

To whom it may concern

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Techtronic Industries
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Date: 23.January.2024

Dear Sir/Madam,

REF: Declaration for Substances of Content according to EU Directive 2011/65/EU on restriction of certain Hazardous Substances in Electric/Electronic Tools (RoHS 2)

COMMISSION DELEGATED DIRECTIVE (EU) 2015/863 amending Annex II to Directive 2011/65/EU of the European Parliament and of the Council as regards the list of restricted substances

The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012 (S.I. 2012 No. 3032)

Regulation (EC) No 1907/2006 concerning Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)

Regulation (EC) No 2019/1021 on persistent organic pollutants amended by Regulation (EC) No 2023/1608

79/117/EEC Waste Electrical and Electronic Equipment Directive 2012/19/EU (WEEE)

Directive 94/62/EC on packaging and packaging waste

COMMISSION DELEGATED DIRECTIVE (EU) 2018/852 amending Directive 94/62/EC on packaging and packaging waste

We herewith declare that products placed on the market by Techtronic Industries GmbH comply (partly based on suppliers' information) with threshold level requirements according to the list attached (page 3), and, does not contain any substances of very high concern (SVHC) above 0.1 mass-% per product that are included in the candidate list (Article 59 REACH, updated: January 23rd 2024), with the exception of Lead (CAS-Nr. 7439-92-1), which may be contained in machined steel, cooper or aluminium parts or specific electronic components of the products, and 1,2-dimethoxyethane; ethylene glycol dimethyl ether (EGDME) (CAS-Nr.110-71-4), which may be contained in lithium button cells integrated in the products.

We comply with taking back requirements for products at the end of their useful life and finance the cost of treatment and recovery of redundant WEEE in accordance with the specific WEEE recycling requirements. The product is marked with the WEEE symbol. We have implemented measures aimed at limiting the production of packaging waste and promoting recycling, re-use and other forms of waste recovery as provided by the packaging and packaging waste directive.

UK REACH STATEMENT

The UK REACH regulation retains the key principals of the EU REACH regulation, though they operate independently from one another. The stated aims of UK REACH are:

- To provide a high level of protection of human health and the environment from the use of chemicals
- To make the people who place chemicals on the market (manufacturers and importers) responsible for understanding and managing the risks associated with their use
- To promote the use of alternative methods for the assessment of the hazardous properties of substances e.g. quantitative structure-activity relationships (QSAR)

UK REACH requires substances manufactured or imported from outside Great Britain (GB) including substances in preparations in quantities over one metric ton per year, to be registered with the Health and Safety Executive (HSE) unless exempt.

All of the TTI manufactured products fall into the category of 'articles' under both the UK and EU REACH regulations, and the Company expects that all substances used by upstream suppliers to be registered within the permitted timescale. TTI is working closely with upstream suppliers and has received confirmation of pre-registration and intended registration of substances used in the preparations which are incorporated into its products. This ensures continuity of supply during the transition and phase in periods.

Products manufactured by TTI do not contain Substances of Very High Concern (SVHC's) in concentrations greater than the stipulated concentrations for those substances with the exception of Lead (CAS-Nr. 7439-92-1), which may be contained in machined steel, cooper or aluminium parts or specific electronic components of the products, and 1,2-dimethoxyethane; ethylene glycol dimethyl ether (EGDME) (CAS-Nr.110-71-4), which may be contained in lithium button cells integrated in the products. TTI will continue to work closely with its suppliers to ensure that the products it manufacturers remain compliant.

Yours faithfully,

Techtronic Industries ELC GmbH



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i.V. Thomas Henkelmann
Director Quality, Regulatory & Sustainability EMEA

Threshold level requirements:

Item	Substance	Threshold level (weight)
1	Polycyclic aromatic carbohydrates (PAHs)	0,001% (sum of 16 substances)
		0,0001% (Benzo(a)pyrene)
2	Phtalates	0,1% (sum of 6 substances)
3	Cadmium*	0,01%
4	Lead*	0,1%
5	Chromium VI*	0,1%
6	Mercury*	0,1%
7	Polybrominated Biphenyl (BPP) flame retardant*	0,1%
8	Polybrominated Diphenyl Ether (PBDE) flame retardant*	0,1%
9	4 softeners in plastic (DEHP, BBP, DBP, DIBP)*	0,1% (per substance)
10	Dimethylfumarat (DMF)	0,0001%
11	Short-chained chlorinated paraffins (SCCP)	0,15%

* The threshold is related to homogenous material

* Exemptions which allow higher threshold levels are specified in the RoHS directive