



MANUFACTURER'S DECLARATION

Translation of original document

Manufacturer's declaration on ship recycling

SAMSON AKTIENGESELLSCHAFT (hereafter referred to as "SAMSON") hereby certifies that its marine equipment products comply with the following ship recycling regulations:

- Regulation (EU) 1257/2013 on Ship Recycling (EU-SRR)
- German law relating to the Hong Kong Convention (HKC) for the Safe and Environmentally Sound Recycling of Ships (2009), as of 29 November 2018
- Hong Kong Convention (HKC) for the Safe and Environmentally Sound Recycling of Ships (2009) – Entry into force: 26 June 2025
- Commission Implementing Decision (EU) 2016/107 of 27 January 2016 not approving cybutryne as an existing active substance for use in biocidal products for product-type 21
- SOLAS Convention Part A-1. Regulation 3-5 New installation of materials containing asbestos
- Regulation (EU) 2019/1021 of 20 June 2019 on persistent organic pollutants (EU POP)
- or equivalent requirements from:
 - United Nations Framework Convention on Climate Change (UNFCCC) (2016)
 - Stockholm Convention on persistent organic pollutants (POP) (2004, 2017)

We observe especially the following provisions to implement these requirements:

- IMO Resolution MEPC.379(80) – 2023 Guidelines for the Development of the Inventory of Hazardous Materials (IHM) – implementing IMO Resolution MEPC.331(76) Amendments to The International Convention on The Control of Harmful Anti-Fouling Systems on Ships
- IMO MSC.1/Circ.1379 Unified Interpretation of SOLAS Regulation II-1/3-5 (concerning asbestos in stowage)
- IMO MSC.1/Circ.1426 Unified Interpretation of SOLAS Regulation II-1/3-5 (asbestos; declarations and documentation)
- IACS, International Association of Classification Societies, IACS Rec. 130 Procedures for verifying that materials are asbestos free, Rev.1 2016, page 4 of 5, Annex 2, Declaration of Conformity
- ISO 30005 Ships and marine technology – Ship recycling management systems – Information control for hazardous materials in the manufacturing chain of shipbuilding and ship operations

In view of our responsibility towards the environment, SAMSON strives at implementing the banned material regulations stipulated in the rules and regulations mentioned above as early as possible. As a result, SAMSON has put extensive work into identifying substances that are harmful to the environment, climate and human health, and into substituting them.

SAMSON does not use the following substances additionally listed in the EU SRR in Annex II above their legal thresholds as specified in EU POP 2019/1021, Annex I: hexabromocyclododecane (HBCDD, a brominated flame retardant) and perfluorooctanesulfonic acid and its derivatives (PFOS substance group) within the family of persistent organic substances (POP).


The following table lists further details on material requirements:



Materials/chemical substances	Legal requirements for marine equipment		Manufacturer's declaration
	EU SRR 1257/2013	IMO Res. MEPC.379(80)	
Asbestos	Annex I; Annex II, No. 1	Appendix 1, Table A, No. A-1	SAMSON does not use these substances in any of its products. EU SRR sets the threshold value of 0 (zero) ppm. According to EU legislation, our suppliers are not permitted to use these substances.
Polychlorinated biphenyls (PCBs)	Annex I; Annex II, No. 1	Appendix 1, Table A, No. A-2	
Ozone-depleting substances	Annex I; Annex II, No. 1	Appendix 1, Table A, No. A-3 and Table B, No. B-7	SAMSON does not use these substances in any of its products.
Anti-fouling compounds and systems (biocide)	Annex I; Annex II, No. 1	Appendix 1, Table A, No. A-4	SAMSON does not use these substances in any of its products. EU legislation severely restricts the use of paints containing organotin compounds or cybutryne as an algaecide.
Cadmium and cadmium compounds	Annex II: No. 2	Appendix 1, Table B: No. B-1	SAMSON only uses these substances whenever legal exemptions are applicable. The substances mentioned are identical with the substances listed in RoHS. While RoHS mandates that the limits be observed, the IMO Resolution only mentions that the exact amounts and positions be specified if the threshold is exceeded. We point out that we observe most quantity thresholds due to the much stricter requirements of the RoHS Directive 2011/65/EU in applying the IEC 63000 standard:
Hexavalent chromium compounds	No. 3	No. B-2	
Lead and lead compounds	No. 4	No. B-3	
Mercury and mercury compounds	No. 5	No. B-4	
Polybrominated biphenyls (PBB)	No. 6	No. B-5	
Polybrominated diphenyl ethers (PBDE)	No. 7	No. B-6	
Polychlorinated naphthalenes (more than 3 chlorine atoms)	Annex II, No. 8	Appendix 1, Table B, No. B-7	SAMSON does not use these substances in any of its products.
Radioactive substances	Annex II, No. 9	Appendix 1, Table B, No. B-8	
Certain short-chain chlorinated paraffins (alkanes, C10-C13, chloro)	Annex II, No. 10	Appendix 1, Table B, No. B-9	SAMSON does not use these substances in any of its products. Trade restrictions according to the EU POP Regulation apply.

SAMSON AKTIENGESELLSCHAFT


Signiert von:



4F847AEC3CD1452...

ppa. Fabio Roma
Vice President
Smart Products and Components
Global Sales

Signiert von:



DC2538B63319447...

i.V. Dirk Hoffmann
Director
Patents & Product Compliance