Philips Regulated Substances List

Royal Philips NV List of Regulated Substances in Products and Product Packaging

RSL 2019-1


© 2019 Koninklijke Philips N.V.
All rights reserved.
Reproduction in whole or in part is prohibited without the written consent of the copyright owner.

Organization: Group Sustainability
Function: Ecodesign, Compliance and Regulatory

Printed copies are FOR REFERENCE ONLY, always confirm printed copies with the online current version.
Table of Contents

1 INTRODUCTION ...................................................................................................................................................................... 3
  1.1 Purpose ........................................................................................................................................................................ 3
  1.2 Scope ........................................................................................................................................................................... 4
  1.3 Deviations .................................................................................................................................................................... 5
  1.4 Thresholds ................................................................................................................................................................. 5
2 SUPPLIER DECLARATION PROCESS ..................................................................................................................................... 6
  2.1 Declaration System ...................................................................................................................................................... 6
  2.2 Demonstrating compliance to the RSL through BOMcheck ........................................................................................ 6
3 PRODUCTS CONTENT RESTRICTIONS AND DECLARATIONS ................................................................................................ 7
  3.1 RoHS Substances Restrictions in products.................................................................................................................. 7
  3.2 Upcoming EU RoHS Restrictions in products ........................................................................................................... 7
  3.3 REACH Article 67 Substance Restrictions in products and packaging ....................................................................... 8
  3.4 Substances restricted or declarable by other legislation in products and packaging .............................................. 10
  3.5 Substance Legislative Restrictions in Batteries ............................................................................................................. 13
  3.6 REACH Candidate List Substances Declaration used in all product and product-packaging related applications (Article 33) ......................................................................................................................... 14
  3.7 California proposition 65 substances used in all product and product-packaging related applications, which are not included in any other Table in the RSL ......................................................... 14
  3.8 Industry Specific Substances Restrictions and Declarations in products and packaging ......................................... 15
  3.9 Additional restrictions in Product-Packaging ................................................................................................................ 16
  3.10 Substances restricted in Manufacturing Processes ................................................................................................... 17
ANNEX 1 - Definitions and interpretation of certain terms ................................................................................................. 18
  1.1. Declaration on homogeneous material (EU RoHS) level .......................................................................................... 18
  1.2. Article Definition ....................................................................................................................................................... 18
ANNEX 2 - Summary Table of Phthalate Restrictions ........................................................................................................ 19
ANNEX 3 - Detailed Requirements for Consumer Product Skin Contact Parts for PAH Compounds in Germany .......... 20
ANNEX 4 - Revision History .................................................................................................................................................. 21
1 INTRODUCTION

At Philips we have been working to minimize the environmental impacts of our products, processes and services since 1970. Guided by the precautionary principle, Philips' philosophy is “prevention is better than cure”. This means where there are threats of serious or irreversible harm to the environment and/or human health, the lack of scientific certainty should not be used as a reason for postponing cost-effective preventive measures. Policies can be developed that may go beyond legislative compliance based on scientific evidence and stakeholder consultation. Decisions to seek alternatives take into account the level of concern, commercial availability and technical feasibility of alternatives.

The above-mentioned policies are reflected in the present document, the “Royal Philips NV List of Regulated Substances in Products and Product-Packaging”, referred to herein as the "Philips Regulated Substances List" or RSL.

This or newer versions of the present RSL List can be found at Philips website http://www.philips.com/shared/global/assets/sustainability/rsl.pdf

Changes of this RSL compared to previous versions are mentioned in Annex 4 of this document.

1.1 Purpose
This document contains the Philips Regulated Substances List and its annexes as part of our commitment to health, safety and the environment.

The list contains product substance requirements related to:
- Federal, state, county or municipal law, regulation, ordinance or code, and
- Philips own requirements

The RSL is part of Philips global policy and therefore included in Philips general purchasing conditions. Each supplier and brand licensee is required to ensure product compliance with this list. In addition, Philips brand licensees are expected to comply with all additional legal substance regulations that are specific to their business and may not be included in the RSL.

Additional specific Philips or legal requirements may apply for certain product categories or applications. Examples are materials that come in contact with food, biocides or materials treated with biocides or products to be used for patients, babies or little children, chemical based products and cosmetics.

The most stringent legislation on which the threshold values have been based, are mentioned in the Tables of the RSL. Further information on legislation is given in some of the footnotes and particularly in the BOMcheck Declaration System. (This is not an exhaustive list but only an indication).

Philips collects compliance data in accordance with the RSL at the part level for every product or product-packaging delivered to Philips by a web-based Declaration System called BOMcheck as described in Section 2.1. Philips recommends its brand license partner to use BOMcheck.

The RSL is aligned with the substances included in the BOMcheck Declaration System. The few deviations from BOMCheck in the current version of the RSL are shown in Table 0. The deviations as mentioned in Table 0, are only for consumer products in some very specific applications. Annex 4 of this RSL mentions the changes compared to the previous version.
TABLE 0: Additional substance restrictions in RSL compared to BOMcheck

<table>
<thead>
<tr>
<th>Substances</th>
<th>Additional requirements in RSL compared to BOMcheck</th>
<th>Maximum Concentration Limit in ppm (mg/kg)</th>
<th>Reason for deviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brominated Flame Retardants restricted in consumer products</td>
<td>6 and 7</td>
<td>900</td>
<td>Additional restriction of Brominated Flame Retardants in printed wiring board laminate (other than PBBS, PBDEs and HBCDD) in consumer products. Medical devices and professional lighting products Mains power supply cordsets are exempted and only declarable in BOMcheck.</td>
</tr>
<tr>
<td>Brominated Flame Retardants, PVC and (P)VC copolymers restricted in consumer products</td>
<td>6 and 7</td>
<td>1000</td>
<td>Additional restriction of PVC, (P)VC copolymers and Brominated Flame Retardants (other than PBBS, PBDEs and HBCDD) in any plastics parts. Mains powersupply cord sets are exempted and only declarable in BOMcheck, just like medical devices and professional lighting products.</td>
</tr>
</tbody>
</table>

### 1.2 Scope

The requirements as set up in the Philips Regulated Substances List are a global policy of Philips, even if local regulatory requirement may be less strict. Where there is a difference between the Philips requirements and the local regulatory requirements, the most stringent, i.e., the most protective for health, safety and the environment applies.

The scope of this document includes all articles (i.e. materials, components, subassemblies, products, labels attached to products, etc., further mentioned as Products in the RSL), product packaging (i.e. wood, paper or card-boxes, plastic material, containers, user manuals, labels, etc., further mentioned as Packaging in the RSL) and some manufacturing processes as described in Table 8.

The requirements as listed in the RSL are mandatory to all products, parts and packaging materials used

- to produce Philips branded products,
- to produce products under a Philips Brand License Agreement and
- to produce products of other brands that are owned by Philips.

This includes all consumables, accessories and non-Philips (owned) branded products that are by-packed or integrated in our products, and of which the original brand name of the OEM is still visible for the customer. A dispensation has to be applied in case the OEM requests to waive certain policy requirements.

For non-Philips (owned) branded products that are placed on the market by Philips (e.g. as a distributor) it is recommended to also use the RSL as baseline requirements document. At least all substance legislation applicable in the country where the product is placed on the market have to be complied with.

These requirements are for products and packaging placed on the global market.
The restricted substances cannot be contained in the product or used in the manufacture of the product and its components above the designated thresholds for the controlled applications listed. Declarable substances that are used in articles or packaging materials must be declared according to the limits given in the respective table.

If the supplier needs clarification with respect to Philips’ guidelines and rules presented here, they should discuss with the Philips Representative, which is generally the supplier account manager. If a brand licensee needs clarification, they should discuss with Philips’ representative for sustainability in the Brand Committee.

1.3 Deviations

In those cases where the supplier supplies or intends to supply articles to Philips that do not comply with the Philips RSL, the supplier needs to contact the Philips Supply Management organization immediately to resolve the issue and to decide through mutual agreement on corrective actions. When a brand license partner intends to bring a brand license product to the market that does not comply with the Philips RSL, licensee needs to contact the Philips representative for sustainability in the Brand Committee.

Recycled content

Philips strongly promotes the use of recycled materials, in particular the use of recycled plastics. Philips realizes that the use of recycled materials may cause challenges in terms of guaranteeing compliance to all substances included in the Philips RSL. For issues related to Philips RSL compliance for recycled materials, please contact Philips Supply Management for support. For non-legal obligations, it may be possible to obtain a waiver for the presence of certain substances in recycled materials.

1.4 Thresholds

Maximum concentration limit for restricted substances

Royal Philips NV accepts that some materials contain a certain amount of naturally occurring restricted substances. However, when a substance is present in products, parts or product packaging at values above the listed maximum concentration limit, the substance is restricted to the maximum concentration limit. Thresholds can represent legal limits, or refer to currently accepted analysis thresholds. Restricted substances (e.g. RoHS) are measured at homogeneous level (unless otherwise stated), so these thresholds must be declared on homogeneous material level (See also Annex 1). Use of substances exempt for use in some specific applications, as mentioned in legislation, is allowed, but needs to be declared.

