

February 2024

Subject: Solenis' position on REACH Regulation

All Solenis' products that are manufactured in or imported into the EEA by Solenis are compliant with the REACH regulation.

The **Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation (EC) Number 1907/2006** is a regulation of the European Union Economic Area (EEA). It entered into force on 1st June 2007 and is adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals, while enhancing the competitiveness of the European Union chemicals industry.

Solenis' REACH roles and obligations

Depending on the product, Solenis can have the role of either a Manufacturer, an Importer or a Downstream User. In any of these roles, Solenis has and continues to fulfill its registration obligations under REACH. Therefore, Solenis works closely with its suppliers to ensure that all Solenis' products manufactured in or imported into the EEA by Solenis are compliant with the REACH regulation. The European Chemical Industry Council (CEFIC) recently launched a "REACH Action Plan for Review/Improvement of Registration Dossiers." This CEFIC initiative comes in response to increasing criticism about "non-compliant" REACH dossiers highlighted by the European Chemicals Agency (ECHA). Solenis is actively taking part in this initiative and has officially signed a 'Declaration of Intent' confirming its willingness and commitment to review and update its REACH registration dossiers in accordance to the REACH regulation.

When importing products from a non-EU Legal Entity of Solenis

Please note that it is your duty as importer to register the substance(s) under EU-REACH.

Should you desire to be covered by Solenis' Only Representative coverage, please contact us in advance to get confirmation before embarking on Product shipment.

Mixtures

Product that is a mixture, is not in itself required to be registered with REACH, but the substances contained in them are required to be registered. **The substances contained in all Solenis' Products have either been registered by Solenis or Suppliers up the supply chain.** The REACH registration numbers of hazardous substances or residual monomers that contribute to the classification and labelling of the mixture are displayed on the Safety Data Sheet (SDS) of the mixture under section 3. Very few Solenis products contain Substances of Very High concerns (SVHC), if any present in the product, they are mentioned in section 15 of the SDS. Solenis also has a generic paper on SVHC.

Exposure scenarios

Exposure scenarios and extended Safety Data Sheets (SDS) are available for products that are Pure substances and required to have an extended SDS.

Polymers (REACH (Article 3(5)))

Polymers are exempt from REACH registration, but the monomers and other reactants are obliged to be registered. Please note that the REACH registration numbers of the monomers are not required to be revealed and hence not mentioned on the Safety Data Sheet. **The monomers and/or other reactants contained in Solenis' polymer products have either been registered by Solenis or Suppliers up the supply chain.**

If you have any more questions, please contact us via your Solenis representative or send an e-mail to REACH-Solenis@solenis.com.

Yours sincerely,
Product Regulatory REACH Team

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