

Statement on the POP Regulation and US TSCA

Regulation (EU) 2019/1021 (Stockholm Convention) & Toxic Substances Control Act

KE-POP-TSCA · R: 05 | A: EN | V: OSP | P: AL | D: 09_26

Applicable frameworks: Regulation (EU) 2019/1021 on persistent organic pollutants (consolidated as of 1 Jan 2026, verified 28 Jul 2026) and the US Toxic Substances Control Act (TSCA), 40 CFR Part 751 Subpart E as amended on 19 Nov 2024 (verified 2 Sep 2026).

This combined statement answers the frameworks POPs and TSCA, which are regularly requested together in customer campaigns.

We, Rainer Schneider Kabelsatzbau & Konfektions GmbH & Co. KG, declare on the basis of the information provided by our suppliers and distributors:

1. Persistent organic pollutants (POP)

Regulation (EU) 2019/1021 implements the Stockholm Convention in the EU and prohibits or restricts the persistent organic pollutants listed in its Annex I, including decaBDE, PFOA, PFOS, PFHxS, SCCPs and Dechlorane Plus.

According to the information available from our suppliers, the articles we place on the market comply with the substance prohibitions and limit values of Annex I of Reg. (EU) 2019/1021. Where an article contains a listed substance within a permitted exemption under Annex I above the identification threshold, we identify this on our business documents on an article-specific basis (analogous to our REACH Art. 33 practice); we do not issue a blanket free-of statement.

2. US Toxic Substances Control Act (TSCA)

TSCA Section 6(h) restricts five persistent, bioaccumulative and toxic substances: decaBDE, PCTP, PIP (3:1), 2,4,6-TTBP and HCBd (40 CFR Part 751 Subpart E). The applicable version is the amendment of **19 November 2024** (89 FR 91486), effective **21 January 2025**.

According to the information available from our suppliers, these substances are not used above the respective applicable threshold in the components we process. The thresholds differ by substance: 0.1 % by weight for PIP (3:1) and decaBDE — and only where the substance was not intentionally added —, 1 % by weight for PCTP, 0.3 % by weight for 2,4,6-TTBP; for HCBd the rule provides no de minimis threshold.

- ▶ **Wire harnesses and circuit boards:** 40 CFR 751.407(b)(1)(iii) exempts the processing and distribution of PIP (3:1) for use in wire harnesses and circuit boards; the provision expressly includes casings, connectors, cable sleeves and tapes.
- ▶ **Passing on information:** Where a supplier provides us with a notification under 40 CFR 751.407(e), we pass it on to you on an article-specific basis.
- ▶ **Our role:** As a German supplier we are regularly not an addressee of TSCA — reporting, certification and record-keeping obligations rest with the importer into the United States. Where we deliver duty paid, we examine the allocation of roles in the individual case.
- ▶ **PFAS reporting under Section 8(a)(7):** The reporting obligation under 40 CFR Part 705 rests with US importers. The submission period begins on 31 January 2027 at the latest, or 60 days after the outstanding substantive rule takes effect, whichever is earlier; the look-back reaches to 1 January 2011. We provide article-specific information on request.

3. Data basis

This statement is based on data from our supply-chain partners; no express or implied warranty is associated with it. We will update the statement in the event of changes to the legal situation or new findings from the supply chain.

We maintain a regular dialogue with our suppliers in order to react to future substance restrictions. We reserve the right to update this document; current versions are available at <https://schneider-kabelsatzbau.de/downloads>. For questions on substance restrictions or specific articles, contact us at compliance@schneider-kabelsatzbau.de.

Wissen, September 2026



Christoph Schneider
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