Maximum concentration limit for declarable substances

Declarable substances (e.g., REACH SVHCs) are substances the use of which needs to be monitored due to a regulatory requirement or because Philips wants to monitor use from a precautionary point of view. Use of these substances is permitted, unless otherwise specified, but must be reported when above the maximum concentration limit. In this case, the maximum concentration limit functions as a threshold above which you must provide the exact concentration of the declarable substance present in the relevant part, article or packaging. A basic understanding and interpretations of definitions like homogeneous material and REACH article definition are presented in Annex 1.
2  SUPPLIER DECLARATION PROCESS

2.1  Declaration System

As referred to in Section 1.1., Philips will collect substance information for its parts, products and product packaging because regulations such as RoHS and REACH require us to maintain regulatory compliance evidence at that level. Philips has decided to utilize BOMcheck as a system to help collect chemical substances information from suppliers (www.bomcheck.net). BOMcheck is an industry platform used by a large number of companies, and represents an efficient system that helps suppliers follow up on the many legal requirements, and provides smooth communication with the customers and, in particular, with suppliers up the supply chain. BOMcheck is primarily a regulatory compliance system designed specifically to enable suppliers to provide declarations for RoHS, REACH, and any other restricted and declarable substances legislation through detailed substances reports. BOMcheck also allows suppliers to provide Full Material Declaration (FMD) of their articles. The benefit of FMD is that suppliers have to upload the total chemical composition of their articles only once (unless the formulation of supplied articles changes), while BOMcheck will then automatically update a company’s compliance status every time regulatory changes are introduced. Philips recommends the brand license partners to follow the same way of working.

BOMcheck complies with FDA requirements in Title 21 CFR Part 11 and Title 21 CFR 820.70(i).

2.2  Demonstrating compliance to the RSL through BOMcheck

Suppliers are requested to make declarations in BOMcheck for all articles (i.e. materials, components, subassemblies, products, labels attached to products, etc.), packaging materials (i.e., wood, paper or card-boxes, plastic material, containers, user manuals, labels, etc.) and some manufacturing processes. We request suppliers to regularly check for possible updates of the RSL to remain informed of the latest changes in all legislative and policy obligations at http://www.philips.com/shared/global/assets/sustainability/rsl.pdf.

The BOMcheck substances list which also includes REACH SVHC’s, Proposition 65 substances and RoHS exemptions can be found at the following link: https://www.bomcheck.net/suppliers/restricted-and-declarable-substances-list
## 3 PRODUCTS CONTENT RESTRICTIONS AND DECLARATIONS

### TABLE 1: RoHS Substances Restrictions in products

Restrictions are derived from EU RoHS Directive. Similar legislation is increasingly adopted in other regions and for other non-EEE applications (e.g., in EU REACH). The restrictions in this Table apply to all Philips products on homogeneous material level in all regions.

<table>
<thead>
<tr>
<th>Substances (remark 1)</th>
<th>Maximum Concentration Limit ppm (mg/kg)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cadmium and Cadmium compounds (remark 2)</td>
<td>100</td>
</tr>
<tr>
<td>Hexavalent Chromium compounds (remark 2)</td>
<td>1000</td>
</tr>
<tr>
<td>Lead and Lead compounds (remark 2)</td>
<td>1000</td>
</tr>
<tr>
<td>Mercury and Mercury compounds (remarks 2 and 3)</td>
<td>1000</td>
</tr>
<tr>
<td>Polybrominated diphenyl ethers (PBDEs) (remark 4)</td>
<td>1000</td>
</tr>
<tr>
<td>Polybrominated biphenyls (PBBs)</td>
<td>1000</td>
</tr>
</tbody>
</table>

1. The restrictions do not apply to the exemption limits in the European Directive RoHS (2011/65/EU), and exemption limits in other RoHS type of regulations like the Canadian CEPA-SOR/2014254. They also do not apply to batteries and automotive applications as these are covered by other legislation (see e.g. EU battery directive 2006/66/EC, see also Table 4). The list of EU RoHS exemptions, EU battery directives and EU ELV directive can be found in BOMcheck. Heavy metal restrictions for batteries and packaging are given in Tables 4 and 7, respectively.

2. Maximum concentration limit applicable for the metal (i.e., Cd, Cr⁶⁺, Pb and Hg) and not for the compounds.

3. Besides the RoHS obligations, Lighting Products should also comply with the Ecodesign /ERP directive 2009/125/EC (Implementing measure EC No 245/2009), therefore, a declaration via BOMcheck is required including: (1) providing the average amount of Mercury per lamp in x, x mg (ErP); and (2) indicating the relevant RoHS exemption number within the section on RoHS in BOMcheck system.

4. Polybrominated diphenylethers (PBDE) are the same as polybrominated biphenylethers (PBBE); polybrominated diphenyloxides (PBDO) are the same as polybrominated biphenyl oxides (PBBO).

### TABLE 1.1 Upcoming EU RoHS Restrictions in products

Phthalates, DEHP, BBP, DBP and DiBP are part of EU RoHS in July 2019 (medical devices, category 8 in July 2021). To prepare for product compliance, the 4 phthalates are declarable substances as of 2015. The declaration threshold, 1000 ppm, applies to all Philips products on homogeneous material level in all regions.

<table>
<thead>
<tr>
<th>Substances</th>
<th>Maximum Concentration Limit ppm (mg/kg)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bis (2-ethylhexyl)phthalate; Di (2-ethylhexyl) phthalate (DEHP), CAS 117-81-7</td>
<td>1000</td>
</tr>
<tr>
<td>Dibutyl phthalate; Di-n-butyl phthalate (DBP), CAS 84-74-2</td>
<td>1000</td>
</tr>
<tr>
<td>Benzyl butyl phthalate; Butyl benzyl phthalate (BBP), CAS 85-68-7</td>
<td>1000</td>
</tr>
<tr>
<td>Diisobutyl phthalate; Di-i-butyl phthalate (DiBP), CAS 84-69-5</td>
<td>1000</td>
</tr>
</tbody>
</table>

Note: as per 7 July 2020 ([EU/2018/2005 of 17 December 2018) these substances (individually or in any combination (i.e., sum)) will be restricted in a concentration equal to or greater than 0.1 % by weight of the plasticised material in the article, except for medical devices and EEE. It will also apply to toys and childcare articles.
### TABLE 2: REACH Article 67 Substance Restrictions in products and packaging

These substances are equivalent to the relevant restrictions as included in article 67 of the EU REACH regulation. Unless otherwise stated the limits are on homogeneous material level. Philips enforces the limits worldwide.

<table>
<thead>
<tr>
<th>Substances</th>
<th>Maximum Concentration ( \text{Limit ppm (mg/kg)} ) or as given in the table</th>
<th>Particular use and further remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asbestos (all types)</td>
<td>No intentionally added content</td>
<td></td>
</tr>
<tr>
<td>Dibutyltin (DBT) compounds</td>
<td>1000</td>
<td>0.1% by weight of tin in a material, used as heat stabilizer</td>
</tr>
<tr>
<td>Dimethylfumarate</td>
<td>0.1</td>
<td>Used as pesticides and biocides, e.g. in silica gel bags in packaging.</td>
</tr>
<tr>
<td>Tri-substituted organostannic compounds</td>
<td>1000</td>
<td>0.1% by weight of tin in a material, used as pesticides and biocides</td>
</tr>
<tr>
<td>Tar oils and creosotes</td>
<td>No content permitted</td>
<td>In wood or wooden material as preservative</td>
</tr>
<tr>
<td>Monomethyl dibromodiphenyl methane (DBBT)</td>
<td>No additionally added content</td>
<td></td>
</tr>
<tr>
<td>Monomethyl dichlorodiphenyl methane (Ugilec 121 or Ugilec 21)</td>
<td>No additionally added content</td>
<td>Used as dielectrics</td>
</tr>
<tr>
<td>Monomethyl tetrachlorodiphenyl methane (Ugilec 141)</td>
<td>No additionally added content</td>
<td></td>
</tr>
<tr>
<td>Polychlorinated terphenyls (PCTs)</td>
<td>No additionally added content</td>
<td></td>
</tr>
<tr>
<td>1,2,4-Trichlorobenzene</td>
<td>1000</td>
<td>Currently restricted in Norway (1000 ppm in all applications or for textiles 1 ( \mu \text{g/cm}^2 )). All applications except medical devices from 4 July 2020 restricted above 0.025 ppm by REACH; RSL/BOMCheck limit before 2018 was not intentionally added/1000 ppm); This 1000 ppm limit will be the limit for medical devices until 2032. PFOA, for example, is used as surfactant in manufacture of some fluoropolymers and fluoroelastomers.</td>
</tr>
<tr>
<td>Perfluorooctanoic acid (PFOA) and its salts</td>
<td>0.025</td>
<td></td>
</tr>
</tbody>
</table>

**Valid from:** 2019-03-06  
**Expires:** 2020-06-30  
**Doc. Owner:** Claudia Albuquerque  

© 2019 Koninklijke Philips N.V.  
**Organization:** Group Sustainability  
**Function:** Ecodesign, Compliance and Regulatory  

