

Regulatory Information concerning NMC's INSUL product range

Note

This version supersedes and replaces version RI-001 INSUL.

The English version of our Product Stewardship declaration is the only legally binding reference document. Translations into other languages have no legal basis.

REACH / SVHC / SCIP

In accordance with Article 33(1) of Regulation (EC) No 1907/2006, suppliers of articles containing SVHCs published in the official ECHA Candidate List in concentrations above 0.1% w/w must provide their customers with sufficient information to allow safe use of the article, including at least the name of the substance.

ADCA (Azodicarbonamide) was added to the candidate list of Substances of Very High Concern for its possible respiratory sensitizing properties.

ADCA is a frequently used chemical blowing agent, which decomposes during heat induced foaming processes commonly used to produce rubber foams. Residual ADCA levels in those foams are typically very low, but not nil. In our production processes we take special care to ensure residual ADCA levels as low as technically feasible. However, the product references listed in Annex I, have, despite our continuous efforts, residual ADCA levels slightly above the 0.1 wt% threshold (≤ 0.5 wt%) for which a mandatory registration is required in the ECHA **SCIP** database. In Annex I, you will, in compliance with REACH Regulation, find their resp. SCIP notification information.

We will continue our efforts in further reducing the residual ADCA levels and are closely monitoring the situation. We will, in due time, inform customers if we've been successful for the concerned references in Annex I.

MCCP (Medium-Chain Chlorinated paraffins) were added to the candidate list of Substances of Very High Concern for its possible persistent, bio-accumulative and toxic properties.

MCCP is commonly used as a plasticizer & flame retardant in rubber foam products. Although we are looking for alternatives, we confirm that the product references listed in Annex I contain MCCP levels exceeding the 0.1 wt% threshold for which a mandatory registration is required in the ECHA **SCIP** database. In Annex I, you will, in compliance with REACH Regulation, find their resp. SCIP notification information.

We will continue our efforts in further replacing MCCP in our formulations and are closely monitoring the situation. We will, in due time, inform customers if we've been successful for the concerned references in Annex I.

Furthermore, based on current information from our upstream suppliers, we hereby declare that the references provided do not contain any substances listed in Annex XIV, i.e. substances subject to authorization, and that we comply with the restrictions under Annex XVII of the REACH Regulation.

Recommended protective measures

Due to the physical encapsulation of the ADCA traces in our foam products and the nature of the risks identified by ECHA, no special care needs to be taken with respect to these residual ADAC levels in product references listed in Annex I.

However, as for most plasticizers it cannot be excluded that MCCP migrates. Due to the nature of the risks identified by ECHA, it is recommended to wear protective gloves when handling & installing foams containing MCCP and to ensure sufficient ventilation.

You may address all your ADCA & MCCP related questions to your commercial contact.

European Regulations and Directives

For the manufacturing of products listed in Annex I of this letter we do not intentionally add substances listed in the following European Regulations / Directives:

- 2017/821/EU (Conflict minerals)
- 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS)
- 2023/1115/EU (EU Deforestation Regulation (EUDR))

Substances or substance groups

For the manufacturing of the products listed in Annex I of this letter we do not intentionally add the following substances / substance groups:

- Per- and polyfluoroalkyl substances (PFAS) including Perfluorooctanoic acids (PFOA) and Perfluorooctanesulfonic acids (PFOS)

For directives, regulations, and substances other than those listed above, NMC does not dispose of all the necessary information. Above listed statements are based on our current understanding of the regulatory requirements, our production processes and information provided by our material suppliers. Though dangerous substances are not added intentionally, the presence of impurities or insignificant traces due to contamination of materials cannot be excluded.

Eynatten, July 2024

Dino Manfredi

Vice-President Research & Innovation

Annex I : Concerned products (crosslinked NBR based foam)

Product range	SCIP reference number	ADCA	MCCP
INSUL-TUBE®	65cb3e24-9887-4ab8-a39b-85acad9a4e57	Yes	Yes
INSUL-TUBE® coil	c93122bd-ae0a-4938-8e12-d37a55dcedd2	Yes	Yes
INSUL-TUBE® cover silver	bb35f742-aaea-48cc-b047-6071d1b8b1e2	Yes	Yes
INSUL-TUBE® xt	8f47d196-d3e7-411b-b8d5-45ead7280f09	Yes	Yes
INSUL-TUBE® xt/It	a646fba0-eab9-4f52-a81f-4274b85a67ba	Yes	Yes
INSUL-TUBE® I	199e6a02-17cc-4d9a-828f-1898c0a1d6f8	Yes	Yes
INSUL-TUBE® xt/I	5ecf597e-d758-4141-85ce-6920b471d18c	Yes	Yes
INSUL-TUBE® H plus	3cfde1d1-6bdf-41a0-bf71-5fc8e074ea22	Yes	Yes
INSUL-TUBE® H plus coil	36bf0b77-3e07-4041-adc1-8c44941806ff	Yes	Yes
INSUL-TUBE® H plus xt	0466e57a-1c23-4dd3-aca3-cd9c530ce4bc	Yes	Yes
INSUL Roll xt	bf7094af-3fa9-4083-ae0b-8e337ed0d1d6	Yes	Yes
INSUL Roll xt alu	fd03622c-e532-403b-b72e-1e2ed5762d0f	Yes	Yes
INSUL Roll xt cover Silver	f6b58c10-e714-4a0a-95ae-47430988996f	Yes	Yes
INSUL Roll	1624f293-7abd-47ad-8915-6f264c2520a6	Yes	Yes
INSUL Roll alu	f9e9269f-87d2-4d7f-a085-0733fa441b1c	Yes	Yes
INSUL Roll cover silver	f44e6f0c-a0b7-4886-b54e-9e1082228cd9	Yes	Yes
INSUL Sheet	68d38714-8a55-494c-89e9-75d043f0d049	Yes	Yes
INSUL Sheet xt	803c421e-0d01-4a9b-9ef9-5855e9ea2556	Yes	Yes
INSUL Tape	03af3509-12f8-4942-832e-f3bdb40a73f5	Yes	Yes

Please contact our customer service for further information.

Disclaimer:

This Product Stewardship declaration has a validity of 1 year starting from the date of signature.

The information provided is based on our current understanding of the regulatory requirements, our production processes and information provided by our material suppliers. It doesn't constitute in any matter a guarantee, nor does it engage in any way NMC's liability.

The customer bears the responsibility to check suitability of the products listed below for their intended use.