

MEMORANDUM

<u>Via E-Mail</u>

| DATE: | September 1, 2009 |
|-------|---|
| TO: | Clients and Friends |
| FROM: | The Acta Group, L.L.C. |
| RE: | ECHA Begins Public Consultation on 15 Potential SVHCs |

Today the European Chemicals Agency (ECHA) published Annex XV dossiers for the identification of 15 chemicals as substances of very high concern (SVHC) under the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) regulation. The substances were proposed by European Union member states and the European Commission, and are identified as carcinogenic, mutagenic, or toxic to reproduction (CMR), or persistent, bioaccumulative, and toxic (PBT). ECHA asks that comments on the dossiers "particularly focus on the hazardous properties that qualify the chemicals as SVHCs." In addition, parties may provide further information on the uses, exposures, and availability of safer alternative substances or techniques, although ECHA notes that "these aspects will mainly be considered at the next stage of the process which includes a new round of public consultation." Comments are due **October 15, 2009**. The Annex XV dossiers are available on the Internet at http://echa.europa.eu/consultations/authorisation/svhc/svhc_cons_en.asp.

| The proposed S | VHCs include: |
|----------------|---------------|
|----------------|---------------|

| Substance Identification | | | Authority | Reason for |
|--------------------------------------|------------|-----------|-----------|------------|
| Substance Name | CAS Number | EC Number | | Proposing |
| 2,4-Dinitrotoluene | 121-14-2 | 204-450-0 | Spain | CMR |
| Anthracene oil | 90640-80-5 | 292-602-7 | Germany | PBT |
| Anthracene oil, anthracene paste, | 91995-17-4 | 295-278-5 | Germany | PBT |

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| Substance Identification | | | Authority | Reason for |
|--------------------------|----------------|-----------|-------------|------------|
| Substance Name | CAS Number | EC Number | | Proposing |
| distn. Lights | | | | |
| Anthracene oil, | 91995-15-2 | 295-275-9 | Germany | PBT |
| anthracene paste, | | | | |
| anthracene fraction | | | | |
| Anthracene oil, | 90640-82-7 | 292-604-8 | Germany | PBT |
| anthracene-low | | | | |
| Anthracene oil, | 90640-81-6 | 292-603-2 | Germany | PBT |
| anthracene paste | | | | |
| Diisobutyl phthalate | 84-69-5 | 201-553-2 | Germany | CMR |
| Aluminosilicate, | (650-017-00-8) | | Germany | CMR |
| Refractory Ceramic | | | | |
| Fibres | | | | |
| Zirconia | (650-017-00-8) | | Germany | CMR |
| Aluminosilicate, | | | | |
| Refractory Ceramic | | | | |
| Fibres | | | | |
| Lead chromate | 7758-97-6 | 231-846-0 | France | CMR |
| Lead chromate | 12656-85-8 | 235-759-9 | France | CMR |
| molybdate sulfate red | | | | |
| (C.I. Pigment Red | | | | |
| 104) | | | | |
| Lead sulfochromate | 1344-37-2 | 215-693-7 | France | CMR |
| yellow (C.I. Pigment | | | | |
| Yellow 34) | | | | |
| Acrylamide | 79-06-1 | 201-173-7 | Netherlands | CMR |
| Tris(2-chloroethyl) | 115-96-8 | 204-118-5 | Austria | CMR |
| phosphate | | | | |
| Coal tar pitch, high | 65996-93-2 | 266-028-2 | European | PBT/CMR |
| temperature | | | Commission | |

ECHA's Member State Committee will review comments received during the consultation period as it decides whether it agrees with the proposed identification of the substances as SVHCs. If the Committee unanimously agrees to the proposals, ECHA will place



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the substances on the Candidate List, which already contains 15 substances. Candidate List substances may eventually be included on the list of substances subject to authorization under REACH. In this case, after a transition period, they can only be used if a specific authorization is granted. Information requirements for suppliers of substances, preparations, and articles containing these substances will also follow from the inclusion of the substances in the Candidate List.

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We hope this information is helpful. As always, please call if you have any questions.