



Regulatory Data Sheet

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3M™ Novec™ 73DE Engineered Fluid

3M
Electronics Materials Solutions Division
3M Center, St. Paul, MN 55144-1000, USA
1-888-3M HELPS (1-888-364-3577)

RDSs are available at www.3M.com

Regulations and Industry Standards

SDS (US OSHA)

See Safety Data Sheet (SDS) for hazard and other regulatory data.

California Proposition 65

This product is an industrial product manufactured outside of California. It has not been assessed for consumer sale or use. Contact the manufacturer if more information is needed for your use.

China RoHS

This product does not meet the definition of Electrical and Electronic Products (EEP) as per Article (3) of MIIT Order 32, Administrative Measures on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Products, or it is an excluded EEP product category as defined in the MIIT FAQ of China RoHS, #11.

China RoHS

This product or part does not exceed the maximum concentration values (MCVs) in China RoHS GB/T 26572-2011/AMD No. 1 (Requirements of Concentration limits for certain restricted substances in electrical and electronic products), which means that each of the homogeneous materials within this product is below the following MCVs: (a) 0.1% (by weight) for lead and its compounds, mercury and its compounds, hexavalent chromium and its compounds, polybrominated biphenyls, polybrominated diphenyl ethers, di(2-ethylhexyl) phthalate, butyl benzyl phthalate, dibutyl phthalate, or diisobutyl phthalate; and (b) 0.01% (by weight) for cadmium and its compounds.

CONEG

This product complies with the US CONEG (Coalition of Northeastern Governors) Model Toxics in Packaging Legislation as there is no intentionally added lead, cadmium, hexavalent chromium or mercury, and the sum total concentration of these substances in the product does not exceed 100 ppm by weight.

Conflict Minerals

Conflict Minerals, which the U.S. Securities and Exchange Commission ("SEC") has defined as gold, columbite-tantalite (coltan), cassiterite, wolframite, or their derivatives (tin, tantalum, or tungsten), are not contained in or are not "necessary to the functionality or necessary to the production" of the above-listed product, as the term "necessary to the functionality or the production" is defined under the SEC's Conflict Minerals Rule. 77 Fed. Reg. 56274 (Sept. 12, 2012).

EU Azo Colourant Directive

This product does not contain azo dyes which, by reductive cleavage of one or more azo groups, may release one or more of the aromatic amines listed in the Appendix I, in detectable concentrations above 30 ppm in the finished article or in the dyes parts thereof, according to the testing method established in accordance with Article 2a of this European Commission Directive 2002/61/EC (2004/21/EC).

EU REACH

This product is a chemical preparation under Regulation No 1907/2006 of the European Parliament and the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). To the best of its knowledge, 3M has pre-registered and has registered/is intending to register all substances of its chemical preparations that it currently imports into and/or manufactures in the European Union that are in scope for (pre-)registration by 3M. It has a required safety data sheet.

EU REACH

This product, including any article that the product is composed of, does not contain at greater than 0.1% by weight a Substance of Very High Concern (SVHC) substance identified according to Article 59 of REACH. This declaration reflects the substances on the candidate SVHC list, effective February 2026.

EU RoHS

This product does not exceed the maximum concentration values (MCVs) set under EU Directive 2011/65/EU (RoHS recast/RoHS 2), as stated in Annex II to that directive. This means that each of the homogenous materials within this product does not exceed the following MCVs: (a) 0.1% (by weight) for lead, mercury, hexavalent chromium, polybrominated biphenyls or polybrominated diphenyl ethers; and (b) 0.01% (by weight) for cadmium.

EU RoHS Phthalates

This product does not exceed the maximum concentration values (MCVs) for phthalates set under EU Directive 2011/65/EU (RoHS recast/RoHS 2), as amended by EU 2015/863, which applies to finished EEE after July 22, 2019 for Category 1-7, 10-11 products and after July 22, 2021 for Category 8 and 9 products. This means that each of the homogeneous materials within this product does not exceed the MCV of 0.1% (by weight) for each of the following phthalates: DEHP, BBP, DBP, and DIBP.

TSCA 8(a) Nanomaterial Reporting

This product does not contain nanoparticles subject to reporting under TSCA Section 8(a). Under the “Chemical Substances When Manufactured or Processed as Nanoscale Materials: TSCA Reporting and Recordkeeping Requirements” rule, a reportable nanoparticle is defined as having at least one dimension in the size range of 1 – 100 nm and is manufactured or processed to exhibit unique and novel properties because of its size.

TSCA Section 6

This product is not known to contain 2,4,6-Tri-tert-butylphenol (CAS 732-26-3).

