



1 October 2016

Subject: Ashland response to questions on REACH

- Ashland confirms REACH Registration of imported and manufactured substances, where applicable.
- Safety Data Sheets (SDS) have been updated with REACH relevant information, where applicable, and will continue to be updated as we receive new information.
- Most of Ashland products are polymers and/or mixtures, accordingly;
 - REACH Registration numbers will not be displayed on most of our products (due to exemptions or the future deadline)
 - Exposure Scenarios (ES) for products composed of single substances will be provided in Annexes to our SDSs (extended SDSs). Provision of ESs for our mixtures will be limited; they may be incorporated into the SDSs or as an Annex to the SDSs; most of our products will not require ESs at this time (due to being a polymer, being non-hazardous, or containing substances that have not (yet) been Registered)
 - Changes to our SDS will gradually be instituted to meet 2018 deadline for REACH
 - Our SDS will inform you if a Substance of Very High Concern (SVHC) is present ($\geq 0.1\%$) in a product. A list of products containing current identified SVHCs is published on our website.

Dear valued Customer,

We are pleased to inform you that Ashland successfully completed, and/or verified with suppliers, the necessary REACH Registration of chemical substances used in products that we manufacture, market and sell in the European Union (EU), that required Registration by the May 31, 2013, deadline. This ensures that there will be no disruptions in the supply of our products on the European markets specifically related to REACH compliance. The following information provides additional detail regarding Ashland's position concerning further communication on REACH.

Registration date and number

In general, Ashland's products are either polymers or mixtures containing several chemical substances. While some of these substances are manufactured by Ashland, many others are sourced from multiple third-party suppliers. Some are non-phase-in substances, but most are phase-in substances. Depending on their nature and tonnage, REACH phase-in substances were Registered in 2010, 2013 or will be Registered in 2018 at the latest. Substances that are exempted from REACH Registration (e.g. polymers, naturals, etc.) will never receive a Registration number.

The actual Registration date of an individual substance may take place either well in advance of, or close to, the deadline date. Because the majority of Ashland's products consist of a mixture of substances, each with individual Registration deadlines, there is no single Registration date that can be given for a single product. Ashland will ensure all products that we will market, manufacture or sell within the European Union after the relevant deadline, will be Registered under REACH in a timely fashion by Ashland or its suppliers, where applicable.

During inspections by Competent Authorities, requests can be made to you about Registration numbers for substances you purchase from Ashland. In case you do not have the complete Registration number for products such as polymers or mixtures, the request can be re-directed to Ashland. We will then respond directly to the relative inspector or agency.



Extended Safety Data Sheet and Exposure Scenario

Under REACH, if a substance is hazardous then an exposure assessment is required as part of the REACH Registration. The result of this assessment is an Exposure Scenario(s) (ES). The ES defines the operational conditions (OCs, e.g., temperature, percentage, duration, etc.) and risk management measures (RMMs, e.g. Personal Protective Equipment-PPE, ventilation controls, etc.) that need to be in place to ensure the safe use of the substance during all life stages. We are required to forward these relevant conditions of safe use to our customers, in the case of registered, hazardous substances. There is, however, no uniform method or format dictated by the legislation or by industry on **how** this information is provided to our further downstream users.

Where a product is composed of a single substance, Ashland will issue ES information as an Annex to the SDS, an extended Safety Data Sheet (extSDS) to ensure all our downstream users' legal requirements are met once the Registration date has been reached (latest 2018).

In the case of our products that are mixtures, **if** they contain one or more registered substances for which an ES has been generated, Ashland will provide customers with this necessary information within 12 months, as required under REACH. We are working together with other members in the industry to develop processes and tools for the incorporation of Exposure Scenarios (ES) for mixtures either embedded in the SDS or as an annex to its SDS (extSDS).

In summary;

- ExtSDS **WILL** be provided for single substances that are registered and are hazardous
- ExtSDS **WILL NOT** be provided when the:
 - product is a polymer
 - product is a non hazardous mixture
 - product is a mixture containing a substance that has not (yet) been registered (low volume; exemption from registration; awaiting deadline 2018)

Safety Data Sheet and GHS-CLP classification

Ashland has met the 1 June 2015 deadline for all products placed on the market in Europe to be classified according to the Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP). The latest version of our SDSs will reflect that classification.

Substance of Very High Concern (SVHC)

Ashland has procedures in place to ensure compliance with the REACH obligations of a supplier for proactively and reactively informing our customers in situations where SVHCs are present in our products. Additionally, as a general rule, Ashland will provide you with the latest version of the SDS upon product purchase. If a SVHC is present in any of the products you purchase from Ashland, the substance will be listed on the European SDS (at "any known concentration" equal to or greater than 0.1 %). Although not legally required, we are working on the reformulation of products containing SVHC, where reformulation would be valuable to both Ashland and customer. In specific cases we will contact you to review the options. A list of products containing current identified SVHCs is published on our website:

www.ashland.com/commitments/reach.

Non-EU Customers

Ashland's non-EU customers exporting products within the scope of REACH to the European Union must ensure that their EU based importer will (Pre-)Register any of the relevant substances or monomers which are imported at levels over one metric ton per year. Ashland does not cover 3rd party imports through an Ashland Only Representative. To ensure you remain compliant with REACH, it is recommended that customers purchase materials from Ashland companies within the EEA. We are happy to advise you which (alternative) materials are available for you.

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If you have questions regarding any REACH-related subject, please contact us via your Ashland representative or send us an e-mail at REACH@ashland.com.

Kind regards,

A handwritten signature in black ink, appearing to read 'SZ', is positioned above the printed name.

Sandor Zuurendonk
Manager – REACH
Ashland

www.ashland.com/commitments/REACH