

## RoHS 2011/65/EU with (EU) 2015/863, (EU) 2018/739, (EU) 2018/740, (EU) 2018/741

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**RoHS** stands for **R**estriction **o**f the use of certain **H**azardous **S**ubstances.

The legal basis for RoHS is the EU Directive **2011/65/EU**, which came into force on 21st July, was published on 1 July 2011 in the official journal of the European Union 2011 and defines the restriction of the use of hazardous substances in electrical and electronic equipment. In Germany the RoHS Directive is implemented by the Electrical and Electronic Equipment Regulation (ElektroStoffV).

According to Article 3, Paragraph 1 of the RoHS Directive electrical and electronic equipment means equipment which is dependent on electric currents or electromagnetic fields in order to work properly and equipment for the generation, transfer and measurement of such currents and fields and designed for use with a voltage rating not exceeding 1000 volts for alternating current and 1500 volts for direct current. This excludes electrical and electronic equipment which are named in Article 2, Paragraph 4, such as largescale fixed installations.

Manufacturers and importers of electrical and electronic equipment ensure that the electrical and electronic equipment placed on the market satisfy the EU requirements, apply CE labels, and provide an EU Declaration of Conformity.

In Annex II of the RoHS Directive six restricted substances and maximum concentration values tolerated by weight in homogeneous materials are listed for electrical and electronic equipment covered by this Directive in Annex I.

The list of restricted substances was changed, and four other substances were added as a result of the Delegated Directive **(EU) 2015/863** from 31st March 2015 regarding changes to Annex II of the 2011/65/EU Directive regarding the list of substances subject to restriction, which came into power on 22nd July, 2019.

Annex II now includes ten restricted substances with the following maximum permissible concentrations in homogeneous materials in percent by weight:

- 0.1 percent in weight (= 1000 ppm) per homogenised material for:
  - Lead
  - Mercury
  - Hexavalent chromium
  - Polybrominated biphenyls (PBB)
  - Polybrominated diphenyl ethers (PBDE)
  - Diethylhexyl phthalate (DEHP)
  - Benzyl butyl phthalate (BBP)
  - Dibutyl phthalate (DBP)
  - Di isobutyl phthalate (DIBP)
- 0.01 percent in weight (= 100 ppm) per homogenised material for:
  - Cadmium

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Annex III of the RoHS Directive defines uses exempted from the restriction of Article 4, paragraph 1. Among others, the use of lead, updated by Delegated Directives **(EU) 2018/739**, **(EU) 2018/740** and **(EU) 2018/741**, is permissible with the following maximum concentration values:

### **6a. / 6a. I**

- 0.35 percent in weight (= 3500 ppm) for:
  - Lead as an alloying element in steel for machining purposes and in galvanised steel
- 0.20 percent in weight (= 2000 ppm) for:
  - Lead in components made of hot-dip galvanised steel

### **6b. / 6b. I / 6b. II**

- 0.40 percent in weight (= 4.000 ppm) for:
  - Lead as an alloying element in aluminium
  - Lead as an alloying element in aluminium, provided it comes from recycled leaded aluminium scrap
  - Lead as an alloying element in aluminium for cutting purposes

### **6c.**

- 4.00 percent in weight (= 40.000 ppm) for:
  - Lead as an alloying element in copper

The objective of the RoHS Directive is to contribute to the protection of human health and the environment including the environmentally sound recovery and disposal of waste of electrical and electronic equipment. This general social aim is regarded by INGUN Prüfmittelbau GmbH as being both worthwhile and indispensable.

We do not conduct regular tests to check for the presence of restricted substances and analytical monitoring of potential contamination is not part of incoming or outgoing goods inspection. Many substances are ubiquitous and can therefore possibly be detected as contamination in products.

**Our product range includes spring-loaded test probes and test fixture components, which individually cannot be attributed an independent function. For this reason, the requirements of the RoHS Directive do not apply directly to our products. However, as there is the possibility that our products are installed in devices which fall within the scope of the RoHS Directive, we declare to our knowledge with regard to the information provided by our suppliers that the products placed on the market by INGUN Prüfmittelbau GmbH do not contain any substances in concentration and application which are prohibited according to the applicable requirements of the EU Directive 2011/65/EU and its amendments, including the Delegated Directives (EU) 2015/863, (EU) 2018/739, (EU) 2018/740 and (EU) 2018/741.**

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Currently, we still manufacture a large number of our spring-loaded test probes with an increased lead content comparable to the exemptions from Annex III of the EU Directive 2011/65/EU. In light of these exemptions, which may end soon, we are working intensively to convert our standard products to lead-free alloys. We are already able to offer some lead-free products and many others are in the test phase. For more information on materials or specific products, please contact us.

International industry associations and independent institutes have submitted renewal applications for the above mentioned exemptions to the EU Commission in due time. **Until the EU Commission has decided on the application for renewal, the exemptions remain valid as before.** In case of rejection, the exemptions according to Article 5, paragraph 6, will expire at the earliest twelve months and at the latest 18 months after the date of the decision. The decision shall be announced by official publication in the EU Official Journal.

Our environmentally-friendly packing - sliding boxes and bags - are made from acrylonitrile butadiene styrene (ABS) and polyethylene (PE).

Regarding the return of components to the manufacturing cycle, INGUN offers its customers the possibility to dispose of used test probes and receptacles free of charge.

The letter was generated electronically and is valid without a signature.

INGUN Prüfmittelbau GmbH

Constance, July 2023

The Management

**Note:**

The terms RoHS-1, RoHS-2 or RoHS-3 are often used in current language. RoHS-1 refers to the EU Directive 2002/95/EU which was repealed with effect from 3rd January, 2013 by EU Directive 2011/65/EU. RoHS-2 refers to the EU Directive 2011/65/EU. RoHS-3 refers to the changes to the EU Directive 2011/65/EU resulting from the EU Directive (EU) 2015/863 with regard to the list of substances subject to restrictions in accordance with Article 4(1).