TSCA Section 6

This product is not known to contain Decabromodiphenyl Ether (Deca-BDE) (CAS 1163-19-5).

TSCA Section 6

This product is not known to contain Hexachlorobutadiene (HCB) (CAS 87-68-3).

TSCA Section 6

This product is not known to contain Pentachlorothiophenol (PCTP) (CAS 133-49-3).

TSCA Section 6

This product is not known to contain Phenol, isopropylated phosphate (3:1) (PIP (3:1)) (CAS 68937-41-7).

Chemicals and/or Compounds of Interest

[Phthalato(2-)]dioxotrilead (dibasic lead phthalate) (CAS 69011-06-9) : Not known to contain.

1,2-benzenedicarboxylic acid, di-C6-10-alkyl esters or mixed decyl and hexyl and octyl diesters : Not known to contain.

1,2-Benzenedicarboxylic acid, di-C6-8-branched alkyl esters, C7-rich (DIHP) (CAS 71888-89-6) : Not known to contain.

1,2-Benzenedicarboxylic acid, di-C7-11-branched and linear alkyl esters (DHNUP) (CAS 68515-42-4) : Not known to contain.

1,2-Benzenedicarboxylic acid, dihexyl ester, branched and linear (CAS 68515-50-4) : Not known to contain.

1,2-Benzenedicarboxylic acid, dipentyl ester, branched and linear (CAS 84777-06-0) : Not known to contain.

2-(2H-benzotriazol-2-yl)-6-(1-methyl-1-phenylethyl)-4-(1,1,3,3-tetramethylbutyl)phenol (CAS 73936-91-1) : Not known to contain.

2-(2'-Hydroxy-3',5'-di-tert-butylphenyl)benzotriazole (CAS 3846-71-7) : Not known to contain.

2-(3-Sec-butyl-2-hydroxy-5-tert-butylphenyl)benzotriazole (CAS 36437-37-3) : Not known to contain.

2-(5-Chloro-benzotriazol-2-yl)-4,6-bis(t-butyl)phenol (CAS 3864-99-1) : Not known to contain.

2,4,6-Tri-tert-butylphenol (CAS 732-26-3) : Not known to contain.

4,4'-Methylenebis(2,6-Diethylaniline) (CAS 13680-35-8) : Not known to contain.

Acrylamide (CAS 79-06-1) : Not known to contain.

Aflatoxins/Mycotoxins : Not known to contain.

Alkylphenol (AP) : Not known to contain.

Alkylphenoethoxylates (APE) : Not known to contain.

Antimony and (Sb) Compounds : Not known to contain.

Aromatic Amines : Not known to contain.

Arsenic and (As) Compounds : Not known to contain.

Asbestos : Not known to contain.

Azocolorants and Azodyes : Not known to contain.

Azocolorants and Azodyes : This product does not contain azo dyes which, by reductive cleavage of one or more azo groups, may release one or more of the aromatic amines listed in the Appendix I, in detectable concentrations above 30 ppm in the finished article or in the dyes parts thereof, according to the testing method established in accordance with Article 2a of this European Commission Directive 2002/61/EC (2004/21/EC).

Barium and (Ba) Compounds : Not known to contain.

Benzenamine, N-Phenyl-, Reaction Products with Styrene and 2,4,4-Trimethylpentene (BNST) (CAS 68921-45-9) : Not known to contain.

Beryllium and (Be) Compounds : Not known to contain.

Biocides/Preservatives : Biocides/preservatives are not intentionally added for the purpose of protecting the product from the growth of microorganisms.

Bismuth and (Bi) Compounds : Not known to contain.

Bisphenol A (BPA) (CAS 80-05-7) : Not known to contain.

Boron and (B) Compounds : Not known to contain.

Butyl Benzyl Phthalate (BBP) (CAS 85-68-7) : Not known to contain.

Butylated Hydroxyanisole (BHA) (CAS 25013-16-5) : Not known to contain.

Butylated Hydroxytoluene (BHT) (128-37-0) : Not known to contain.

Cadmium and (Cd) Compounds : Not known to contain.

Chlorinated Paraffins, Short Chain : Not known to contain.

Chlorinated Polyethylene : Not known to contain.

Chloroprene (Neoprene) : Not known to contain.

Chlorosulfonated Polyethylene : Not known to contain.

Chromium and (Cr) Compounds : Not known to contain.

Cobalt and (Co) Compounds : Not known to contain.

Colophony (Rosin) (CAS 8050-09-7) : Not known to contain.

Copper and (Cu) Compounds : Not known to contain.

Creosote : Not known to contain.

Crystalline Silica : Not known to contain.

Decabromodiphenyl Ether (Deca-BDE) (CAS 1163-19-5) : Not known to contain.

