



19 January 2021

**Subject:** REACH Substances of Very High Concern and Ashland

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)
  - cyclohexane-1,2-dicarboxylic anhydride (December 2012)
  - octamethylcyclotetrasiloxane (D4), decamethylcyclopentasiloxane (D5), dodecamethylcyclohexasiloxane (D6), and dicyclohexyl phthalate (June 2018)
  - 2-benzyl-2-dimethylamino-4'-morpholinobutyrophenone (January 2020)
  - butyl 4-hydroxybenzoate(butylparaben) (June 2020)
- 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 release. 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.
- 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.

If you have questions regarding any REACH-related subject, please contact Ashland via your representative or send an e-mail to [globalregulatorycustomerrequest@ashland.com](mailto:globalregulatorycustomerrequest@ashland.com)

Kind regards,

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

IMPORTANT DISCLAIMER: This information has been gratuitously provided by Ashland. Although it is intended to be accurate, Ashland DISCLAIMS ANY AND ALL LIABILITY, EITHER EXPRESS OR IMPLIED. This information is based on many factors beyond Ashland's control, including but not limited to the completeness and accuracy of information received, or the conditions prevailing when operations were observed and/or sampled. In choosing to rely on or use this information, you assume all risk including the results obtained and agree to indemnify Ashland against any and all claims. All recommendations or suggestions must be evaluated by you to determine their applicability or suitability for your particular program. Any information claimed by Ashland to be confidential or proprietary is not to be disclosed to any third party.

## Appendix 1

### SVHC

SVHCs, also known as "Annex XIV substances," are clearly described in Article 57 of Regulation (EC) No 1907/2006 (the "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 1 or 2 in accordance with Directive 67/548/EEC,
- **PBT** substances; Persistent, Bioaccumulative and Toxic according to the criteria in Annex XIII of the REACH regulation, or
- **vPvB** substances; very Persistent and very Bioaccumulative according to the criteria in Annex XIII of the REACH Regulation, and/or
- Identified, on a case-by-case basis, from scientific evidence as causing probable serious affects to human health or the environment of an equivalent level of concern as those above (e.g., endocrine disrupters).

In January 2021, ECHA updated the candidate list of SVHCs, which now contains 211 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:

<http://www.echa.europa.eu/web/guest/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 Directive 1999/45/EC 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.

<b>1-methyl-2-pyrrolidone (EC#212-828-1)</b>	
<b>Ashland Product Number</b>	<b>Product Name</b>
830697,830698, 830699, 830703, 934681	PHARMASOLVE
829921, 829929, 829933	M-PYROL
829838, 829844, 857892	MICROPURE EG
829847, 829848, 857894	MICROPURE ULTRA II
828305	GAFSOLVER TMP

<b>cyclohexane-1,2-dicarboxylic anhydride (EC#201-604-9)</b>	
<b>Ashland Product Number</b>	<b>Product Name</b>
842346	PURERAD 3401263 LA
845211, 862056	PURERAD L7000E HB LAM ADH
845214, 910231	PURERAD L7070E PET LAM ADH
883053, 885291, 895777	PURERAD L7200E LM LAM ADH
906032, 906033	PURERAD L7211E UV LAM ADH
824468, 904986	PURERAD MAHP MONOMER

<b>dodecamethylcyclhexasiloxane (D6) (EC#208-762-8)</b>	
<b>Ashland Product Number</b>	<b>Product Name</b>
877124	CAPTIVATES GL21748
877126	CAPTIVATES GL21749
910490	CAPTIVATES GL21881
935346	CAPTIVATES GL21997
722163	DREW 210-900
324678, 340945	DREWPLUS S-4273
143449, 324503, 357055	DREWPLUS S-4287
587590, 587753	DREWPLUS S-4288
576560, 576901	DREWPLUS S-4374
358205	DREWPLUS S-4382
51357, 100799, 309880	DREWPLUS S-4386
919799	DREWSLIP 738C
828966	ISP CAPTIVATES HC2825

<b>decamethylcyclopentasiloxane (D5) (EC#208-764-9)</b>	
<b>Ashland Product Number</b>	<b>Product Name</b>
877124	CAPTIVATES GL21748
877126	CAPTIVATES GL21749
910490	CAPTIVATES GL21881
935346	CAPTIVATES GL21997
722163	DREW 210-900
324678, 340945	DREWPLUS S-4273
143449, 324503, 357055	DREWPLUS S-4287
587590, 587753	DREWPLUS S-4288
576560, 576901	DREWPLUS S-4374
358205	DREWPLUS S-4382
51357, 100799, 309880	DREWPLUS S-4386
919799	DREWSLIP 738C
828966	ISP CAPTIVATES HC2825
831713	SI-TEC GF 1000
831714	SI-TEC GF 3092

<b>octamethylcyclotetrasiloxane (D4) (EC#209-136-7)</b>	
<b>Ashland Product Number</b>	<b>Product Name</b>

320775, 320777, 353540	DREW 210-886
722163	DREW 210-900
143449, 324503, 357055	DREWPLUS S-4287
587590, 587753	DREWPLUS S-4288
576560, 576901	DREWPLUS S-4374
358205	DREWPLUS S-4382
51357, 100799, 309880	DREWPLUS S-4386
357699, 552561	DREWPLUS TS-4387
831708, 831709	SI-TEC DMC 6031
831713	SI-TEC GF 1000
831714	SI-TEC GF 3092

<b>dicyclohexyl phthalate (EC#201-545-9)</b>	
<b>Ashland Product Number</b>	<b>Product Name</b>
879635, 889243	PURESEAL 23519ES HEATSEAL

<b>2-benzyl-2-dimethylamino-4'-morpholinobutyrophenone (EC#404-360-3)</b>	
<b>Ashland Product Number</b>	<b>Product Name</b>
845213, 885716, 944811	PURERAD L8060E COLD FOIL ADH
905960, 910430	PURELED 3500E GLOSS TTR CTG
905974, 944811	PURELED 3600E MATT TTR CTG
929758, 929759	PURELED 4500E REL CTG

<b>Butyl 4-hydroxybenzoate (EC#202-318-7)</b>	
<b>Ashland Product Number</b>	<b>Product Name</b>
829518	LIQUAPAR OIL
829522	LIQUAPAR OPTIMA
829525	LIQUAPAR PE
831551, 831552	ROKONSAL PB-4