

## DECLARATION LETTER for EU REACH 欧盟 REACH 法案声明

Follow EU REACH REGULATION No.1907/2006 , our products no volatile or intentionally release substances, nor chemicals directly export to EU, so our products no need to (pre-)registration, and our products will fully comply with EU REACH REGULATION No.1907/2006 and subsequent amendments. And we guarantee that all products provide by our company follow up substances of SVHC candidate list now, comply with SVHC 209 substances of batch 1-23 in a concentration less than 0.1% (w/w) in an article(Excluding RoHS lead exemption see detail\*) (See full list in <https://echa.europa.eu/candidate-list-table>)

按照欧盟 REACH 法案 No.1907/2006,我司产品无挥发性物质或有意释放物质、也非直接出口欧盟的化剂类物质,因此不涉及(预)注册问题,完全符合欧盟REACH法案 No.1907/2006及其后续修订要求。并且我司保证我司产品本身均满足当前高关注物质(SVHC)候选清单中的物质要求,符合欧盟REACH法案要求的第1-23批209类SVHC物质在物品中含量小于0.1%的要求(RoHS含铅豁免除外详见\*)  
(完整清单见 <https://echa.europa.eu/candidate-list-table>)。

If EU SVHC list update and confirm our products contain substances in the SVHC candidate list in a concentration over 0.1%(w/w), we will provide required information to follow the EU REACH REGULATION No.1907/2006. From 1st June 2011, we will notify ECHA through EU and EEA importers, if our products contain substances in the SVHC candidate list over 0.1%(w/w) and one substance in the products export to EU are over 1 ton in total per year per company, and which no alternative substances.

若随欧盟SVHC清单更新,确认我司产品中存行含量大于0.1%的SVHC候选物质时,我司将依据 REACH 法案要求提供必要信息。自2011年6月1日起,若我司产品中存在含量大于0.1%的SVHC 候候选物质时,将在确认出口欧盟的总量 1 吨/年公司以上并且该物质无法替代的情况下,通过欧盟范围内此类物品的制造商或进口商向欧盟化学品管理局(ECHA)进行通报。

\* Information for lead: Lead-tin-silver high-temperaturesolder used in medium and high power package products is currently exempt from RoHS regulations . The expiration date of the exemption is July 21, 2021 Although the maximum lead content of such package products is less than 2%, it is used the total amount of lead exported to the EU is less than 1 ton/year, which complies with the requirements of REACH. And our company will use lead-free solder to complete the replacement before the exemption expires accordance with the latest exemption deadline date of the RoHS regulations.

\* 针对铅的说明信息:中大功率封装产品使用铅锡银的高温焊料焊膏。目前属于 RoHS 法规豁免项目。豁免期限2021年7月21日,此类封装产品最高铅含量小于 2%,但所用铅的出口欧盟总量小于 1 吨 / 年,符合 REACH 法规要求,且我司上程会按照 RoHS 法规最新豁免期限要求日期,在豁免到期前使用无铅焊料完成替代。





And up to now, as the best of our knowledge:

1. Follow EU ECHA 2008/10/28 official report, Cyclododence (CAS No.:294-62-2) have been excluded out of SVHC list.
2. If use normal moisture indicator for dry packing, content. about 10-30% Cobalt dichloride(CAS No.:7646-79-9)in color agent. but much less than 1 ton in total per year, which comply with REACH SVHC limit.And from April 2011, we have used moisture indicator without Cobalt dichloride..
3. If use PVC tube as packing material DEHP(CAS No..117-81-7) impurity content less than 0.1%. or if use H9607 as epoxy material DBP(CAS No.:84-74-2) impurity content less than 0.1%, which comply with REACH SVHC limit.
4. If product use flux Tacflux026, which must use nonylphenol 60-70% in its initial chemical material but the product which use Tacflux026 are subject to the reflow process, and experimental verification that the flux after reflow do not contain nonylphenol substances anymore , which comply with REACH SVHC limit .
5. If product use BT substrate, BPA(CAS No.:80-05-7) impurity content less than 0.1%, which comply with REACH SVHC limit.
6. Follow EU ECHA2012/06/18 official report, the scope of the more recent Al-RCF and ZrAl-RCF entries fully covers the earlier ones, so comprises a consolidation of the entries of aluminosilicate refractory Ceramic fibres (Al-RCF) and zirconia aluminosilicate refractory ceramic fibres (ZrAl-RCF) included in the SVHC candidate list in January 2010 and December 2011.

到目前为止根据我公司确认:

1. 依据 2008年10月28日欧盟ECHA官方公报, 环十二烷 (CAS No.. 294-62-2)已经被排除SVHC清单;
- 2.若有使用常规湿度指示卡用于干燥包装, 在其显色剂中约含有10-30%的二氯化钴 (CAS N6-7648-79-9),但年用量远小于1吨, 符合REACH SVHC限值要求。并且从2011年4月开始, 我司已全部换用不含二氯化钴的无钴湿度指示卡;
- 3.若有使用PVC料管用作包装材料, 则含有小于0.1%的邻苯二甲酸双(2-乙基己(CAS AB)(CAS)(1-7)杂质, 若有使用H9607胶用作装片材料, 则含有小于0.1%的邻苯二甲酸二丁酯(CAS NO.84-4.27.6.2)杂质符合REACH SVHC限制要求;
- 4.若产品有使用助焊剂Tacflux026,在其初始化学材料中使用60-70%的壬基酚物质, 由于使用Tacflux026的产品都需经过回流焊工艺处理, 经实验验证助焊剂通过回流焊工艺处理后不再含有壬基酚物质, 符合REACH SVHC限制要求;
- 5.若产品有使用BT基板材料, 含有小于0.1%的双酚A(CAS No.80-05-7)杂质, 符合REACH SVHC限制要求;
- 6.依据2012年06月18日欧盟ECHA官方公报, 对于硅酸铝陶瓷纤维和氧化锆硅酸铝陶瓷纤维这两类物质, 2011年12月第六批SVHC候选清单公布的物质范围完全覆盖2010年01月第二批SVHC候选清单公布的物质范围, 因此作合并处理。

Company stamp (公司盖章): 江苏润石科技有限公司  
Jiangsu Runic Technology Co., Ltd

Person in Charge(负责人): Michael.Gao

Date (日期): 2020/06/18