

Bad Wildungen, April 2009

## **Customer information in accordance with the REACH regulation on HBCDD in EPS hard foam**

Ladies and Gentlemen,

In line with REACH, the European regulation, the committee of member states of the European Chemicals Agency (ECHA) has decided to include the flame retardant HBCDD (hexabromocyclododecane) on the list of candidates.

We hereby comply with our obligation as per REACH item no. 33(1) to provide customers with information on the presence of HBCDD as an additive flame retardant in our products that are made of expanded polystyrene hard foam (EPS).

### Information on HBCDD:

HBCDD (hexabromocyclododecane) is a proven flame retardant that has been used for decades in, primarily, thermal-insulating polystyrene hard foam panels that help to reduce CO<sub>2</sub> emissions. As well as being used as a thermal insulant, flame-retardant polystyrene hard foam is also used in the form of EPS on our products such as supporting frames or skirtings for bath and shower tubs floor level shower systems.

Flame-retardant EPS hard foams help to protect people and buildings.

The low content of HBCDD is a condition for building materials based upon it in order for them to comply with legal fire protection requirements in Germany.

Flame-retardant HBCDD is incorporated completely in the polymer matrix of the EPS hard foam, so when used correctly is of no risk either to the environment whilst in use or afterwards when the product is no longer in use.

HBCDD has been included in the REACH list of candidates because of its PBT (persistent, bioaccumulative, toxic) characteristics. This is more because of the possible risk of causing damage than to any actual risk.

Accordingly, used correctly, flame-retardant EPD hard foams are, as always, absolutely safe, essential materials for our products.

The presence of HBCDD on the REACH list has no direct legal implications for the manufacture and circulation of our products in expanded polystyrene hard foam (EPS). This means that, based on our bilateral transactions, the list contains no limitations for the production, handling, sale or use of our products in expanded polystyrene hard foam (EPS).

This letter complies with our obligation to provide information; nothing in the processing of our other activities changes.

Yours truly,

illbruck Sanitärtechnik GmbH

A handwritten signature in black ink, appearing to read "H. J. Schönberger-Messer".

Heinz-Joachim Schönberger-Messer  
Managing director

A handwritten signature in black ink, appearing to read "K. Iglhaut".

ppa. Dr. Karl Iglhaut