



05.03.2026

## Subject: Hazardous Substances/Substances of Concern

To Whom It May Concern:

Ereğli Demir ve Çelik Fabrikaları T.A.Ş. (ERDEMİR) do not routinely analyze for presence of following hazardous substances to control the impact of environmentally sensitive material getting into our steel products.

- Lead, Mercury, Cadmium, or Chromium+6,
- Ozone depleting chemicals,
- Environmentally persistent transformer fluids (Polychlorinated Biphenyls, PCBs) or flame retardants (Polybrominated Biphenyls, PBBs, etc.)
- Dibutyl Phthalate (DBP)
- Diethyl Hexyl Phthalate (DEHP)
- Benzyl Butyl Phthalate (BBP)
- Diisobutyl Phthalate (DIBP)

Because, they are not a part of the manufacturing process, add no inherent quality to the product, and are typically, if present, below threshold concentrations.

1. We hereby declare under our sole responsibility that the supplied steel products comply with the requirements of Directive 2011/65/EU (RoHS), as amended by Directive (EU) 2015/863. None of the restricted substances listed in Annex II exceed the maximum concentration values per homogeneous material:
  - \* 0.1% (1000 ppm) for Pb, Hg, Cr<sup>6+</sup>, PBB, PBDE, DEHP, BBP, DBP, and DIBP
  - \* 0.01% (100 ppm) for Cd

Lead and Cadmium may be present only as trace elements inherent to the steel manufacturing process and are not intentionally added. Mercury (Hg) and hexavalent chromium (Cr<sup>6+</sup>) are not intentionally introduced during production and are not expected to be present in the bulk metallic material.

Compliance is ensured through supplier material declarations, documented process controls, and/or testing performed in accordance with applicable standards (e.g., IEC 62321 series).

2. Ozone depleting chemicals and environmentally persistent transformer fluids / flame-retardants are not a part of the steel manufacturing process and would not survive in the steel manufacturing process. These hazardous chemicals are not added as a part of the post manufacturing process.



### EREĞLİ DEMİR VE ÇELİK FABRİKALARI T.A.Ş.

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RoHS Proposed Maximum Limits were approved by EU council in 2011.

EU RoHS specifies maximum levels for the following 10 restricted substances. The first six applied to the original RoHS while the last four were added under RoHS 3, which took effect July 22, 2019.

### RoHS Restricted Substances & Maximum Concentration Values

Substance	Chemical Symbol / Name	Limit (% w/w)	Limit (ppm)
Lead	Pb	0.1 %	1000 ppm
Mercury	Hg	0.1 %	1000 ppm
Cadmium	Cd	0.01 %	100 ppm
Hexavalent Chromium	Cr <sup>6+</sup>	0.1 %	1000 ppm
PBB	Polybrominated Biphenyls	0.1 %	1000 ppm
PBDE	Polybrominated Diphenyl Ethers	0.1 %	1000 ppm
DEHP	Bis(2-ethylhexyl) phthalate	0.1 %	1000 ppm
BBP	Butyl benzyl phthalate	0.1 %	1000 ppm
DBP	Dibutyl phthalate	0.1 %	1000 ppm
DIBP	Diisobutyl phthalate	0.1 %	1000 ppm

Testing Item	Testing Method	MDL
Cadmium (Cd)Content	With reference to IEC 62321-5:2013, determination of Cadmium by ICP-MS/ICP-OES. <sup>1</sup>	2 ppm
Lead (Pb)Content	With reference to IEC 62321-5:2013, determination of Lead by ICP-MS/ICP-OES. <sup>1</sup>	2 ppm
Mercury (Hg)Content	With reference to IEC 62321-4:2013+A1:2017, determination of Mercury by ICP-MS/ICP-OES. <sup>1</sup>	2 ppm
Chromium VI (Cr6+) (For non-metal)	With reference to IEC 62321-7-2:2017, determination of Hexavalent Chromium by Colorimetric Method using UV-Vis. <sup>1</sup>	8 ppm
Chromium VI (Cr6+) (For metal)	With reference to IEC 62321-7-1:2015, determination of Hexavalent Chromium by Colorimetric Method using UV-Vis. <sup>1</sup>	0.1 µg/cm <sup>2</sup> with 50 cm <sup>2</sup> (IN TESTING SOLUTION)
PBBs/PBDEs	With reference to IEC 62321-6:2015, determination of PBBs and PBDEs by GC-MS. <sup>1</sup>	5 ppm
Phthalates	With reference to IEC 62321-8:2017, determination of phthalates by GC-MS. <sup>1</sup>	50 ppm



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3. Ereğli Demir ve Çelik Fabrikaları T.A.Ş. (ERDEMİR) routinely scrutinizes to detect the radioactivity levels of scrap that getting into our steel products (radioactivity detection is accomplished in accordance with "The Instructions of Controlling Radiation Level of Scrap"). This detection is carry out by use of portable and fixed detection equipment. Monitors are installed to control the possibility of errant radioactivity from scrap to contaminate our steel products. Radioactivity detection is also done for every heat in steel making process. Radiation levels are below threshold concentrations or no inherent quantity for both scrap and samples of liquid steel. Typical measured radiation level is less than 22  $\mu$  rem / hr (specification max: 40  $\mu$  rem/ hr).

If you have any questions, please advise.

Best Regards,

**Serkan DİKEÇ**  
Quality Metallurgy  
Manager

**Sinan BOZKURT**  
Executive Vice President  
Operations

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