

28th January 2021

REACH SVHC declaration for extruded roll foam products

With respect to the <u>REACH</u> directive – **Substances of Very High Concern (SVHC): UPDATED** Candidate List

We declare the following:

To the best of our knowledge, Palziv's cross-linked foam products in rolls (Galfoam/Fuzion) from a density of 25kg/m3 and above, conform to the requirements set by the REACH directive.

With the exception of the ADCA Blowing agent none of the 211 SVHC listed substances are intentionally added/used as raw materials in the production of Palziv foams.

Status of ADCA

The foaming agent Azodicarbonamide (ADCA, CAS# 123-77-3) was added by ECHA (The European Chemicals Agency) to the candidate list (Annex XVII).

There is however no standardized and validated analytical method for testing ADCA concentration in foams.

Responses of ADCA users

In response to the inclusion of ADCA in the candidate list, a group of companies that use/manufacture ADCA formed the "ADCA Taskforce". The Taskforce is working vis-a-vis ECHA and also devising the policy to be adopted by the manufacturers, including amending the MSDS, Customer notifications etc.

Palziv's Position

Palziv's crosslinked foam extruded roll products (Galfoam/Fuzion) *may* include ADCA in very small concentrations.

Given the lack of credible test methods, we are not yet in a position to declare the levels of ADCA concentration in our extruded roll products.

Notwithstanding, we are conducting an effort to reduce ADCA concentration to the very minimum.

Palziv are constantly monitoring changes in the regulations and in the event that there are further developments, will release declarations and notifications as required.

Baruch Zur CTO Palziv

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