Di(2-Ethylhexyl) Phthalate (DEHP) (CAS 117-81-7) : Not known to contain.

Di(Methoxyethyl) Phthalate (DMEP) (CAS 117-82-8) : Not known to contain.

Dibutyl Phthalate (DBP) (CAS 84-74-2) : Not known to contain.

Dibutyl Tin Compounds : Not known to contain.

Dicyclohexyl phthalate (DCHP) (CAS 84-61-7) : Not known to contain.

Dihexyl phthalate (DNHP) (CAS 84-75-3) : Not known to contain.

Diisobutyl Phthalate (DIBP) (CAS 84-69-5) : Not known to contain.

Diisodecyl Phthalate (DIDP) : Not known to contain.

Diisohexyl phthalate (CAS 71850-09-4) : Not known to contain.

Diisononyl Phthalate (DINP) : Not known to contain.

Diisopentylphthalate (DIPP) (CAS 605-50-5) : Not known to contain.

Dimethyl Fumarate (DMF) (CAS 624-49-7) : Not known to contain.

Dimethylacetamide (CAS 127-19-5) : Not known to contain.

Di-n-Octyl Phthalate (DNOP) (CAS 117-84-0) : Not known to contain.

Diocetyl tin Compounds : Not known to contain.

Dioxins and Furans : Not known to contain.

Dipentyl phthalate (DPP) (CAS 131-18-0) : Not known to contain.

Dyes : Not known to contain.

Flame Retardants (not PBB or PBDE) : Not known to contain.

Formaldehyde (CAS 50-00-0) : Not known to contain.

Gold and (Au) Compounds : Not known to contain.

Graphite (CAS 7782-42-5) : Not known to contain.

Halogenated Compounds : Contains.

Halogenated diphenyl methanes : Not known to contain.

Halogenated Flame Retardants : Not known to contain.

Hexabromo Cyclo-Dodecane (HBCD) : Not known to contain.

Hexabromobenzene (CAS 87-82-1) : Not known to contain.

Hexachlorobenzene (CAS 118-74-1) : Not known to contain.

Hexavalent Chromium and (Cr+6) Compounds : Not known to contain.

Indium and (In) Compounds : Not known to contain.

Iridium and (Ir) Compounds : Not known to contain.

Iron and (Fe) Compounds : Not known to contain.

Isocyanates : Not known to contain.

Lead and (Pb) Compounds : Not known to contain.

Lithium and (Li) Compounds : Not known to contain.

Magnesium and (Mg) Compounds : Not known to contain.

Manganese and (Mn) Compounds : Not known to contain.

Materials of Human or Animal Origin : Not known to contain.

Medium-chained chlorinated paraffins, C14-C17 (MCCP) : Not known to contain.

Melamine (CAS 108-78-1) : Not known to contain.

Mercury and (Hg) Compounds : Not known to contain.

Mica : Not known to contain.

Molybdenum and (Mo) Compounds : Not known to contain.

Musk Xylene (CAS 81-15-2) : Not known to contain.

Nanomaterial : Nanomaterial is not intentionally added in this product. Nanomaterial is manufactured or naturally occurring solid particles for which at least 1% by weight of the primary particles are between approximately 1 and 100 nanometers in at least one external dimension.

Naphthalene (CAS 91-20-3) : Not known to contain.

Natural Rubber Latex : This product is not made with natural rubber latex.

Natural Rubber Latex : Not known to contain.

Nickel and (Ni) Compounds : Not known to contain.

N-Nitrosamines : Not known to contain.

Nonylphenol (NP) : Not known to contain.

Nonylphenol Ethoxylates (NPE) : Not known to contain.

N-pentyl-isopentyl phthalate (CAS 776297-69-9) : Not known to contain.

Organochlorine Pesticides : Not known to contain.

Organophosphate Pesticides : Not known to contain.

Organotin Compounds : Not known to contain.

Osmium and (Os) Compounds : Not known to contain.

Palladium and (Pd) Compounds : Not known to contain.

Pentachlorophenol (87-86-5) : Not known to contain.

Phenol (CAS 108-95-2) : Not known to contain.

Phenol, 2-(2H-benzotriazol-2-yl)-4,6-bis(1,1-dimethylpropyl)- (CAS 25973-55-1) : Not known to contain.

Phosphorus and (P) Compounds : Not known to contain.

Phthalates : Not known to contain.

Platinum and (Pt) Compounds : Not known to contain.

Polybrominated Biphenyls (PBB) : Not known to contain.

Polybrominated Diphenylethers (PBDE) : Not known to contain.

Polychlorinated Biphenyls (PCBs) : Not known to contain.

