

SUBJECT: REACH & the Candidate list of SVHC (Substances of Very High Concern)

To whom it may concern,

The purpose of this letter is to explain the EU REACH Regulation, and more specifically how GCP Industrial Products is affected by it and is taking steps to ensure compliance with the regulation. Looking at the regulation as EU importers, as REACH directly regulates them, there are three key components of the directive which require our compliance along the supply chain.

The first, and most general, of the three is the requirement for an importer to register substances, be them within articles or preparations, which meet specific criteria. To overview these criteria the substance must be considered as intended to be released from the article/preparation under normal or reasonably foreseeable conditions AND the substance must be present in the articles/preparations in quantities greater than 1 tonne/year (weight of article x wt% of substance x mass imported > 1 Tonne). Furthermore substances requiring registration are defined as being any of the following: category 1 or 2 CMR (carcinogenic, mutagenic, reprotoxic), PBT (persistent, bioaccumulative, and toxic), vBvP (very bioaccumulative and very persistent), or substances with endocrine disrupting properties.

GCP's products do not meet these criteria as there are no substances intended to be released under normal or foreseeable conditions, and therefore do not require registration.

Another important component of the REACH regulation is the SVHC Candidate List. As of the current date this list is composed of 155 substances which remain as candidates for promotion to the Authorization List. The Candidate List is much more encompassing than the Authorization List, containing many more substances, and serves as an intermediate step between a substance being unregulated and completely restricted (complete restriction represented by the Authorization List). From an importer's standpoint, this requirement does not depend on the amount being imported but simply requires that any substance on the list must be present below an individual concentration of 0.1 wt%, above which SDS and non-compliant substance(s) information needs to be provided to all downstream consumers to ensure the article is being used in complete safety.

Pertaining to the rubber industry and GCP Industrial Products, many of the substances on the SVHC Candidate List are not relevant to rubber articles. There are however a few, including PAHs (polycyclic aromatic hydrocarbons), which do need to be monitored and controlled to ensure compliance to this list. Based on GCP's best knowledge, the PAHs and other substance don't exceed the individual concentration of 0.1 wt%. Thus there is no need to report noncompliance substance information to downstream users.



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The third and strictest component of the REACH regulation is Annex XIV, referenced to above as the Authorization List. As of the current date this list refers to 22 substances which have been promoted from the Candidate List once it was determined that they pose sufficient human and environmental health risks. When a substance is placed on this list it is given a “sunset date” after which it can no longer be used or imported in any quantity without authorization from the agency; it is essentially banned.

The key substances on Annex XIV which relate to the polymer industry are several chemicals in the phthalate family. These chemicals are not present in GCP’s products.

In summary, GCP’s rubber sheet products are in compliance with EU Directive 1907/2006 on the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), including the 155 Substances of Very High Concern (SVHC) identified on the candidate list last updated June 16, 2014 and the 22 substances identified on the authorization list (Annex XIV) last updated April 19, 2013. Further, it does not require any special labelling or registration for the REACH regulation.

This information has been presented to the best of our knowledge as of July 18th, 2014. We will continue to monitor updates and changes to the regulation with a commitment to ensuring that our products maintain compliance with the requirements and obligations of the EU REACH regulation. Should you have any questions pertaining to the content of this letter or the REACH regulation please don’t hesitate to contact us.

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