



Milano, 03 DIC. 2025

Our ref.: PB/pb/TSCA_2025/01

TO WHOM IT MAY CONCERN

Your ref.:

Subject: **Toxic Substances Control Act (TSCA)**
Conformity of I.L.M.E. S.p.A. products

We refer to the subject matter to inform you as follows.

New USA rules under the Toxic Substances Control Act – TSCA, Section 6(h) – as amended in 2016, have been set by EPA (Environmental Protection Agency) and in force since 2021-02-05, prohibiting all manufacture (including import), processing, and distribution in commerce of the following Persistent, Bioaccumulative, and Toxic (PBT) Chemicals:

- **decaBDE** (decabromodiphenyl ether, CASRN 1163-19-5);
- **PIP (3:1)** (phenol, isopropylated phosphate (3:1), CASRN 68937-41-7);
- **2,4,6-TTBP** (2,4,6-tris(tert-butyl)phenol, CASRN 732-26-3);
- **HCBD** (hexachlorobutadiene, CASRN 87-68-3), and
- **PCTP** (pentachlorothiophenol, CASRN 133-49-3),

or of above-chemicals-containing products or articles (with some exclusions and rules specific to each substance regarding allowed percentage).

Most of these substances are already regulated either by the EU REACH Regulation and/or by the EU RoHS 2 Directive, for which we already provide Declaration of Conformity.

On November 19, 2024, final rules were issued by EPA revising the Regulations for decaBDE and PIP (3:1), effective on January 31, 2025. We have reviewed the files publicly provided by the EPA website for each of the substances.

Following our previous declaration issued in July 2021, based on our current knowledge, we confirm that we do not expect any of the above listed regulated substances in our products.

Concerning other chemicals currently banned or restricted by the TSCA, besides the five ones mentioned above, we are aware of the following:

- **chrysotile asbestos**: total ban in USA under TSCA effective 2024-05-28;
- **methylene chloride (dichloromethane)**: most commercial uses prohibited by TSCA, effective 2024-07-08; other sources report this ban as partially curtailed;
- **lead-based paints** in housing (lead is already regulated by RoHS 2 in EU);
- **PCBs** (polychlorinated biphenyls) (already regulated by RoHS 2 in EU);
- **mercury** (already regulated by RoHS 2 in EU);
- **hexavalent chromium** (already regulated by RoHS 2 in EU);
- **formaldehyde**;
- **radon**;
- **chlorofluorocarbons (CFCs)** (already regulated in EU);
- **dioxins and furans** (PCDDs and PCDFs) (already regulated in EU).

To our current knowledge, none of the above substances is present in ILME products, except for lead as covered in the RoHS 2 and REACH Declarations.

We remain at your disposal if any further information needed.

Best regards,

I.L.M.E. S.p.A.
Un Amministratore

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