Printed copies are FOR REFERENCE ONLY, always confirm printed copies with the online current version.
### Substances

<table>
<thead>
<tr>
<th>Substances</th>
<th>Maximum Concentration Limit ppm (mg/kg) or as given in the table</th>
<th>Particular use and further remarks</th>
</tr>
</thead>
</table>

#### Additional restrictions which apply to parts used in toys and childcare products

- **Sum of selected Phthalates Group 1 (BBP, DBP, DEHP)**: 1000 ppm
  - In plasticized material
- **Sum of selected Phthalates Group 2 (DIDP, DINP, DNOP)**: 1000 ppm
  - In plasticized material when used in toys and childcare articles which can be placed in the mouth
- **Benzene**: 5 ppm
  - Toys
- **Dioctyltin (DOT) compounds**: 1000 ppm
  - Plastic or rubber material coming to repetitive skin or oral cavity contact in toys and childcare articles, in force for products placed on market after 27th December 2015
  - See Table 6 for additional requirements on PAH

#### Additional restrictions which apply to parts that contain leather and textiles

- **Dioctyltin (DOT) compounds**: 1000 ppm
  - 0.1% by weight of tin in a material
- **Azocolourants and azodyes which form certain aromatic amines**: 30 ppm
  - Not permitted in textile and leather articles
- **Tris-[1-aziridinyl] phosphinoxide**: No content permitted
  - Not permitted in textile articles
- **Tri-[2,3-dibromo-propyl] phosphate**: No content permitted
  - Not permitted in textile articles

#### Additional restrictions which apply to parts that come into contact with skin

- **Nickel and nickel alloys (see remark 5)**: 0.5 µg/cm²/week
- **Any individual PAH compound (see list under remark 6)**: 1 ppm
  - Plastic or rubber material coming to repetitive skin or oral cavity contact in consumer articles, in force for products placed on market after 27th December 2015
  - See Table 6 for additional requirements on PAH

#### Additional restrictions which apply to parts which contain chemical products (liquids, gases, powders; as substance or preparation)

- **Nonylphenol and nonylphenol ethoxylates compounds**: 1000 ppm
  - For example, use in textile processing
### Substances

<table>
<thead>
<tr>
<th>Substances</th>
<th>Maximum Concentration Limit ppm (mg/kg) or as given in the table</th>
<th>Particular use and further remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>1000</td>
<td>For example, use in cleaners</td>
</tr>
<tr>
<td>Pentachlorophenol (PCP)</td>
<td>1000</td>
<td></td>
</tr>
</tbody>
</table>

5. ECHA guidance on defining "direct and prolonged skin contact can be found at: [http://echa.europa.eu/documents/10162/13641/nickel_restriction_prolonged_contact_skin_en.pdf](http://echa.europa.eu/documents/10162/13641/nickel_restriction_prolonged_contact_skin_en.pdf). Does not apply to Medical devices and associated equipment. Medical device safety standards require biocompatibility testing to ensure that chemical substances, which may contact patients during use per the device’s intended use, do not pose a health risk, specifically with respect to biocompatibility.


#### TABLE 3: Substances restricted or declarable by other legislation in products and packaging.

Unless otherwise stated the limits are on homogeneous material level. Philips enforces the limits worldwide.

<table>
<thead>
<tr>
<th>Substances</th>
<th>Maximum concentration limit ppm (mg/kg) or as given in the Table</th>
<th>Particular use / Legislation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Restrictions for electrical and mechanical products in all applications</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>No intentionally added content</td>
<td>in composite wood products or components (plywood, particle board and MDF) and textiles</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(see remark 7); U.S. EPA TSCA Title VI/ California ATCM.</td>
</tr>
<tr>
<td>Polychlorinated and polybrominated dioxins and furans</td>
<td>No intentionally added content</td>
<td>EU POP regulation.</td>
</tr>
<tr>
<td>Radioactive substances</td>
<td>No intentionally added content</td>
<td>Japan Law Concerning Prevention from Radiation Hazards; EU-D 96/29/Euratom.</td>
</tr>
<tr>
<td>Pentachlorophenol (PCP)</td>
<td>No intentionally added content</td>
<td>EU Biocidal Product Regulation; applied in wood and furniture (5 ppm, Germany and Switzerland); Applied in all products (Denmark, no limit); For textiles in Korea 0.05 ppm for children textile/leather, 0.5 ppm for adult’s textile/leather.</td>
</tr>
<tr>
<td>Biocides</td>
<td>No intentionally added biocide</td>
<td>EU Biocidal Product Regulation; Medical devices are exempted.</td>
</tr>
</tbody>
</table>

Valid from: 2019-03-06  Expires: 2020-06-30

Doc. Owner: Claudia Albuquerque

© 2019 Koninklijke Philips N.V.

All rights reserved. Reproduction in whole or in part is prohibited without the written consent of the copyright owner.

**Printed copies are FOR REFERENCE ONLY, always confirm printed copies with the online current version**
<table>
<thead>
<tr>
<th>Substances</th>
<th>Maximum concentration limit ppm (mg/kg) or as given in the Table</th>
<th>Particular use / Legislation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Perfluorooctane sulfonate (PFOS) compounds</td>
<td>1000</td>
<td>1000 ppm in all articles and semi-finished products, in textiles 1 µg/m2 of the coated material; EU POP legislation</td>
</tr>
<tr>
<td>Benzenamine, N-phenyl-, reaction products with styrene and 2,4,4-trimethylpentene (BNST)</td>
<td>No intentionally added content</td>
<td>e.g., as lubricant; Canada regulation.</td>
</tr>
<tr>
<td>Hexabromocyclododecane (HBCDD) and its main diastereoisomers</td>
<td>100</td>
<td>EU POP regulation 2016/293 on persistent organic pollutants; use as flame retardant</td>
</tr>
<tr>
<td>Alkanes, C10-13, chloro (SCCP; Short chained chlorinated paraffins)</td>
<td>No intentionally added content</td>
<td>Applied as plasticizers and flame-retardants; Legislation in The Netherlands: no intentionally added content; Please note, Restricted by EU POP regulation 2015/2030 on persistent organic pollutants when applied in articles in concentrations higher than 0.15 % by weight.</td>
</tr>
<tr>
<td>Polychloronaphthalenes</td>
<td>No intentionally added content</td>
<td>With one or more chloro atoms; applied as stabilizer and flame retardant in plastics; UN Stockholm Convention on POPs, Swiss, Canada and Japan legislation</td>
</tr>
<tr>
<td>Polychlorinated biphenyls (PCBs)</td>
<td>No intentionally added content</td>
<td>EU POP regulation; use as plasticizers, flame retardants and dielectrics</td>
</tr>
</tbody>
</table>

**Additional Restrictions which apply to parts used in toys and childcare products**

<table>
<thead>
<tr>
<th>Compounds</th>
<th>Limit / Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tris[2-chloroethyl]phosphate (TCEP; CAS 115-96-8)</td>
<td>No content permitted (see remark 8 for legislation)</td>
</tr>
<tr>
<td>Tris[2-chloro-1-methylethyl] phosphate (TCP; CAS 13674-84-5)</td>
<td></td>
</tr>
<tr>
<td>Tris(1,3-dichloro-2-propyl)phosphate (TDCPP/TDCP; CAS 13674-87-8)</td>
<td></td>
</tr>
<tr>
<td>Lead and lead compounds</td>
<td>100 Applied in accessible parts in toys and childcare products; US Consumer Product Safety Improvement Act</td>
</tr>
<tr>
<td>Lead and lead compounds</td>
<td>90 Applied in paint and similar coatings; US Consumer Product Safety Improvement Act</td>
</tr>
</tbody>
</table>

**Additional restrictions which apply to parts which come into contact with food**

<table>
<thead>
<tr>
<th>Compounds</th>
<th>Limit / Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>BPA (Bisphenol A)</td>
<td>No content permitted In all food contact materials in consumer products (see remark 9); French legislation</td>
</tr>
</tbody>
</table>

**Additional requirements which apply to parts used in medical devices**

<table>
<thead>
<tr>
<th>Compounds</th>
<th>Limit / Declaration</th>
</tr>
</thead>
<tbody>
<tr>
<td>BPA (Bisphenol A)</td>
<td>Declare If manufactured from raw materials using BPA or derived of BPA and if used in medical devices and part comes in contact with patient or patient fluids (e.g., via intravenous, inhalation, oral exposure, contact with skin, or as an implant). Canadian legislation</td>
</tr>
</tbody>
</table>
### Substances

<table>
<thead>
<tr>
<th>Substances</th>
<th>Maximum concentration limit ppm (mg/kg) or as given in the Table</th>
<th>Particular use / Legislation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Latex</td>
<td>No intentionally added content</td>
<td>The United States FDA requires all medical devices and its packaging which contain natural rubber (Latex) or dry natural rubber that can contact human skin to be marked per FDA User Labeling for Devices that Contain Natural Rubber (21 CFR 801.437)</td>
</tr>
<tr>
<td>CMR 1A and 1B substances and endocrine disrupting substances (EDCs)</td>
<td>1000</td>
<td>Justify and label or restrict in any material which has invasive contact with the patient, or any material which transports or stores fluids or gases which contact the patient, per definition in EU MDR 2017/745 Annex 1 Section 10.4; the BOMCheck information page on this entry provides a substances list for CMR1A and 1B and EDCs likely to be used in medical devices in scope.</td>
</tr>
</tbody>
</table>

