

Dear Sir or Madam,

Statement of item Industrietechnik GmbH on the Toxic Substances Control Act (TSCA).

The United States Environmental Protection Agency (EPA), which is considered the equivalent of the European Chemicals Agency (ECHA), has finalized the Toxic Substances Control Act (TSCA) Section 6 (h) rules. This happened in January 2021, and what surprised many companies, including in the US, was that the rules became legally effective as early as March 2021.

Selling chemicals and articles containing EPA-listed PBT substances will be very difficult in the US from now on. Similar to REACH, their presence must be communicated along the supply chain from now on. In addition, there are different transition periods depending on the substance.

Persistent, bioaccumulative and toxic (PBT) substances are known in Europe, but their use is only partially regulated. Of particular interest are five listed PBT substances.

- Decabromodiphenyl ether (Deca BDE) is already represented in RoHS and REACH,
- Hexachlorobutadiene (HCBD) in the POP Regulation of the Stockholm Convention.

The remaining substances are on the so-called CoRAP list of ECHA. These substances, which are listed in the Community Rolling Action Plan, are considered hot candidates for the SVHC list, but are not yet officially listed. This means that they are not considered in supplier requests for REACH, RoHS, POPs and the like.

The following chemical groups,

- Phenol, isopropylated phosphate 3:1; PIP 3:1
- 2,4,6-Tris(tert-butyl)phenol; 2,4,6-TTBP
- Pentachlorothiophenol; PCTP

which are not yet restricted in Europe, could be contained in corresponding products of item GmbH. However, they are neither necessary for functionality nor for the manufacturing process.

In general, it can be assumed that all metallic items are unproblematic. It is possible that the use of paint in powder coatings and wet paint finishes still needs to be investigated.

Soft plastics and products containing lubricants are particularly critical.

For this reason, we are not able to provide general information about the entire product portfolio, but we offer to analyse the ordered products and to label them accordingly.

Yours sincerely
item Industrietechnik GmbH
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Stephan Buchmann
Managing Director
Solingen, August 2023