



| Legislation   | Scope of legislation   | PR relevance  | PR comments   |
|---|--|---|---|
| <a href="#">REACH (EU Regulation 1907/2006)</a>   | <ul style="list-style-type: none"> <li>Registration, Evaluation, Authorization and restriction of Chemicals</li> </ul>   | Directly governed by law.   | <p>400+ chemicals with threshold limit value – lists updated several times a year.</p> <p>Consist of 2 lists of chemicals requiring an approval:</p> <ul style="list-style-type: none"> <li>An Authorization list containing restricted/banned chemicals</li> <li>A Candidate list with particularly problematic chemicals (SVHC), threshold limit 0,1w/w%</li> </ul> <p>Obligation to communicate downstream in your supply chain if your product contains any of the regulated chemical substances.</p> <p>At minimum inform your customers of:</p> <ul style="list-style-type: none"> <li>the substance name,</li> <li>content amount,</li> <li>where the substance is contained in your product,</li> <li>and if applicable, safety advise on how to use the product safely.</li> </ul> |
| <a href="#">EU RoHS2 (EU Directive 65/2011)</a><br><a href="#">EU RoHS3 (EU Directive 863/2015)</a> | <ul style="list-style-type: none"> <li>Restriction of certain hazardous substances in electrical and electronic equipment</li> <li>Scope is by July 22, 2019 extended to include “all electrical and electronic equipment (EEE), including cables and spare parts”.</li> </ul> | <p>Directly governed by law</p> <p>Business specific.</p> <p>No requirement in legislation to communicate exemptions, if any, neither to customers nor in product documentation.</p> <p>PR electronics A/S have had this assessed by the Danish Authorities</p> | <p>Restriction on 6 substances:</p> <ul style="list-style-type: none"> <li>Lead</li> <li>Mercury</li> <li>Cadmium</li> <li>Hexavalent chromium</li> <li>Polybrominated biphenyls (PBB)</li> <li>Polybrominated diphenyl ethers (PBDE)</li> </ul> <p>From 22. July 2021 additional restriction:</p> <ul style="list-style-type: none"> <li>Bis(2-ethylhexyl) phthalate (DEHP)</li> <li>Butyl benzyl phthalate (BBP)</li> <li>Dibutyl phthalate (DBP)</li> <li>Diisobutyl phthalate (DIBP)</li> </ul> <p>Exemptions exist for specific applications.</p>  |

