

Würth Elektronik eiSos GmbH & Co. KG

EMC & Inductive Solutions

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Statement in light of the Toxic Substance Control Act (TSCA)

The Toxic Substance Control Act (TSCA), as amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act released on June 22nd, 2016, gives the U.S. Environmental Protection Agency (EPA) the authorities to take expedited actions to propose rules under TSCA, including:

For a new chemical substance or a significant new use of an existing substance it is required to submit a notice of its usage, etc. to EPA, at least 90 days before its manufacturing or processing, for the hazardous assessment to see whether or not a proposed rule is applied.

On July 27th, 2020, the significant new use EPA identified under section 5(a) (2) of the Toxic Substances Control Act (TSCA) regarding the import of an article or category of articles with certain PFAS chemicals as part of the surface coating, was finalized into the rule “Long-Chain Perfluoroalkyl Carboxylate and Perfluoroalkyl Sulfonate Chemical Substances; Significant New Use Rule” (85 FR 45109) together with its implementing regulations at 40 CFR Part 721.

Chemicals identified in EPA’s update of the TSCA Work Plan in 2014 are required to be put as first priority for the chemical assessment regarding their persistence, bioaccumulation and toxicity (PBT) and other factors, to see whether a proposed rule is applied, under TSCA section 6(h)

On January 6th, 2021, five PBT chemicals, which were previously identified for expedited action in 2016 and issued into a proposed rule in 2019, was finally issued in a rule, prohibiting their manufacture, processing, and distributing in commerce and in products. Details are as following:

Substance	PIP/PIP(3:1)	DBDE/DecaBDE	HCBD	PCTP	TTBP/2,4,6-TTBP
Substance Full Name	Phenol, isopropylated phosphate(3:1)	Decabromodiphenyl ether	Hexachlorobutadiene	Pentachlorothiophenol	2,4,6-tris(tert-butyl) phenol
CAS Number	68937-41-7	1163-19-5	87-68-3	133-49-3	732-26-3
Restriction Threshold	Prohibition	Prohibition	Prohibition	1% at article or mixture level	0.3% at mixture level
Restrictions	prohibiting processing and distribution in commerce of PIP (3:1), and products containing the chemical substance	the manufacture (including import), processing, and distribution in commerce of decaBDE, and products containing decaBDE	EPA is prohibiting the manufacturing (including import), processing, and distribution in commerce of HCBD and HCBD-containing products or articles, except for the unintentional production of HCBD as a byproduct during the production of chlorinated solvents, and the processing and distribution in commerce of HCBD for burning as a waste fuel.	EPA is prohibiting the manufacture (including import), processing, and distribution in commerce of PCTP, and products or articles containing PCTP, unless PCTP concentrations are at or below 1% by weight.	prohibiting the distribution in commerce of 2,4,6-TTBP and products containing 2,4,6-TTBP at concentrations above 0.3% by weight
Effective date	Sep 4, 2021	Mar 8, 2021 for manufacturer; Jan 6, 2022 for selling	Mar 8, 2021;	Mar 8, 2021 for manufacturer; Jan 6, 2022 for selling	Jan 6, 2026
normal use	as a plasticizer, a flame retardant, an anti-wear additive, or an anti-compressibility additive in hydraulic fluid, lubricating oils, lubricants and greases, various industrial coatings, adhesives, sealants, and plastic articles.	an additive flame retardant in plastic, textile, wire, cable	a halogenated aliphatic hydrocarbon that is produced as a byproduct during the manufacture of chlorinated hydrocarbons, particularly perchloroethylene, trichloroethylene, and carbon tetrachloride and is subsequently burned as a waste fuel.	make rubber more pliable in industrial uses	an intermediate/reactant in processing and is incorporated into formulations destined for fuel and fuel-related additives, as well as into formulations intended for the maintenance or repair of motor vehicles and machinery, including in oils and lubricants.
Risk in Electronics	High	Low, as it is already regulated under RoHS and REACH	Low, based on its presence and currently founding by EPA	Low, based on its presence and current finding by EPA	Not applicable for Electronics

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Würth Elektronik eiSos GmbH & Co. KG, as a manufacturer of electronic components, based on our current knowledge of our products and understanding of TSCA, declares that:

- We are free of notification to EPA for any new substance manufactured and new significant use of existing substance.
- We don't use PFAS intentionally in a coating on our products.
- For PBT substance, to keep our American customer free of the penalties we are doing our verification of our products right now. And a final statement will be published afterwards, before Sep 4th 2021, the effective date of PIP (3:1).

If there is an urgent case it is possible to ask for a risk assessment for specific part numbers under eiSos-CN-QDC-MaterialManagement@we-online.com.

i. A. Anika Wegmann

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Material Management

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