

27th June 2024

Subject: Ashland position on EU-REACH Substances of Very High Concern

Dear Customer,

The following information is provided in response to your request for Ashland's position concerning the presence of Substances of Very High Concern (SVHCs) in the products we manufacture, market and sell to customers in the European Union (EU).

Ashland can confirm that:

- Procedures are in place to ensure compliance with the REACH obligations of a supplier (see appendix 1) 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 Safety Data Sheet (SDS) upon product purchase. If an 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 %).
- The following SVHC substances are present in Ashland products (see appendix 2 for specific products):
 - 1-methyl-2-pyrrolidone (June 2011)
 - nonylphenol, branched, ethoxylated (December 2012)
 - octamethylcyclotetrasiloxane (D4), decamethylcyclopentasiloxane (D5) and dodecamethylcyclohexasiloxane (D6) (June 2018)
 - butyl 4-hydroxybenzoate(butylparaben) (June 2020)
 - 2-(4-tert-butylbenzyl)propionaldehyde (July 2021)
 - isobutyl 4-hydroxybenzoate (isobutylparaben) (January 2023)
- Acrylamide, which was added in March 2010, is not present in our product at levels of 0.1 %, or higher. The acrylamide in our polyacrylamide products is bound and will not be released. Polyacrylamide is not a SVHC.
- Propylene oxide (methyl oxirane), which was added in December 2012, is not present in our products at levels of 0.1%, or higher. The propylene oxide in our products is bound (to polymers or other substances) and will not be released.
- Diethyl sulphate, which was added in December 2012, is not present in our products at levels of 0.1%, or higher. The Diethyl sulphate in our products is bound (to polymers or other substances) and will not be released.
- Branched nonylphenol, which was added in December 2012, is not present in our products at levels of 0.1%, or higher. The Branched nonylphenol in our products is bound (to polymers or other substances) and will not be released.
- Please see appendix 2 for an overview of the Ashland products involved. Where applicable, you will see these substances identified on the European SDS for the product. Although not legally required, Ashland is working on the reformulation of (some of) these products, where there is a benefit from reformulation to Ashland and our customers. In specific cases, you may be contacted to review the options.
- As additional SVHCs are placed on the candidate list, we will review the formulations of our product portfolio to phase out these substances from our products, where possible.

Please be assured that Ashland is continually striving to maintain the highest standards in the services and products it supplies. We hope this information proves helpful, and if Ashland can be of any further assistance, please feel free to contact Ashland account representative.

Kind regards,

Ryan Hamilton, PhD, DABT, ERT
Sr. Manager, Product Safety & Global Chemicals Management

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Appendix 1

SVHC

SVHCs, also known as "Annex XIV substances," are clearly described in Article 57 of Regulation (EC) No 1907/2006 (the "EU-REACH Regulation"). These substances are identified according to ECHA (European Chemicals Agency):

- **CMR** substances; Carcinogenic, Mutagenic or Toxic to Reproduction, meeting the criteria for classification in category 1A or 1B in accordance with the CLP Regulation,
- **PBT** substances; Persistent, Bioaccumulative and Toxic according to the criteria in Annex XIII of the EU-REACH regulation, or
- **vPvB** substances; very Persistent and very Bioaccumulative according to the criteria in Annex XIII of the EU-REACH Regulation, and/or
- Identified, on a case-by-case basis, from scientific evidence as causing probable serious effects to human health or the environment of an equivalent level of concern as those above (e.g., endocrine disrupters).

In June 2024, ECHA updated the candidate list of SVHCs, which now contains 241 substances. The list is incomplete and more substances may be added. Please use the following link to see the latest version of the candidate list:

<https://echa.europa.eu/candidate-list-table>

These substances may become subject to Authorisation. As result the following obligations apply;

Obligations

ARTICLES

- **From 28 Oct 2008**, EU and European Economic Area (EEA) suppliers of articles which contain substances on the Candidate List in a concentration above 0.1% (w/w) **must**
 - **provide sufficient information, available to them, to their customers and on request to consumers within 45 days of the receipt of this request.** This information must ensure safe use of the article and, as a minimum, include the name of the substance.
 - **notify the Agency**, according to article 7 (2), **if the substance is present in those articles** in quantities totaling over 1 tonne per producer or importer per year.

SUBSTANCES

- **From 28 Oct 2008**, EU and EEA suppliers of a substance have to **provide a safety data sheet to their customers** when the substance is on the Candidate List.

