnPb37), and/or
- Leaded solder alloys (CuPb15Sn),

which contain lead (CAS number 7439-92-1) in concentrations greater than 0.1% by weight. All applications fall under the currently applicable exemptions outlined in Annex III of the RoHS Directive.

We commit to continuously monitoring developments regarding these exemptions and ensuring that our products comply with applicable EU regulations.

Our products do not fall under the definition of electrical and electronic equipment under the WEEE Directive (2012/19/EU) since they are mechanical components that do not rely on electric currents or electromagnetic fields.

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### **Conflict Minerals**

We confirm that, in connection with the requirements of the Dodd-Frank Act, Section 1502, we require our key suppliers to disclose the origins of the raw materials used. Based on the information available to us, we confirm that no cassiterite (tin ore), columbite-tantalite (coltan, tantalum ore), gold, or tungsten in our products originates from the relevant conflict regions as defined by the Dodd-Frank Act.

Additionally, we confirm compliance with Regulation (EU) 2017/821, which establishes due diligence obligations for tin, tantalum, tungsten, and gold ("3TG") from conflict-affected and high-risk areas.

Our suppliers are contractually obligated to ensure traceability and full transparency throughout the supply chain to guarantee compliance with these regulations.

#### **POP** Regulation

We confirm that, to the best of our knowledge and based on our suppliers' confirmations, the products we supply do not contain substances prohibited under Regulation (EU) 2019/1021 on persistent organic pollutants (POPs).

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### **PFAS** Regulation

Per- and polyfluoroalkyl substances (PFAS) are a group of chemicals used in the manufacture of many products. Directive (EU) 2020/2184 sets specific limits for PFAS in drinking water, which will become binding in 2026.

Additionally, there are initiatives under the REACH Regulation to restrict PFAS in various products. The European Chemicals Agency (ECHA), in collaboration with several countries, has submitted a proposal for an EU-wide restriction of PFAS. A decision by the European Commission on this proposal is expected in 2025.

We acknowledge our responsibility for environmental protection and take concerns about the health impacts of PFAS seriously. Therefore, we closely monitor these developments and remain in contact with our suppliers to identify potential impacts on our products early on. Our goal is to ensure that our products comply with current and future legal requirements.

### Toxic Substances Control Act (TSCA)

We confirm that, to the best of our knowledge and based on information from our suppliers, the products we supply comply with all applicable requirements of the Toxic Substances Control Act (TSCA) of the U.S. Environmental Protection Agency (EPA). This includes, but is not limited to, regulations under Section 6(h) concerning persistent, bioaccumulative, and toxic (PBT) chemicals, as well as other provisions related to the manufacture, placing on the market, processing, and disposal of chemical substances. We commit to continuously monitoring our supply chain to ensure that our products comply with applicable U.S. regulations.

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## California Proposition 65 (CP65)

We confirm that, to the best of our knowledge and based on information from our suppliers, the products we supply do not contain chemicals listed under the current California Proposition 65 (CP65) regulations.

Our products therefore do not result in exposure to chemicals that would require a warning under the California "Safe Drinking Water and Toxic Enforcement Act of 1986" (California Health & Safety Code Section 25249.6).

We remain committed to continuously monitoring and collaborating with our suppliers to ensure that potential exposures remain below the defined "Safe Harbor" thresholds and that our products continue to meet all requirements under California Proposition 65.

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# Questions?

Eichenberger Gewinde AG stands for precision, quality, and safety. We are dedicated to ensuring that all our products meet current and future legal requirements, so you can always rely on us.

Would you like to learn more about our material compliance? Contact our experts today.

Burg, December 4, 2024



Thomas Haller Head of Sales & Marketing

June



Theo Keller Head of Management Systems



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