

Munich, July 17th, 2023

RoHS-REACH Declaration of Conformity

Declaration of Conformity – RoHS

Herewith we confirm the conformity of our products with the Restriction of Hazardous Substances (RoHS) Directive 2011/65/EU and the directive 2015/863/EU of the European Parliament and the Council for restricting the application of hazardous substances in electric and electronic devices.

We further confirm the compliance of our products with the permissible ceiling concentrations in homogenous materials in weight percent as follows.

The list of Restrictions may be accessed on the website of ECHA.
<https://echa.europa.eu/de/candidate-list-table>

According to attachment II of the directive, eCOUNT embedded GmbH confirms that all products, unless otherwise noted, are produced in compliance with RoHS.

Furthermore, eCOUNT confirms that we take all necessary organizational measures to meet the requirements after the introduction of REACH. From today's point of view and against the background of the information provided by our suppliers, it is unlikely that any of the substances of very high concern (SHVC substance) listed in the list will be included in the list up to and including June 14th, 2023 in a mass concentration above 0.1 percent.

The use of lead in refractory grades (ie lead-based solder alloys) containing at least 85 percent by weight of lead, current exception 7a in Annex III of the RoHS Directive, categories 1 to 7 and 10 (exemptions 24) (Lead in solders for discoidal and planar array multilayer ceramic capacitors with metallized holes) are excluded from exception 7a). The relevant communication from the EU Commission and the implementing regulation can be found here:
https://ec.europa.eu/info/law/better-regulation/initiatives/c-2018-1076_en

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Declaration of Conformity – REACH

eCOUNT embedded GmbH as a producer of electric and electronic goods is classified as «downstream handler» (German: «nachgeschalteter Anwender») in the sense of REACH regulation 1907/2006. Duties and liabilities for pre-registration or registration (ECHA) based on the production and bringing into circulation of substances and chemicals are therefore not effective for eCOUNT embedded GmbH.

Our products are manufactured items and therefore not to be defined as substance or preparation. Furthermore, the items manufactured by eCOUNT embedded GmbH do not evaporate or lay off any substances as long as operated under normal and foreseeable conditions.

Consequently, eCOUNT embedded GmbH is not subject to any registration duty nor the duty to issue safety datasheets. To continuously provide our customers with reliable and safe products, eCOUNT embedded GmbH do apply regular audits to ensure that our suppliers comply with all requirements related to the usage of chemical substances and materials.

Thus, we are certain that no substances or materials from the list of alarming substances (SVHC) are used for the production of our products.

<https://echa.europa.eu/candidate-list-table> (last update 06/14/2023)

In doing so, eCOUNT embedded GmbH is guided by the duties as outlined in the «Guideline ECHA for downstream handlers» (German: «Leitlinien der ECHA für nachgeschaltete Anwender»).

eCOUNT embedded GmbH


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