

Wachendorff Automation GmbH & Co. KG Wachendorff Prozesstechnik GmbH & Co. KG Industriestraße 7 D-65366 Geisenheim, Germany

Date: April 2023

# Information for customers

on Material Compliance (RoHS, REACH, OzDS, POP, Conflict Minerals) of the Wachendorff Automation GmbH & CO KG and Wachendorff Prozesstechnik GmbH & Co. KG (hereinafter collectively referred to as "(hereinafter collectively referred to as "Wachendorff").

# RoHS Directive 2011/65/EU, Delegated Directive EU 2015/863.

In addition to the already known restricted substances (Pb, Hg, Cd, Cr6+, PBB, PBDE), four additional substances (DEHP, BBP, DBP and DIBP) have been added to the list of restricted substances on 22 July 2019. In addition, the scope of application has been extended from the previous 10 categories to category 11, in which Wachendorff classifies itself.

Based on the results of regular conformity queries in our supply chain, we can confirm conformity with the directive with regard to the substance bans.

A detailed declaration on **Wachendorff Automation** products can be found here.

A detailed declaration on Wachendorff Prozesstechnik products can be found here.

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

Wachendorff is a supplier of sensors and automation products for industrial use. Within the meaning of the REACH Regulation, the products supplied by Wachendorff are to be classified as "articles" (cf. Art. 3 Para. 3 of the REACH Regulation) and are therefore not subject to any registration, evaluation or authorisation obligation. No chemical substances are released from our products under normal conditions of use (cf. Art. 7 Para. 1 of the REACH Regulation).

With regard to registration and compliance with the specifications for raw materials used, we are in constant contact with our suppliers, who assure us that they fulfil all REACH obligations in this respect.

To the best of our current knowledge, Wachendorff does not process any substances in articles that are subject to a notification obligation to the European Chemicals Agency (ECHA) pursuant to Article 7 (2).

The European Chemicals Agency (ECHA) has published a list of substances of very high concern (SVHC) on its website which meet the criteria set out in Article 57 of the REACH Regulation and have been identified in accordance with Article 59 of the REACH Regulation.

A more detailed declaration on Wachendorff Automation products can be found here.

A more detailed declaration on Wachendorff Prozesstechnik products can be found here.

### Duty to inform according to Article 33, REACH

As a supplier of an article, Wachendorff has the obligation to inform the customer according to Article 33 (1) of the REACH Regulation if one or more substances of the "SVHC Candidate List" are contained in the delivered articles in a concentration of more than 0.1% by mass (w/w) per article.



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According to the decision of the ECHA Member State Committee (MSC), lead was also included in the SVHC candidate list.

In case lead nevertheless becomes subject to authorisation, there is a transition period until 2024.

It can be assumed that corresponding approvals will be granted by the Chemicals Agency, especially since a substitution of machining brass containing lead is not readily possible according to the current state of the art.

# Note on lead (Pb), CAS no. 7439-92-1

In June 2018, lead (Pb) was newly added to the SVHC list. Thus, all exemptions concerning lead (Pb) based on the RoHS Directive 2011/65/EU Annex III and IV are now subject to information according to Article 33, REACH.

WACHENDORFF products may contain sub-products with lead (Pb) in a concentration of more than 0.1% by mass (w/w) per sub-product.

With regard to the machinability of some supplier products made of brass (e.g. plugs), the raw materials have a maximum lead content of 3%. This currently applies to part products with exemptions according to RoHS Directive 2011/65/EU, Annex III, 6c.

We will be happy to provide you with corresponding written product-specific documentation on request.

#### Restriction of substances, REACH, Annex XVII

WACHENDORFF suppliers are required to comply with the restrictions on the manufacture, placing on the market and use of substances and mixtures set out in Annex XVII of the REACH Regulation.

WACHENDORFF regularly checks the substance restrictions according to Annex XVII for updates.

Based on the information currently available, WACHENDORFF products comply with the requirements of Annex XVII.

# **POP Convention**

The Stockholm Convention on Persistent Organic Pollutants (POP Convention) has been adopted into national law by various countries. In the European Union it is regulated by Regulation (EU) 2019/1021.

Based on the information currently available, WACHENDORFF does not use any of these substances in products, nor are they knowingly added.

#### OzDS, Montreal Protocol

Substances that lead to the depletion of the ozone layer (OzDS) are laid down in the Montreal Protocol via an international agreement. Regulated in the European Union by Regulation (EC) No. 2037/2000.

According to the information currently available, WACHENDORFF does not use any of these substances in products, nor are they knowingly added.



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#### **Conflict Minerals**

Conflict minerals" are minerals that are mined illegally and outside of government control in the eastern provinces of the Democratic Republic of the Congo (DRC) and adjoining countries, and whose financial proceeds go directly or indirectly to rebels or militias involved in civil wars in those areas.

In August 2012, the United States Securities and Exchange Commission (SEC) upheld the Final Rule on conflict minerals sourcing as set out in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 (HR4173). This requires US listed companies and their suppliers to ensure that no conflict minerals such as cassiterite (tin), coltan (tantalum), wolframite (tungsten) or gold enter their supply chain.

This is also implemented in the EU Conflict Materials Supply (EU)/2017/821, to establishing supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores and gold from conflict and high risk areas.

WACHENDORFF supports this legislation, the efforts of the Electronic Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI), which call for companies to conduct appropriate due diligence on their supply chains. This is to ensure that no products enter the supply chain that contain minerals from mines in the affected "conflict regions" that are controlled by military non-governmental organisations.

In light of this commitment, WACHENDORFF is working with its suppliers to track the materials in all products to determine if minerals from mining or smelting operations in the conflict region are used in WACHENDORFF products. WACHENDORFF uses the standardised RMI Reporting Standard Template (CMRT) to record and monitor suppliers' use and activities in this regard.

WACHENDORFF does not knowingly use any materials from the conflict region in its own products.

A detailed information on conflict materials from Wachendorff Automation can be found here.

A detailed information on conflict materials from Wachendorff Prozesstechnik can be found here.

The information in this customer information is based on the current state of knowledge and legislation at the date of issue. New information on "Material Compliance" will be published on the Wachendorff website as soon as changes occur and will then replace earlier information.

If you have any questions, please contact <a href="mailto:compliance@wachendorff.de">compliance@wachendorff.de</a>

Best regards

Christian Stingl

- Quality Management -