



Date: February 2026

RE: RoHS Recast Declaration (RoHS 3)

The European Union's original RoHS Directive 2002/95/EU has been superseded with the recast RoHS Directive 2011/65/EU and is also known as RoHS 2 effective in January of 2013. This revision contained no changes to the original restricted materials and maximum concentrations. However, in June 2015 the EU commission published a new Directive 2015/863 to amend the RoHS 2 Directive 2011/65/EU to include four (4) new restricted substances to the list. This directive has been identified as RoHS 3. The full list of substances noted in Directive (EU) 2015/863 Annex II (RoHS 3) is identified in the table below.

Substance	Max
Cadmium (Cd)	0.01%
Mercury (Hg)	0.1%
Lead (Pb)	0.1%
Hexavalent chromium (Cr ⁶⁺)	0.1%
Polybrominated biphenyls (PBB)	0.1%
Polybrominated diphenyl ethers (PBDE)	0.1%
Bis(2-Ethylhexyl) phthalate (DEHP) (2015)	0.1%
Benzyl butyl phthalate (BBP) (2015)	0.1%
Dibutyl phthalate (DBP) (2015)	0.1%
Diisobutyl phthalate (DIBP) (2015)	0.1%

10 hazardous substances will now be restricted in Electrical and Electronic Equipment (EEE) under EU RoHS 3.

Backer Hotwatt can state that all raw materials used in the manufacturing of our products are compliant with the RoHS 3 Directive list of substances and maximum limits. There are no RoHS substances contained in your parts/products above the listed threshold.

In addition, the RoHS Directive also requires the use of the CE mark to demonstrate compliance for finished electrical and electronic equipment (EEE). The responsibility for affixing the CE mark resides with the manufacturer of finished product only. Backer Hotwatt products are considered components only for EEE finished products. Therefore, Backer Hotwatt products must only meet the substance restrictions accordingly but do not need CE marking.

Sincerely,

Michael Parisi
Director of Operations