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To whom it may concern

Schwäbisch Hall, 4th of April 2024

EU REACH Declaration


Extension to 240 SVHC

Dear Sirs and Madams,

Based on Art. 33 of Regulation (EC) 1907/2006 of the European Parliament, **EU REACH** (→**Registration, Evaluation, Authorization and Restriction of Chemicals**), as interpreted by EU Court of Justice decision C-106/14 of 10th of September 2015, we are obliged to inform our customers and business partners, if a SVHC (→**Substance of Very High Concern**, definition according to EU REACH Art. 57 + 59) is contained with >0.1 percent by mass (w/w) in an article (= an object which during production is given a special shape, surface or design that determines its function to a greater degree than its chemical composition) delivered by us. The list of the SVHC - expanded from 235 to 240 substances on the 23rd of January 2024 - is viewable on the homepage of the ECHA (→**European Chemicals Agency**): <https://www.echa.europa.eu/candidate-list-table>.

We feel a deep commitment to our environment and take our obligation, to provide information, very seriously - both in our own interest and against the background of product safety. We comply as a so-called downstream user with Art. 33 of the EU REACH Regulation as follows: We are in contact with our suppliers of relevant articles that are processed in our products and ask for immediate information about if listed SVHC with >0.1% w/w are contained in those articles. Because of the recent candidate list extension, we are carrying out an intensive supply chain evaluation at the moment. We already mentioned **Lead** (CAS#7439-92-1) in our previous EU REACH declarations. Lead is at a concentration of partly >0.1% w/w per article in some of our finished products contained, especially in the PTC heating element. According to our evaluations, either (depending on the supplier) **Lead Zirconium Titanate / Lead Titanium Zirconium Oxide** (CAS#12626-81-2) or **Lead Titanium Trioxide / Lead Titanium Oxide** (CAS#12060-00-3 or synonymous: CAS#14650-47-6) is used as a *Lead compound* in the PTC heating element, with reference to EU **RoHS** exemption 7(c)-I. Besides, **Lead Monoxide** (CAS#1317-36-8) has been mentioned in a resistive element and ceramic material. In general, we apply the EU **RoHS** exemptions regarding Lead (compounds), namely 6(a), 6(a)-I, 6(b), 6(b)-I, 6(b)-II, 6(c), 7(a), 7(c)-I and 15 - based on EU **RoHS** Directive 2011/65/EU Annex III. **N,N-Dimethylacetamide** (CAS#127-19-5) occurs in some integrated axial fans with a concentration of >0.1% w/w and one supplier/manufacturer uses **Imidazolidine-2-Thione** (CAS#96-45-7) with 0.3% w/w in a coupling socket. Recently, one supplier declared **6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol/DBMC** (CAS#119-47-1) with max. 0.3% w/w as an antioxidant additive in an O-ring (however, this affects only our fan heater CR 03054.2-01). According to our present state of knowledge and based on the information from our supply chain so far, we currently rule out that further SVHC with >0.1% w/w are contained in the articles that we purchase from our suppliers. Trace impurities from raw materials, additives and processing aids or ubiquitous traces can never be ruled out completely. We do not carry out any investigations into the presence of these substances, instead we refer to the statements made by our suppliers. We provide this information to you "AS IS", without any express or implied warranties of any kind.

Best Regards,
STEGO Elektrotechnik GmbH


Elmar Mangold
CEO