

Date: January 23, 2024

Subject: REACH (Registration, Evaluation, Authorization and Restriction of Chemicals -EC No.1907/2006), Annex XIV, Annex XVII and the SVHC list compliance of Armacell, LLC Insulation Products

Products covered by this letter: AP Armaflex, AP Armaflex White Lap Seal, AP Armaflex Black Lap Seal, AP Armaflex SA, AP Armaflex FS, AP ArmaFlex FS SA, AP Coilflex, AP Spiralflex, Armaflex Coil, AC Accoflex, ArmaFlex Shield, ArmaFlex ULTRA, OE Armaflex (OET and OER), ProFlex, NH Armaflex, UT SolaFlex, ArmaFlex UT, Armaflex Insulation Tape, Armaflex Black Lap Seal Tape, Tubolit, Tubolit SS, Tundra, Tundra SS, IMCOA, IMCOA SS, ArmaFlex 520 BLV Adhesive, ArmaFlex HT 625 adhesive, Armacell Low VOC Spray Adhesive and ArmaFlex WB Finish.

To Whom It May Concern:

Armacell, LLC manufactures several types of insulation foams at 5 manufacturing plants located in Mebane, NC, Conover, NC, Dallas, GA, Yukon, OK and Brampton, Canada. All Armacell's products are classified as "articles" according to Title 29 of the Code of Federal Regulations, OSHA Part 1910.1200©, page 463.

According to REACH the definition of "article" is as follows:

"Article means an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition;" (REACH, Article 3(3))"

Articles as defined by REACH regulations are exempt from registration as long as they are not intended to release a chemical substance. To the best of our knowledge, all Armacell foam products meet the definition of "article" according to REACH.

In addition, to the best of our knowledge, the Armacell Insulation products listed above do not contain any substances of very high concern (SVHC) above the threshold limit included in the REACH SVHC list updated January 23, 2024.

The full SVHC list updated on January 23, 2024, is available on-line at:
<https://echa.europa.eu/candidate-list-table>

If you should have any further questions regarding Armacell REACH initiatives, please contact:

North America: Kartik Patel, Technical Services Manager – Advanced Insulation

(919) 304-8907 | kartik.a.patel@armacell.com

Shervin Ejlali, Chemical Compliance and Regulations Manager

(984) 484-8208 | shervin.p.ejlali@armacell.com

Sincerely,

Technical Marketing Department
Armacell LLC