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Customer Letter 11  
Status: 24 October 2008

24 October 2008

Dear customer,

**Subject:** REACH and DuPont

*The intention of DuPont to support customers uses of its products under REACH*

This communication related to REACH focuses on how DuPont intends to support customer's uses of DuPont products. In general, DuPont is not expecting that due to REACH it will need to change the supported uses of its products, unless the technical or commercial burden would be too great. All support for customer uses is conditional upon the implementation of the risk management measures DuPont prescribes and as indicated in the current and revised Material Safety Data Sheets.

**Important remarks:**

The following comments refer to DuPont Performance Polymers and DuPont Packaging & Industrial Polymers businesses only. Other DuPont Businesses may operate in other business environments and therefore have to adopt other approaches than our Polymers Businesses.

We provide the information below for use of our polymers / polymer compounds on their own without addition of other chemicals.

The following summary contains elements of the  
*Guidance on Information Requirements and CSA, last updated by ECHA 30 July, 2008*

[http://reach.jrc.it/docs/guidance\\_document/information\\_requirements\\_en.htm?time=1219411362](http://reach.jrc.it/docs/guidance_document/information_requirements_en.htm?time=1219411362)



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### **The process DuPont intends to follow:**

Following the CEFIC workflow for communication of use & exposure scenarios in the supply chain, DuPont will prepare a first 'initial' Exposure Scenario (ES) which will be communicated to customers. Customers whose uses are covered by this first 'initial' ES will not need to take any further action in order to have their use and exposure included into the supported uses by DuPont. Those customers whose uses are not covered will need to communicate back to DuPont using the *CEFIC Use and Exposure Communication Template* with detailed information on their use and exposure (e.g. duration of exposure to workers, presence of Local Exhaust Ventilation (LEV) at the workplace). DuPont then will have to perform the required evaluations to decide if the additional requested use can be supported.

CEFIC has developed a standardised format for communication. DuPont will use this format in order to assure a harmonised and efficient communication throughout the industry.

Based on today's knowledge of processes used to convert DuPont Polymer materials and their related exposure (within the limits established in our current Safety Data Sheets), we intend to support the conversion processes listed below. For final confirmation, the exposure scenario of the revised Safety Data Sheet will show the supported use and exposure categories.

### **Processes used to convert DuPont Polymer materials will become registered by DuPont under REACH.**

### **Conversion processes at industrial users intended to be supported (depending on materials used):**

- Compounding
- Injection moulding
- Extrusion (into various shapes, including films and extrusion coating)
- Calandring
- Blow moulding
- Injection blow moulding
- Extrusion blow moulding
- Rotomoulding
- Laminating
- Powder coating



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**Related material handling processes intended to be supported (dependant on materials used):**

Loading and unloading  
Storage  
Conveying  
Mixing and blending  
Dying

**Related article handling processes intended to be supported (dependant on materials used):**

Separation and trimming  
Machining  
Assembly (various techniques like welding, rifting)  
Curing and annealing  
Printing, surface coating and marking

The above industrial uses are related to the next level down in the supply chain (direct polymer converters). A detailed categorisation according to the guidance on information requirements and CSA described above will be made in due time to establish the first 'initial' Exposure Scenarios (ES). Work is in progress to develop these scenarios jointly with the converter industry.

**We believe it is in the interest of industry to follow a harmonized communication process between the actors of a supply chain. DuPont is dedicated to support the CEFIC approach for this process. As a consequence, we ask you not to communicate use and exposure information to DuPont as we shall provide you with an initial exposure scenario in due time. We plan to start this dialogue with you early in 2009.**



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**For information**, use and exposure categorisation required for REACH registrations must follow the process described below.

### **1. Use and Exposure categorisation according to the ‘Guidance on Information Requirements and CSA’**

The ‘Guidance on Information Requirements and CSA’ mentioned above provides a structure of categories which is segmented into a Use Descriptor System (1 - 4) and ERC, Environmental Release Categories (5).

- |                                   |  |
|-----------------------------------|--|
| 1. Sectors of Use SU              | The ‘Sector of Use’ describes either industry sectors or subsectors of chemical manufacturing and use, or even non-industrial sectors such as households. The sectors are codified by numbers with a preceding ‘SU’. (Example: Mining Industry – SU2)  |
| 2. Product Category               | The ‘Product Category’ defines the type of preparation the substance is used for. The categories are codified by numbers with a preceding ‘PC’. (Example: Explosives – PC11)   |
| 3. Process Category               | The ‘Process Category’ groups together the way a substance is used or converted into a subsequent product (‘preparation’ or ‘article’). The categories are codified by numbers with a preceding ‘PROC’. (Example: Industrial calendering operations – PROC6) Note: The PROC’s need to be selected from the Use Descriptor PROC, chapter R12 of ‘Guidance on Information Requirements and CSA’  |
| 4a. Pick list I Articles          | The ‘Article I Category’ groups together the articles in which the substance ultimately is used. The categories are codified by numbers with a preceding ‘AC’. (Example: Electrical and electronic products – AC04)  |
| 4b. Pick list II Articles         | The ‘Article II Category’ groups together the articles which may be subject to intended release of substances from the article. These substances may be subject to registration obligations under REACH. The categories are codified by numbers with a preceding ‘AC31 to AC40’. (Example: Eraser – AC32)  |
| 5. Environmental Release category | The ‘Environmental Release Category’ defines activities for which typical emissions into the environment can be assumed. The categories are codified by numbers with a preceding ‘ERC’ (Example: Production of plastics – ERCC6c). Note: The ERC’s need to be selected from PART D – EXPOSURE SCENARIO BUILDING, Appendix D-3: Names and descriptions Environmental Release Categories in the ‘Guidance on Information Requirements and CSA’ |



