

To whom it may concern

January 2022

REACH Registration

Sun Chemical has successfully registered all required substances with 2010, 2013 and 2018 deadline. It is our intention to register all substances for which we are liable in the future should our manufacturing / imports exceed the registration volume threshold. Substances which are exempt from registration or below the registration threshold will not be registered.

Sun Chemical does not provide specific information on product composition, on individual ingredient's registration date nor on the provenance of our products. This is regarded as confidential business information.

Customers purchasing from Sun Chemical offices in EEA (EU, Norway, Iceland, and Lichtenstein) will be covered by our REACH registrations. For non-EEA customers purchasing from Sun Chemical in Europe re-importation can be claimed for registered substances.

We can confirm that Sun Chemical Switzerland only export products to EU, which are covered by re-import or Only Representative agreements.

Customers purchasing from other non-EEA Sun Chemical offices will not be covered by the registrations.

We have also received confirmation from all non-EEA suppliers setting up only representatives in EEA that Sun Chemical import will be covered by intended registration. Sun Chemical will inform customers on registration numbers if these are made available to us. This information will be communicated via an updated Safety Data Sheet. However, please note that there is no obligation to provide REACH registration numbers for mixtures as this would give away confidential information on composition. In such instance, only REACH registration numbers for classified substances will be disclosed in section 3 of the SDS.

Should you wish to evaluate Sun Chemical registrations for specific substances not listed in the SDS you may consult the ECHAs homepage:

<https://www.echa.europa.eu/home>

Enter CAS number or C.I. name, e.g. Pigment Green 7, click on the dossier in following screen and find under registrants whether Sun Chemical is an active registrant.

Information on substances of very high concern (SVHC)

This information is valid for the candidate list found on ECHA's homepage including 223 entries (last updated on 17/01/2022) as well as substances listed on the Authorisation list (last updated on 06/02/2020).

The Sun Chemical stewardship program does not accept listed candidate SVHCs and at the time of formulation, our products intended for the EU market do not contain any substances of very high concern (SVHCs) at levels above 0.1% (or the lowest concentration limit specified in Part 3 of Annex VI to Regulation (EC) No 1272/2008 which results in the classification as a SVHC), and which could be subject to potential future authorization process (as outlined in REACH Art 56). We are also looking to substitute any SVHCs in our existing non-EU product portfolio. Information on substance use restrictions will continue to be communicated as part of our SDS.

However, as more substances are added to the SVHC candidate list and as we receive updated information from our suppliers on SVHCs present in our raw materials, Sun Chemical has identified several products sold in the EU market which are now known to contain more than 0.1% (w/w) of a SVHC substance. In such instances, information on the nature of those SVHCs can be found in section 15 and / or section 3 of the SDS for those affected products. As part of our commitment to inform customers with the latest information, updated SDS will be sent automatically.

The SVHC identified in our products at levels above 0.1% are:

- Octamethylcyclotetrasiloxane (D4), Decamethylcyclopentasiloxane (D5) or Dodecamethylcyclohexasiloxane (D6): affecting 5 ink / varnish additives
- Trimellitic anhydride: affecting 1 pigment polymeric additive
- tris(nonylphenyl) phosphite containing more than 0.1% (w/w) of 4-nonylphenol (branched or linear): affecting 4 screen inks products
- 4-tert-butylphenol: affecting 6 ink / varnish additives
- 2-methyl-1-(4-methylthiophenyl)-2-morpholinopropan-1-one: affecting 79 UV inks
- 2-benzyl-2-dimethylamino-4'-morpholinobutyrophenone: affecting 2402 UV inks
- 2-(2H-benzotriazol-2-yl)-4,6-ditertpentylphenol : affecting 3 UV inks
- Glutaral: affecting 4 fountain products
- 6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol: 7 ink products

We are actively looking for alternatives in all these products.

For customers outside of the EU, please request our current EU label and SDS when considering exports to the EU for products containing some of our non-EU products.

Articles are specifically excluded from consideration under REACH, however there are specific circumstances related to articles where this does not apply. In these cases, we recommend that you contact your REACH specialist.

In case any further information is required, please contact your Sun Chemical sales representative.

CLP-regulation

Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP Regulation) require any manufacturer or importer to:

- 1) notify European Chemical Agency (ECHA) on classification for all hazardous substances and all non-classified substances imported or manufactured above 1 tpa.
- 2) First notification is done for all substances on the market 1 December 2010 before January 3rd 2011
- 3) Any other substance placed on the market must be notified within 1 month after placing on the market.

Sun Chemical has notified to ECHA all substances on the market 1 December 2010 identified by CAS nos, that Sun Chemical manufacture within Europe or import into a European Sun Chemical legal entity.

We have also an internal procedure to make sure new substances for which we are liable to notify ECHA will be notified within 1 month after their placing on the market.

For customers where an agreement is in place, Sun Chemical has also notified ECHA on classification, this apply e.g. to customers receiving products from Sun Chemical Switzerland or Sun Chemical Turkey.

For customers with which we have no agreement in place, Sun Chemical has not notified ECHA.

Exposure Scenarios, Identified uses and Use Descriptor System

It is the right of any Sun Chemical customer to inform us on known uses to make it an identified use and become included in chemical safety assessment including preparation of exposure scenarios.

Sun Chemical will, as reliable supplier, consider any identified use made known to us where the REACH-legislation require us to, and where Sun Chemical is not the registrant we shall pass on the information to our suppliers.

However, we need customers to accept that it is not necessary in the following cases according to REACH article 14 and 37.4:

- The EU SDS supplied by Sun Chemical informs the product is not classified, does not contain information on a dangerous substance >1% (w/w) or does not contain information on candidate substances, PBTs or vPvBs >0.1%(w/w).
- The purchase of a Sun Chemical product is less than 1 tonne per year
- If a Chemical Safety Report is not required to be completed
- If the substance volume registered by the registrant entity is less than 10 tonnes per year

We already supply information on appropriate risk management recommendation in the SDS for preparations and substances in above instances.

Sun Chemical will request suppliers to include or pass up the supply chain the following uses for inks related materials:

	Product Category	Sector of Use	Process Category	Article Category	Environmental Release Category
Manufacture	PC 18	SU 10	PROC 1, 2, 3, 5, 8a, 8b, 9	N/A	ERC 2
Application	PC 18	SU 3	PROC 2, 3, 4, 5, 8b, 10	N/A	ERC 4, 5

Ref: ECHA Guidance on information requirements and chemical safety assessment, version 1.2; May 2008

Sun Chemical will implement generic exposure scenarios developed by CEPE as soon as possible. We are currently not in a position to distribute for inks and inks related materials.

Most pigments and pigment preparations are not classified and a Chemical Safety Report is not required to be completed, therefore exposure scenarios will not be developed. For the registration dossier we will include PC, SU, PROC, AC and ERC as required for registration and the continued use by Sun Chemical customers, including personal care products.

For pigments and pigment preparations classified as dangerous and purchased above 1 tonne per year we recommend contacting us for inclusion of your specific use.

Sincerely Yours



Thomas Hansen
Regulatory Analyst
Contact: PigmentsEurope.CustomerInq@sunchemical.com