

POLICY STATEMENT

Re: RoHS and WEEE Directives

Batteries and RoHS and WEEE

We are asked regularly to confirm that the batteries we supply are compliant with the RoHS Directive (2002/95/EC) - and/or that we disclose their material breakdown concerning the substances targeted by it - and also that they are compliant with the WEEE Directive (2002/96/EC).

This is to inform you that batteries fall outside the scope of both of these Directives because the issues they address are already covered by a Directive specific to batteries.

This is stated in recital (9) of the RoHS Directive which gives precedence to the Battery Directive 91/157/EEC over the RoHS Directive. The Battery Directive 91/157/EEC governs substance restrictions in new batteries as well as collection and recycling schemes for spent batteries. The RoHS and WEEE Directives cannot be a competing instrument to regulate restrictions in batteries.

In addition, Article 2 of the RoHS Directive defines its scope to include electrical and electronic equipment falling under the categories 1,2,3,4,5,6,7 and 10 set out in Annex 1A to Directive No 2002/96/EC (WEEE) and to electric light bulbs and luminaries in households. Batteries are not included in any of these categories.

The WEEE Directive 2002/96/EC requires that producers (or third parties acting on their behalf) set up systems to provide for the treatment of WEEE. A list of substances or components that have to be removed is listed in Annex II of the Directive, amongst which are batteries and accumulators. There is no further requirement to separate the components of the batteries or to treat them in a specific way.

RoHS

It is our policy to ensure that all products that fall within the scope of the RoHS Directive are verified for compliance and labelled as such. In the overwhelming majority of cases nowadays, this is indicated on the packaging.

All of our Purchase Orders make RoHS compliance a standard requirement where appropriate. It is a part of our Goods In inspection procedure that we check for this, and where it is not present, we check for other evidence, most notably the delivery paperwork or occasionally on supplier websites, and add a label ourselves.

WEEE

The WEEE Directive applies to the Torches and Battery Chargers that we supply. In line with the requirements of this, we can provide you with the Producer Registration Number and Compliance Scheme of any of the suppliers of these products.

We trust this will be of assistance, however do not hesitate to contact us should you require further information.