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## 2. Use and Exposure categorisation according to the REACH regulations Annex VI section 6 (< 10 t/y)

The uses and exposures conforming to the obligatory requirements pursuant to the final REACH regulation, Annex VI section 6, are differentiated between three main use categories (industrial, professional and consumer), with a view to possible final uses.

In terms of the **risks of the use** of chemicals, 3 groups of users can be described:

Industrial use	Engineering controls and/or Personal Protection Equipment (PPE) used, training possible, in scope of occupational health, employment etc. regulations.
Professional use	(sometimes referred to as Open Professional category): Personal Protection Equipment (PPE) used, but generally no or only limited recourse to engineering controls, training possible, in scope of occupational health, employment etc. regulations.
Consumer use	No engineering controls, limited recourse to Personal Protection Equipment (PPE), no training, outside scope of occupational health regulations etc.

[Reference: CEPE Position Paper, 19 March 2002]

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In terms of the **risks of exposure** to chemicals, a matrix of several factors is considered:

Differentiation is made between human routes of exposure (oral, dermal, inhalation), exposure to environmental compartments (water, air, soil/solid waste) and exposure patterns (short term and long term).

When completing the matrix, "uses" in the meaning of REACH (such as filling into containers or transferring from one container to another) the question to be asked is whether they are frequently performed activities leading to a long term exposure of humans and the environment, or if they are infrequently performed activities (such as occasional transfer from one container to another in repair work, sample taking) leading to a short-term exposure of humans and the environment. For convenience, "infrequent" and "occasional" exposure are summed up under "short term"; "continuous" and "frequent" exposure are summed up under "long term" in this matrix. To provide guidance, the following time-based criteria are recommended for assigning "short term" and "long term" exposure.

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## Human

### Definition of „short-term“:

#### Inhalation exposure

industrial or professional use (worker)

- a) less than 7 x 0.5 hours per week (0.5 hours per day, e.g. for sampling), or
- b) less than 1 x 4 hours per week (e.g. for maintenance work) - does not apply

for substances with  $\log Pow > 3$

consumer use

- a) less than 1 x 0.5 hours per week, or
- b) less than 1 x 4 hours per month, or
- c) less than 2 days per annum

#### Dermal exposure

industrial or professional use (worker)

- a) less than 7 x 0.5 hours per week, or
- b) less than 1 x 4 hours per week (exposure of hands only)

consumer use

- a) less than 1 x 0.5 hours per week, or
- b) less than 1 x 4 hours per month, or
- c) 2 days per annum

#### Oral exposure

industrial, professional, consumer use

In industrial and professional use, short-term oral exposure usually occurs only in accidents. In the given context, continuous oral exposure does not need to be examined. However, this does not necessarily apply in the consumer use category.

### Definition of „long term“:

Duration and frequency that exceed the criteria for the definition "short term".

## Environment

Definition of „short term“: less than once per each 28 days

Definition of „long term“: more than once per each 28 days

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[Source: REACH Standard Questionnaire for Communication along the Supply Chain; Annex to Part II and III, February 2007, published in the CEFIC REACH Industry Preparation Letter No 5, March 2007]



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We hope that the above indication of our intentions provides you already with some useful information. More detailed information will follow in due time.

Should you have any question regarding the content of this letter, or any other REACH related subject, please do not hesitate to contact us.

Yours faithfully,

Rainer Kurzknabe  
Regulatory Affairs Programs Manager  
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This information is based on our current level of knowledge and expresses only our intention. It does not constitute a binding obligation. Whilst the information is provided in good faith, no representations or warranties are made with regards to its completeness or accuracy and no liability will be accepted for damages of any nature whatsoever resulting from the use of or reliance on the information.

As we cannot be aware of all aspects of your business and the impact REACH Regulation may have on your company, we strongly encourage you to get familiar with REACH, its requirements and timelines.

For your information, please see also the REACH web site of the EU commission:  
[http://ec.europa.eu/environment/chemicals/reach/reach\\_intro.htm](http://ec.europa.eu/environment/chemicals/reach/reach_intro.htm)