

# INFORMATION TO WHOM IT MAY CONCERN

Subject : China RoHS 2

Manufacturer : ETA SA Manufacture Horlogère Suisse

Schild-Rust-Strasse 17 CH-2540 Grenchen

Product designation : All quartz movement mentioned at the quartz collection are

compliant as stated below.

### 1. Obligations related to the China RoHS 2

To our understanding, quartz watches fall within the definition of products concerned by China RoHS 2. Every watch company as a producer or importer of quartz watches in Mainland China may therefore be subject to certain obligations under China RoHS 2. We recommend that every watch company analyze the implications of this legislation for its activities carefully.

In accordance with a legal review of Swiss FH1, at this stage there seems to be no restriction regarding the placing on the market related to the presence of substances falling under the China RoHS 2 (lead, mercury, hexavalent chromium, cadmium, PBB, PBDE). As a consequence, the products of your watch company falling within the scope of China RoHS 2 and containing the above mentioned substances above the threshold limits can probably be imported or sold in Mainland China even if they contain such substances. Every watch company has to verify, whether this is actually true for its own products.

However the presence of these substances must be communicated to the consumer in a table placed in the user manuals for your products as provided for by China RoHS 2. The imposed substances and communication threshold limits are the same as those of the European RoHS: 0.1% for lead, mercury, hexavalent chromium, PBB and PBDE and 0.01% for cadmium.

Where a product concerned by the China RoHS 2 contains one or more substances above the imposed threshold limits, a symbol called EPUP or EFUP<sup>2</sup> must be provided to the consumer by the manufacturer of the product as provided for by China RoHS 2.

## 2. Substances in ETA quartz movements

The ETA quartz movement references listed in **Annex A** contain lead exceeding the limit defined in the Chinese standard GB/T 26572 in at least one homogeneous material of one of the following component parts:

- Copper alloys in some internal watch components
- Free machining steels in some internal watch components
- High melting point temperature solder used for hermetic sealing of microcrystal (not used in all models)

<sup>&</sup>lt;sup>1</sup> FH: Federation of the Swiss Watch Industry

<sup>&</sup>lt;sup>2</sup> EPUP : Environmental Protection Use Period ; EFUP : Environmentally Friendly Use Period.



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The information contained in the present document is in no way a substitute to the obligations of the entity responsible for the placing on the market of the finished product as per China RoHS 2.

Place, Date

Grenchen, December 2019

Binding signatures

Thierry Conus

Member of Management Board

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Head of Quality & Processes

#### ANNEX A:

- ETA quartz product ranges containing lead exceeding the limit defined in standard GB/T 26572;
  - Thermoline Flatline

  - 0 Normflatline
  - Trendline O
  - Fashionline