**Additional restrictions which apply to parts which contain chemical products (liquids, gases, powders; as substance or preparation)**

<table>
<thead>
<tr>
<th>Ozone depleting substances</th>
<th>No intentionally added content</th>
<th>All applications; Montreal protocol and EU Regulation No 2037/2000</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alkanes, C10-13, chloro (SCCP; Short chained chlorinated paraffins)</td>
<td>10000</td>
<td>Restricted by EU POP regulation 2015/2030 on persistent organic pollutants when applied in preparations in concentrations higher than 1 % by weight</td>
</tr>
<tr>
<td>Fluorinated Greenhouse gases (PFC, SF6, HFC)</td>
<td>Specific permission needed</td>
<td>EU regulation 517/2014</td>
</tr>
</tbody>
</table>

7. Composite wood finished goods must be labeled showing compliance either with U.S. EPA TSCA Title VI regulation or the California Air Resources Board (CARB) Airborne Toxic Control Measures (ATCM) Phase II emission standards. Formaldehyde emission from materials: Emission from hardwood plywood (HW PW) veneer core is 0.05 ppm after 1-Jan-2010. HW PW composite core emission limit is 0.05 ppm from 1-July-2012. Emission limit from particle board (PB) is 0.09 ppm from 1-Jan-2011. Emission limit from medium density fibreboard (MDF) is 0.11 ppm from 1-Jan-2011. Emission limit from thin medium density fibreboard (MDF) is 0.13 ppm from 1-Jan-2011. Composite wood is defined by California Code of Regulations (CCR), Title 17, Section 93120.1. Refer to CCR, Title 17, Section 93120.9 for test methods.

8. TRIS flame retardants are regulated for childcare articles and children’s products in Canada, EU toy directive 2009/48/EC and by US states New York, Maryland, Vermont. US District of Columbia restricts TCEP and TDCPP in consumer products for children under 12 years of age from 2018 onwards and in all consumer products from 2019 onwards. See the BOMCheck online guidance for more details on legislation.

9. For Philips consumer products, a policy banning BPA applies to all food contact materials in appliances introduced to market since 1 January 2012;
### TABLE 4: Substance Legislative Restrictions in Batteries

The limits are on battery level. Philips enforces the limits worldwide.

<table>
<thead>
<tr>
<th>Substances</th>
<th>Maximum concentration limit ppm (mg/kg)</th>
<th>Remarks/Legislation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cadmium and cadmium compounds (see remarks 2 and 10)</td>
<td>10</td>
<td>EU battery directive</td>
</tr>
<tr>
<td>Mercury and mercury compounds</td>
<td>1</td>
<td>Chinese Standard GB 24427-2009</td>
</tr>
<tr>
<td>Lead and lead compounds (see remark 10 and 11)</td>
<td>40</td>
<td>Chinese Standard GB 24427-2009</td>
</tr>
<tr>
<td>Perchlorates in all batteries</td>
<td>0.006</td>
<td>Labelling requirement in Californian regulation</td>
</tr>
</tbody>
</table>

10. Cadmium use is exempted for batteries used in emergency lighting (see European Battery directive (2006/66/EU), and for some spare parts for electric vehicles (2009/127/EC) and the amendment (2011/37/EU)). Additionally, cadmium and lead compounds use is exempted for batteries in some automotive applications (see European ELV directive (2000/53/EC) and the amendment (2011/37/EU)).

11. The lowest restriction limit for non-alkaline zinc-manganese dioxide batteries is 1000 ppm from Conama 257/99 (Brazil) and from Swiss legislation. The IEC 62474 database includes a restriction on Lead and Lead compounds in all types of batteries of 0.004% (40 ppm) by weight of battery based on Chinese Standard GB 24427-2009 (Alkaline zinc manganese dioxide batteries) and the EU battery directive.
TABLE 5.1: REACH Candidate List Substances Declaration used in all product and product-packaging related applications (Article 33).

The limits are on REACH article level. Philips enforces the limits worldwide.

Due to the fact that the European Chemicals Agency updates this list at least twice a year, we refer to the http://echa.europa.eu/chem_data/candidate_list_table_en.asp for the most recent list of candidate substances. BOMcheck will also contain the most recent list of SVHC and separates between those SVHC which are likely to be found in electronics and those that are not. Please see the lists for substances likely to be present in product and packaging applications in the following link: Link to BOMcheck.

The use of an SVHC is allowed (unless otherwise stated in any of the other Tables in the RSL). However, when the concentration on the article level is found to be above the limits stated here, declaration is obligatory. For definitions, such as “Article”, please see the Annex 1.

TABLE 5.2: California proposition 65 substances used in all product and product-packaging related applications, which are not included in any other Table in the RSL.

The limits are on homogeneous material level. Philips enforces the limits worldwide.

Prop 65 requires companies doing business in California to provide a “clear and reasonable” warning via product labeling before knowingly and intentionally exposing anyone to a Prop 65 Listed Chemical, unless the manufacturer can show that the anticipated exposure level will not pose a significant risk of cancer, or is significantly below levels observed to cause birth defects or other reproductive harm. Safe Harbor Levels exist for some Listed Chemicals and include No Significant Risk Levels (NSRLs) for cancer-causing chemicals and Maximum Allowable Dose Levels (MADLs) for chemicals causing reproductive toxicity. These levels are measured in µg/day and must take into account all exposure routes (e.g. inhalation, oral, dermal). When the product exposes individuals to chemicals above the Safe Harbor Level, a clear and reasonable warning must be provided by the manufacturer. When no Safe Harbor Level is available and the product contains a Prop 65 Listed Chemical, a manufacturer also would be required to provide a Proposition 65 warning, unless the manufacturer can show that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

Due to the fact that OEHHA updates the Prop65 list regularly, we refer to the list in BOMcheck. BOMCheck will only show those substances which are likely to be found in hardware products and electrical and electronic equipment and are not listed elsewhere in BOMCheck. Please see this list in the following link: Link to BOMcheck.
### TABLE 6: Industry Specific Substances Restrictions and Declarations in products and packaging.

Unless otherwise stated the limits are on homogeneous material level. Philips enforces the limits worldwide. These restrictions and declarations go beyond legislation and are included due to upcoming legislation and customer requirements.

<table>
<thead>
<tr>
<th>Substances</th>
<th>Restricted or declarable</th>
<th>Maximum Concentration or declaration Limit ppm (mg/kg)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Restrictions for electrical and mechanical products in all applications</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Beryllium and Beryllium Compounds by weight of any material (see remark 12)</td>
<td>Declarable</td>
<td>1000</td>
</tr>
<tr>
<td>Brominated Flame Retardants in printed wiring board laminate (other than PBBs, PBDEs and HBCDD); restriction/declaration threshold for total bromine concentration by weight in homogeneous material used in printed wiring laminates (see remark 13)</td>
<td>Restricted in consumer products, declarable in professional Lighting products and Medical devices (see remarks 13 and 14)</td>
<td>900</td>
</tr>
<tr>
<td>Brominated Flame Retardants (other than PBBs, PBDEs and HBCDD) in any plastics parts; restriction/declaration threshold for total bromine concentration by weight in homogeneous material used in plastics (see remark 13)</td>
<td>Declarable</td>
<td>1000</td>
</tr>
<tr>
<td>Polyvinyl Chloride (PVC) and polyvinyl chloride copolymers in total chloride concentration by weight in homogeneous material (see remark 14)</td>
<td>Declarable</td>
<td>1000</td>
</tr>
<tr>
<td>Chlorinated Flame Retardants in printed wiring board laminate; declaration threshold for total chlorine concentration by weight in homogeneous material used printed wiring laminates</td>
<td>Declarable</td>
<td>900</td>
</tr>
<tr>
<td>Chlorinated Flame Retardants in any plastics parts; declaration threshold for total chlorine concentration by weight in homogeneous material used in plastics</td>
<td>Declarable</td>
<td>1000</td>
</tr>
<tr>
<td>Antimony trioxide in plastic materials;</td>
<td>Declarable</td>
<td>1000</td>
</tr>
<tr>
<td>Phthalates (see remark 15)</td>
<td>Declarable</td>
<td>1000</td>
</tr>
<tr>
<td><strong>Additional restrictions which apply to parts used in lamps and lamp ballasts</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Antimony compounds in glass of lamp bulbs</td>
<td>Restricted</td>
<td>1000</td>
</tr>
<tr>
<td>Arsenic compounds in glass of lamp bulbs</td>
<td>Restricted</td>
<td>1000</td>
</tr>
<tr>
<td>PAH (Polycyclic aromatic hydrocarbons) in potting material for electronic ballast of lamps</td>
<td>Restricted</td>
<td>50</td>
</tr>
<tr>
<td><strong>Additional restrictions which apply to parts which come into contact with skin</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Azocolourants and azodyes which form certain aromatic amines (see remark 16)</td>
<td>Restricted</td>
<td>30</td>
</tr>
<tr>
<td>PAH compounds (German product safety requirement for consumer products)</td>
<td>Restricted</td>
<td>See Annex III for limit values</td>
</tr>
<tr>
<td><strong>Additional restrictions which apply to parts that contain leather and textiles</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Alkylphenol and alkylphenol ethoxylates (see remark 17)</td>
<td>Restricted</td>
<td>100</td>
</tr>
</tbody>
</table>
12. By making these substances declarable, Philips intends to collect information on the presence of the Beryllium and Beryllium compounds also when no feasible technological alternatives exist, such as in the following applications: i) Be metal and BeO used in X-Ray applications, ii) BeO as ceramic heat-resistant in semiconductors, iii) Be metal alloy (e.g., BeCu), and iv) BeO used in high power RF resistors.

