To Whom it may concern

Kallo, 11 July 2017/VIM

Teflon™ Industrial Coating Products – REACH Statement

Dear Customer,

For Teflon™ Industrial Coating Products, Chemours is both a manufacturer and an importer of substances covered under REACH. All products sold to our EEA customers by Chemours legal entities in Europe are compliant with REACH regulatory requirements, including registration for those substances that required registration in 2010 and 2013 and pre-registration.

REACH requires registration for individual substances (on their own or in mixtures) greater than one metric ton per year manufactured or imported in the EEA. Each importer is responsible for their own compliance with REACH and Teflon™ Industrial Coating Products sold to customers outside of EEA may not necessarily be compliant with REACH requirements.

Teflon™ Industrial Coating Products are considered mixtures therefore no single registration number is available or relevant. The way to communicate regulatory information and safe use down the supply chain is via (extended) Safety Data Sheets ((e)SDS). Registration numbers will be included in the SDS, when available.

Twice per year the European Chemicals Agency (ECHA) updates the Candidate List of Substances of Very High Concern (SVHC) for authorisation. This list currently contains one substance which is an

---

1 European Economic Area
2 This includes the Chemours legal entities in the EU/EEA, as well as Chemours International Operations Sàrl.
3 Chemours, for its products and brands, has submitted pre-registration files to ECHA for the substances requiring pre-registration that are manufactured/imported by Chemours. Receipt of those files has been acknowledged by ECHA. To the best of our knowledge, the substances that Chemours purchases on the European market have been (pre-)registered by their respective manufacturers or importers.
4 Inclusion of a substance on the Candidate List may impose immediate legal obligations upon companies whose chemical products or articles contain more than 0.1 wt% of the substances. You can find more information about these obligations on the ECHA website, including the relevant updates of the Candidate List of SVHC: [https://echa.europa.eu/candidate-list-obligations](https://echa.europa.eu/candidate-list-obligations)
intended ingredient at a greater limit than the threshold of 0.1 wt% in Teflon™ Industrial Coating Products:

- 1-methyl-2-pyrrolidone (CAS 872-50-4, EC 212-828-1) (NMP): used as a solvent in most of the Teflon™ Industrial Coating solvent-based products and also used as a co-solvent in many of the Teflon™ Industrial Coating water-based primer products.
- 4,4'-isopropylidenediphenol (CAS 80-05-7, EC 201-245-8) (BPA): present as a monomer of an epoxy powder in select Teflon™ Industrial Coating products.\(^5\)

Chromic Acid (CAS 7738-94-5, EC 231-801-5) is on the authorisation list (REACH Annex XIV) with Sept 21, 2017 as sunset date. Please find on our web site the letter sent to customers on that matter.

For the products that contain a SVHC, we notify our direct customers and distributors in the EEA via the Safety Data Sheet in Section 15.

Although REACH provides specific obligations for manufacturers and importers of chemical substances, downstream users of substances, mixtures and articles may have other duties. As such, each actor in the supply chain needs to determine for their own specific situation what their legal obligations are under the REACH regulation.

We would like to bring the following to the attention of our Teflon™ Industrial Coating Products customers who are placing coated articles on the EU market:

When you, our customer/coater and as such downstream user, apply a coating on a substrate/article and cure the coating according to the application methods and conditions as specified in the Teflon™ Industrial Coating Products fact sheet, the coating becomes an integral part of the article. As a result of this, Articles 7 and 33 of REACH shall apply and define obligations for article producers, importers and suppliers concerning notification and communication of information on substances in articles if the substance is on the Candidate List.

In this respect, one of the key questions is whether the concentration of a substance on the Candidate List in the article is above the threshold value of 0.1 wt%, and above one ton per year. To the best of our knowledge, analytical testing on model systems applied according to standard application conditions (see Teflon™ Industrial Coating Products fact sheet) indicate that NMP could not be detected in the cured coating in any relevant quantity. Therefore, based on this current data, we believe that these two conditions are not met, and subsequently there is no obligation respectively of notification to ECHA of substance in article or of communication to customers and consumers.

---

\(^5\) None of those products is supported for food contact applications.


This information is given in good faith and is based on data we believe to be reliable and on our current level of knowledge as of the date of this response. Therefore, we advise the recipient to request updates periodically. The information applies only to the specific material designated herein as sold by Chemours and does not apply to use in any process or in combination with any other material. It is provided at the request of and without charge to our customers. Since conditions of use and applications of above mentioned products are outside Chemours' control, Chemours makes no warranties, express or implied, and assumes no liability in connection with any use of this information.

Teflon™ and the Teflon™ Logo are trademarks of The Chemours Company, and its affiliates. Chemours™ and the Chemours Logo are trademarks of The Chemours Company.
Although the addition of a substance to the said SVHC Candidate List may impose obligations in specific situations, it does not mean a prohibition of use and it has no short term effect on its use in Teflon™ Industrial Coating Products.

Currently, NMP is proposed for restriction (REACH Annex XVII) and is listed in ECHA’s 8th draft recommendation for inclusion in the Authorisation List published on March 2, 2017. Coating technologists of Chemours are actively working on finding replacement products and technologies for this substance. In the specific case of NMP, substitution is not an easy task because of its uniqueness as a solvent. Chemours is searching for alternatives and we are working towards developing alternative technologies before the use restriction or use authorisation comes into effect.

We continue working towards the next registration deadline of 31 May 2018. Meanwhile we will continue to monitor our suppliers for any possible product discontinuation.

For more detailed information on REACH, we recommend that you consult the REACH website at https://echa.europa.eu/home.


On behalf of Chemours Belgium BVBA

Joeri Leenaers
Global Regulatory Affairs & Advocacy Manager