

January 1, 2025

20250101-GSS-ENG-06

To Whom It May Concern,

On January 3, 2013, European Union Directive 2011/65/EU on the Restriction of the use of certain Hazardous Substances (hereinafter referred to as RoHS 2) took effect.<sup>1</sup> On July 22, 2019 (July 22, 2021 for medical devices and monitoring and control instruments), EU Directive 2015/863/EU (hereinafter referred to as RoHS 3) amended EU Directive 2011/65/EU, adding an additional four restricted substances and maximum concentration values to those in RoHS 2 Annex II. The primary objective of RoHS is to address concerns related to waste electrical and electronic equipment (WEEE). Hazardous substances in this equipment could be released during waste processing and have a detrimental impact to human health and the environment.

Gibson Stainless & Specialty, Inc. (GSS) products are designed for and intended to be used in subsystems of buildings and industrial installations, and, as such, fall under the definition of large-scale fixed installations (Article 3(4)). That is, GSS products are intended to be permanently installed by professionals in pre-defined and dedicated locations as part of large-scale combinations of apparatus. They are also intended to be de-installed by professionals should the need arise. Under Article 2(4)(e), these large-scale, fixed installations are exempt from the regulation of this directive.

Despite the fact that RoHS 3 does not apply to our products, GSS provides the following information regarding the requirements of the Directive and our full product line; the Directive restricts the following substances to the listed maximum concentration values (by weight percent in homogeneous materials):

- Lead (Pb) (0.1%),
- Mercury (Hg) (0.1%),
- Cadmium (Cd) (0.01%),
- Hexavalent chromium (Cr VI) (0.1%),
- Polybrominated biphenyls (PBB) (0.1%),
- Polybrominated diphenyl ethers (PBDE) (0.1%),
- Bis (2-ethylhexyl) phthalate (DEHP) (0.1%),
- Butyl benzyl phthalate (BBP) (0.1%),
- Dibutyl phthalate (DBP) (0.1%), and
- Diisobutyl phthalate (DIBP) (0.1%).

Gibson Stainless & Specialty, Inc. provides this letter to declare that the substances detailed above have not been added to the products in our line during the manufacturing process and that they are not present natively in any of the raw materials in values exceeding the maximum concentration value in homogeneous materials.

If there is anything further you need please feel free to contact GSS at (724) 838-8320.

Sincerely,



Daniel R. Weimer  
Vice President, Engineering & Compliance  
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<sup>1</sup> (Note: This directive superseded EU Directive 2002/95/EC, restriction of hazardous substances (RoHS) in electrical and electronic equipment, which had taken effect July 1, 2006 and was amended as part of EU Directive 2015/863 on March 21, 2015.)