

Regulatory Information concerning nmc's INSUL product range

Note

This version supersedes and replaces version RI-004 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. The table attached in Annex I provides an overview of which product ranges contain one of the substances listed on the Candidate List in concentrations above 0.1% w/w.

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.

DBDPE (1,1'-(ethane-1,2-diyl)bis[pentabromobenzene]) has been identified by ECHA as very persistent and very bioaccumulative (vPvB) under Article 57e on 5th November 2025. Some product ranges of our technical insulation segment require flame retardants for their intended use, which is why DBDPE is present in certain products (see annex I for more details about concerned product ranges).

NMC has fulfilled its SCIP notification obligations within the required deadlines. The SCIP registration number is provided in Annex I. In parallel, we are working intensively to adapt our formulations and remove DBDPE from our products. We expect these changes to be implemented within the next few months and will notify you once completed.

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.

In the state of our current knowledge, these risks relate to environmental persistence and bioaccumulation rather than immediate hazards. Under normal conditions of use, our foam products do not release dust, are not inhaled, and are not ingested. The substance is physically embedded within the material, which minimizes any potential exposure. Therefore, no additional precautions are required beyond standard good practices for storage, handling, and installation.

You may address all your ADCA, MCCP, DBDPE 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.



Florent Pouzet
CEO

Eynatten, June 2026



Foams that fit

Version RI-005 ISO INSUL - EN

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 bares the responsibility to check suitability of the products listed below for their intended use.

Annex I : Concerned products (crosslinked NBR based foam)

Product range	SCIP reference number	MCCP	ADCA	DBDPE*
INSUL-TUBE®	65cb3e24-9887-4ab8-a39b-85acad9a4e57	Yes	Yes	Yes*
INSUL-TUBE® coil	c93122bd-ae6a-4938-8e12-d37a55dcedd2	Yes	Yes	Yes*
INSUL-TUBE® cover silver	bb35f742-aaea-48cc-b047-6071d1b8b1e2	Yes	Yes	Yes*
INSUL-TUBE® xt	8f47d196-d3e7-411b-b8d5-45ead7280f09	Yes	Yes	Yes*
INSUL-TUBE® xt/lt	a646fba0-eab9-4f52-a81f-4274b85a67ba	Yes	Yes	Yes*
INSUL-TUBE® I	199e6a02-17cc-4d9a-828f-1898c0a1d6f8	Yes	Yes	Yes*
INSUL-TUBE® xt/I	5ecf597e-d758-4141-85ce-6920b471d18c	Yes	Yes	Yes*
INSUL Roll xt	bf7094af-3fa9-4083-ae0b-8e337ed0d1d6	Yes	Yes	Yes*
INSUL Roll xt alu	fd03622c-e532-403b-b72e-1e2ed5762d0f	Yes	Yes	Yes*
INSUL Roll xt cover Silver	f6b58c10-e714-4a0a-95ae-47430988996f	Yes	Yes	Yes*
INSUL Roll	1624f293-7abd-47ad-8915-6f264c2520a6	Yes	Yes	Yes*
INSUL Roll alu	f9e9269f-87d2-4d7f-a085-0733fa441b1c	Yes	Yes	Yes*
INSUL Roll cover silver	f44e6f0c-a0b7-4886-b54e-9e1082228cd9	Yes	Yes	Yes*
INSUL Sheet	68d38714-8a55-494c-89e9-75d043f0d049	Yes	Yes	Yes*
INSUL Sheet xt	803c421e-0d01-4a9b-9ef9-5855e9ea2556	Yes	Yes	Yes*
INSUL Tape	03af3509-12f8-4942-832e-f3bdb40a73f5	Yes	Yes	Yes*

Please contact our customer service for further information.