| <p><a href="#">China RoHS2</a></p>   | <ul style="list-style-type: none"> <li>Restriction of certain hazardous substances in electrical and electronic equipment sold in China</li> <li>Product must be marked with EFUP logo - “Environmental-friendly use period” + hazardous substance marking in product instructions on name and content of hazardous substance and where in the product the substance is contained.</li> </ul> | <p>Directly governed by law – because PR sell products into China.</p> <p>The electrical and electronic products which are imported and sold in China should conform to the National Standard GB/T 26572 – 2011 on limits to the hazardous substances used in electrical and electronic products (Article 11 and 16)</p> <p>The manufacturer and importer of electrical and electronic products should properly mark the hazardous substances contained in the electrical and electronic products they put into the market according the Industrial Standard SJ/T 11364 – 2014 (Article 13)</p> <p>PR electronics A/S have had this assessed by Chinese lawyer - Senior Partner.</p> | <p>Same restrictions as EU RoHS2, but it also covers the compounds of the substances, which make it stricter.</p> <p>Exemptions for specific applications exist, but not precisely the same as for EU RoHS2.</p> <p>EFUP - “Environmental-friendly use period” examples:</p> <div style="text-align: center;">   </div> <p>Marking table in product instruction example:</p> <table border="1" data-bbox="1563 847 2112 1142"> <thead> <tr> <th rowspan="2">Part Name</th> <th colspan="6">Hazardous Substances</th> </tr> <tr> <th>Lead (Pb)</th> <th>Mercury (Hg)</th> <th>Cadmium (Cd)</th> <th>Hexavalent Chromium (Cr (VI))</th> <th>Polybrominated biphenyls (PBB)</th> <th>Polybrominated diphenyl ethers (PBDE)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td colspan="7"> <p><small>This table is prepared in accordance with the provisions of SJ/T 11364.</small></p> <p><small>O: Indicates that said hazardous substance contained in all of the homogeneous materials for this part is below the limit requirement of <a href="#">GB/T 26572</a>.</small></p> <p><small>X: Indicates that said hazardous substance contained in at least one of the homogeneous materials used for this part is above the limit requirement of <a href="#">GB/T 26572</a>.</small></p> <p><small>(Enterprises may further provide in this box technical explanation for marking “X” based on their actual circumstances.)</small></p> </td> </tr> </tbody> </table> | Part Name                     | Hazardous Substances           |                                       |  |  |  |  | Lead (Pb) | Mercury (Hg) | Cadmium (Cd) | Hexavalent Chromium (Cr (VI)) | Polybrominated biphenyls (PBB) | Polybrominated diphenyl ethers (PBDE) |  |  |  |  |  |  |  | <p><small>This table is prepared in accordance with the provisions of SJ/T 11364.</small></p> <p><small>O: Indicates that said hazardous substance contained in all of the homogeneous materials for this part is below the limit requirement of <a href="#">GB/T 26572</a>.</small></p> <p><small>X: Indicates that said hazardous substance contained in at least one of the homogeneous materials used for this part is above the limit requirement of <a href="#">GB/T 26572</a>.</small></p> <p><small>(Enterprises may further provide in this box technical explanation for marking “X” based on their actual circumstances.)</small></p> |  |  |  |  |  |  |
|--|---|--|--|-------------------------------|--------------------------------|---------------------------------------|--|--|--|--|-----------|--------------|--------------|-------------------------------|--------------------------------|---------------------------------------|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
| Part Name  | Hazardous Substances  |  |  |                               |                                |                                       |  |  |  |  |           |              |              |                               |                                |                                       |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Lead (Pb)   | Mercury (Hg)   | Cadmium (Cd)   | Hexavalent Chromium (Cr (VI)) | Polybrominated biphenyls (PBB) | Polybrominated diphenyl ethers (PBDE) |  |  |  |  |           |              |              |                               |                                |                                       |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |   |  |  |                               |                                |                                       |  |  |  |  |           |              |              |                               |                                |                                       |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| <p><a href="#">IMO MEPC 269 (68)</a></p>   | <ul style="list-style-type: none"> <li>Marine Environmental Protection</li> </ul>   | <p>Indirectly governed by law – Customer demand.</p> <p>PR products’ content of regulated substances in components mounted on printed circuit board are exempt by §3.3.2</p> <p>PR electronics A/S have had this assessed by the Danish Authorities</p>  | <p>Also called Green Passport as required by marine customers e.g. shipowners.</p> <p>Restrictions on:</p> <ul style="list-style-type: none"> <li>Cadmium and cadmium compounds</li> <li>Hexavalent chromium and hexavalent chromium compounds</li> <li>Lead and lead compounds</li> <li>Mercury and mercury compounds</li> </ul>  |                               |                                |                                       |  |  |  |  |           |              |              |                               |                                |                                       |  |  |  |  |  |  |  |  |  |  |  |  |  |  |

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|---|--|---|--|
|   |  | (Miljøstyrelsen – The Danish Environmental Protection Agency) | <ul style="list-style-type: none"> <li>• Polybrominated biphenyl (PBBs)</li> <li>• Polybrominated diphenyl esters (PBDEs)</li> <li>• Polychlorinated naphthalenes</li> <li>• Radioactive substances</li> <li>• Certain shortchain chlorinated paraffins (Alkanes, C10-C13, chloro)</li> </ul> <p>Exemptions exist for specific materials §3.3.</p> |
| <a href="#">EU Directive 66/2006</a>  | <ul style="list-style-type: none"> <li>• Batteries &amp; accumulators</li> <li>• Waste batteries &amp; accumulators</li> </ul> | Directly governed by law.                                     | Scope: To minimize negative impact from batteries and accumulators on the environment  |
| <a href="#">EU Directive 94/62</a>  | <ul style="list-style-type: none"> <li>• Packaging</li> <li>• Packaging waste</li> </ul>                                       | Directly governed by law.                                     | This directive covers all packaging no matter industry.  |
| <a href="#">US Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502</a>                      | <ul style="list-style-type: none"> <li>• Conflict Minerals (Gold, Tin, Tungsten &amp; Tantalum)</li> </ul>                     | Indirectly governed by law – Customer demand                  | <p>Gold, Tin, Tungsten &amp; Tantalum – The production of the minerals must not contribute to the conflict in Congo and the surrounding countries.</p> <p>No matter where the minerals are from, they are named “conflict minerals” and reporting is mandatory.</p>  |
| <a href="#">EU Conflict Minerals (Regulation (EU) 2017/821)</a><br><br><a href="#">EU Conflict Minerals FAQ</a> | <ul style="list-style-type: none"> <li>• Conflict Minerals (Gold, Tin, Tungsten &amp; Tantalum)</li> </ul>                     | Directly governed by law.                                     | <p><b><u>NEW – NEW – NEW – NEW – NEW – NEW</u></b></p> <p>EU directive coming into force 01.01.2021 with extended scope: “Conflict-affected or high-risk areas”.</p>   |