

Material Compliance



October 25, 2021

General Company Information

congatec GmbH is obligated to develop and manufacture environment-friendly products that fulfill the Directive 2011/65/EU as well as the amendment Directive 2015/863/EU for the Restriction of Hazardous Substances (RoHS) and the Directive 2012/19/EU regarding the Waste of Electrical and Electronic Equipment (WEEE).

The members of the European Union implement these directives according to their own strategies using local regulations. That is the reason for many different laws and provisions within the different countries of the EU. Countries that do not belong to the EU such as China, Japan and the USA have established regulations similar to RoHS in order to restrict the use of hazardous substances and to create environmentally friendly products.

The RoHS Directive 2011/65/EU was first published in February 2003 by the European Union and took effect July 1, 2006. This initial RoHS directive limited the use of six dangerous substances frequently used in electronic products, equipment and its manufacturing processes. The amendment Directive 2015/863/EU added 4 additional substances.

These ten relevant substances are:

Lead (Pb)	Polybrominated diphenyl ether (PBDE)
Mercury (Hg)	Di-2-ethylhexyl phthalate (DEHP)
Cadmium (Cd)	Benzyl butyl phthalate (BBP)
Hexavalent chromium (Cr ⁶⁺)	Di-n-butyl phthalate (DBP)
Polybrominated biphenyls (PBB)	Diisobutyl phthalate (DIBP)

The maximum permitted mass fraction of the above-named substances is limited to 0.1 % (w/w) (except for Cadmium, which is limited to 0.01 % (w/w)) based on the homogeneous material. It follows that the limit does not relate to the total weight of the product or a component.

The requirements of the directives 2011/65/EU and 2015/863/EU are implemented in our development processes as well as clarified with our contract manufacturers.

RoHS is closely associated with the Directive 2012/19/EU regarding the Waste of Electrical and Electronic Equipment (WEEE) which targets the recycling of electronics after the return to the manufacturer. Based on the current regulations, congatec GmbH is not required to take further actions based on the WEEE.

Material Compliance



RoHS-compliant Product Design and Manufacturing

All congatec products are designed and manufactured according to the current valid directives. The requirements for the material selection are considered in the early project phase and ensured during the lifetime of the product.

congatec's Electronic Manufacturing Service (EMS) partners are legally obligated to fulfill the material compliance requirements for purchased materials for the product and its processes in production. The evidence of the material conformity must be declared.

Material declarations are based on the information we receive from our manufacturers and suppliers and are requested for each component.

Material Compliance Declaration

congatec GmbH declares the material compliance according to the valid directives of the European Union. All congatec products are subject to these regulations.

congatec GmbH declares the conformity without detailed listing of substances and the corresponding amount of a substance within a single component. Exemptions are listed where applicable. congatec GmbH does not prepare Full-Material-Disclosure, neither for RoHS nor for REACH.

congatec GmbH continuously works on improvements for collecting data and related preparation of declarations in terms of efficiency. The implementation of a component database is one of the improvements we are currently doing to provide better data collection efficiency in the future. In the meantime, we will prepare all requested declarations as PDF documents. congatec GmbH cannot and will not enter or maintain compliance data in various customer tools.

RoHS

The declaration regarding RoHS compliance is based on part numbers. RoHS is also checked and declared for revision updates of our products on request. The individual declaration of RoHS compliance contains exemptions whenever relevant for the product.

REACH

The declaration for REACH compliance is based on part numbers. The candidate list is updated approximately every 6 months during which all BOM items of congatec products are checked. In case of an affected product, the corresponding customers will be informed within 45 days. Previous deliveries (day of published new candidate list) are not considered.

Material Compliance



Proposition 65

The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) is a Californian law aiming at the protection of drinking water sources from chemicals that produce cancer or birth defects. A Proposition 65 declaration can be provided upon request.

Conflict Minerals

Every year all relevant information is collected to evaluate the conflict minerals that will be used for the congatec products. The resulting report will be provided on request as soon as a reasonable amount of data is available. This is a free of charge service provided by congatec GmbH to its customers.

UL

congatec products are **not** UL-listed. congatec uses UL-recognized components that are relevant in order to UL-list customer's products, e.g. connectors. congatec GmbH will provide this information on request for any congatec product. This information is based on a product group and not specific for product part numbers.

CE

All congatec products are CE-marked. According to the corresponding directive, it is not mandatory to share the DoC with customers. Nevertheless, the CE declaration can be provided for each product group on request.

Letter of Volatility

The letter of volatility can be provided, on request, for the onboard memories used on congatec products. The letter of volatility is issued based on the part numbers of congatec products.

All requests may be directed to the responsible congatec sales representative or directly to the compliance team Material-Compliance@congatec.com.

Sincerely,

Gerhard Edi
CTO