



*New Dimensions in Precision Metals™*

An ISO 9001 Registered Company

December 7, 2017

To Whom It May Concern:

RE: Compliance to EU Directive 2011/65/EU (“Restriction of Hazardous Substances 2” or “RoHS2”) and Directive (EU) 2015/863 to amend Annex II to EU RoHS 2 to add the additional phthalates onto the list of restricted substances.

Dear Sir/Madam,

We do not intentionally add any of the hazardous substances included in the directive to our products. However, we do not analyze for each of the hazardous substances. Additional information is listed below.

**Cadmium and its compounds**

Cadmium is not added to any of our products. It may exist in our raw materials in trace levels, but our melting process would reduce the amount of cadmium (if any). Although we do not typically analyze for cadmium we have performed limited testing on a brass and copper alloy. Those results indicate that the concentration of cadmium is well below the 0.01% by weight limit.

**Chromium (VI)**

The hexavalent oxidation state chromium does not exist in metal.

**Lead and its compounds**

The ASTM/CDA specifications for lead in the alloys that we manufacture are below that of RoHS 2 threshold.

**Mercury and its compounds**

Its low boiling point precludes the likelihood of its presence in our product.

**PBB and PBDE**

Polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE). These are manufactured chemicals that are added to plastics as flame retardants. The decomposition temperature of PBBs and PBDEs are below the melting temperature of copper. Purchasing specifications require that all scrap purchased by PMX Industries, Inc. be free from coatings and plastics.

**Brominated Fire Retardants**

PMX Products do not contain the brominated fire retardants Pentabromodiphenyl ether (PentaDBE), Octabromodiphenyl (OctaDBE), Decabromodiphenyl (DecaBDE), Bis(2-ethylhexyl) phthalate (DEHP), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP) and Diisobutyl phthalate (DIBP) as spelled out in the new Directive 2015/863.

**PFOS**

Perfluorooctane sulfonates (PFOS) are manufactured organic chemicals that have been used as coatings, fire fighting foams, and in some plating and photographic processes. Purchasing specifications require that all scrap purchased by PMX Industries, Inc. be free from coatings and plastics. The manufacturing processes PMX Industries, Inc. uses to produce copper and brass do not provide an opportunity for these chemicals to become part of our product.

**REACH**

Copper and brass products manufactured by PMX Industries, Inc. do not require registration under REACH legislation because copper and brass strip are classified as articles.

Notification is not required because there are no substances included on the candidate list of SVHC (substances of very high concern) as updated July 10, 2017 present in the articles.

This declaration applies to copper and brass produced by PMX Industries, Inc. It does not include packaging materials or processes performed on PMX products by others.

Please do not hesitate to contact me at (319) 368-7700 x1412 with any concerns or questions regarding this response.

Sincerely,



Marc Tucker  
Environmental & Safety Engineer