



Cookson Electronics

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Enthone REACH Compliance Information

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REACH Compliance (Regulation (EC) No 1907/2006)

Enthone complies with REACH today and in future. Enthone ensures worldwide compliance by a central coordination of all REACH related obligations at its European Headquarters located in Langenfeld, Germany.

Pre-Registration/Registration

The pre-registration deadline ended December 1, 2008. According to the latest list of pre-registered substances published by the European Chemicals Agency (ECHA) as well as according to supplier statements, all substances contained in Enthone products have been pre-registered (EINECS-substances) or registered (ELINCS-substances), where not exempted. With respect to own import and manufacturing, Enthone has pre-registered substances for different legal entities, where required.

Evidence of Pre-Registration/Registration

As required by REACH, Enthone will communicate registration numbers through the Safety Data Sheets (SDSs) as soon as registration numbers become available to Enthone.

Enthone does not communicate pre-registration numbers. Beside the fact that such numbers are not provided to Enthone by the vast majority of suppliers, pre-registration numbers do not imply any extra benefit, since they are valid only per manufacturer's legal entity and per substance. To ensure supply availability to the customers, Enthone has several suppliers for one and the same substance (which may be valid for the upstream supplier as well). This leads to several different numbers just for this single substance. Since Enthone in most cases does not sell single substances but preparations, the amount of pre-registration numbers will result in customer's confusion only.

By providing a compliance statement to downstream users, an evidence of (pre-)registration is obsolete.

Safety Data Sheet (SDS)

As can be seen on the SDS's very header, Enthone's SDSs are REACH conform. SDSs are automatically sent to customers as soon as a new major change applies. Beside this fact, the European Commission (EC) and the European Chemical Industry Council (CEFIC) have defined that it is not mandatory to send

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updated SDSs before December 1, 2010, due to the continual changes in data while executing REACH. However, this is not valid in case new information relevant to safety arises or when authorities impose restrictions during registration of a product. In such a case, an updated SDS needs to be sent promptly.

Application of a Product

REACH requires an application description of a product within the SDS. The application is a basis for estimating the risk of a product when used by humans or when released to the environment. This will be of particular importance when exposure scenarios need to be created.

The description of applications has been specified with the REACH Implementation Project RIP 3.2-2 and has been published on May 29, 2008 (see http://reach.jrc.it/guidance_en.htm). On this basis and in cooperation with the Central Association of Surface Treatment Professionals in Germany (ZVO), Enthone actively creates standardized applications and exposure scenarios for our branch of industry.

Substances of Very High Concern (SVHC)

According to REACH Article 57, SVHCs are defined at least by one of the following properties:

- cancerogenic or mutagenic or toxic to reproduction, category 1 or 2 (CMR Cat 1/2)
- persistent and bioaccumulative and toxic (PBT)
- very persistent and very bioaccumulative (vPvB)
- scientifically proven to be of very high concern to man or environment (e.g. endocrine disruptors)

The European Chemicals Agency (ECHA) has published the so called Candidate List of Substances of Very High Concern, which will be regularly updated on the following website:

http://echa.europa.eu/chem_data/candidate_list_table_en.asp

Any update will be discussed between industry and ECHA and agreed substances will be transferred to REACH Annex XIV. After a transition period, applications as well as any use of such substances must be authorized.

Hence, SVHCs in products must be communicated along the supply chain. These products are distinguished by REACH between "substances", "preparations" and "articles":

- Identity and quantity of an SVHC supplied as a substance or contained in a preparation, if any, must be communicated down the supply chain through the corresponding Safety Data Sheet (SDS) in Section 3, as required by REACH Article 31.
- Suppliers of articles containing more than 0.1 %w/w of an SVHC "shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance" (REACH Article 33). This is also applicable for consumer inquiries.

As a result, REACH Article 33 about the duty to communicate information about substances in articles is not applicable to Enthone, because Enthone does not supply articles but substances/preparations (certain anodes exempted, but such anodes do not contain any of the currently identified SVHC).

According to our current knowledge we do not expect that components of our preparations deposit as such on an article >0.1%w/w when the surface treatment process is performed as described in our corresponding technical data sheet. This has been agreed by the German Professional Association Surface Technology (fvo). Please note, that Enthone in no case is in the position to take over any responsibility for your statements, which you have to provide to your customers according to REACH Article 33.

Quality Management

Besides any regulatory obligation and according to our ISO 9001 quality management system, Enthone maintains a direct communication to customers. Customers will be involved in any upcoming change related to Enthone's product portfolio or supply availability.

We hope that this information has been sufficient to answer your questions.
If you have any further queries please do not hesitate to contact us.

Kind regards

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