13. Philips is pursuing a phase out of the use of BFRs in consumer products newly put on the market. Mains power supply cordsets are exempt from this policy. The use of BFRs needs to be declared to Philips via the BOMcheck system. For Philips consumer products organobromine compounds in the form of flame retardants should not be used in parts, components, materials, or products in concentrations equal to or greater than 0.09% (900 ppm maximum of Bromine) by weight in any homogeneous material. BFRs are declarable for professional Lighting products and Medical Devices and main power supply cordsets.

14. Philips is pursuing a phase out of the use of PVC in consumer products newly put on the market. Therefore, the use of PVC needs to be declared to Philips via the BOMcheck system. For Philips consumer products organochlorine compounds in the form of polyvinyl chloride or PVC copolymers should not be used in parts, components, materials, or products in concentrations equal to or greater than 0.1% (1000 ppm maximum of Chlorine) by weight in any homogeneous material. Mains power supply cordsets are exempt from this PVC phase out. PVC is declarable for professional Lighting products, Medical devices and mains power supply cordsets.

15. E.g., phthalates used in parts of a device (or a device itself) intended to administer and/or remove medicines, body liquids or other substances to or from the body, or in devices intended for transport and storage of such body fluids or substances; EU Medical Device Directive; See further in Annex II for all legal requirements for phthalates.

16. This restriction of Azo dyes goes beyond the legal restriction under REACH article 67 (see Table 2) as Philips restricts the use of Azo dyes in all applications that come into contact with the skin, and not only for textiles and leather. Also two additional aromatic amines are restricted in Philips compared to the 22 aromatic amines restricted under REACH Article 67, based on regulation in Japan, Thailand and China. These 2 additional aromatic amines are: 2,6-xylidine (CAS: 87-62-7) and 2,4-xylidine (CAS: 95-68-1).

17. Increasing number of alkyl phenols and their ethoxylates are becoming regulated under legislation, e.g. EU Reach restriction in 2021 for textiles and leather (100 ppm). In view of the increasing concern and attention focused on these alkylphenols and their ethoxylates, a precautionary approach is taken to restrict the allowable concentration of these substances in parts to <0.01% w/w. Examples of such alkylphenols, including their ethoxylates are octylphenol and nonylphenol.

### TABLE 7: Additional restrictions in Product-Packaging

*Unless otherwise stated the limits are on homogeneous material level. Philips enforces the limits worldwide.*

<table>
<thead>
<tr>
<th>Legislative Substances</th>
<th>Maximum concentration limit ppm (mg/kg)</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sum of Heavy metals (Cd, Hg, Cr(6+) and Pb)</td>
<td>100</td>
<td>EU packaging directive</td>
</tr>
<tr>
<td>Arsenic compounds, applied for wood packaging</td>
<td>No intentionally added content</td>
<td>REACH Article 67, bans the use of arsenic compounds for the preservation of wood</td>
</tr>
<tr>
<td><strong>Industry substances</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Polyvinyl chloride (PVC) and (P)VC copolymers</td>
<td>1000</td>
<td></td>
</tr>
<tr>
<td>Expanded polystyrene (EPS) and other polymeric foam materials inside any consumer product packaging</td>
<td>Not permitted</td>
<td>For example, EPP, EPE, EVA as shock absorber buffers enclosing the product, excluding thin foam sheets and foam bags.</td>
</tr>
</tbody>
</table>

Valid from: 2019-03-06  
Expires: 2020-06-30  
Doc. Owner: Claudia Albuquerque  

© 2019 Koninklijke Philips N.V.  
All rights reserved.  
Reproduction in whole or in part is prohibited without the written consent of the copyright owner.
### TABLE 8: Substances restricted in Manufacturing Processes

<table>
<thead>
<tr>
<th>Substances</th>
<th>Maximum concentration limit ppm (mg/kg)</th>
<th>Application</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hexavalent Chromium (Cr 6+) and compounds (see remark 18)</td>
<td>Not permitted</td>
<td>Not permitted in passivation processes</td>
</tr>
<tr>
<td>Ozone Depleting Substances (see remark 19)</td>
<td>Not permitted</td>
<td>Not permitted in any manufacturing processes</td>
</tr>
</tbody>
</table>

18. Due to the difficulties to control the plating Cr6+ process, posing compliance risks of products (e.g. RoHS) brought to the market by Philips, this substance must not be used in any passivation process. Passivation process here means the process where metal surface is getting hexavalent chromium conversion coating, leaving hexavalent chromium residues on the processed surface.

19. Use of Ozone Depleting Substances in processes is subject of federal excise tax law applied to all imported electronics in USA. The substances are also internationally banned under UNEP Montreal Protocol on Substances that Deplete the Ozone Layer and incorporated in the REACH Regulation under article 67.
ANNEX 1 - Definitions and interpretation of certain terms

1.1. Declaration on homogeneous material (EU RoHS) level

A homogenous material is a single substance such as a thermoplastic, for example the PVC insulation on insulated copper wire. Components such as capacitors, transistors and semiconductor packages are not regarded as “materials” but instead contain several different homogenous materials. For example, a semiconductor package will contain at least six homogenous materials as shown in Figure 1. The RoHS materials restrictions apply to each of these individual homogenous materials.

![Material breakdown of an Integrated Circuit (IC) component](image)

Figure 1: Material breakdown of an Integrated Circuit (IC) component

Substance 'X' < 0.1% at Homogeneous Material level means:
- Plastic encapsulation  →  X < 0.1%
- Bond wire  →  X < 0.1%
- Silicon ship  →  X < 0.1%
- “Lead Frame” coating (Cu)  →  X < 0.1%
- “Lead Frame” coating (Sn)  →  X < 0.1%
- Die Attach  →  X < 0.1%
- Etc.

1.2. Article Definition

An article means an object, which during production is given a special shape, surface or design, which determines its function to a greater degree than does its chemical composition. The European Court of Justice ruled on 10th September 2015, on EU REACH Regulation article definition, that each of the articles, that are assembled or joined together in a complex product, remain as articles and are covered by the relevant duties to notify and provide information when they contain a Substance of Very High concern in a concentration above 0.1% of their mass.
## ANNEX 2 - Summary Table of Phthalate Restrictions

<table>
<thead>
<tr>
<th>Chemical name</th>
<th>Abbreviation</th>
<th>CAS No.</th>
<th>EU RoHS restricted from 2019</th>
<th>Restriction REACH, CSPIA (1,2)</th>
<th>Proposition 65 declarable</th>
<th>Declaration as industry substance</th>
<th>MDD (3) labeling</th>
<th>REACH declarable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bis(2-ethylhexyl)phthalate; Di(2-ethylhexyl) phthalate</td>
<td>DEHP</td>
<td>117-81-7</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x (4)</td>
</tr>
<tr>
<td>Dinonyl phthalate; Di(2-nonyl) phthalate</td>
<td>DNP</td>
<td>28333-12-0; 62515-48-0</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x (4)</td>
</tr>
<tr>
<td>Diisobutyl phthalate; Di-i-butyl phthalate</td>
<td>DIBP</td>
<td>84-69-5</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x (4)</td>
</tr>
<tr>
<td>Diisononyl phthalate; Diisononyl phthalate</td>
<td>DINP</td>
<td>68515-68-1; 68515-69-1</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Di-n-octyl phthalate</td>
<td>DNOP</td>
<td>117-84-0</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Di-n-hexyl phthalate</td>
<td>DNOP</td>
<td>117-84-0</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>1,2-Benzenedicarboxylic acid, di-C6-8-branched alkyl esters</td>
<td>DIHP</td>
<td>71888-89-6</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>1,2-Benzenedicarboxylic acid, di-C7-11-branched and linear</td>
<td>DHNUP</td>
<td>68515-42-4</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Bis(2-methoxyethyl) phthalate</td>
<td>DMEP</td>
<td>117-82-8</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>N-pentyl-isopentylphthalate</td>
<td>-</td>
<td>776297-69-9</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>1,2-Benzenedicarboxylic acid, dipentylester, branched and linear</td>
<td>DPP</td>
<td>131-16-0</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Dicycloseryl phthalate</td>
<td>-</td>
<td>605-50-5</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>1,2-Benzenedicarboxylic acid, dihexyl ester, branched and linear</td>
<td>-</td>
<td>68515-90-4</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>1,2-benzenedicarboxylic acid, di-C6-10-alkyl esters; 1,2-benzenedicarboxylic acid, mixed decyl and heptyl and octyl diesters with a 0.3% of dihexyl phthalate</td>
<td>-</td>
<td>68515-41-5 or 68544-93-1</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Docyclohexyl phthalate</td>
<td>-</td>
<td>84-61-7</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>1,2-benzenedicarboxylic acid, dipentylester, branched and linear</td>
<td>-</td>
<td>84777-06-0</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
</tbody>
</table>

