

To: Pexa Customer REACH responsible Executive

3rd February 2012

Subject: European Regulation 1907/2006 Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Pexa Bulletin No. 6.

Dear Customer,

This bulletin acts as a response to various queries as well as an update to the previous communication we have sent to you regarding Pexa's planning for REACH. In order to address these issues as well as fulfil our recognised responsibility relating to REACH as part of your supply chain, this letter seeks to clarify any uncertainties you may have.

The majority of queries we have received have been in relation to the Candidate List (CL) of Substances of Very High Concern (SVHC), registration assurances and registration number requests. This bulletin serves to address these issues and outline Pexa's responsibility as an importer and distributor.

Candidate List (CL)

The total number of substances currently in the candidate list is 73 and the up to date list can be accessed via the following link: <http://echa.europa.eu/web/guest/candidate-list-table>.

In December, 20 new substances were added to the CL, 12 of which were added by unanimous agreement of the Member State Committee (MSC) and 8 that were added directly as no comments challenging their identification as possible SVHC were made during the public consultation period. Of these 20 substances, 19 were added due to being identified as carcinogenic or reprotoxic and 4-tert-octylphenol became the first substance to be added under the "equivalent concern" rule. 4-tert-octylphenol has been added to the CL due to its endocrine disrupting properties deemed equivalent to the level of concern associated with CMRs because of possible serious effects to the environment.

http://echa.europa.eu/en/web/guest/view-article/-/journal_content/a5533137-4976-4054-b8e8-da4a5b3dd623

Of the 20 substances added to the CL many are relevant to the aerospace and coatings industry. These include:

- Aluminosilicate Refractory Ceramic Fibres
- Bis(2-methoxyethyl) ether
- Bis(2-methoxyethyl) phthalate
- Dichromium tris(chromate)
- N,N-dimethylacetamide (DMAC)
- Formaldehyde, oligomeric reaction products with aniline (technical MDA)
- Pentazinc chromate octahydroxide
- Potassium hydroxyoctaoxodizincatedichromate
- 4-tert-octylphenol
- Trilead diarsenate
- Zirconia Aluminosilicate, Refractory Ceramic Fibres

Shortly after the 20 new substances were added to the CL, the third recommendation for authorisation by the ECHA was made comprising of 13 substances which were added due to their CMR properties, volumes used and likelihood of human exposure. The ECHA believes that these substances should no longer be used without authorisation, it is up to the European Committee (EC) to make a final decision on whether they should be added to the Authorisation List and a "sunset date" set after which they will only be able to used for specific uses for which authorisation has been applied for.

http://echa.europa.eu/web/guest/view-article/-/journal_content/84f13bf9-d6fd-41ee-aeeb-cdf2e7e9cdee

Of these 13 substances many are important to the aerospace and coatings sector, with the majority used in surface treatment and metal finishing applications. These include:

- Ammonium dichromate
- Chromic acid, oligomers of chromic acid and dichromic acid
- Chromium trioxide
- Colbalt (II) diacetate
- Colbalt (II) dinitrate
- Colbalt (II) sulphate
- Potassium chromate
- Potassium dichromate
- Sodium chromate
- Sodium dichromate
- Trichloroethylene

Another significant member of the CL is strontium chromate which was added in June 2011. The MSC unanimously agreed that strontium chromate be added to the list as a carcinogen. Many corrosion inhibiting primers include strontium chromate. We have been assured by the manufacturer that R&D is ongoing to develop alternatives to products containing chromates. They have also informed us that if suitable alternatives are not found or the technical and safety performances have not been verified for proposed replacements and strontium chromate was to be made subject to authorisation, they will apply for authorisation for the specific use as a corrosion inhibiting primer.

A summary of the obligations that arise from adding a substance to the CL is available from: <http://echa.europa.eu/candidate-list-obligations>

As a supplier and importer of substances and mixtures Pexa has the following obligations to our customers:

- To provide customers with a Safety Data Sheet (SDS) when supplying a substance on the CL.
- To provide customers, at their request, with a SDS when supplying a mixture which contains at least one substance on the CL at a concentration greater than or equal to 0.1 % (w/w).

Registration

As a distributor, Pexa is not responsible for registering substances from the EU it is the manufacturer or importers responsibility. As an importer, we have either ensured that our suppliers have appointed an only representative (OR) in the EU responsible for registering the appropriate substances or that we import less than 1 tonne of the substance per annum. We have been assured by our suppliers that REACH registrations have been made where necessary.

We are not able to provide individual registration numbers for every substance, as many substances are precursors to raw materials used by the products manufacturer and the information is not available to us and is in many cases not practical to obtain. We will make every effort to supply you with individual registration numbers at your request if possible. Many substances are exempt as they are non hazardous or polymers and as REACH registration requirements are volume driven, many substances are not due to be registered until future deadlines in either 2013/2018.

<http://echa.europa.eu/web/guest/regulations/reach/substance-registration/substances-to-be-registered>



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Our aim is to keep you informed with updates on this particularly important issue. Below are a few links that contain information on REACH processes in more detail:

REACH FAQs:

<http://echa.europa.eu/web/guest/support/faqs/frequently-asked-questions/frequently-asked-questions-about-reach>

BCF:

http://www.coatings.org.uk//Key_Issues/REACH.aspx

HSE:

<http://www.hse.gov.uk/reach/index.htm>

For further information, please do not hesitate to contact us at reach@pexa.co.uk.