

US Toxic Substances Control Act (TSCA) Declaration of Conformity

Spark Holland B.V. hereby declares that all products supplied to customers comply with the requirements of the U.S. Toxic Substances Control Act (TSCA), as amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act.

Compliance with PBT Restrictions (TSCA Section 6(h))

The U.S. Environmental Protection Agency (EPA) has issued final rules restricting the manufacture (including import), processing, and distribution in commerce of selected persistent, bioaccumulative, and toxic (PBT) substances, including Decabromodiphenyl ether (DecaBDE), Phenol Isopropylated Phosphate (3:1) (PIP 3:1), 2,4,6-tris(tert-butyl)phenol (2,4,6-TTBP), Hexachlorobutadiene (HCBd), and Pentachlorothiophenol (PCTP).

To the best of our knowledge and based on supplier documentation, Spark Holland B.V. products do not contain these PBT chemicals and none of them are intentionally added during manufacturing.

Compliance with Current TSCA New-Chemical Review Requirements (TSCA Section 5)

Spark Holland B.V. does not manufacture or process any substances requiring Premanufacture Notices (PMNs), Significant New Use Notices (SNUNs), or other TSCA Section 5 submissions for our products.

TSCA Section 8(a) Recordkeeping and Reporting Obligations

Manufacturers and importers are required to maintain records and report information as mandated under TSCA Section 8(a) and 40 CFR Part 711.

Spark Holland B.V. maintains appropriate documentation demonstrating that materials used comply with TSCA and meet all applicable reporting and recordkeeping requirements.

PFAS Reporting Rule (TSCA Section 8(a)(7))

EPA finalized a PFAS reporting rule requiring manufacturers and importers of PFAS to report historical data (2011–2022) during the 2026 submission window (April 13 – October 13, 2026).

> visit us at sparkholland.com

+31 591 631 700
info@sparkholland.com

Spark Holland B.V.
Waanderweg 40
7825 HZ Emmen
The Netherlands

ING BANK 65.96.49.268
IBAN NL77 INGB 0 659 649 268
BIC INGBNL2A
Registered 04034580 KvK Meppel
VAT No. NL008061737B01

Based on available supplier information and internal assessments, Spark Holland B.V. products are not known to contain PFAS subject to the reporting requirements. Documentation of applicability is maintained in accordance with EPA guidance.

TSCA Import Certification (TSCA Section 13)

For applicable shipments into the United States, Spark Holland B.V. ensures that all imports comply with TSCA Section 13 requirements and U.S. Customs and Border Protection (CBP) regulations at 19 CFR 12.118–12.127.

Positive TSCA certification is provided when required, confirming that goods comply with all applicable TSCA rules and orders.

Anticipated Regulatory Updates and Ongoing Compliance

Spark Holland B.V. actively monitors all upcoming TSCA obligations, including updates affecting PFAS, solvents, and other regulated substances, to ensure ongoing compliance.

To the best of our knowledge, based on supplier declarations, material assessments, and current EPA regulatory information, Spark Holland B.V. declares that our products comply with all applicable TSCA requirements and do not contain substances restricted under TSCA.

Signed for and on behalf of:

Emmen, The Netherlands, July 22, 2026



H.P. Karman, QA/RA Manager

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