

Statement Regarding RoHS Compliance

RoHS is a European directive aimed at the control and use of certain hazardous substances in the manufacture of new electrical and electronic equipment. RoHS stands for the “restriction on the use of certain hazardous substances in electrical and electronic equipment”. The RoHS Directive applies to products placed on the European market and each member state has its own legislation, in the UK the RoHS Directive is implemented through the RoHS Regulations (Statutory Instrument SI2008 No. 37).

RoHS restricts the use of a range of flame retardants such as polybromated Bi-phenyls (PBB) and polybromated di-phenyl esters (PBDE), and the heavy metals; cadmium, hexavalent chromium, lead and mercury. There are some exemptions for the use of these hazardous substances, for technical purposes where currently viable alternatives do not exist, and there are also permissible maximum concentration limits that allow for trace amounts of these substances.

In the UK RoHS regulations apply to those businesses defined as producers that:

- manufacture or assemble electrical or electronic equipment in the UK
- import electrical or electronic equipment from outside Europe
- re-badge electronic products as their own brand.

Further information can be obtained from the RoHS website: www.rohs.gov.uk

As surface coatings manufacturers we do not come under these regulations as we do not produce and sell electrical equipment, however HMG products could be used in electrical equipment, so we understand there can be a need to determine if our products are RoHS compliant.

Ultimately HMG Paints Limited do not have a legal responsibility to provide RoHS statements or test reports, but these can be arranged if required. If test reports are required there would be a cost associated with the necessary independent testing. Furthermore testing of our paint products still does not guarantee RoHS compliance of the final saleable item as HMG products may very well be compliant, but other material used by the electrical equipment manufacturer may not.

HMG Paints Limited has set up a system to identify the presence of any substances listed in the RoHS directive provided by our raw material suppliers, and we have also compiled a list of non-compliant raw materials. HMG Paints Limited do not purposely add Hexavalent Chromium, Mercury, Cadmium, PBB and PBDE to our products, but we do use Lead Chromate products that obviously contain lead and chromium, and we also use zinc containing products that can contain small amounts of cadmium. So to minimise the possible risk of using any of our products containing non-compliant materials customers should only order “lead-free” products and also avoid using “zinc-rich” primers, again individual products can be independently tested, but this would incur additional costs.

The fact that HMG Paints Limited do not purposely add non-compliant materials does not also guarantee RoHS compliance, ultimately it is the responsibility of the electrical equipment manufacturer to ensure compliance through testing on the final product/components.

HMG Quality Assurance Department

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