


Issue: 27.04.2010	Declaration of Conformity				 ROSE A Phoenix Mecano Company
	RoHS	2002/95 EC			
DecaBDE	Flame retardants dd. 01/07/2008				
Revision: 1	PAK	Polycyclic aromatic hydrocarbons			
	PFOS	Perfluorooctanesulfonic acids 2006/122/EC dd. 12/12/06			
	REACH	"Registration, Evaluation and Authorisation of Chemicals"			
	DMF	Dimethyl fumarate			

I. Area of applicability – Substances -

	Substances	Legal basis
1.	Lead (Pb),	RoHS EU Directive 2002/95 EC
2.	DecaBDE (decabromdiphenylether)	Decision of the European Court of Justice dd. 01/04/2008, in effect as
3.	PAK	Voluntary reference values
4.	PFOS	Directive 2006/122/EC
5.	REACH – Chemical substances	REACH Directive (EC) No. 1907/2006
6	DMF (dimethyl fumarate)	EU decision 2009/251/EG (dimethyl fumarate) dd. 17/03/2009

II. Explanation

To 1. RoHS

The Directive 2002/95/EC of the European Union governing the restriction and use of certain hazardous substances in electric and electronic devices (RoHS) came into effect on 01/07/2006. Since then, none of the substances lead (Pb), cadmium (Cd), hexavalent chromium (Cr IV), polybromated biphenyl (PBP), polybromated diphenylether (PBDE), mercury (Hg) may be contained or only in the permissible quantities in electric and electronic devices (§§ 2,3 ElektroG).

The raw materials, semi-finished products or products used by us do not contain the above substances in quantities exceeding the defined limit values.

To 2. DecaBDE


On 1/04/2008 the European Court of Justice has decided that the flame retardant decabrominatediphenylether (DecaBDE) is one of the hazardous substances listed in the RoHS Directive. Since 01/07/2008, electric and electronic devices launched on the markets of the European Union may no longer exceed the permissible limit value for DecaBDE.

The polymers used by us do not contain the flame retardant DecaBDE.

To 3. PAK

Statutory limit values relating to the concentration of PAHs in plastics materials currently do not exist. There are merely recommendations, especially for consumer products.

The raw materials used for the manufacture of our products do not contain such compounds.

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To 4. PFOS

Directive 2006/122/EC has amended Directive 76/769/EEC.

As from 27/06/2008, circulation and use of PFOS and preparations as well as products containing PFOS are widely forbidden.

The raw materials, semi-finished products or products used by us do not contain PFOS or PFOS in quantities exceeding the limit values laid down in the EU Directive 2006/122/EC.

To 5. REACH / Including the current SVHC list (substances of very high concern)

We, as an industrial purchaser of substances, preparations and products according to Art. 3 REACH-VO, are only affected by the legal requirements as a downstream user.

The products manufactured by us are not subject to any registration obligation in the sense of the REACH-VO. This especially applies to our products made of plastic.

Polymer granulates are not liable to any substance evaluation.


The recommended measures are taken into account for the chemical substances used by us.

To 6. DMF

Decision (2009/251/EG) of the committee from 17 March 2009 which describes the responsibility of member states to ensure that products which contain the biocide dimethyl fumarate are not placed or made available on the market.

The biocide dimethyl fumarate (DMF) is used for preservation of certain consumer goods (furniture, footwear, leather garments, etc.) during their storage or their transportation.

The products which we are producing are not including this substance and don't come during production, storage or transport in contact with biocide dimethyl fumarate.

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III. Date and scope of the declaration

This declaration is prepared and issued on the basis of preset currently and valid laws and directives, as well as according to our best knowledge and state of information as of today.

All data, recommendations and information regarding the individual products and materials released by us or on our behalf are based on examinations/investigations and information of the individual material manufacturer.

The property reference values represent non-binding average values found by the individual manufacturer by testing specimens.

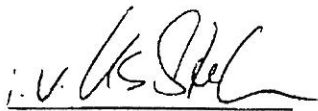
With regard to components specified or provided by the customer, the customer will submit a Declaration of Conformity for such components!

The interested person/company is obligated to satisfy itself of the quality and all properties of the product as well as their suitability for the intended purpose, and must carry out all required examinations/investigations in this regard under its own responsibility, unless in individual cases we expressly guarantee certain properties or applications of the product in writing.

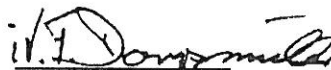
The same correspondingly applies to other technical application information and consultancy provided by us verbally and in writing.

Porta Westfalica, 27th of April 2010

(Place and data of issue)



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