

## Compliance Statement

### **SubliJet®, Artainium®, SubliM®, SubliM® Direct, M-ink®, ChromaBlast® and Rotech® Water-based Ink Jet Inks**

To whom it may concern,

Sawgrass Technologies Inc. hereby certifies that the above branded products do not contain any of the substances listed in 2002/95/EC (RoHS) as amended, in amounts greater than the stated threshold limits (see attachment for the limits and background to this legislation). Further, that the above products would not affect compliance with US CPSIA and Canadian ASTM standard for toys as described below.

ICP, UV-Vis & GC/MS analysis performed at an independent laboratory on the Sawgrass branded inks listed above provided the following data, confirming the above statement.

Test Item	Result*	MDL (ppm*)	RoHS Limit (ppm)	ASTM 963-03 (ppm)	CPSIA 101 (ppm)	CPSIA 108 (ppm)
Cadmium (Cd)	ND	2	100	75	-	-
Lead (Pb)	ND	2	1000	90	90 <sup>Δ</sup>	-
Mercury (Hg)	ND	2	1000	60	-	-
Chromium (VI)	ND	2	1000	60	-	-
Antimony (Sb)	ND	1	-	60	-	-
Selenium (Se)	ND	3	-	500	-	-
Arsenic (As)	ND	1	-	25	-	-
Barium (Ba)	ND	1	-	1000	-	-
PBB	ND	5	Σ1000	-	-	-
PBDE	ND	5		-	-	-
Phthalates						
DEHP	ND	300	-	-	-	1000
DBP	ND	300	-	-	-	1000
BBP	ND	300	-	-	-	1000
DINP	ND	100	-	-	-	1000
DIDP	ND	100	-	-	-	1000
DnOP	ND	30	-	-	-	1000

\*parts per million; ND = Not detected (below method detection limit <MDL)

<sup>Δ</sup> 16 CFR 1303/CPSIA Title 1 section 101: "Lead in surface coatings"

<sup>ε</sup>Canadian Hazardous Product Act: Surface Coatings Materials Regulations, Subsection 4(1)

Yours sincerely,

Robert Cole  
Director of Product Development



### **RoHS Directive**

Commission Directive 2002/95/EC (commonly known as RoHS) aims to protect human health and the environment by restricting the use of certain hazardous substances in new Electrical and Electronic Equipment. It is complementary to the WEEE directive (2002/96/EC) which establishes the criteria for the collection, treatment, recycling and recovery of such equipment. Both these directives refer to the final equipment and as such compliance of them is the responsibility of the equipment manufacturer.

Commission Directive 2002/95/EC was amended by Commission Decision (2005/618/EC) of 18 August 2005 which set limits for the maximum concentration values for certain hazardous substances in homogeneous materials viz:

Lead	0.10% (1000ppm)
Mercury	0.10% (1000ppm)
Cadmium	0.01% (100ppm)
Hexavalent Chromium	0.10% (1000ppm)
Polybrominated Biphenyls (PBB's)	0.10% (1000ppm)
Polybrominated DiPhenyl Ethers (PBDE's)	0.10% (1000ppm)

### **ASTM F963**

The "Toy Standards" -- ASTM F963 and EN71-- identify possible hazards that may not be readily recognized by the public, and that may be encountered in the normal use for which a toy is intended or after reasonably foreseeable abuse. These standards include restrictions on the soluble levels of Antimony, Arsenic, Barium, Cadmium, Chromium, Mercury, Selenium and total Lead in surface coating materials used for toys. The ISO Global Toy Standard (IS 8124-3) also addresses these elements.

### **CPSIA SECTION 101**

The limits on the amount of lead in children's products are phased in over the course of three years. By February 10, 2009, products designed or intended primarily for children 12 and younger may not contain more than 600 ppm of lead. Children's products that contain more lead than 600 ppm are banned in the U.S. after February 10, 2009, and the sale of those products can result in significant civil and criminal liability. The statute provides that paint, coatings or electroplating may not be considered a barrier that would make the lead content of a product inaccessible to a child. After 1 year from enactment, or August 14, 2009, products designed or intended primarily for children 12 and younger cannot contain more than 300 ppm of lead. The limit goes down to 100 ppm after three years, or August 14, 2011, unless the Commission determines that it is not technologically feasible to have this lower limit.

In addition, after 1 year or August 14, 2009, the Act provides that paint and similar surface-coating materials for consumer use must be reduced from 600 ppm to 90 ppm.

For further information see: <http://www.cpsc.gov/about/cpsia/sect101.html>

## **CPSIA SECTION 108**

Three phthalates, DEHP, DBP, and BBP, have been permanently prohibited by Congress in concentration of more than 0.1% in “children’s toys” or “child care articles.” A “children’s toy” means a product intended for a child 12 years of age or younger for use when playing, and a “child care article” means a product that a child 3 and younger would use for sleeping, feeding, sucking or teething.

Three additional phthalates, DINP, DIDP, and DnOP, have been prohibited pending further study and review by a group of outside experts and the Commission. This interim prohibition applies to child care articles or toys that can be placed in a child’s mouth or brought to the mouth and kept in the mouth so that it can be sucked or chewed that contains a concentration of more than 0.1% of the above phthalates.

For further information, see: <http://www.cpsc.gov/about/cpsia/faq/108faq.html>

## **Canadian Hazardous Product Act (HPA): Surface Coatings Materials Regulations, Subsection 4(1)**

The *Hazardous Products Act* (HPA) prohibits or restricts the advertisement, sale and importation of products which are, or are likely to be, a danger to the health or safety of the public. Under the *Surface Coating Materials Regulations*, in effect since April 19, 2005, Health Canada (HC) set a 600 mg/kg total lead limit for surface coating materials, including paints or other similar materials that dry to a solid film when a layer of it is applied to a surface, but not including materials that become a part of the substrate. Health Canada also prohibits, under Part I of Schedule I to the HPA, children’s toys (paragraph 9(b)), furniture and other articles for children other than toys (item 2) as well as pencils and artists’ brushes (item 18) that have a surface coating material applied to them that contains more than 600 mg/kg total lead.

In aligning Canadian and US standards, on October 21, 2010, Subsection 4(1) of the *Surface Coating Materials Regulations* was replaced by the following:

“The concentration of total lead present in a surface coating material must not be more than 90 mg/kg when a dried sample of it is tested in accordance with a method that conforms to good laboratory practices.”

For further information, please see:

<http://www.gazette.gc.ca/rp-pr/p2/2010/2010-11-10/html/sor-dors224-eng.html>