February 1, 2024

To Whom it may concern:

RE: Compliance to EU directive 2011/65/EU

Restriction of Hazardous Substances 2, or RoHS2 and the directive 2015/863 to amend Annex II to the EU RoHS2 by the addition of phthalates onto the current list of restricted substances

### Dear Sir /Madam

PMX Industries does not intentionally add any of the hazardous substances included in the Directive EU 2015/863 to any of our manufactured products. We do maintain a strict quality control over incoming products as well as production materials. The following substances, while monitored are not analyzed specifically. PMX has reviewed the latest REACH 233 listings of Substances of Very High Concerns (SVHC) and none of the chemicals listed are used within the PMX manufacturing process

### Cadmium and its compounds

Cadmium is not added to any of the products manufactured by PMX Industries. The material may exist in products but only in trace levels. Our melting process will also reduce any cadmium, if even present. In our testing of the brass and copper alloys on a totals basis, any concentrations of cadmium are shall be in a PPM range.

### Chromium VI

Hexavalent Chromium (Chromium 6) is not present in any materials produced by PMX Industries.

#### Lead and Lead based Compounds

The ASTM/CDA specifications for lead in any alloy PMX manufactures is well below that of the RoHS 2 specification threshold

#### Mercury and any Mercuric Compound

Mercury is not present in any alloy produced by PMX Industries.

#### PBB and PBDE

Polybrominated Biphenyls and Polybrominated Diphenyl Ethers and are manufactured to be added as a flame retardant for various plastics.

The purchase specifications require that ALL scrap materials purchased by PMX Industries be free of any coating or plastics materials. If coatings or plastics are detected in our initial load inspections, the load is rejected. This keeps these compounds out of our manufacturing process

# **Brominated Fire Retardant compounds**

PMX Industries products will not contain any of the Brominated Fire Retardant chemicals. Pentabromodiphenyl Ether (PentaDBE), Octabromodiphenyl Ether (OctaDBE), Decabromodiphenyl Ether (DecaDBE), Bis 2-ethylhexyl phthalate (DEHP), Butyl benzyl phthalate BBP), Dibutyl phthalate (DBP), and Diisobutyl phthalate (DIBP) as declared in the new Directive 2015/863.

# **PFOS**

Perfluorooctane Sulfonates (pfos) are manufactured organic compounds that has been used primarily in firefighting foams, and in some plating and photographic processes. The purchasing specifications require that all materials purchased by PMX Industries be free of any coating or plastics, or any material that may resemble PFOS. The heating of the alloys to a molten state, assure buyers that these materials are not part of any product produced by PMX Industries.

## **REACH and EU REACH POPs 2023 listings**

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

Notification is not required as well, because there are no substances included on the candidate listings of SVHC (substances of high concern) as defined in the updated Directive in any article.

This declaration of compliance applies to the copper and brass products as produced by PMX Industries. It may not include any packaging materials used by PMX as produced by others.

I have reviewed the documents related to the POPs list of chemical contaminates and PMX does not produce or use any of the products listed and is in compliance with the guidelines as established in 2023

If you have any questions regarding this information, please do not hesitate to contact me

Respectfully,

Mark A. Lob

**Environmental Manager** 

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