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Letter of response to per- and polyfluoroalkyl substances PFAS

Dear Sir or Madam,

PFAS (per- and polyfluorinated alkyl substances) are industrially manufactured substances that are used in a variety of products and processes. Due to the large number of molecular structures present and the resulting different properties, there are different definitions of PFAS. The OECD Global Database of PFAS identifies at least 4.730 different PFAS, while the CompTox Chemicals Dashboard of the US EPA lists 14.735 of these compounds. PubChem even assumes that there are around 6 million PFAS. Our confirmation considers all relevant perspectives and definitions to ensure that we have a comprehensive understanding of the PFAS issue. We are not currently aware of PFAS being present in our products. We are in constant contact with our suppliers to provide up-to-date information regarding the ingredients of our products. As soon as we become aware of any deviating information, we will inform you immediately. In addition, there are further specific legal requirements regarding PFAS, which we will discuss individually below.

Regulation (EC) 1005/2009 on substances that may damage the ozone layer.

We confirm that none of the substances listed in Regulation (EC) 1005/2009 are contained in our products.

Stockholm Convention

We confirm that none of the substances listed in the Stockholm Convention are contained in our products. In Europe, the Stockholm Convention has been transposed into European law by Regulation (EU) 2019/1021 (EU-POP Regulation). For more information see our separate document on the POP-Regulation.

Rotterdam Convention

The Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade (PIC Convention) entered into force on 24 February 2004. We confirm that none of the substances listed in the Stockholm Convention are contained in our products.

Canadian Environmental Protection Act, 1999 (CEPA)

We confirm that none of the substances listed on the "List of Toxic Substances (LOTS) – last amended on 2021-05-01" are contained in our products.

Japan - Chemical Substances Control Law (CSCL)

Under the CSCL, manufacturers and importers of chemicals must report them and prepare an annual report, depending on the classification of the chemical under the law obligations to be fulfilled. Our products are exclusively articles that are not affected by the requirements of the CSCL.

US-TSCA section 8(a)(7)

With the National Defense Authorization Act of 2020, the U.S. Environmental Protection Agency (EPA) requires all companies that manufacture/import PFAS or PFAS-containing articles in the U.S. to report information to the EPA in accordance with the requirements of TSCA section 8(a)(7).

At this time, we are not aware of any PFAS contained in R+W Antriebselemente GmbH products that require notification under TSCA section 8(a)(7)

Regarding the significant new use rules (SNURs) under the US-TSCA

The US Environmental Protection Agency (EPA) has issued regulations under the Toxic Substances Control Act (TSCA) for significant new uses (SNURs) for chemical substances that were the subject of "Pre-Manufacture Notices (PMNs)". This mainly affects manufacturers and importers of chemical substances, in particular, companies from the chemical processing industry.

R+W Antriebselemente GmbH does not fall under the definition of affected companies (NAICS codes 325 and 324110). R+W Antriebselemente GmbH, as defined by TSCA, sells only items that are exempt from most of the requirements of the TSCA import requirements.

Although we are not affected by this regulation, we note that we are not aware of any substances in our products that are affected by the TSCA Significant New Uses (SNURs) regulations.

In case of queries please contact us by phone: +49 9372 9864-0 | email: info@rw-kupplungen.de

Kind regards

R+W Antriebselemente GmbH