

ACPEIP (China-RoHS)

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ACPEIP is the abbreviation for **Administration on the Control of Pollution caused by Electronic Information Products**.

The ACPEIP, which was confirmed by the Peoples Republic of China on 28. February 2006 as an administrative ordinance, is often referred to as China-RoHS, because, as in the case of the European RoHS-Directive, the usage of toxic substances in electronic products is regulated. The stated prohibition of substances in both directives and the allowed maximum limits of concentration are identical, however, the ACPEIP allows no exceptions.

The following substances and allowed maximum limits of concentration were regulated:

- > 0,1 Weight in percent (= 1000 ppm) according to SJ/T11363-2006 for:
 - Lead
 - Mercury
 - Sexavalent Chrome
 - Polybromated Biphenyl (PBB)
 - Polybromated Diphenylether (PBDE)
- > 0,01 Weight in percent (= 100 ppm) according to SJ/T11363-2006 for:
 - Cadmium

The scope of ACPEIP covers all so called **Electronic Information Products (EIPs)**, which are manufactured and put on the market in China and applicable imported products for the Chinese market. The ACPEIP is not binding for EIPs that are manufactured in China and then exported.

Implementation of the regulations is carried out in two stages. The 1st. stage came into force on 1. March 2007 and covers **Product Description Marking, Disclosure of Substances of Content and Labelling of Packing Material**. In the 2nd. stage, not only the actual prohibited substances will become active but also the proof of laboratory tests will also be binding.

Components and electronic components only then fall under the obligation to be described when they are intended to be sold to Chinese end-users. Sub-suppliers can limit themselves to providing the necessary information (also electronically) to the manufacturers of the end-products, who need to describe and identify their end-products.

The aim of ACPEIP is to ensure a high level of protection of human health and the environment. This basic society aim is regarded by INGUN Prüfmittelbau GmbH as being both worthwhile and indispensable. For this reason, all business decisions and actions of INGUN Prüfmittelbau GmbH are always reviewed in regard to environmental aspects and their implications.

The question which needs to be clarified is to what extent Test Equipment Products fall within the scope of the ACPEIP and its directive. After reviewing the stipulations we take the following standpoint and confirm according to our present level of knowledge:

INGUN Prüfmittelbau GmbH being a manufacturer of Test Equipment to test Printed Circuit Boards (PCBs) supplies passive, not active components, such as spring-loaded Test Probes and appropriate Contacting Systems (Test Fixtures) which do not need any electric currents to fulfill at least one intended function.

Our spring-loaded Test Probes which are categorised as EIP-components according to the product list of the ACPEIP are not destined for the Chinese end-user, and therefore do not fall under the obligation of direct product description.

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As a sub-supplier, INGUN Prüfmittelbau GmbH is allowed to limit itself to providing the manufacturers of end-products the necessary information (also electronically), which is needed to describe their end-products.

INGUN Prüfmittelbau GmbH complies to the mentioned requirements as shown below:

1. Spring-loaded Test Probes and Receptacles:

Substances	铅	镉	汞	六价铬	多溴联苯	多溴二苯醚
	Pb	Cd	Hg	Cr6+	PBB	PBDE
Max. Concentration	0,1 %	0,01 %	0,1 %	0,1 %	0,1 %	0,1 %
Product:						
Spring-loaded Test Probes (Steel)	X	O	O	O	O	O
Spring-loaded Test Probes (Brass / CuBe)	X	O	O	O	O	O
Receptacles (Bronze)	O	O	O	O	O	O
Receptacles (Brass / New-silver [NiAg])	X	O	O	O	O	O



Key:

- O = Concentration below the max. threshold limit according to SJ/T11363-2006
- X = Concentration above the max. threshold limit according to SJ/T11363-2006

The **Environmentally Friendly Use Period (EFUP)** states the period of time of the intended usage of the product before any of the RoHS substances are likely to leak out and cause possible harm to health and the environment.

2. Packaging:

Our nonpolluting packaging - plastic box and plastic bag - is made of Acrylnitril-Butadien-Styrol (ABS) and of Polyethylene (PE).



To the best of our knowledge and considering our suppliers' information we can confirm, that our spring-loaded test probes and our nonpolluting packaging are compliant to the ACPEIP regulation of the Peoples Republic of China and we see no hindrance to put them on the market according to this law.

This statement was generated electronically and is also valid without a signature.

INGUN Prüfmittelbau GmbH

Konstanz, June 2019

The Management