

WEEE Reg. No. DE 15466059

Notice Regarding the Electrical and Electronic Equipment Act (ElektroG) and WEEE / RoHS

By way of the following information we would like to inform you fundamentally about the current status relating to compliance with the new law and about the steps that have been initiated by CeoTronics AG:

1. WEEE / ElektroG

The law on the putting-into-circulation, the taking-back and the environmentally friendly disposal of electrical and electronic equipment (Electrical and Electronic Equipment Act – ElektroG) of 16 March 2005¹ regulates among other things the waste disposal duties of the manufacturers of such equipment. The directive 2002/96/EC on waste electrical and electronic equipment (WEEE - Waste Electrical and Electronic Equipment) of 27.01.2003 is the basis for this.²

Our comments:

- We are familiar with the regulations of the Electrical and Electronic Equipment Act relating to the taking-back and disposal of waste electrical and electronic equipment and shall of course comply with these.
- The registration required in accordance with Section 6 (2) of the Electrical and Electronic Equipment Act (ElektroG) with the EAR (waste electronic equipment register foundation) has been successfully completed. In our capacity as a manufacturer of professional electrical and electronic equipment of category 3 (information and telecommunications technology equipment) we have been registered since 16.08.2005, with effect as of 24.11.2005, and are therefore allowed to continue putting these devices into circulation.
- Our registration number is DE 15466059. This number will be shown on our written business correspondence as of 24.11.2005 in compliance with Section 6 (2) Point 4 of the Electrical and Electronic Equipment Act (ElektroG).
- Furthermore, we shall ensure that any products that we put into circulation for the first time from 24 March 2006 onwards are durably marked so that the manufacturer can be identified unambiguously. When the device was put into circulation for the first time can be determined by means of our serial number, which is applied to the outside or inside of the product.

2. RoHS / ElektroG

Substance bans for lead, mercury, cadmium, hexavalent chromium and brominated flame protection agents shall come into effect in compliance with Section 5 of the Electrical and Electronic Equipment Act (ElektroG) for new electrical and electronic equipment that is put into circulation as of 01.07.2006. The directive 2002/95/EC for restriction of the use of specific hazardous substances in electrical and electronic equipment (RoHS – Restriction of Hazardous Substances) of 27.01.2003³ and its updates are the basis for this.⁴

According to Section 5 (1) Point 1 of the Electrical and Electronic Equipment Act (ElektroG) it is prohibited as of 01.07.2006 to put into circulation new electrical and electronic equipment that contains more than 0.1 per cent by weight each of lead, mercury, hexavalent chromium, polybrominated biphenyl (PBB) or

¹ Pronounced in the Federal Law Gazette Part I no. 17 of 23 March 2005; page 762 onwards, download available from: <http://www.bmu.de/files/pdfs/allgemein/application/pdf/elektrog.pdf>.

² See: Official Bulletin of the European Union no. L37 of 13.02.2003, page 24 onwards, download available from: http://europa.eu.int/smartapi/cgi/sga_doc?smartapi!celexapi!prod!CELEXnumdoc&lg=EN&numdoc=32002L0096&model=quichett
See: Official Bulletin of the European Union no. L37 of 13.02.2003, page 19 onwards, download available from: http://europa.eu.int/smartapi/cgi/sga_doc?smartapi!celexapi!prod!CELEXnumdoc&numdoc=32002L0095&model=quichett&lg=de

³ See: Official Bulletin of the European Union no. L214 of 19.08.2005, page 65; no. L271 of 15.10.2005, page 48 onwards and no. L280 of 25.10.2005, page 18 onwards; download available from: http://europa.eu.int/eur-lex/lex/LexUriServ/site/en/oj/2005/l_214/l_21420050819en00650065.pdf, http://europa.eu.int/eur-lex/lex/LexUriServ/site/en/oj/2005/l_271/l_27120051015en00480050.pdf and http://europa.eu.int/eur-lex/lex/LexUriServ/site/en/oj/2005/l_280/l_28020051025en00180019.pdf.

polybrominated diphenyl ether (PBDE) per homogeneous material and 0.01 per cent by weight of cadmium per homogeneous material.

Our measures:

- Several older products will be terminated as of 01.06.2006 for reasons of non-conformity with either the above mentioned EU directive or the Electrical and Electronic Equipment Act (ElektroG). Spare parts and spare part assemblies will remain available as long as the corresponding components are available on the open market and the legality for its manufacture in compliance with the law continues to exist. Subassemblies and/or components can be prematurely cancelled without replacement for reasons of uneconomicalness (for example, decreasing demand, higher prices for older components or prefabricated materials...).
- In the event of terminations there will be fundamentally no special service or sales information bulletins. For individual products/product groups we shall be offering the possibility of a last purchase as of 28.02.2006 with delivery up to 31.05.2006. We shall be writing to the appropriate customers. All terminated products will be announced on our web site www.ceotronics.com only.
- We shall probably continue to manufacture all our products up to 30.06.2006 with lead content / non-compliant with RoHS, because quite a lot of the components used will not be changed over by the manufacturers until sometime during the next few months. Not until April/May 2006 onwards shall we be able to state correctly whether and what products will be able to be manufactured and delivered in compliance with RoHS as of 01.07.2006.

At this point we expressly draw attention to the fact that up to and including 30.06.2006 products that are not yet RoHS compliant may still be put into circulation for the first time. This means that you in your capacity as the end-customer, retailer or distributor may legally purchase these products up to and including 30.06.2006 and continue to sell them after 01.07.2006, because these products will have been put into circulation for the first time prior to the deadline on 01.07.2006. Please take note of the following quotation:

“ ‘Putting into circulation’ is the initial provision either subject to payment or gratuitously of a product on the community market for distribution or use within the territory of the community.”⁵

At this point we assure you that we shall do everything necessary to meet the new requirements to the full extent. Please consider this declaration to be a statement of principle. We request your understanding that for cost reasons we must refrain from issuing any further advance information bulletins or individual commitment declarations.

We hope that we shall continue to work together intensively and successfully.

Rödermark, 02.01.2006

Yours sincerely



per proc. Rolf Dieter Gläsel
Manager of the Purchasing and Production Divisions



per proc. Stefan Felke
Manager of the Technical Division

⁵ See: Guide to implementation of the directives formulated in accordance with the new concept and the overall concept, page 18 subsection 2.3, published by the European Commission, download available from:
<http://europa.eu.int/comm/enterprise/newapproach/legislation/guide/document/guidepublicde.pdf>