

## QA Technology Company, Inc. and RoHS 2 (Recast):

08/19/15

The new RoHS Directive 2011/65/EU (RoHS 2) entered into force on July 21, 2011. The “Recast” Directive supersedes the previous Directive 2002/95/EC of the European Parliament and of the Council of 27 January 2003 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS 1). With the RoHS 2 implementation, the substances identified, and their allowable trace amounts, have not changed from the RoHS 1 Directive. As previously discussed in QA Technology’s original “RoHS Statement” some of the restrictions will be applicable to the materials used in QA Technology’s products and others will not. The threshold levels for each of these substances are again clearly defined in the Articles/Annexes of the Recast Directive. In article 4, section 1 via Annex II, of the Recast Directive, “non-Exempted” Applications must fall below defined levels for Lead, Mercury, Cadmium, Hexavalent Chromium, Polybrominated Biphenyls (PBB), and Polybrominated Diphenyl Ethers (PBDE). The threshold levels for any “Exempted” Applications from article 4, section 1, can be found in the Annex III of the Recast Directive.

**RoHS Directive 2011/65/EU (RoHS 2):** <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:174:0088:0110:en:PDF>

**RoHS Directive 2002/95/EC (original RoHS):** <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2003:037:0019:0023:EN:PDF>

**Frequently Asked Questions (RoHS 2):** [http://ec.europa.eu/environment/waste/rohs\\_eee/pdf/faq.pdf](http://ec.europa.eu/environment/waste/rohs_eee/pdf/faq.pdf)

### Threshold Levels for “Non-exempt” Applications:

Hazardous Substance	Threshold Levels (ppm)
Lead	1,000
Mercury	1,000
Cadmium	100
Hexavalent Chromium	1,000
Polybrominated Biphenyls (PBB)	1,000
Polybrominated Diphenyl Ethers (PBDE)	1,000

### Threshold Levels for “Exempted” Applications Specific to QA Technology’s Products:

Hazardous Substance	Threshold Levels (ppm)
Lead	Steel - 3,500   Aluminum – 4,000   Copper Alloys – 40,000
Cadmium	100

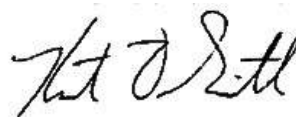
Note: All “Allowable Content Levels” pertain to levels as measured in *homogeneous* materials.

#### Definitions:

- Homogeneous - Uniform in structure or composition throughout, as of a chemical mixture. A material that cannot be *mechanically separated* (i.e. metals, alloys, paper, plastic, ceramics, etc.).
- Mechanically Separated – Where two or more materials can be separated through mechanical means (i.e. cutting, grinding, abrasive processes, crushing, tearing, disassembling, etc.).

#### Substances Applicable to QA Technology Company, Inc.:

QA Technology does not specify any finishes, or materials, for its products containing levels of hazardous substances that exceed the RoHS 2 Directive’s thresholds, per the exemptions. As a first step towards eliminating Lead from our products we now manufacture sockets using Lead-free solder. Lead is also used as an alloying element in metals to vary mechanical properties, as needed. QA Technology uses materials that contain Lead such as Steels, Aluminums, and Copper Alloys, in a broad array of our products. To further demonstrate our concern for the environment, we have begun implementing the use of Lead-free steel in our products. Whether Lead-free, or not, the materials we use fall within acceptable levels as per the RoHS 2 Directive’s thresholds.



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*Note: All statements made within this document are valid as of the date of this document.*