

Compliance with environmental product requirements

Version 01/04/2024

Dear Sir or Madam,

Product-related environmental protection is an elementary component of DEHN's sustainability strategy. Compliance with substance bans/restrictions and other legal requirements is a high priority. Extensive material-specific data is therefore required as part of our duty of care and in order to fulfil the requirements of our customers. This data must be submitted as a complete material declaration (e.g. in accordance with the IPC 1752A standard, IMDS, Umbrella Specification or similar).

Irrespective of this, we expect that the legal requirements listed below are also implemented accordingly.

1. The supplier ensures that all delivered products comply with European and German regulations for the protection of the environment, insofar as these products fall within the scope of these regulations. These include, in particular, Regulation (EC) No. 1907/2006 (REACH) with Annexes XIV and XVII, Directive 2011/65/EU in conjunction with the Delegated Directive (EU) 2015/863 (RoHS), the German Ordinance on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (ElektroStoffV) and the POP regulation (EU) 2019/1021 on the protection against persistent organic pollutants, in each case in the currently applicable version.
2. In particular, the supplier shall also fulfil all information obligations in accordance with Article 33 of Regulation (EC) No. 1907/2006. If the products delivered to DEHN contain substances of very high concern on the current candidate list (<https://echa.europa.eu/en/candidate-list-table>) in a concentration of more than 0.1 percent by mass, the supplier undertakes to inform DEHN of this immediately. In addition to the name of the substance and the associated CAS number, the corresponding SCIP number must also be submitted.
3. If the delivered goods also fall within the scope of Directive 2012/19/EU (WEEE) or the German Electrical and Electronic Equipment Act (ElektroG), labelling with the crossed-out waste bin symbol on the product and an explanation in the operating or assembly instructions is required. In addition, manufacturers/first distributors of electrical and electronic equipment are required to register with the German national foundation for electrical and electronic waste goods ("stiftung elektro-altgeräte register" [ear]). In this respect, the supplier shall inform DEHN of its registration number or the registration number of the manufacturer.
4. In the event that the products to be supplied also include batteries, batteries are installed in the products to be supplied or batteries are enclosed with the products to be supplied, the supplier guarantees compliance with all requirements of the Battery Directive 2006/66/EC or the German Battery Act (BattG). In this respect, the manufacturers/first distributors must also register with the German national foundation for electrical and electronic waste goods "stiftung elektro-altgeräte register" (ear). The supplier will inform DEHN of the corresponding registration number and will also provide all information required for the dispatch of the products concerned.

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5. The supplier is also responsible for compliance with the Packaging Directive 94/62/EC and the German Packaging Act (VerpackG). Packaging subject to system participation must be licensed by the supplier as the first distributor. Furthermore, all distributors of packaging are obliged to register in the national packaging register (LUCID) at the Central Agency Packaging Register foundation (ZSVR). The supplier will also inform DEHN of its registration number.
6. If the goods to be delivered are hazardous substances as per the hazardous substances regulations (REACH/CLP/German Hazardous Substances Ordinance), the supplier will provide a safety data sheet in German at the latest before the first delivery. In the case of updates with a retroactive duty of information, a current version will be sent unsolicited. The supplier will also ensure that no goods banned by chemical regulations are supplied. If restrictions on use or distribution apply in this respect, the supplier must inform DEHN of this in writing at the latest when the order is placed.
7. If the goods to be delivered are goods which may pose hazards during transport (dangerous goods according to ADR/RID/ICAO/IATA, etc.), the dangerous goods classifications will be communicated to DEHN by the supplier at the latest when the order is placed. The minimum requirement is the necessary content of the shipper's declaration. Dangerous goods must be labelled and packaged in accordance with the relevant dangerous goods regulations.
8. The supplier should operate a standard environmental and energy management system. In this context, DEHN welcomes certification in accordance with the ISO 14001 (environmental management system) and ISO 50001 (energy management system) standards. If the supplier has a corresponding certification in accordance with these standards or a comparable certification, it will provide DEHN with proof of this.
9. Compliance with international standards is also of interest to DEHN. This includes in particular the US Toxic Substances Control Act (TSCA). If the delivered products contain substances according to TSCA Section 6 (h) or Section 8(a)(7), the supplier will inform DEHN immediately.