1) REACH Restriction under article 67: Restriction applies to the sum of the phthalates (the sum of DEHP, DBP, BBP) and (the sum of DINP, DIDP, DNOP).
2) Same substances also restricted in CSPIA, USA: section 108 (see: https://cpsc.gov/Business-Manufacturing/Business-Guidance/Phthalates-Information)
3) MDD: Medical Devices Directive
4) REACH authorization per 21-02-2015

Valid from: 2019-03-06  
Expires: 2020-06-30  
Doc. Owner: Claudia Albuquerque

© 2019 Koninklijke Philips N.V.  
All rights reserved.  
Reproduction in whole or in part is prohibited without the written consent of the copyright owner

Printed copies are FOR REFERENCE ONLY, always confirm printed copies with the online current version
ANNEX 3 – Detailed Requirements for Consumer Product Skin Contact Parts for PAH Compounds in Germany

The German GS-Mark on product safety ("Geprüfte Sicherheit") has revised their PAH-limits for consumer products.

Three different product categories have been defined:
1. Material is used in a toy and prolonged skin contact is intended or product material is intended to be placed in the mouth
2. During the intended use of the product, material is has prolonged skin contact or repeated short term skin contact
3. During the intended use of the product, material only has short term skin contact.

For each category, material needs to fill not only the total maximum allowable sum for all 18 PAHs, but also the individual PAH substance limits described in the table below.

In Table 2 of this RSL you will find the EU REACH restrictions on PAH. The REACH-restricted PAH-compounds have been marked in the table below.

<table>
<thead>
<tr>
<th>Substance</th>
<th>CAS</th>
<th>1) Materials intended to be placed in the mouth and toy materials with intended prolonged skin contact (&gt;30 sec.) [mg/kg]</th>
<th>2) Materials which do not fall under Cat. 1, with foreseeable prolonged skin contact (&gt;30 sec.) or repeated short term skin contact. [mg/kg]</th>
<th>3) Materials which do not fall under Cat. 1 and 2, with foreseeable short term skin contact (&lt;30 sec.). [mg/kg]</th>
<th>EU REACH restricted PAH [x]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzo[a]pyrene (BaP)</td>
<td>50-32-8</td>
<td>0.2</td>
<td>0.5</td>
<td>&lt;1</td>
<td>x</td>
</tr>
<tr>
<td>Benzo[a]anthracene</td>
<td>56-35-3</td>
<td>0.2</td>
<td>0.5</td>
<td>&lt;1</td>
<td>x</td>
</tr>
<tr>
<td>Chrysene</td>
<td>118-01-9</td>
<td>0.2</td>
<td>0.5</td>
<td>&lt;1</td>
<td>x</td>
</tr>
<tr>
<td>Benzo[b]fluoranthene</td>
<td>107-99-2</td>
<td>0.2</td>
<td>0.5</td>
<td>&lt;1</td>
<td>x</td>
</tr>
<tr>
<td>Benzo[k]fluoranthene</td>
<td>107-08-9</td>
<td>0.2</td>
<td>0.5</td>
<td>&lt;1</td>
<td>x</td>
</tr>
<tr>
<td>Dibenz[a,h]anthracene</td>
<td>53-70-3</td>
<td>0.2</td>
<td>0.5</td>
<td>&lt;1</td>
<td>x</td>
</tr>
<tr>
<td>Benzo[j]fluoranthene</td>
<td>105-82-3</td>
<td>0.2</td>
<td>0.5</td>
<td>&lt;1</td>
<td>x</td>
</tr>
<tr>
<td>Benzo[e]pyrene</td>
<td>192-97-2</td>
<td>0.2</td>
<td>0.5</td>
<td>&lt;1</td>
<td>x</td>
</tr>
<tr>
<td>Indeno[1,2,3-c,d]pyrene</td>
<td>193-39-5</td>
<td>0.2</td>
<td>0.5</td>
<td>&lt;1</td>
<td>x</td>
</tr>
<tr>
<td>Benzo[g,h,i]perylene</td>
<td>191-24-2</td>
<td>0.2</td>
<td>0.5</td>
<td>&lt;1</td>
<td>x</td>
</tr>
<tr>
<td>Acenaphthylene</td>
<td>108-96-8</td>
<td>&lt;1</td>
<td>&lt;10</td>
<td>&lt;50</td>
<td></td>
</tr>
<tr>
<td>Acenaphthene</td>
<td>83-32-8</td>
<td>&lt;1</td>
<td>&lt;10</td>
<td>&lt;50</td>
<td></td>
</tr>
<tr>
<td>Fluorene</td>
<td>56-73-7</td>
<td>&lt;1</td>
<td>&lt;10</td>
<td>&lt;50</td>
<td></td>
</tr>
<tr>
<td>Phenanthrene</td>
<td>85-01-08</td>
<td>&lt;1</td>
<td>&lt;10</td>
<td>&lt;50</td>
<td></td>
</tr>
<tr>
<td>Anthracene</td>
<td>120-12-7</td>
<td>&lt;1</td>
<td>&lt;10</td>
<td>&lt;50</td>
<td></td>
</tr>
<tr>
<td>Fluoranthene</td>
<td>206-44-0</td>
<td>&lt;1</td>
<td>&lt;10</td>
<td>&lt;50</td>
<td></td>
</tr>
<tr>
<td>Pyrene</td>
<td>128-00-0</td>
<td>&lt;1</td>
<td>&lt;10</td>
<td>&lt;50</td>
<td></td>
</tr>
<tr>
<td>Naphthalene</td>
<td>91-20-3</td>
<td>&lt;1</td>
<td>&lt;10</td>
<td>&lt;50</td>
<td></td>
</tr>
<tr>
<td>Sum of 18 PAH</td>
<td></td>
<td>&lt;1</td>
<td>&lt;10</td>
<td>&lt;50</td>
<td></td>
</tr>
</tbody>
</table>
### ANNEX 4 - Revision History

<table>
<thead>
<tr>
<th>Date</th>
<th>Revision</th>
<th>Short Explanation</th>
</tr>
</thead>
</table>
| March 2019 |          | • Version 14 – Typo correction  
• Alignment with BOMcheck version 5.2.  
• Section 1.1: removed versions numbers of RSL and BOMcheck (moved into Annex 4). |
| January 2019 |          | • Version 13  
• BOMcheck (declaration) “tool” changed into “system”.  
• Table 0 aligned with Table 6: added clarification that lighting products exempted are “professional”; deleted exemption for “mains power supply cordsets” for BFR restriction at 900 ppm; added “(P)VC copolymers” to BFR and PVC restriction at 1000 ppm.  
• Section 2.2, added “Proposition 65 substances” to the substances that can be found in BOMcheck substances list.  
• Table 1: added remark with clarification on maximum concentration limit applicable for the metal (i.e, Cd, Cr6+, Pb and Hg) and not for the compounds.  
• Remarks numbering and references updated accordingly.  
• Table 1.1, added note informing that as per 7 July 2020 new requirements on phthalates from EU/2018/2005 of 17 December 2018 will apply.  
• Table 3: corrected TCPP name by adding “phosphate”.  
• Table 3: added new entry (label and justify or restrict) for additional requirements which apply to parts used in medical devices “CMR 1A and 1B substances and endocrine disrupting substances (EDCs)”.  
• Table 4: added reference to remark 2 for cadmium and cadmium compounds restriction.  
• Table 6: changed “Beryllium Guide” to “Beryllium compounds”; added “by weight of any material”; changed from “restricted” into “declarable”.  
• Table 6: added clarification that PVC requirements also apply to “polyvinyl chloride copolymers”.  
• Table 6: correction/alignment with BOMcheck for chlorinated flame retardants declarable from 900 ppm by replacing “plastics” for “printed wiring laminates” and chlorinated flame retardants declarable from 1000 ppm by replacing “printing laminates” for “plastics”.  
• Remark 12 on Beryllium adapted to explain the changes in the Beryllium requirements (Table 6) from restricted (when feasible alternatives exist) into declarable (to collect information also when no feasible technological alternatives exist.  
• Annex 2, note 2: new hyperlink added for the Phthalates Business Guidance & Small Entity Compliance Guide  
• Annex 2: updated RSL Table references for Proposition 65 (“RSL Table 5.2”) and for REACH declarable (“RSL Table 5.1’); changed Proposition 65 from “restricted” into “declarable”; deleted remarks 3), 4) and 5) on Proposition 65 and other remarks renumbered.  
• Format changes. |
| May 14, 2-18 |          | • Version 12  
• California Proposition 65 legislation substances are added in Table 5.2 as declarable substances. The California Proposition 65 listed in previous RSL versions are removed from Table 3 and visible in Table 5.2 in version 12.  
• Medical device exemptions are added for Biocides in Table 3 and PFOA in Table 2.  
• Phthalates, when present in specific medical devices need labelling under the current EU MDD legislation are transferred from Table 3 to Table 6 to better align with BOMcheck.  
• Scope is adapted to have non-Philips branded and owned products when by-packed or integrated in Philips owned products in scope of RSL.  
• Table 0 only contains 2 instead of 4 differences between Philips RSL and BOMcheck.  
• Tables 2, 3 and 6 are also valid for packaging now. Table 7 shows only the additional requirements for packaging.  
• Further alignment between BOMCheck and RSL took place in listing of substances per application. Skin contact and leather & textiles are listed under textiles & leather now. |
February 8, 2018
- Version 11
- The restriction for Perfluorooctanoic acid (PFOA) and its salts is set from 1000 ppm for all applications and no additionally added content for textile and leather applications to 25 ppb due to upcoming EU REACH legislation per July 2020.
- The restrictions for Azo colourants containing certain amines is changed to Asocolourants and azodies which form certain aromatic amines (Table 2 and 6). The maximum concentration limit is changed from “No content permitted” to 30 mg/kg.
- Biocides are added to Table 3 to declare with threshold No intentionally added biocide content due to the EU Biocidal Product Regulation;
- Following text is added to comment 8: US District of Columbia restricts TCEP and TDCPP in consumer products for children under 12 years of age from 2018 onwards and in all consumer products from 2019 onwards. It is noted here that businesses falling into this scope should take care of this additional requirement.

