

Henkel AG & Co. KGaA, 40191 Düsseldorf, Germany

To All customers of Henkel Adhesive Technologies

Date Your message July 2024

Department

**REACH Office Adhesive Technologies** 

Phone Fax E-mail

# REACH – Effects of the EU chemical regulation on products of Henkel Adhesive Technologies

Dear Sir/Madam,

We would like to inform you about the status of the REACH Regulation (EC) No 1907/2006 implementation at Henkel Adhesive Technologies.

#### **Registrations**

Henkel submitted registration dossiers to ECHA for all substances we were obliged to register in time for any of the deadlines (30<sup>th</sup> of November 2010 / 31<sup>st</sup> of May 2013 / 31<sup>st</sup> of May 2018). As required by REACH, you can find the registration numbers in the respective sections of the SDS. The last four digits of REACH registration numbers are not required to be communicated down the supply chains. This also applies for registration numbers of non-hazardous components in mixtures. We also would like to point out that as downstream users as well for most of the substances present in our products, we rely on the communication of our suppliers.

It goes without saying that Henkel will fulfill all legal obligations of REACH. This includes REACH compliance of all our products and all required information as well. By accepting our order, our suppliers also confirm to deliver only REACH compliant raw materials.

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Management Board: Carsten Knobel (CEO), Mark Dorn, Wolfgang König, Sylvie Nicol, Marco Swoboda

Aufsichtsratsvorsitzende: Dr. Simone Bagel-Trah



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### **Intended Uses and Use Reports:**

Generally, intended Uses of chemical substances must be included in the registration dossiers. Industrial associations developed a standard format of Use Reports based on the ECHA Use & Exposure Descriptors according to RIP 3.2 Chapter R12 and R16, in which the uses at our customers have been covered as far as they are known to us. These use reports had been reported to our suppliers to be included in their registration dossiers.

Please find Use Maps defined by several industrial associations on the ECHA website

https://www.echa.europa.eu/web/guest/csr-es-roadmap/use-maps/use-maps-library

For our cleaners the AISE use map applies, for adhesives the FEICA use map fits best and there is also the EFCC Use mapo for the construction products.

The identified uses of our products are mentioned in the respective technical datasheet, where you can check, whether your Uses are covered. Appropriate REACH information will be communicated via SDS once received from our suppliers. If Uses might not be covered, we strongly recommend reporting them to us by referring to the ECHA-Use-Descriptors. This is the only way to include such missing Uses into our Use-Communication along the supply chain.

## SVHC and Annex XIV:

**S**ubstances of **V**ery **H**igh **C**oncern (SVHC) are published by the European Chemicals Agency in the socalled Candidate List (<u>http://echa.europa.eu</u>). Because this list is continuously updated, it is subject to a permanent monitoring by us. Whenever new substances are included in the list, all our formulations are checked accordingly.

Most of our products are preparations/mixtures. Article 31 of REACH Regulation (EC) No 1907/2006 describes the obligation to inform about preparations/mixtures. That means dangerous substances like SVHC have to be mentioned in the European Safety Data Sheets (Section 3).

Special obligations of information concerning SVHC in <u>articles</u> are described in Article 33 of the REACH ordinance because articles have not been regulated by the old chemicals legislation even if articles contained dangerous substances

# If preparations or articles contain substances $\geq$ 0.1 % weight by weight of the ECHA candidate list (last updated June 27th, 2024), they are mentioned and identified in the EU / REACH SDS.

If the release of the safety data sheet is dated after the inclusion into the candidate list you also find a note about the SVHC status there.

Additionally you can find so-called Regulatory Data Sheets (RDS) on our website <u>https://mysds.henkel.com/index.html#/appSelection</u>

which contain always current information about SVHCs and Annex XIV/XVII substances. If you cannot find the RDS, please contact your Henkel sales representative or our customer service.



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When a substance has entered the SVHC candidate list, this does not automatically mean that its use is forbidden. The substance concerned can still be used considering the safety and application conditions.

In the meantime, substances of the SVHC candidate list have been transferred to Annex XIV and some are already under authorization obligation. We are aware of the implications and we are undertaking all necessary actions concerning authorization and uses in order to ensure REACH compliance of our products.

We do not expect the packaging of our products to contain any of the substances included in the SVHC candidate list in a concentration above 0.1 % by weight, based on preliminary information received from our suppliers. Should we receive contrary information – which we do not expect – we will advise you immediately.

#### <u>eSDS</u>

An Annex to the safety data sheet including Exposure Scenarios has to be provided for substances (...) in case the actors in the supply chain created a Chemical Safety Assessment. Only in a few cases Henkel Adhesive Technologies acts as manufacturer/ importer of pure chemicals. For the very few substances where the requirement applies, the Annex can be downloaded via <a href="https://mysds.henkel.com/index.html#/appSelection">https://mysds.henkel.com/index.html#/appSelection</a> together with the Safety Data Sheets. Information on the safe use of our mixtures can be found in the safety data sheets of our products. According to Article 31(7) REACH Regulation, there is no obligation to communicate exposure scenarios from our suppliers for substances in mixtures.

For safety data sheets CLP according Reach Regulation (EG) Nr. 1907/2006 applies. There is no legal obligation to refer to the current revision of REACH Annex II in the safety data sheet. Since Annex II to the REACH Regulation can be further modified, these updates are covered by the REACH Regulation and its amendments in the header phrase of the Safety Data Sheet.

Regarding the future amendment of the EU REACH regulation, please be assured that we are closely monitoring the regulatory landscape.

After the withdrawal of the United Kingdom UK REACH has been activated, which is similar to the EU REACH regulation. All chemical substances which have been identified as requiring registration by Henkel Adhesive Technologies have been submitted as Downstream User Import Notification (DUIN) (...) to the Health & Safety Executive (HSE). There is no obligation according to UK REACH to publish DUIN numbers.



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Statements made in this letter are valid for <u>all</u> products of Henkel Adhesive Technologies sold in the EU and UK by Henkel EU/UK Affiliates as well as Henkel products coming out of Switzerland.

If you are a Non-EU customer importing our products into the EU or UK, compliance with REACH obligations is within the responsibility of you as the importer. If you have got any further question, please get in touch with your local contact in the region.

Yours sincerely,

Henkel Adhesive Technologies Henkel AG & Co. KGaA