Polychlorinated Naphthalenes (PCNs) (>3 Chlorine Atoms) : Not known to contain.

Polychlorinated Terphenyls (PCTs) : Not known to contain.
Polycyclic Aromatic Hydrocarbons (PAHs) : Not known to contain.
Polyvinyl Chloride (PVC) : Not known to contain.
Potassium and (K) Compounds : Not known to contain.
Radioactive Substance : Not known to contain.
Rare Earth Elements (REE) or Rare Earth Metals (REM) : Not known to contain.
Rhodium and (Rh) Compounds : Not known to contain.
Ruthenium and (Ru) Compounds : Not known to contain.
Selenium and (Se) Compounds : Not known to contain.
Silicone : Not known to contain.
Silver and (Ag) Compounds : Not known to contain.
Sulfur and (S) Compounds : Not known to contain.
Tantalum and (Ta) Compounds : Not known to contain.
Tetrabromobisphenol A (TBBA) (CAS 79-94-7) : Not known to contain.
Thallium and (Tl) Compounds : Not known to contain.
Tin and (Sn) Compounds : Not known to contain.
Titanium and (Ti) Compounds : Not known to contain.
Tributyl Tin Compounds : Not known to contain.
Triphenyl Tin Compounds : Not known to contain.
Tris(1 chloro-2-propyl) phosphate (TCPP) (CAS 13674-84-5) : Not known to contain.
Tris(1,3 dichloro-2-propyl) phosphate (TDCPP) (CAS 13674-87-8) : Not known to contain.
Tris(1-aziridinyl)phosphine oxide (TAPO) (CAS 545-55-1) : Not known to contain.
Tungsten and (W) Compounds : Not known to contain.
Urea-Formaldehyde (UF) : Not known to contain.
Vanadium and (V) Compounds : Not known to contain.
Zinc and (Zn) Compounds : Not known to contain.

Per- and Polyfluoroalkyl Substances (PFAS)

PFAS refers to a broad range of thousands of materials with varying properties and characteristics, which may include high resistance to oil, water, temperature, chemicals, and fire, which makes certain PFAS critical to the functioning of many modern products.

Chlorofluorocarbons (CFCs) : Not intentionally added.
Hydrochlorofluorocarbons (HCFCs) : Not intentionally added.
Per- and polyfluoroalkyl substances (PFAS) : Intentionally added. *"Please see section 3 of the SDS"*
Perfluorooctanesulfonic Acid (PFOS) (CAS 1763-23-1) : Not intentionally added.
Perfluorooctanoic Acid (PFOA) (CAS 335-67-1) : Not intentionally added.

Definitions

Note: all Definitions take Disclaimers into account and apply to the "Chemicals and/or Compounds of Interest" and/or "Per and poly-fluoroalkyl Substances (PFAS)" sections only

Terms	Definitions
Contains*	Present based on composition information disclosed by 3M suppliers, analytical testing, or both.
Not known to contain*	1. Analytical measurement for presence is not currently available; 2. If measurement is possible, - The material has not been identified or disclosed to 3M and - The material has not been specifically quantified or detected; OR - Based on information from raw material suppliers, possible presence as an impurity or by-product at or below regulatory thresholds (e.g., 0.1 or 0.01 %)
Intentionally added**	Desired in the final product to provide a specific characteristic, appearance, or quality and/or to perform a specific function.
Not intentionally	By-product(s), impurity(ies) and/or unintended artifact(s) resulting from the formulation and/or

added**	manufacture of a material.
By-product***	A chemical substance produced without a separate commercial intent during the manufacture, processing, use, or disposal of another chemical substance or mixture.
Impurity***	A chemical substance which is unintentionally present with another chemical substance (e.g., residuals, catalysts, process solvents).

**Terms apply to the Chemicals and/or Compounds of Interest Section only (if section is present)*

***Terms apply to the PFAS Section only (if section is present)*

****Terms apply to both the Chemicals and/or Compounds of Interest and PFAS Sections (if section(s) are present)*

Disclaimers: The information provided in this document related to material content represents 3M's knowledge and belief, which may be based in whole or in part on information provided by suppliers to 3M. This is intended to answer commonly asked questions about 3M products and is not intended to be a comprehensive listing of all substances that may be of interest or that may be regulated in this or other 3M products, nor is it intended to be a comprehensive summary of any and all regulations that may apply to this product. Where substances are listed, their listing does not infer or constitute a judgment as to their safety, environmental or health impacts. Information is supplied upon the condition that the persons receiving the same will make their own determination as to its suitability for their purposes prior to use. Customers are encouraged to consult with legal and regulatory experts to determine applicable regulations in light of intended use of the product.

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