



04 September 2018

RE: ROHS II

To our valued customers,

To understand the scope of the RoHS II Directive 2011/65/EU as amended by EU 2015/863, namely which products are subject to the RoHS provisions, it is fundamental to develop a common understanding of the scope provisions, which must be fully in line with the legal text and spirit of RoHS II.

RoHS II is a standalone directive. There is no longer a link to the Directive on Waste Electrical and Electronic Equipment 2002/96/EC (WEEE). Until the repeal of the initial RoHS Directive 2002/95/EC, a product that does not fall under the scope of the WEEE Directive is automatically excluded from the scope of RoHS. Following the repeal of Directive 2002/95/EC, this will no longer be the case.

There are 6 restricted substances that are the same ones in the original Directive (2002/95/EC), however there are now maximum allowable values assigned to each (Article 4, Annex II):

Substance	Maximum Concentration Values (MCV)
Lead	0.1
Mercury	0.1
Cadmium	0.01
Hexavalent chromium	0.1
Polybrominated biphenyls (PBB)	0.1
Polybrominated diphenyl ethers (PBDE)	0.1
Bis(2-Ethylhexyl) phthalate (DEHP)	0.1
Benzyl butyl phthalate (BBP)	0.1
Dibutyl phthalate (DBP)	0.1
Diisobutyl phthalate (DIBP)	0.1

The MCV is determined by dividing the weight of the substance by the weight of the homogenous material containing that substance, multiplied by 100. Essentially this is weight %. The recast RoHS Directive applies the material restrictions at different dates depending on the type of EEE, and also introduces a number of exemptions from the given restrictions.

In addition, the number of applicable categories of affected EEE has been affected. The following is Annex I:

ANNEX I

Categories of EEE covered by this Directive:

1. Large household appliances
2. Small household appliances
3. IT and telecommunications equipment
4. Consumer equipment
5. Lighting equipment
6. Electrical and electronic tools
7. Toys, leisure and sports equipment
8. Medical devices
9. Monitoring and control instruments including industrial monitoring and control instruments
10. Automatic dispensers
11. Other EEE not covered by any of the categories above

In regards to Techspray® products that you may use, it is important to understand exactly what EEE includes:



The definition of "electrical and electronic equipment (EEE)" cannot be interpreted as targeting anything and everything with the slightest connection to electricity or electronics, but requires an assessment of the entire definition of "EEE". The recast RoHS Directive applies only to products that represent a functional unit that is a finished EEE meeting the definition of "electrical and electronic equipment -EEE" provided in Article 3(1):

Article 3(1)

"electrical and electronic equipment or EEE means equipment which is dependent on electric currents or electromagnetic fields in order to work properly and equipment for the generation, transfer and measurement of such currents and fields and designed for use with a voltage rating not exceeding 1000 volts for alternating current and 1500 volts for direct current."

With guidance from the (recast) ROHS Directive and input from ITW's corporate regulatory team, Techspray® products do not fall within the scope of the Directive and the definition of EEE. Most of our products are considered "consumables" and so fall outside the scope of the Directive. Cleaning agents, for example, are not affected by ROHS II.

We feel that the only products we make available to you that would even remotely be considered as part of the affected EEE are the conformal coatings (2102, 2103, 2104, 2106, 2108, 2109 and 2120) and the desoldering braid containing natural gum rosin flux ("Techspray PROWICK") and synthetic rosin flux ("Techspray NO-CLEAN") due to the possibility of flux residues on the assembly. *Please note that none of these products contain any restricted material listed in Article 4, Annex II.*

In the Plato-branded product line, consumables such as solder tips, sponges, etc are again outside the scope of the Directive. Due to the potential of residue, the Plato TT-95 Tip Tinner may remotely be considered as applicable because of the residue possibly being retained on the functional assembly. *However, it contains no restricted ingredient listed in Article 4, Annex II.*

Techspray values the partnerships with all of our customers and wish to submit this letter to allay any concerns you may have regarding our compliance with the Directive (ROHS II).

Our products will continue to meet the requirements of all relevant directives, including those of RoHS if/where applicable. Any of our products affected by or coming into the RoHS scope for the first time, as a result of the inclusion in the recast Directive of product Categories 8, 9 or (the new) 11, changes to the exclusions or changes to exempted applications, will meet these new requirements from their due dates, or enable a finished product into which they may be incorporated to do so.

Should you have any questions, please do not hesitate to contact the following directly:

Matthew Morris, Chemist
678-819-1408 x266
mmorris@itwcce.com

Respectively submitted,

Steve Cook
Director of Product Technology
Techspray