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V18

## Valued Customer To Whom It May Concern

Thursday, 27 March 2014

### REACH with Ecolab

Dear Valued Customer,

Regarding Ecolab's preparations for the Registration, Evaluation, Authorization and Restriction of CHemicals (REACH) Regulation (1907/2006), Ecolab has an active program in place to secure our customer's processes through REACH. You can reach our Centre of Excellence via the email address [reach@ecolab.com](mailto:reach@ecolab.com). Furthermore our website [www.ecolab.com](http://www.ecolab.com) is regularly updated with information on our strategy and its delivery.

The products that we deliver are generally made from a mixture of substances, including polymers that Ecolab either manufactures/imports or purchases from third party European Union (EU) suppliers. The situation is very complex and we would like to update you on certain aspects of our program:

#### ***Pre-registration***

Ecolab has pre-registered all the substances that Ecolab manufactures or imports for sale within the European Union as a first step. Third party substances for which we did not receive a satisfactory response from our supplier(s) during our enquiries were also pre-registered as a precaution. Monomer units have been pre-registered along with all our other chemistries, as polymers are exempt from the REACH regulation.

In line with the recommendation of CEFIC, The European Chemical Industry Council, the voice of the chemical industry, Ecolab will not release pre-registration numbers. We do not believe that releasing pre-registration numbers will add value to our customers as it does not reveal the identity of a substance nor will it be published by ECHA for verification. However as stated Ecolab has pre-registered all chemicals manufactured or imported in quantities more than one tonne per year.

#### ***Registration***

Ecolab successfully registered our portfolio of substances that fell under the registration deadlines of REACH in 2010 and 2013. These were important milestones, for Ecolab and demonstrates our commitment to and support of REACH. Registration numbers are available on request.

Plans are in place to proceed with the registration of substances with a 2018 deadline. In line with our duty of care commitment, Ecolab has approached all of our suppliers and asked for their commitment to register. Generally, Ecolab has received this assurance.

**Substances of Very High Concern (SVHC)**

Based on current and available information, other than a very small segment of products, none of the Ecolab products sold within the European Union contain any SVHC greater than 0,1 percent as listed on the Candidate List published by the ECHA. To view the Candidate List of SVHC, please visit:

[http://echa.europa.eu/chem\\_data/authorisation\\_process/candidate\\_list\\_table\\_en.asp](http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp)

Recent additions to the Candidate List have affected a small number of Ecolab programs. Ecolab tracks the percentage of products in our portfolio that contain SVHCs. Currently less than 2,0 percent of the product portfolio is affected.

Please contact Ecolab should you require additional information.

**Exposure Scenarios**

Use and fate exposure scenarios to cover the applications for which our Ecolab products are used have been developed. These have been used in our own dossier submissions and communicated to our suppliers for inclusion within the dossiers of those substances that Ecolab purchase. Typically these are:

**Professional uses: Public domain (SU22)**

**Industrial uses: Uses of preparations at industrial sites (SU3)**

The scenarios for each sector cover professional applications of the substances and its mixtures and in certain cases industrial applications of the substance and its mixtures.

Generally the following use descriptor codes have been used:

- (PROC01) Use in closed process, no likelihood of exposure;
- (PROC02) Industrial use in closed continuous process with occasional controlled exposure (sampling);
- (PROC04) Use in batch and other process (synthesis) where opportunity for exposure arises;
- (PROC07) Industrial spraying
- (PROC08a) Transfer of substance or preparation (charging/discharging) from/to vessels/large containers at non dedicated facilities;
- (PROC08b) Transfer of substance or preparation (dis-)charging from/to vessels/large containers, at dedicated facilities;
- (PROC10) Roller application or brushing;
- (PROC11) Non industrial spraying;
- (PROC 13) Treatment of articles by dipping and pouring;
- (PROC15) Use as a laboratory reagent;
- (PROC19) Hand-mixing with intimate contact and only PPE available;
- (ERC04) Industrial use of processing aids, not becoming part of articles;
- (ERC08a) Wide dispersive indoor use of processing aids in open systems;
- (ERC08b) Wide dispersive indoor use of reactive substances in open systems;

Please note that there is no obligation to prepare an exposure scenario if:

- The substance is used in a mixture in amounts of less than one ton a year
- The substance is a polymer
- The substance is non-hazardous
- The use of the substance is exempt from the obligation (for example biocides)

We will naturally consider any customer's request for additional scenarios.

**Extended Safety Data Sheets (eSDS)**

The REACH regulation requires that more detailed information is communicated throughout the supply chain in extended safety data sheets (eSDS). This information can include toxicological information, registration numbers, exposure scenarios and, most importantly, Risk Management Measures that document how to use the product safely. Ecolab has modified our systems to allow the generation of extended safety data sheets. However, Ecolab is reliant on our suppliers for the provision of such information. As information is received, Ecolab will work to ensure that it is communicated to you, our customer, without undue delay.

Our REACH team can be contacted at:

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Southampton SO45 3NP,  
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Program Director: Mr Huw P. Jones  
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Please rest assured that it is Ecolab's intent to comply fully with the REACH regulation and to secure the long-term future of chemicals that you our customer can rely upon. A customer bulletin, which explains REACH and our strategy, is available. Should you require any further information, please do not hesitate to contact us.

Sincerely yours,



**Huw P Jones**  
**REACH Program Director**  
**REACH Centre of Excellence**