

REACH
CONDAT's products compliance with REACH
November 2018

- Updated following the publication by ECHA of SVHC's new list on June 27th 2018 (191 substances)
- Applied to all CONDAT's products

Dear Sir or Madam,

The implementation of REACH 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 REACH concerned substances which are manufactured in our plant or imported from the outside EU.

2. Registration

CONDAT registered all the substances produced in our plant and concerned by the reach deadlines of 2010, 2013 and of the 31th of May 2018.

The reach numbers are mentioned on the MSDS of our products for the concerned substances disclose in the section 3 of the MSDS

3. Raw materials sustainability

For all our raw materials and all our products, we have developed with our suppliers a monitoring system to anticipate any changes because of the implementation of REACH, (enquiries in 2017 and 2018). Our homologation process includes the check of the registration numbers. We haven't been informed of any sudden break of the supply chain.

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 30th of November 2009 and then before the 31st 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.

Some Condat products contain SVHC. If the concentration of these substances is above or equal at 0.1% in one of our products, customers are informed by SDS in section 3 and 15.

In the others products and according to suppliers information currently in our possession, CONDAT products contain no substances of the candidate list (updated in June 2018) in concentration above the declaration threshold.

In any way, CONDAT policy is to limit 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)

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,

Pierre-Yves BONDON

Development and quality Director

Laetitia CHAUVY

Products Regulatory Affairs Manager