

China RoHS2.0 compliance statement

About the China RoHS2.0

“Management Methods for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products“ have been released by the China’s Ministry of Industry and Information Technology department (“MIIT”) and being valid as of 1st July 2016. Whether we are compliant with the rules or not, especially for the label requirement to add an “e” mark to our product or not, have been clarified by Schaffner China by participating at workshops hosted by the Chinese Government and professional testing agencies.

Comparison of Substances between China RoHS2.0 and EU RoHS

| | China RoHS2.0 | EU RoHS directive |
|----------------|--|---------------------------------------|
| Refer standard | GB/T26572-2011 | EU RoHS directive 2011/65/EU Annex II |
| Test standard | GB/T26125-2011 idt IEC62321:2008 ¹⁾ | IEC62321:2008 |

| Substance | Threshold China RoHS2 | Threshold EU RoHS |
|---------------------------------------|-----------------------|-------------------|
| Lead (PB) | 1000ppm | 1000ppm |
| Mercury (Hg) | 1000ppm | 1000ppm |
| Hexavalent Chromium (Cr6+) | 1000ppm | 1000ppm |
| Cadmium (Cd) | 100ppm | 100ppm |
| Polybrominated Biphenyls (PBB) | 1000ppm | 1000ppm |
| Polybrominated Diphenyl Ethers (PBDE) | 1000ppm | 1000ppm |
| Bis(2-Ethylhexyl) phthalate (DEHP) | - | 1000ppm |
| Benzyl butyl phthalate (BBP) | - | 1000ppm |
| Dibutyl phthalate (DBP) | - | 1000ppm |
| Diisobutyl phthalate (DIBP) | - | 1000ppm |

¹⁾ Remark: “idt” means “identify adopt to“

The comparison shows, that the restricted substances and their maximum permissible content for China RoHS2.0 are covered by the EU RoHS directive. The test standards are also identical. Therefore we can confirm that we have covered the limited requirement of the restricted substances also for China RoHS2.0.

Requirement of adding “e” mark on products

According to the Chinese official standard SJ/T11364-2014 “marking requirement for the restriction of the use of hazardous substance in electrical and electronic product”, the fourth chapter: *“For the auxiliary products purchased for supporting the manufacturing of the end products, the suppliers may need not label the product they supply, but must provide all the materials information required for labeling”*. This means that the labeling is not a mandatory requirement for the supplier of the auxiliary products.

With following explanations we refer to the Frequent Asked Questions (FAQ) published on 16th May 2016 by MIIT. What is meant with auxiliary products:

“The auxiliary products mentioned in the new manage methods are the components, parts and materials used in the end products”

MIIT released a “compliance management catalogue” which contains 10 different categories in the question 12 of the file FAQ. The 10 different categories and their respective example are as follows:

- a) *Communication equipment. such as mobile phone, fax machine, radar speedometer*
- b) *Radio and TV equipment. Such as receivers, TV, radio.*
- c) *Computer and other office equipment. Such as PC, IC card mobile storage media.*
- d) *Household electrical and electronic equipment. such as air conditioner, cooker and gas heater*
- e) *Electronic instrumentation. Such as electrotechnical or electronic meters, electronic analyzers*
- f) *Industrial electronic equipment. include industrial processing, manufacturing and testing equipment*
- g) *Electric tools .such as tools for cutting the metals and wood, for grinding, for assembly process*
- h) *Electric devices for medical use.*
- i) *Lighting products such as halogen tungsten lamps LED lamps*
- j) *Electric products for education, arts, sport and cultural activities such as toys and sport requisites.*

Our products are sold or traded and built in final equipment which have to comply with the new regulation and shall be “e” marked as assembly. Obviously the filters supplied by Schaffner are not “end products” and do belong to auxiliary products. Therefore Schaffner products do not need a label with “e” marking

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