



STEGO Elektrotechnik GmbH · Kolpingstraße 21 · D 74523 Schwäbisch Hall

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## To whom it may concern

Schwäbisch Hall, 11<sup>th</sup> of December 2023

### EU REACH Declaration

### Extension to 235 SVHC

Dear Sirs and Madams,

Based on Art. 33 (1) of Regulation (EC) 1907/2006 of the European Parliament, EU REACH (→**Registration, Evaluation, Authorization and Restriction of Chemicals**), as interpreted by EU Court of Justice decision C-106/14 of 10<sup>th</sup> of September 2015, we are obliged to inform our customers and business partners, if a SVHC (→**Substance of Very High Concern**, definition according to EU REACH Art. 57 + 59) is contained with >0.1 percent by mass (w/w) in an article (= an object which during production is given a special shape, surface or design that determines its function to a greater degree than its chemical composition) delivered by us. The list of the SVHC - expanded from 233 to 235 substances on the 14<sup>th</sup> June 2023 - is viewable on the homepage of the ECHA (→**European Chemicals Agency**): <https://www.echa.europa.eu/candidate-list-table>.

We feel a deep commitment to our environment. In other words, constantly improving our company means reducing our environmental impact. We comply with Art. 33 of the EU REACH regulation as follows: We are in contact with our suppliers of relevant articles that are processed in our products and ask for immediate information about if listed SVHC with >0.1% w/w are contained in those articles. Because of the recent candidate list extension, we are carrying out an intensive supply chain evaluation at the moment. We already mentioned **Lead** (CAS # 7439-92-1) in our previous EU REACH declarations. Lead is at a concentration of partly >0.1% w/w per article in some of our finished products contained, especially in the PTC heating element. According to our evaluations, either (depending on the supplier) **Lead Zirconium Titanate / Lead Titanium Zirconium Oxide** (CAS # 12626-81-2) or **Lead Titanium Trioxide / Lead Titanium Oxide** (CAS # 12060-00-3 or synonymous: CAS # 14650-47-6) is used as a *Lead compound* in the PTC heating element, with reference to EU **RoHS** exemption 7(c)-I. Besides, **Lead Monoxide** (CAS # 1317-36-8) has been mentioned in ceramic material. In general, we apply the EU **RoHS** exemptions regarding Lead (compounds), namely 6(a), 6(a)-I, 6(b), 6(b)-I, 6(b)-II, 6(c), 7(a), 7(c)-I and 15 - based on EU **RoHS** Directive 2011/65/EU Annex III. **N,N-Dimethylacetamide** (CAS # 127-19-5) occurs in some integrated axial fans with a concentration of >0.1% w/w and one supplier uses **Imidazolidine-2-Thione** (CAS # 96-45-7) with 0.3% w/w in a coupling socket. Recently, one supplier declared **6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol / DBMC** (CAS # 119-47-1) with max. 0.3% w/w as an antioxidant additive in an O-ring (however, this affects only our fan heater CR 03054.2-01).

According to our present state of knowledge and based on the information from our own suppliers so far, we currently rule out that further SVHC with >0.1% w/w are contained in the articles that we purchase from our suppliers. Trace impurities from raw materials, additives and processing aids or ubiquitous traces can never be completely ruled out. We do not carry out any investigations into the presence of these substances, instead we refer to the statements made by our suppliers. We provide this information to you "AS IS", without any express or implied warranties of any kind.

Best Regards,  
STEGO Elektrotechnik GmbH

  
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