

# SunChemical®

a member of the DIC group



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To whom it may concern

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## **REACH Registration and Pre-registration**

Sun Chemical has successfully registered all substances with 2010 and 2013 deadline. We will inform you registration numbers as part of updated Safety Data Sheets. None of the registrations require exposure scenario as they are either non-hazardous or monomers in imported polymers. It is our intention to register all substances for which we are liable with the timeline 2018 as given by REACH.

Sun Chemical does not provide specific information on product composition or when we will register individual ingredients or from where we will source the products. This is regarded as confidential business information.

This letter also confirms Sun Chemical Performance Pigments and Sun Chemical Inks have successfully pre-registered all substances for which we are liable as importer or manufacturer to pre-register. We can also confirm that Sun Chemical Switzerland only export products to EU, which are covered by re-import or Only Representative agreements.

Customers purchasing from Sun Chemical offices in EEA (EU, Norway, Iceland, and Lichtenstein) will be covered by our REACH (pre-)registrations. For non-EEA customers purchasing from Sun Chemical in Europe re-importation can only be claimed for registered substances. Should pre-registration be required we will act as your Only Representative during the phase-in period until registration. After Sun Chemical registration re-importation can be claimed and we will no longer act as Only Representative.

Customers purchasing from other non-EEA Sun Chemical offices will not be covered by the (pre-)registrations.

We have also received confirmation from all non-EEA suppliers setting up only representatives in EEA that Sun Chemical import will be covered by intended registration. Sun Chemical will inform you on registration when registration numbers are available. This will be part of an updated Safety Data Sheet.

Sun Chemical will not use the pre-registration number for confirmation as this number is not mandatory information in the supply chain and therefore does not exist for all substances we have available.

In case suppliers will not register we will inform you as soon as we have the information and advice on alternatives to ensure our customers' success. We have identified alternative suppliers for the majority of our raw materials.

Sun Chemical products are mainly mixtures of substances. A REACH-compliant product will therefore be dependant on the requirements for the individual substances in the product. This will include per substance: time-line for registration, hazard profile and restrictions/authorization if any.

We will ensure compliance and include registration numbers in our SDS following registration. We will also provide exposure scenarios including exposure estimates where required (substances above 10 ton per year). The SDS may change for some of our products over the next few years, but the product will be REACH compliant at any given point in time.

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### **Information on substances of very high concern**

This information is valid for the candidate list found on ECHA's homepage including 174 entries as well as substances listed on the Authorisation list.

The Sun Chemical stewardship program does not accept listed candidate SVHC's and our products intended for the EU market generally do not contain any known amounts of substances of very high concern (SVHCs) at more than 0.1% (or the lowest concentration limit specified in Part 3 of Annex VI to Regulation (EC) No 1272/2008 which results in the classification as a SVHC), and which could be subject to potential future authorization process (as outlined in REACH Art 56). We are also looking to substitute any SVHCs in our existing non-EU product portfolio. Information on substance use restrictions will continue to be communicated as part of our SDS.

However, the pigment code 2719136 has been identified to contain more than 0.1%(w/w) Alkyl Phenol Ethoxylates. We are actively looking for alternative. RCD8107 and BCD9391 for seed coating also contains APEO and customers should contact SC sales person for alternative products.

For customers outside of the EU, please request our current EU label and SDS when considering exports to the EU based upon our non-EU products.

Articles are specifically excluded from consideration under REACH, however there are specific circumstances related to articles where this does not apply. In these cases, we recommend that you contact your REACH specialist.

In case any further information is required we kindly ask you to contact your Sun Chemical sales representative.

### **CLP-regulation**

Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP Regulation) require any manufacturer or importer to:

- 1) notify European Chemical Agency (ECHA) on classification for all hazardous substances and all non-classified substances imported or manufactured above 1 tpa.
- 2) First notification must be done for all substances on the market 1 December 2010 before January 3<sup>rd</sup>, 2011
- 3) Any other substance placed on the market must be notified within 1 month after placing on the market.

Sun Chemical has notified to ECHA all substances on the market 1 December 2010 identified by CAS nos, that Sun Chemical manufacture within Europe or import into an European Sun Chemical legal entity.

We have also an internal procedure to make sure new substances for which we are liable to notify ECHA will be notified within 1 month after their placing on the market.

For customers where an agreement is in place, Sun Chemical has also notified ECHA on classification, this apply e.g. to customers receiving products from Sun Chemical Switzerland or Sun Chemical Turkey.

For customers, where we have no agreement in place, Sun Chemical has not notified ECHA.

### **Exposure Scenarios, Identified uses and Use Descriptor System**

It is the right of any Sun Chemical customer to inform us on known uses to make it an identified use and become included in chemical safety assessment including preparation of exposure scenarios.

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Sun Chemical will as reliable supplier consider any identified use made known to us where the REACH-legislation require us to, and where Sun Chemical is not the registrant we shall pass on the information to our suppliers.

However, we need customers to accept that it is not necessary in the following cases according to REACH article 14 and 37.4:

- The EU SDS supplied by Sun Chemical informs the product is not classified, does not contain information on a dangerous substance >1% (w/w) or does not contain information on candidate substances, PBTs or vPvBs >0.1%(w/w).
- The purchase of a Sun Chemical product is less than 1 tonne per year
- If a Chemical Safety Report is not required to be completed
- If the substance volume registered by the registrant entity is less than 10 tonne per year

We already supply information on appropriate risk management recommendation in the SDS for preparations and substances in above instances.

Sun Chemical will request suppliers to include or pass up the supply chain the following uses for inks related materials:

	Product Category	Sector of Use	Process Category	Article Category	Environmental Release Category
Manufacture	PC 18	SU 10	PROC 1, 2, 3, 5, 8a, 8b, 9	N/A	ERC 2
Application	PC 18	SU 3	PROC 2, 3, 4, 5, 8b, 10	N/A	ERC 4, 5

Ref: ECHA Guidance on information requirements and chemical safety assessment, version 1.2; May 2008

Sun Chemical will implement generic exposure scenarios developed by CEPE as soon as possible. We are currently not in a position to distribute for inks and inks related materials, but we will forward all ES received by suppliers to ensure compliance.

Pigments and pigment preparations are generally speaking not classified and the Chemical Safety Report is not required to be completed and exposure scenarios will not be developed. For the registration dossier we will include PC, SU, PROC, AC and ERC as required for registration and the continued use by Sun Chemical customers, including personal care products.

For pigments and pigment preparations classified as dangerous and purchased above 1 tonne per year we recommend contacting us for inclusion of your specific use.

Sincerely Yours



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