PREPARATIONS

- **From 28 Oct 2008**, EU and EEA suppliers of a preparation not classified as dangerous according to CLP Regulation have to **provide the recipients, at their request, with a safety data sheet** if the preparation contains at least one substance on the Candidate List and its individual concentration is at least 0.1% (w/w) for non-gaseous preparations and at least 0.2% by volume for gaseous preparations.

Ashland's products, in general, are preparations (mixtures of several substances).

Appendix 2

The tables below present an overview of those Ashland products currently on the European market containing SVHCs. Although not legally required, we are working on the reformulation of (some of) these products, where reformulation would be valuable to both Ashland and our customers. In specific cases we will contact you to review the options.

* Under Article 56(3) use of substances in scientific research and development is exempt from Authorisation. According to the definition of REACH, scientific research and development means any scientific experimentation, analysis or chemical research carried out under **controlled conditions** in volume less than one tonne per year. On the basis of this, it is likely that the use of substances as test reagent or indicator **in laboratory settings** is exempt.

1-methyl-2-pyrrolidone (EC#212-828-1)	
Ashland Product Number	Product Name
830697, 830703, 934681	PHARMASOLVE
829921, 829929, 829931, 829933, 837351	M-PYROL
829838, 829840, 829843, 829844, 857892	MICROPURE EG
829847, 857894	MICROPURE ULTRA II
828305	GAFSOLVER TMP

dodecamethylcyclohexasiloxane (D6) (EC#208-762-8)	
Ashland Product Number	Product Name
877126	CAPTIVATES GL21749
935346	CAPTIVATES GL21997
828966	ISP CAPTIVATES HC2825
308927, 324649	DREW 210-694
324678, 340945	DREWPLUS S-4273
143449, 324503, 357055	DREWPLUS S-4287
587590, 587753	DREWPLUS S-4288
358205	DREWPLUS S-4382
51357, 100799, 309880	DREWPLUS S-4386
341304	DREWPLUS TS-4380
309218, 359019	DREWPLUS TS-4384
723975	DREWPLUS TS-4582
919799	DREWSLIP 738C

decamethylcyclopentasiloxane (D5) (EC#208-764-9)	
Ashland Product Number	Product Name
877126	CAPTIVATES GL21749
935346	CAPTIVATES GL21997
828966	ISP CAPTIVATES HC2825
340807, 309587	DREW 210-692
308927, 324649	DREW 210-694
324678, 340945	DREWPLUS S-4273
143449, 324503, 357055	DREWPLUS S-4287
587590, 587753	DREWPLUS S-4288
358205	DREWPLUS S-4382
51357, 100799, 309880	DREWPLUS S-4386
341304	DREWPLUS TS-4380
359019, 309218	DREWPLUS TS-4384
84415, 100492	DREWPLUS TS-4385
723975	DREWPLUS TS-4582
919799	DREWSLIP 738C
831714	SI-TEC GF 3092

octamethylcyclotetrasiloxane (D4) (EC#209-136-7)	
Ashland Product Number	Product Name
340807, 309587	DREW 210-692
308927, 324649	DREW 210-694
143449, 324503, 357055	DREWPLUS S-4287
587590, 587753	DREWPLUS S-4288
358205	DREWPLUS S-4382
51357, 100799, 309880	DREWPLUS S-4386
341304	DREWPLUS TS-4380
359019, 309218	DREWPLUS TS-4384
84415, 100492	DREWPLUS TS-4385
357699, 552561	DREWPLUS TS-4387
919799	DREWSLIP 738C
831708, 831709	SI-TEC DMC 6031
831714	SI-TEC GF 3092

butyl 4-hydroxybenzoate (EC#202-318-7)	
Ashland Product Number	Product Name
829518	LIQUAPAR OIL
967331, 967332	EUXYL K 340

2-(4-tert-butylbenzyl)propionaldehyde (EC#201-289-8)	
Ashland Product Number	Product Name
922984	CAPTIVATES A004 R16-1636
923236	CAPTIVATES A006 R17-3736

isobutyl 4-hydroxybenzoate (isobutylparaben, IBP) (EC#224-208-8)	
Ashland Product Number	Product Name
829518	LIQUAPAR OIL

nonylphenol, branched, ethoxylated (EC#500-209-1)	
Ashland Product Number	Product Name
424641	DEXTROL OC-50