



Henkel AG & Co. KGaA, 40191 Düsseldorf, Deutschland

To
All customers of
Henkel Adhesive Technologies

Datum / Date August 2019
Ihre Nachricht /
Your message

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REACH – Effects of the EU chemical regulation on products of Henkel Adhesive Technologies

Dear Sir/Madam,

We would like to inform you about the current status of the REACH¹ implementation at Henkel Adhesive Technologies.

Pre-registration:

On May 31st, 2018, the transition phase for registrations according to Article 6 of the Regulation ended. By this, the existing pre-registrations became obsolete in regard of further import or manufacturing of substances in a volume > 1 ton per calendar year and legal entity.

¹ Regulation (EC) No 1907/2006

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Registrations

Henkel submitted registration dossiers to ECHA for all substances we were obliged to register in time for any of the deadlines (30th of November 2010 / 31th of May 2013 / 31th of May 2018). As required by REACH, you can find the registration numbers in the respective sections of the SDS. The last four digits of REACH registration numbers are not required to be communicated down the supply chains. This also applies for registration numbers of non-hazardous components in mixtures. We also would like to point out that as downstream users as well for most of the substances present in our products, we rely on the communication of our suppliers.

It goes without saying that Henkel will fulfill all legal obligations of REACH. This includes REACH compliance of all our products and all required information as well.

By accepting our order, our suppliers also confirm to deliver only REACH compliant raw materials.

Intended Uses and Use Reports:

Generally, intended Uses of chemical substances must be included in the registration dossiers. Industrial associations developed a standard format of Use Reports based on the ECHA Use & Exposure Descriptors according to RIP 3.2 Chapter R12 and R16, in which the uses at our customers have been covered as far as they are known to us. These use reports had been reported to our suppliers to be included in their registration dossiers.

Concerning our products for Surface Treatment and Metal Pre-Treatment, our Use Reports are explained and published on the web site of A.I.S.E. (International Association for Soaps, Detergents and Maintenance Products):

<http://www.aise.eu/our-activities/product-safety-and-innovation/reach/description-of-uses.aspx>

for adhesives and sealants you find use maps on the web site of FEICA (European Adhesive Association):

<http://www.feica.eu/our-priorities/key-projects/reach.aspx>

The use descriptors of construction chemical products can be found at:

https://bauchemie.vci.de/wiki/SPERC_User_CC/Seiten/UseReports.aspx

The identified uses of our products are mentioned in the respective technical datasheet, where you can check, whether your Uses are covered. Appropriate REACH information will be communicated via SDS once received from our suppliers. If Uses might not be covered, we strongly recommend reporting them to us by referring to the ECHA-Use-Descriptors. This is the only way to include such missing Uses into our Use-Communication along the supply chain.

SVHC and Annex XIV:

Substances of Very High Concern (SVHC) are published by the European Chemicals Agency in the so-called Candidate List (<http://echa.europa.eu>). Because this list is continuously updated, it is subject to a permanent monitoring by us. Whenever new substances are included in the list, all our formulations are checked accordingly.



Most of our products are preparations/mixtures. Article 31 of REACH Regulation (EC) No 1907/2006 describes the obligation to inform about preparations/mixtures. That means dangerous substances like SVHC have to be mentioned in the European Safety Data Sheets (Section 3).

Special obligations of information concerning SVHC in articles are described in Article 33 of the REACH ordinance because articles have not been regulated by the old chemicals legislation even if articles contained dangerous substances

If preparations or articles contain substances ≥ 0.1 % weight by weight of the ECHA candidate list (last updated July 17th, 2019), they are mentioned in the EU / REACH SDS. This might be the case for products which are exclusively designated for industrial applications.

With a release date of the safety data sheet after the inclusion into the candidate list you also find a note about the SVHC status there.

We do not expect the packaging of our products to contain any of the substances included in the SVHC candidate list in a concentration above 0.1 % by weight, based on preliminary information received from our suppliers. Should we receive contrary information – which we do not expect – we will advise you immediately.

When a substance has entered the SVHC candidate list, this does not automatically mean that its use is forbidden. The substance concerned can still be used considering the safety and application conditions.

In the meantime, substances of the SVHC candidate list have been transferred to Annex XIV and some are already under authorization obligation. We are aware of the implications and we are undertaking all necessary actions concerning authorization and uses in order to ensure REACH compliance of our products.

eSDS

An Annex to the safety data sheet including Exposure Scenarios has to be provided substance specific in case the actors in the supply chain created a Chemical Safety Assessment. Only in a few cases Henkel Adhesive Technologies acts as manufacturer/ importer of chemicals. For all the substances for which an own Chemical Safety Assessment has been created, the Annex can be downloaded via www.mymds.henkel.com in the section "EU Annex".

Information on the safe use of our mixtures can be found in the safety data sheets of our products. According to Article 31(7) REACH Regulation, there is no obligation to communicate exposure scenarios from our suppliers for substances in mixtures.

For safety data sheets CLP according Reach Regulation (EG) Nr. 1907/2006 applies. There is no requirement to indicate the reference to the regulation setting the version of Annex II of REACH used. This applies to all amendments of the regulation.

Regarding the Brexit, we are aware of the upcoming challenges and are closely following the process in order to take necessary actions in due time.



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Statements made in this letter are valid for all products of Henkel Adhesive Technologies sold in the EU by Henkel EU Affiliates.

If you are a Non-EU customer importing our products into the EU, compliance with REACH obligations is within the responsibility of you as the importer. If you have got any further question, please get in touch with your local contact in the region.

Yours sincerely,

—
Henkel Adhesive Technologies
Henkel AG & Co. KGaA

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