

RoHS

RESTRICTION OF HAZARDOUS SUBSTANCES

MAY 2026

PMG Company endeavours to accurately reflect the information from our manufacturers.

Dear Customer,

This Customer Letter provides information of PMG Company's activities to ensure compliance with the European Restriction of Hazardous Substances in Electrical and Electronic Equipment Directive (EU RoHS 2). The RoHS Directive includes a mechanism for the regular review of its scope and the substances it restricts. This ensures that the directive can adapt to new scientific evidence and technological changes. Therefore, we update this letter periodically based on developments relative to the EU RoHS 2 Directive. Please check the PMG Company website for the most current version of this letter.

Background

Since 2003, EU laws have restricted the use of certain hazardous substances in Electrical and Electronic Equipment (EEE) through the RoHS Directive. On July 21 2011, Directive 2011/65/EU (RoHS 2) entered into force and came into effect on 3 January 2013, repealing Directive 2002/95/EC (RoHS 1).

RoHS 2, in its expanded scope (covering 11 EEE categories), phased in the previously excluded categories of medical devices and monitoring & control instruments, as well as certain cables.

RoHS 2 initially restricted the same 6 hazardous substances with the same maximum concentration limits as RoHS 1: lead [Pb] (0.1%), mercury [Hg] (0.1%), cadmium [Cd] (0.01%), hexavalent chromium [CrVI] (0.1%), polybrominated biphenyls [PBB] (0.1%) and polybrominated diphenyl ethers [PBDE] (0.1%). On 24 June 2015, Delegated Directive 2015/863 entered into force adding 4 new substance restrictions to Annex II of RoHS 2: bis(2-ethylhexyl)phthalate [DEHP] (0.1%), butyl benzyl phthalate [BBP] (0.1%), dibutyl phthalate [DBP] (0.1%) and Di isobutyl phthalate [DIBP] (0.1%).

RoHS 2 allows for exemptions (Annexes III & IV) for specific materials or components, but these exemptions are limited in scope and duration to encourage the development of safer alternatives. When an exemption is reaching its expiry date, industry stakeholders can apply for its renewal. An "industry stakeholder refers to any party with a vested interest in the manufacturing, distribution, regulation, or usage of EEE within scope of the RoHS regulations.

Such a renewal application needs to be submitted no later than 18 months before the expiry date. Existing exemptions for which a renewal request has been submitted (in due time) remain valid until a decision is taken by the European Commission. This decision either indicates a new expiry date or, in case of rejection, grants a transition period of 12 to 18 months before the exemption expires.

Please visit the official website of the European Commission for the most up-to-date exemption information.

RoHS 2 is a CE-marking Directive that requires the use of the CE mark on the finished EEE products to show compliance. It is required for products manufactured anywhere in the world that are then marketed in the EU. Additionally, all CE marked EEE requires a Declaration of Conformity (DoC) and associated technical documentation. The responsibility for affixing the CE mark, preparing the DoC and technical documentation resides with the manufacturer.

PMG Company Implementation

When establishing our compliance rule, PMG Company relied on the RoHS 2 Frequently Asked Questions (FAQ) document 3, Last updated on 12 December 2012, from the official working group established by the Commission and Member States at the 2011 RoHS/WEE Technical Adaptation Committee meeting.

PMG Company has dedicated programs and resources to address legislative requirements and business continuity concerns related to EU RoHS. PMG Company monitors the development of implementation guidelines (and their transposition into national laws) and works with its suppliers to ensure conformity with the requirements prior to the legal implementation date.

PMG Company continuously monitors the status of the RoHS 2 exemptions and updates our compliance systems to reflect changing exemptions. PMG Company will recode the compliance status of a part as needed. A part claiming an expired exemption will be recoded to 'not compliant'.

For finished EEE where PMG Company is the legal manufacturer, PMG Company will affix the CE mark. For finished EEE that PMG Company produces for OEMs, the CE mark can, like other customer specifications, be affixed by PMG Company on the customers' behalf without PMG Company assuming the OEM'S (manufacturer's) responsibility.

For finished EEE where PMG Company is the legal manufacturer, PMG Company will provide the DoC and prepare technical documentation per Harmonised European Standard EN IEC 63000. For finished EEE that PMG Company produces for OEMs, it is only the OEM that can fulfil the obligations to provide the required documentation under its own name.

Regarding RoHS 3 (2015/863) certificate of compliance. The current official name for RoHS Directive, is still RoHS 2 or RoHS Directive 2011/65/EU. Since 22 July 2019, the RoHS directive 2011/65/EU covers 10 substances for EEE categories 1-7, 10 & 11, except for categories 8 & 9 for which the 4 new substances (added to RoHS 2 by amending Directive 2015/863) only come into effect as of 22 July 2021. RoHS 3 does not exist, this is not an official name. RoHS 3 will only become official if after a review of the RoHS 2 Directive, the RoHS 2 Directive gets repealed and replaced by RoHS 3.

Our RoHS 2011/65/EU compliance statement is against the 10 substances. Because we know that for some people it may not be clear that the RoHS Directive now covers 10 substances but is still called 2011/65/EU, the same name as when it only covered 6 substances, we added an informative statement which clearly references that the additional scope is considered in the statement: *"This declaration covers EU Directive 2011/65/EU incl. Delegated Directive 2015/863/EU. The restrictions under 2015/863/EU apply as of 22 July 2021 for EEE categories 8 (medical devices) and 9 (monitoring and control equipment)".* We do not know what type of EEE category our customers use our parts that is why we provide a RoHS statement against 10 substances (already in effect for cat 1-7, 10 & 11). This also means that a part with a statement "not compliant" because it contains for example DBP, can still be used in cat. 8 or 9 EEE, cause for that application the part is actual still compliant.

Before 22 July 2019 when amending Directive 2015/863/EU was not yet into effect, PMG Company provided 2 separate RoHS statements, one against the 6 substance restrictions and an additional RoHS2 statement that covered the 10 substance restrictions (thus incl. the 4 new substances added to RoHS2 by Dir. 2015/863/EU) although legally we were not yet required to do so.

Now that Dir. 2015/863/EU has come into effect PMG Company only provides one RoHS compliance statement against the 10 substance restrictions.

Should you have any further questions regarding the compliance status of a specific PMG Company part number, please contact: sales@pmgcompanyonline.com.

Authorised Signatory for PMG Company Ltd

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Position: Director

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