Nov 30, 2017
- Version 10.
- SUS-007 identification added to be able to link the document to the new E2E PEPEF processes. Content remains the same as previous version: PHGR-GS-BP01-012 version 9.

May 15, 2017
- Version 8 and 9.
- RSL version 8 is not published. RSL version 8 is aligned with BOMcheck 4.8, RSL version 9 with BOMcheck 4.9.
- Separate categories has been made within the Tables for leather and textiles, toys and childcare, chemical products, skin contact applications, medical devices, food contact applications, lamp and lamp ballasts.
- Scope of RSL slightly adapted on page 1 to have it mandatory for all Philips and Philips branded and licensed products only.
- Fluorinated Greenhouse gases (PFC, SF6, HFC) added to Table 3 replacing the SF6 entry, due to EU regulation 517/2014. Will be active in BOMcheck version 4.9.
- 3 phthalates with CMR class 1b have been added to Annex 2, due to labelling requirements under the current MDD (Table 3).
- 2 azo dyes added to Table 6 additional to REACH due to requirements in Japan, Thailand and China
- Annex 3 on PAHs has been made clearer.
- Phenols in Table 6 changed into Alkylphenols and their ethoxylates in leather and textile applications (100 ppm, Table 6) due to upcoming legislation and customer demands. Will be active in BOMcheck version 4.9.
- PCP has been adjusted in Table 3 to no intentionally added content as threshold due to the EU biocide directive. PCP was also restricted due to various country legislations with a 5 ppm or even lower limit depending on the application. See Further in Table 3. Will be active in BOMcheck version 4.9.
- Mains power supply cordsets exempted for PVC/BFR restriction in Table 6.
- Table 0 adapted to the changes not included in BOMcheck yet and format adapted
- Phthalates DiDP, DnHP and DiNP have been added to Table 3 to align with BOMcheck and due to California proposition 65 requirements.
- Exemption for BeO used in high power RF resistors added to industry restrictions for Be compounds in Table 6.
- Threshold was changed from “no content permitted” to “no intentionally added content” for PCTs, DBBT, Ugleics 21 or 121 and 141 in Table 2 to align with BOMcheck and other similar restrictions. Will be active in BOMcheck version 4.9.
- Perchlorate was added to Table 4 for batteries due to a labelling requirement in California legislation. This will be active in BOMcheck version 4.9.

April 2016
- Version 7
- Table 3: Application text and threshold changed for Alkanes, C10-13, chloro (SCCP; Short chained chlorinated paraffins) and Hexabromocyclododecane (HBCDD) and its main diastereoisomers due to EU POP regulations 2015/2030 and 2016/283.
- Minor text changes in Chapter 1.3, 2.1 and 2.2.
January 2016

- Version 6
- Edited the Table 0 to reflect the differences between RSL and Bomcheck list of reportable and declarable substances
- Table 2, the subheader “Substances which are liquids at room temperature” changed to “Restrictions applicable to substances and preparations”
- Table 3, added restriction for hexabromocyclododecane, HBCDD
- Table 3, restrictions to the use of named phthalates (DEHP, BBP, DBP, DIDP and DNHP for cables in headsets and DEHP, BBP and DBP in bags, pouches and other accessories) from Table 6 to emphasize the obligatory restrictions
- Table 3, included the term “food contact” in the subheader “Parts used in medical devices or in toys and childcare products” to correctly reflect the scope of BPA restriction
- Table 4, added a remark to the footnote for lead compounds “For zinc chloride zinc manganese batteries, the concentration limit 1000 ppm is applied”
- Table 7, foam use in packaging restriction scope clarified
- Table 8, Hexavalent chromium passivation term clarified
- Annex I, article definition changed due to EU Official Court ruling on 10th September 2015
- Annex II, included phthalate 1,2-benzenedicarboxylic acid, di-C6-10-alkyl esters; 1,2-benzenedicarboxylic acid, mixed decyl and hexyl and octyl diesters with ≥ 0.3% of dihexyl phthalate (EC No. 201-559-5)

January 2015

- Version 5
- Edited the Table 0 to reflect the differences between RSL and Bomcheck list of reportable and declarable substances
- Added new Table 1.1 describing the RoHS phthalates; now declarable and restricted from 2019 onwards
- Corrected Table 2 PAH restriction scope: any PAH compound instead of sum of PAH
- Table 2, added a footnote to official guidance on prolonged skin contact for nickel
- Table 2, benzene requirement clarified
- Table 3, formaldehyde requirement aligned with wording in Bomcheck
- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Trist[2-chloro-1-methyl(ethyl) phosphate (TCP); CAS 13674-84-5
- Table 3, clarified the scope of lead in paint and similar coatings
- Table 3, added a footnote describing the Philips BPA policy
- Table 4, lead compounds in batteries limit value updated
- Table 6, replaced outdated PAH and Benzo(a)pyrene limits with reference to detailed requirement found in ANNEX 3
- Table 6, the scope of PVC restriction clarified; also vinylchloride copolymers belong to the scope (previously mentioned in PVC footnote)
- Table 7, included other foam polymeric packaging materials into the scope of EPS ban
- Annex 2: Phthalate table updated
- Annex 3: Detailed requirements for PAH compounds for German GS mark added

February 2014

- Version 4, GS-BP01-2014-001 (change to ISO conform version numbering, 4th version RSL)
- Added a remark on additional requirements which apply to special products into paragraph 1.1 Purpose
- Edited the Table 0 to reflect the differences between RSL and Bomcheck list of reportable and declarable substances
- Clarified the restriction for phthalates under REACH Article 67 restrictions, Table 2
- Added REACH Article 67 regulation for PAH compounds to Table 2 with footnote listing the restricted substances. Restriction will be in force from 27th Dec 2015
- Transferred the Californian Formaldehyde emissions requirement from Table 8 (Transport Emissions) to Table 3
- Added the new restriction on PFOA originating from Norway to Table 3
- Added the restrictions on TCEP and TDCPP in toys and childcare, and in children’s products originating from state-level legislation in USA to Table 3
- Corrected the restriction of PAH compounds limit for to be taken into the mouth or in contact with the skin of small children to Table 6 parts

Valid from: 2019-03-06
Expires: 2020-06-30
Doc. Owner: Claudia Albuquerque

© 2019 Koninklijke Philips N.V.
All rights reserved. Reproduction in whole or in part is prohibited without the written consent of the copyright owner.
Printed copies are FOR REFERENCE ONLY, always confirm printed copies with the online current version
- Added the list of PAH compounds with their CAS numbers as a footnote to Table 6
- Removal of Table 8 (Transport emissions), replaced by internal control document
- Added a summary of Phthalate requirements in the RSL to the Annex 2

February 2013
- Version C, CSO-BP01-2013-001
- Lead and lead compounds in primary alkaline zinc-manganese dioxide batteries to 40 ppm in line with China Standard: GB 24427-2009
- Lead and lead compounds in non-alkaline zinc-manganese dioxide batteries to 1000 ppm in line with Brazil Legislation (CONAMA Resolution 401/2008)
- Cadmium in batteries to 10 ppm in line with change in Swiss legislation (20 ppm) and Korean legislation (10 ppm)
- RSL further aligned with BOMcheck and legislation (addition of antimony trioxide in plastics to Table 6, SF6 to Table 3 (Austrian Legislation), thresholds for dimethylfumarate, organo stannic compounds and arsenic compounds in products and/or packaging
- Certain tin compounds (DBT and DOT) moved from table 6 to Table 2 (REACH article 67)
- Phthalates in some applications moved from Tables 2 and 3 to Table 6 and further specified which phthalates need to be declared if not asked elsewhere in the RSL.
- Ozone depleting substances and PFOS moved from Table 2 to Table 6
- Phenols in Table 6 have been further specified.
- Philips policy on PVC and Bromine and Chlorine flame retardants has been slightly adapted in Table 6.
- Added Diisobutyl phthalate (DIBP) 84-69-5 in footnote 7 to align with the essential requirements of the EU Medical Devices Directive.

