

Updated in July 2017 following the publication by ECHA of SVHC's new list on July, 07<sup>th</sup> 2017  
(174 substances)

Dear Sir or Madam,

The REACH implementation is part of CONDAT'S strategic projects. We wish to inform you of the progress of our action plan at every important step of this process.

As you know, REACH requires the registration of every substance manufactured or imported in quantity higher than 1t/year **for every downstream usage** (unless exempted).

### 1. Preregistration

**CONDAT pre-registered all the eligible substances to this procedure which are manufactured in our plant or imported from the outside EU.**

On the other hand, CONDAT is committed to pre-register all the eligible substances for new developments.

The obtaining of the confirmation of our raw materials preregistration is a part of our approval process for new references.

### 2. Registration

CONDAT as manufacturer was not concerned by the registration deadline of 12-01-2010: our substances produced in quantity superior to 1000 tons are exempted in conformance with the Annexe V.9.

Otherwise, CONDAT has successfully proceeded to the registration of substances produced in quantity greater than 100 tons per year, on May, 31st 2013. Registration numbers will be communicated through Safety Data Sheet of the product concerned.

**CONDAT is working on its registration file for the 2018 deadline.**

### 3. Raw materials sustainability

We have developed with our suppliers a monitoring system to anticipate any changes because of the Reach implementation, regarding the products they deliver us.

Condat is currently collecting information and documents on substances registered in 2013.

However REACH may affect the availability of raw materials and we may have to deal with circumstances beyond our control as they arise. We have to do everything legally possible to limit these potential disruptions. We will inform you as quickly as possible of possible regulatory situations, which may cause supply disruption.

### 4. Taking into account of customer uses

**As a substances manufacturer or importer, CONDAT will take into account all the CONDAT lubricants usages, as described in our products sheets / technical data sheets, for the registration purpose.**

**As a substances downstream user, we informed all of our suppliers, before the 30<sup>th</sup> of November 2009 and then before the 31<sup>st</sup> of June 2012, of all the CONDAT lubricants applications, as they are described in our products sheets / technical data sheets, in order our suppliers take them into account for the registration purpose.**

Then, exposure scenarii and risk evaluation will be developed.

If your application is different, we encourage you to inform us as soon as possible. If your application is confidential, you could inform the European Chemical Agency directly and develop the exposure scenario yourself.

### 5. Extended SDS (SDS with exposure scenarios)

As a downstream user, CONDAT receives and will receive from its suppliers, following the REACH registration deadlines (2010, 2013, 2018), extended SDSs for its raw materials if they are concerned (with substances registered and classified as dangerous or PBT (persistent, bioaccumulative and toxic) or vPvB (very persistent and very bioaccumulative).

The CONDAT extended SDSs will be forwarded as soon as possible taking into account the transmission delays of extended SDSs for substances through the supply chain and the complexity of realization of the extended SDSs for a mixture.



## **6. Substances concerned by the authorisation procedure**

### **A) Candidate List (Substances of Very High Concern)**

The candidate list to authorisation is available on the ECHA (European Chemical Agency) Web Site. Two substances, Disodium tetraborate and boric acid added in the list on the 18th of June 2010, are contained in some CONDAT lubricants. Our customers using these products have been specifically informed by letter in July 2010. Since 2008, the substitution of these substances is studied in partnership with the concerned users.

In the others products and according to suppliers information currently in our possession, CONDAT products contain no substances of the candidate list (updated in **July 2017**) in concentration above the declaration threshold. **In any way, CONDAT policy is to ban the uses of SVHC substances in CONDAT products and to impose the substitution in case of new classification.**

### **B) Authorisation List (Annex XIV of REACH)**

ECHA prioritises the substances from the Candidate List to determine which ones should be included in the Authorisation List (Annex XIV of REACH) and therefore, subject to authorisation.

These substances cannot be placed on the market or used after a given date, unless an authorisation is granted for their specific use, or the use is exempted from authorisation.

According to suppliers' information currently in our possession, CONDAT products contain no substances of the Authorisation List (Annex XIV of REACH) in concentration above the declaration threshold.

Our Reach implementation covers all our manufactured and marketed products.

**The aim of Condat is to propose a product to you:**

- **that conforms with regulations**
- **that is safe for the health of your workforce and the Environment**
- **and that completely responds to the request on your application.**

If you have any questions, please don't hesitate to contact: Laetitia CHAUVY (Products regulatory affairs)  
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We look forward to hearing from you in the future.

Thank you very much.

Yours faithfully

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