



PLASTICS ENGINEERING COMPANY
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March 4, 2025

Subject: European Union RoHS II Compliance, added 4 phthalates
(also referred to as RoHS 3 or ROHS III or EU ROHS 10)

Dear Customer,

To the best of my knowledge, Plastics Engineering Company thermoset molding compound products are in compliance with European Parliament directives regarding hazardous substances:

1. **ROHS II** (ROHS recast), Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (EEE) recast - The maximum concentration values referred in Article 4(2) are listed in Annex II to RoHS 2. For **lead**, **mercury**, **hexavalent chromium**, **polybrominated biphenyls (PBB)** and **polybrominated diphenyl ethers (PBDE)**, the maximum concentration is 0.1 % and for **cadmium**, the corresponding maximum concentration is 0.01 % by weight, in all homogeneous materials in the EEE.
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:174:0088:0110:en:PDF>
2. COMMISSION DELEGATED DIRECTIVE (EU) 2015/863 of 31 March 2015 amending Annex II to Directive 2011/65/EU of the European Parliament and of the Council as regards the list of restricted substances. Concerns above plus four additional phthalates; Bis(2-ethylhexyl) phthalate (**DEHP**), Butyl benzyl phthalate (**BBP**), Dibutyl phthalate (**DBP**) and Diisobutyl phthalate (**DIBP**).
<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32015L0863>
3. DIRECTIVE 2003/11/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 6 February 2003 relating to restrictions on the marketing and use of certain dangerous substances and preparations (pentabromodiphenyl ether (**pentaBDE**), octabromodiphenyl ether (**octaBDE**)).
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2003:042:0045:0046:EN:PDF>
4. DIRECTIVE 2006/122/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 12 December 2006 amending for the 30th time Council Directive 76/769/EEC on the approximation of the laws, regulations and administrative provisions of the Member States relating to restrictions on the marketing and use of certain dangerous substances and preparations **PFOS** (perfluorooctane sulfonates). The Directive includes Perfluorooctanoic acid (**PFOA**).
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2006:372:0032:0034:en:PDF>
5. EU COMMISSION DECISION 2009/251/EC of 17 March 2009 requiring Member States to ensure that products containing the biocide dimethylfumarate (**DMF**) are not placed or made available on the market
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:074:0032:0034:EN:PDF>
6. EU COMMISSION DECISION 2009/425/EC COMMISSION DECISION of 28 May 2009 amending Council Directive 76/769/EEC as regards restrictions on the marketing and use of organostannic compounds. Includes Dibutyltin Compounds (**DBT**), Dioctyltin Compounds (**DOT**), and Tri-substituted Organostannic Compounds (**TBT**, **TPT**).
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:138:0011:0013:en:PDF>

To the best of my knowledge, the above mentioned substances are not intentionally a part of the formulation and not intentionally added during manufacture of Plastics Engineering Company thermoset molding compound products.

Plastics Engineering Company has an on-going process to have raw material suppliers ensure RoHS compliance.

Plastics Engineering Company thermoset molding compound products are made from some natural raw materials. Trace quantities of heavy metals are present in all natural materials. Limited testing performed by an outside lab on our molding compound products indicate we are below the 0.1% (0.01% for cadmium) threshold levels for the heavy metals mentioned. Plastics Engineering Company does not test for them as part of our quality assurance program. No testing has been performed for the brominated flame retardants or phthalates.

Thank you.

Sincerely,

Thomas W. Olmsted
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