

TSCA / EPA – Declaration of Conformity (2021)

Dear Madams and Sirs,

the U. S. Environmental Protection Agency (EPA), which is seen as the counterpart to the European Chemicals Agency (ECHA), has set the final rules of the Toxic Substances Control Act (TSCA) Section 6 (h). On January 6, 2021, the EPA implemented a rule regulating these 5 chemicals:

- **PIP (3:1), Phenol, isopropylated phosphate (3:1), CASRN 68937-41-7**
- **DecaBDE, Decabromodiphenyl ether, CASRN 1163-19-5**
- **HCBD Hexachlorobutadiene, CASRN 87-68-3**
- **PCTP, Pentachlorothiophenol, CASRN 133-49-3**
- **2,4,6-TTBP, 2,4,6-Tris(tert-butyl)phenol, CASRN 732-26-3**

To the surprise of many companies, including the American ones: the regulations have an Effective Date of March 8, 2021. Very few companies have obtained compliance from their suppliers and therefore could no longer immediately offer compliant products in the USA.

The question is, are DecaBDE, PIP 3: 1, PCTP, HCBD, PTB and TTBP already regulated by RoHS, REACH & POP?

Partly yes. The persistent, bioaccumulative and toxic (short: PBT) substances are known in Europe, but their use is only partially regulated, e. g. decabromodiphenylether (DecaBDE) is already represented in the RoHS and REACH and hexachlorobutadiene (HCBD) in the POP regulation of the Stockholm Agreement. The rest are on the so-called CoRAP list of the ECHA. Substances from the Community Rolling Action Plan are hot contenders for the SVHC list, but not officially listed yet. This means that they are not considered in supplier inquiries about REACH, RoHS, POP and the like.

Göttle has actively asked the main suppliers to submit Declaration of conformity as soon as possible. We have currently received these confirmations from our suppliers and can be herewith declared that all our products comply with the TSCA / EPA regulations.

For more information:

<https://ecfr.federalregister.gov/current/title-40/chapter-I/subchapter-R/part-751>

Do you have questions? We are happy to help you!

Contact our REACH / RoHS contact person:

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