

REACH Statement for LEAD in EEE (Electric and Electronic Equipment)

The EU REACH Regulation (Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)) addresses the production and use of chemical substances, and their potential impacts on human health and the environment. It applies to any product placed on the market inside the EU.

Lindy supports the aims of REACH and declares its full support for protecting people and the environment. Lindy is continuously striving to stay a pioneer in our market sector and to continue to keep any hazardous substances out of our products.

REACH Article 33 defines a duty to inform if products contain substances of very high concern (SVHC) with a threshold value above 0.1% (1000 ppm). The SVHC list is updated and extended approximately every 6 months by the EU. The latest version can be found on the European Chemicals Agency website: <https://echa.europa.eu/candidate-list-table>

In June 2018 (metallic) Lead was added to the SVHC list with a threshold limit of 0.1%.

Lead is a significant and partly indispensable substance in some parts and components used in the electronics industry and is specifically regulated by the EU RoHS Directive for Electric and Electronic Equipment, with a threshold limit of 0.1%. However, there are RoHS Exemptions that allow higher concentrations for certain parts, components, use cases and functions. Various electronic parts and components, such as thermally highly charged components like diodes and MOSFET, very often contain lead above 0.1% with reference to such a RoHS exemption. These parts and components then usually exceed the REACH Article 33 limit for lead, triggering the information requirement.

However, the lead content in these parts, components and use cases does not cause any harm to people or the environment, and no significant amounts of lead are released into the environment under normal and foreseeable use of the product. In electronic parts and components, the lead containing sub-parts/components are integrated within a chip, chipset, or similar electronics part, and are not in human contact under normal operation. In brass or copper alloys used in connectors, lead can be used as a component that is solidly bound into the alloy and does not migrate or diffuse out.

Products	Product components	Substance that may be contained above 0.1%	CAS Number	Exempted by RoHS for EEE	REACH Annex XVII compliance
Electronic products (EEE)	Chipsets, transistors, diodes, resistors, capacitors, etc.	Lead (Pb)	7439-92-1	Yes	Yes
Power supplies (EEE)	AC connectors	Lead (Pb)	7439-92-1	Yes	Yes
Electric products, cables (EEE)	AC connectors	Lead (Pb)	7439-92-1	Yes	Yes
Electric products, cables (EEE)	3.5mm audio connectors	Lead (Pb)	7439-92-1	Yes	Yes

Background for this information procedure – see section 4.1.1. of:

https://echa.europa.eu/documents/10162/23036412/nutshell_guidance_articles2_en.pdf

Lindy-Elektronik GmbH (Hersteller EU)
Lindy Electronics Limited (Manufacturer UK)
Lindy International Limited

Mannheim, März 2021
Stockton-on-Tees, March 2021
Mannheim & Stockton-on-Tees, March 2021

Similar declarations from other electronics manufacturers can be found here:

Apple: <https://www.apple.com/environment/answers/>

Lenovo: <https://www.lenovo.com/medias/Lenovo-REACH-SVHC-Disclosure.pdf?context=bWFzdGVyfHJvb3R8OTQxNzJ8YXBwbGljYXRpb24vcGRmfGgxYS9oYjEvMTAwOTI3NTE2ODM2MTQucGRmfDg4ZjcwMDVhMDQ0OTU2MzRkYzE5ZTk2ODYxMTc4MGlwNzFIMDdiYjNhMTkwYjM0M2RkM2NhMWRkNDYzZmJmMWM>

HP: <http://h22235.www2.hp.com/hpinfo/globalcitizenship/environment/productdata/reachall-products.html>

HP also provides a list of similar REACH statements from many electronic manufacturers worldwide: <https://h20195.www2.hp.com/V2/GetDocument.aspx?docname=c05997203>

DELL: https://i.dell.com/sites/csdocuments/Legal_Docs/en/dell-tech-reach-svhc.pdf