



Henkel AG & Co. KGaA, 40191 Düsseldorf, Deutschland

To
all customers of
Henkel Adhesive Technologies

Datum / Date January 2018
Ihre Nachricht /
Your message

Abteilung / Dept. REACH Office Adhesive Technologies

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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 Mai 21st 2017 the pre-registration possibility for tonnage bands 1-10t/a and 10-100t/a ended due to the ending of the transition phase by May 31st 2018.

All chemical substances which have been identified before end of the pre-registration deadline as requiring registration by Henkel Adhesive Technologies have been submitted for pre-registration to the European Chemicals Agency (ECHA). Respective confirmation has been sent by ECHA. There is no obligation according to REACH to publish pre-registration numbers.

As we are primarily a Downstream User, we are reliant on our upstream suppliers for the pre-registration / registration of our raw materials.

¹ Regulation (EC) No 1907/2006

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Where our suppliers have given their statements as a letter of intention, this is not legally binding. We are sure you will understand that we ourselves cannot sign a legally binding document on such a basis.

But in any case, by accepting our order, suppliers confirm to deliver only REACH compliant raw materials.

Intended Uses and UseReports:

In connection with the registration processes, which will take place during the next years, the Intended Uses of chemical substances must be part of the registration dossiers. Industrial associations developed a standard format of UseReports 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 will be reported to our suppliers in order to be included in their registration dossiers.

Concerning our products for Surface Treatment and Metal Pre-Treatment, our UseReports 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 on the web site of FEICA (European Adhesive Association) respectively:

<http://www.feica.org>

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 to report 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 of our formulations are checked accordingly.

The majority of our products are preparations/mixtures. Article 31 describes the obligation to inform about preparations/mixtures. That means dangerous substances like SVHC have to be mentioned in the European Safety Data Sheets.

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 15th of January, 2018), they are mentioned as such in the EU / REACH SDS. This might be the case for products which are exclusively designated for industrial applications.

According to the information we received so far and to our own investigations, we assume that the packaging of our products also do not contain any of the substances included in the candidate list in a concentration above 0.1 % weight by weight. 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 authorisation 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 substances an own Chemical Safety Assessment has been created, the Annex can be downloaded via www.mymsds.henkel.com in the section “EU Annex”.

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

Registrations

Henkel submitted registration dossiers to ECHA for all substances we were obliged to register in time for the first (deadline of 30th of November 2010) as well as for the second registration deadline (31th of May 2013). As required by REACH you can find the registration numbers in the respective chapters of the MSDS. The last four digits of REACH registration numbers are not required to be communicated down the supply chains.

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

Regarding the Brexit, we are aware of the upcoming challenges and 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 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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