



## RoHS Scope Statement & Certificate of Conformance

Revised October 5, 2026 · Supersedes the RoHS Exemption & Certificate of Compliance revised August 1, 2019

### 1. Scope Statement

Edmund A. Gray Company, Inc. ("EAG") of Los Angeles, California, manufactures pipe nipples and distributes pipe fittings and related flow-control (PVF) products to wholesale distributors serving the plumbing, industrial piping, irrigation, utility and waterworks markets.

EU Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment ("RoHS"), as amended, including by Commission Delegated Directive (EU) 2015/863, applies to **electrical and electronic equipment ("EEE")** as defined in Article 3 of the Directive: equipment that depends on electric currents or electromagnetic fields in order to work properly.

EAG products are passive mechanical components made of metal or plastic. They contain no electrical or electronic parts and do not depend on electric current to perform their function, so they are not EEE. **As supplied by EAG, they are outside the scope of RoHS**, and RoHS conformity assessment, CE marking and an EU declaration of conformity do not apply to them.

### 2. Declaration for Manufacturers of Electrical and Electronic Equipment

When an EAG product is built into EEE (for example a water heater, boiler, appliance or other powered equipment), the RoHS restrictions apply to each homogeneous material in the finished equipment, including components we supply, and conformance of the finished equipment is the responsibility of its manufacturer. To support that work, EAG declares the following for these products:

*Steel pipe nipples (black and galvanized), red brass pipe nipples, PVC plastic pipe nipples, stainless steel pipe nipples, aluminum pipe nipples, black and galvanized malleable iron fittings, cast bronze pipe fittings, merchant steel pipe fittings and couplings, and copper tube fittings.*

| Substance                      | Max.* | Substance                             | Max.* |
|--------------------------------|-------|---------------------------------------|-------|
| Lead (Pb)                      | 0.1%  | Polybrominated diphenyl ethers (PBDE) | 0.1%  |
| Mercury (Hg)                   | 0.1%  | Bis(2-ethylhexyl) phthalate (DEHP)    | 0.1%  |
| Cadmium (Cd)                   | 0.01% | Butyl benzyl phthalate (BBP)          | 0.1%  |
| Hexavalent chromium (Cr VI)    | 0.1%  | Dibutyl phthalate (DBP)               | 0.1%  |
| Polybrominated biphenyls (PBB) | 0.1%  | Diisobutyl phthalate (DIBP)           | 0.1%  |

\* Percent by weight in each homogeneous material, per Annex II of Directive 2011/65/EU as amended.

EAG does not intentionally add any of the substances listed above to these products. Based on declarations from our raw-material and finished-goods suppliers, and to the best of our knowledge, the homogeneous materials in these products do not exceed the maximum concentrations listed above, except where the use is permitted by an exemption in Annex III of the Directive, as described below.

**Lead in metal alloys.** Lead can be present as an alloying element in copper alloys (brass and bronze), in steel produced for machining, and in hot-dip galvanized coatings. Where it is, its use in EEE may be permitted by Annex III exemption 6(a)-I (steel for machining, up to 0.35% lead), 6(a)-II (batch hot-dip galvanized steel components, up to 0.2% lead) or 6(c) (copper alloy, up to 4% lead), as amended by Commission Delegated Directive (EU) 2025/2364. These exemptions are time-limited and vary by equipment category, so manufacturers should confirm their status for their own equipment. Item-specific material information, including which exemption (if any) applies, is available from EAG on request.

### 3. Other Jurisdictions and Related Requirements

In Great Britain, the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012 (S.I. 2012/3032) use the same EEE scope and the same substance limits, and the position stated above applies equally to them. This statement addresses RoHS only. It is not a declaration under EU REACH (Regulation (EC) No 1907/2006), U.S. lead-free plumbing requirements (Safe Drinking Water Act Section 1417, NSF/ANSI/CAN 372, California Health and Safety Code Section 116875) or California Proposition 65. Information on those requirements is available separately on request.

### 4. Basis and Limitations

This statement reflects the regulations in effect and the information available to EAG on the revision date shown, including declarations from suppliers whose manufacturing processes EAG does not control. EAG will revise it when regulations or supply sources change. It applies to the products listed above shipped on or after the revision date and supersedes all prior versions.