



Cookson Electronics

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Enthone REACH Compliance Information

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REACH Compliance (Regulation (EC) No 1907/2006)

Enthone complies with REACH today and in future. Enthone ensures worldwide compliance by a central coordination of all REACH related obligations at its European Headquarters located in Langenfeld, Germany.

Pre-Registration / Registration

The pre-registration deadline ended December 1, 2008. According to supplier statements as well as according to the list of pre-registered substances published by the European Chemicals Agency (ECHA), all substances contained in Enthone products have been pre-registered, where not exempted. With respect to own import and manufacturing, Enthone has pre-registered substances for different legal entities, where required.

The first registration deadline ends on December 1, 2010, and is related to substances > 1000 t/y, to substances classified as R50/53 > 100 t/y as well as to CMR-substances Cat 1 or 2 > 1t/y.

Evidence of Pre-Registration / Registration

Enthone does not communicate pre-registration numbers. Beside the fact that such numbers are not provided to Enthone by the vast majority of suppliers, pre-registration numbers do not imply any extra benefit, since they are different not only for each substance, but for each manufacturer's legal entity also. To ensure supply availability to the customers, Enthone has several suppliers for one and the same substance (which may be valid for the upstream supplier as well). This leads to several different numbers just for this single substance. Since Enthone in most cases does not sell single substances but mixtures, the high quantity of pre-registration numbers will result in customer's confusion only.

As required by REACH, Enthone will communicate registration numbers by the Safety Data Sheets (SDSs) as soon as registration numbers become available to Enthone.

By providing a compliance statement to downstream users, an evidence of (pre-)registration is obsolete.

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Safety Data Sheet (SDS) and Extended Safety Data Sheet (eSDS)

As can be seen in the SDS's very header, Enthone's SDSs are REACH conform. SDSs are automatically sent to customers as soon as a new major change applies.

In future it is possible that there will be two different SDSs for one and the same substance, i.e. one with an annexed exposure scenario ("eSDS") and one without ("SDS"). According to REACH Article 14 this depends on the registrant's obligation to carry out a Chemical Safety Assessment (CSA) when registering a quantity of 10 tons or more. In case of a hazardous substance, the results from the CSA must be communicated to the customer via an exposure scenario in the eSDS. With a registration quantity below 10 tons as well as for a non-hazardous substance, there will be no exposure scenario and hence there will be no "eSDS" but an "SDS" instead.

As a manufacturer of mixtures, Enthone has two possibilities: either to pass all exposure scenarios obtained from raw-material-suppliers collected for the Enthone-mixture to the customer or to annex an own consolidated exposure scenario to the Enthone-SDS.

Intended Use and Safe Use of a Product

The description of uses and operational conditions is a basis for estimating the risk of a product when used by humans or when released to the environment. Descriptions are standardised via an official "use descriptor system".

On this basis and within a task force of the Central Association of Surface Treatment Professionals in Germany (ZVO), Enthone developed general uses with broad operational conditions for the plating industry. The results were communicated to the suppliers. However, this does not necessarily mean, that reported uses and operational conditions of use will be included in the related registration of substances. According to REACH Annex II only the most important uses need to be named in the "SDS", whereas the "eSDS" needs to show all of the identified uses supported by the registrant.

Independently, the downstream user must appropriately adapt any information relevant to the safety of man and environment, to ensure a safe use. The responsibility of the adaption rests with each downstream user.

Substances of Very High Concern (SVHC)

According to REACH Article 57, SVHCs are defined at least by one of the following properties:

- cancerogenic or mutagenic or toxic to reproduction, category 1 or 2 (GHS: category 1A or 1B)
- persistent and bioaccumulative and toxic (PBT)
- very persistent and very bioaccumulative (vPvB)
- scientifically proven to be of very high concern to man or environment (e.g. endocrine disruptors)

The European Chemicals Agency (ECHA) has published the so called Candidate List of Substances of Very High Concern, which on the following website will expectably be updated every January and July, yet at least once a year:

http://echa.europa.eu/chem_data/candidate_list_table_en.asp

Any update will be discussed between industry and ECHA and agreed substances will be transferred to REACH Annex XIV. After a transition period, applications as well as any use of such substances must be authorized.

Hence, SVHCs in products must be communicated along the supply chain. These products are distinguished by REACH between "substances", "mixtures" and "articles":

- Identity and quantity of an SVHC supplied as a substance or contained in a mixture, if any, must be communicated down the supply chain by the corresponding Safety Data Sheet in Section 3, as required by REACH Article 31.
- Suppliers of articles containing more than 0.1 %w/w of an SVHC "shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance" (REACH Article 33). This is also applicable for consumer inquiries.

As a result, REACH Article 33 about the duty to communicate information about substances in articles is not applicable to Enthone, because Enthone does not supply articles but substances/mixtures (certain anodes exempted, but such anodes do not contain any of the currently identified SVHC). Enthone must provide information about SVHCs with the Safety Data Sheet instead.

According to our current knowledge we do not expect that components of our mixtures deposit as such on an article >0.1%w/w when the surface treatment process is performed as described in our corresponding technical data sheet. This has been agreed by the German Professional Association Surface Technology (fvo). Please note, that Enthone in no case is in the position to take over any responsibility for your statements, which you have to provide to your customers according to REACH Article 33.

Quality, Environmental and Occupational Health & Safety Management

Beyond legal obligations, all REACH activities are integrated into our Management Systems ISO 9001, ISO 14001 and OHSAS 18001. Moreover, direct communication between customers and Enthone is our stated aim. This way we believe to ensure safety and customer's satisfaction.

We hope that this information has been sufficient to answer your questions.
If you have any further queries please do not hesitate to contact us.

Kind regards

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