15.09.2011
- Version B, CSO-BP01-2011-001
- Clarified in Section 1.1 where the RSL deviates from BOMcheck
- Changed Lead and lead compounds restriction limit from 300 to 100 ppm in line with US Legislation.
- Reorganized sequence of the Tables and a number of substances so it is the same sequence as BOMcheck (www.bomcheck.net)
- Paragraph explaining different thresholds moved from chapter 2.2 to chapter 1.4
- Added clarification that waivers may be obtained to stimulate use of recycled content in chapter 1.3
- Added chapter 2.3 Demonstrating compliance through BOMcheck
- Revision in Chapter 3 moved completely to Annex II
- Adjusted the schedule for Medical device's RoHS compliance in Chapter 3, Table 1
- Added hyperlink to RoHS recast in Official Journal of European Union and to BOMcheck with ELV and RoHS exemptions in Chapter 3, Table 1
- Adjusted table sub-header to "toys and childcare products" in Chapter 3, Table 2
- Organostannic compounds restriction corrected to "tri-substituted organostannic compounds in Chapter 3, Table 2
- Dioctyltin and Dibutyltin compounds restrictions added to Chapter 3, Table 6.
- Removed remarks from asbestos, Ozone depleting substances, PFOS exemptions in Chapter 3, Table 2 Added new legislation concerning the phthalates use, based on Proposition 65 of California, USA, to Chapter 3, Table 3
- Added a remark on the phthalates in the scope of new Proposition 65 regulation in Chapter 3, Table 3
- Added CAS-numbers and corrected faulty EC numbers for medical devices phthalates remark in Chapter 3, Table 3
- Formaldehyde, radioactive substances and lead advisory remarks removed in Chapter 3, Table 3
- Added new batteries regulations to Chapter 3, Table 4
- Cadmium remark for Medical devices removed from Chapter 3, Table 4
- Added word "declarations" to better describe the contents of Chapter 3, Table 6 contents
- Removed explanatory remark for PAH compounds in Chapter 4, Table 5
- Arsenic compounds concentration limit changed from 10 ppm to "no content permitted" in Chapter 3, Table 6
- Removed the substances table for REACH Candidate list substances and added a reference to BOMcheck as source of information for Chapter 3, Table 7
- Old Table 7 contents moved to be part of Chapter 3, Table 3
- Old Table 8 contents moved to be part of Chapter 3, Table 3

© 2019 Koninklijke Philips N.V.
All rights reserved. Reproduction in whole or in part is prohibited without the written consent of the copyright owner. Printed copies are FOR REFERENCE ONLY, always confirm printed copies with the online current version
### Annex I on RoHS exemptions removed

- New reference PE_005520
- Old references: SUS‐007; PHGR‐GS‐BP01‐012

#### Version: 14

- Classification: UNCLASSIFIED
- Page 25 of 26

<table>
<thead>
<tr>
<th>Date</th>
<th>Changes</th>
</tr>
</thead>
</table>
| 22‐3‐2010  | - Version A, CSO‐BP01‐2010‐001  
- The Philips Regulated Substances List covers not only restricted, but also declarable substances and, therefore, replaces both the Restricted and Relevant Substances Lists in Products (CSO‐BP01‐2006‐11 and CSO‐BP01‐2006‐12).  
- The layout of the Philips RSL was aligned with the BOMcheck IT System.  
- Hg declaration - EPI(2009/125/EC) Implementing measure EC No 245/2009 and Philips policy for Lighting products in anticipation of the revision the EU ROHS exemption list.  
- List of exemptions of Annex 1 updated (new exemptions added according to Decision 2009/443/EC. Expired exemptions are crossed out).  
- Updated Annex 1 with exemptions for ROHS Categories 8 and 9 in anticipation of ROHS Recast.  
- The List has been broadened from Substances in products to other relevant applications like packaging and transport material. Also regulated declarable substances as requested by REACH have been included.  
- Dimethylfumarate restricted in all applications according to Decision 2009/251/EC.  
- Restriction of Phenol and Phenolic compounds in PCB's was removed, as there is no reason to believe it still represents a problem in this application.  
- SCCP are no longer restricted but declarable, in line with the REACH regulation.  
- PVC and BFR declaration should comply with Industry guide – IEC 61249‐2‐21.  
- Limits for (gas) emissions from products, product-packaging and transport material as to fulfil with Dutch requirements. (http://www.vrominspectie.nl/actueel/publicaties/uitvoering‐motie‐poppe‐boelhouwer‐containers‐met‐gevaarlijke‐gassen.aspx). Substances being controlled are Carbon monoxide, Carbon dioxide, Cyanide, Ammonia, Sulfurylfluoride, Chloropicrine, Dichloroethane, Benzene, Styrene, Toluene and Xylene and fumigants, Phosphine and Methyl bromide.  
- Lead in Childcare products according to USA requirements was added.  
- Beryllium: exemption Be metal alloy added (where no feasible technological alternative exist).  
- EU ROHS substances for medical devices were added to the restricted List with a phase-out date of 1‐1‐2013.  
- Formaldehyde emission levels from composite wood have been changed according to California legislation  
- Restriction to Cr6+ in processes limited to passivation processes  
- EU ROHS exemptions lists is replaced by the December 3 2008 EU Commission proposal  
- Annex 1.1 is added with an explanation on homogeneous and article product declaration  
- Beryllium: few exemptions and possibility for waivers were included.  
- Cadmium and Mercury declaration obligation above 50 ppm, moved from the footnote to one of the remarks just below the table for more visibility. There was no change on the content.  
- Perfluorotane Sulfonates (PFOS's) compounds were added to the list as they were restricted as from 27 June 2008 (EU DIRECTIVE 2006/122/ECOF).  
- Sum of all Polycyclic Aromatic Hydrocarbons (PAHs) (16 mentioned in EPA list) and Benzoapyrene: Those substances are included in the UNECE Protocol to be formalized in Regulation 850/2004/EEC on Persistent Organic Pollutants (POPs). Furthermore, also the "German Stiftung Warentest" or GS imposes this requirements for consumer products, based on the German transposition of the General Product Safety Directive (2001/95/EC) and the regulation on food contact materials (EC/1935/2004) to justify the legal basis for this requirement.  
- Formaldehyde: requirements have been split into two categories, namely in products (e.g. wooden loudspeakers, bread roasters, etc.) and packaging material (incl. transportation material, like pellets). Official requirements exist in many countries, like Germany Chem Verbot, Denmark statut. order nr 289, Austria, Norway, Poland, Lithuania, Finland, The Netherlands, USA – CA (93120‐93120.12, title 17, California Code of Regulations). The limits in CA for HWPW were corrected.  
- Restricted Substances in Batteries: to follow legislation.  
- Chlorobenzene: general "chlorobenzene" was replaced by the two hazardous forms, hexachlorobenzene and trichlorobenzene (CMR 1 and 2, respectively). |
• Chromium 6+ in plating process: Due to the difficulties to control the plating Cr6+ process, posing compliance risks of products brought to the market by Philips, it is proposed to fully restrict use of this substance in any plating or passivation process.

• Ozone Depleting Substances in processes: ODCs are subject of federal excise tax law applied to all imported electronics in USA. As part of federal efforts to implement the Montreal Protocol, the U.S. tax code applies excise taxes on the importation of a range of products – including electronics – based on the use or presence of banned/restricted ODCs. These taxes apply even if the ODCs were only used as process chemicals in the manufacture of the products and were never intended to be in the finished product. While there is a minimis exception for certain types of products, this exception does not apply to electronics. Prove of non-use must be delivered in order to apply for exemption.

• For clarity and help, annexes containing a list with exemptions and more detailed information about the substances of this list (CAS numbers, names, legislation information, use) were added.

1-1-2007

• Due to its toxicity (CMR category 1) and to prepare ourselves on REACH, Beryllium is made restricted now.

• To solve problems at numerous suppliers, who only guarantee the ROHS limits, the restriction thresholds limits for Cd in plastics and Hg are changed to the ROHS limits (100 and 1000 ppm, respectively). To be sure that these supplied materials have Cd and Hg concentrations well below the legal ROHS limits, declaration above 50 ppm is introduced for these substances. Therefore also the text “declaration threshold” is changed into “restriction threshold” on the restricted substance list.

• Some minor text changes are made for phthalates on the restricted list and lead reporting for PMS on the relevant list.