

To whom it may concern

SUBJECT: REACH : Substances of Very High Concern –Draft pre-candidate list

With reference to the draft pre-candidate list “proposal for inclusion of substances in the candidate list” (press release ECHA/PR/08/34 of October 9th 2008), we hereby declare that none of the substances listed below are intentionally added in the materials manufactured and sold by Rhodia Polyamide Engineering Plastics in Europe under the trademark TECHNYL and TECHNYLSTAR. Furthermore based on our knowledge of the manufacturing process and information provided by raw materials suppliers, we would do not expect these substances to be present in our final products. To date, we do not presume having any other Substances of Very High Concern present in our products requiring further information to the supply chain.

Saint Fons, 20 October 2008

Jean-François Galey

Global Product Stewardship & REACH Project Leader

Rhodia Polyamide



Press Release: ECHA/PR/08/34

Helsinki, 9 October 2008

ECHA MEMBER STATE COMMITTEE AGREES ON THE IDENTIFICATION OF 14 SUBSTANCES OF VERY HIGH CONCERN

At its meeting in Helsinki of 7 and 8 October 2008 the ECHA Member State Committee unanimously agreed on the identification of 14 Substances of Very High Concern (SVHC) that may become subject to authorisation. One additional substance was already identified as SVHC without Member State Committee involvement as no comments were provided during the public consultation. These 15 substances will be included in the 'Candidate List' which will be published on the ECHA website later in October.

Executive Director of ECHA Geert Dancet stressed that "these 15 are only the first substances of very high concern identified through the formal process. The EU Member States and ECHA are preparing new proposals and the Candidate List will thus be updated".

The agreement concerned the following substances:

Substance name	CAS number	EC number	Basis for Identification as a SVHC
Anthracene	120-12-7	204-371-1	Persistent, bioaccumulative and toxic
4,4'- Diaminodiphenylmethane	101-77-9	202-974-4	Carcinogen, cat. 2
Dibutyl phthalate	84-74-2	201-557-4	Toxic for reproduction, cat. 2
Cobalt dichloride	7646-79-9	231-589-4	Carcinogen, cat. 2

Substance name	CAS number	EC number	Basis for Identification as a SVHC
Diarsenic pentaoxide	1303-28-2	215-116-9	Carcinogen, cat. 1
Diarsenic trioxide	1327-53-3	215-481-4	Carcinogen, cat. 1
Sodium dichromate	7789-12-0 10588-01-9	234-190-3	Carcinogen, cat. 2; Mutagen, cat. 2 Toxic for reproduction, cat. 2
5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	81-15-2	201-329-4	Very persistent and very bioaccumulative
Bis (2-ethyl(hexyl)phthalate) (DEHP)	117-81-7	204-211-0	Toxic for reproduction, cat.2
Hexabromocyclododecane (HBCDD) and all major diastereoisomers identified (α – HBCDD, β -HBCDD, γ -HBCDD)	25637-99-4 and 3194-55-6 (134237-51-7, 134237-50-6, 134237-52-8)	247-148-4 and 221-695-9	Persistent, bioaccumulative and toxic
Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins)	85535-84-8	287-476-5	Persistent, bioaccumulative and toxic Very persistent and very bioaccumulative
Bis(tributyl/tin)oxide	56-35-9	200-268-0	Persistent, bioaccumulative and toxic
Lead hydrogen arsenate	7784-40-9	232-064-2	Carcinogen, cat. 1 Toxic for reproduction cat. 1
Benzyl butyl phthalate	85-68-7	201-622-7	Toxic for reproduction, cat.2

Identification without MSC involvement:

Triethyl arsenate	15606-95-8	427-700-2	Carcinogen, cat. 1
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Proposals for 16 substances to be included in the 'Candidate' list were submitted in the form of Annex XV dossiers by seven Member States in June 2008. The proposals were published for public consultation (July-August 2008). The Member State Committee (MSC) debated on 15 substances and found unanimous agreement on the identification of 14 substances as SVHCs that may become subject to authorisation, taking into account the comments received from various stakeholders and Member States. On one proposal, Cyclododecane, the MSC unanimously agreed that there was no sufficient scientific data to justify identification under Art. 57.

The 16th substance, triethyl arsenate, was already identified as a SVHC without MSC involvement, as no comments had been received during the consultation process.

Later in October ECHA will, following a formal decision, include the 15 substances identified as SVHCs in the Candidate List and publish the list on its website.

Background: From “candidate list” to “authorisation list” and authorisations

The inclusion of a substance in the Candidate List is solely based on the specific intrinsic hazardous properties of the substance (as described by Article 57 of REACH). The list will be regularly updated. ECHA publishes on its website a registry of intentions (see below), indicating the substances on which the EU Member States or ECHA upon request by the European Commission are preparing an Annex XV dossier. This allows for timely preparation of the interested parties for commenting later in the process.

Based on an assessment of the inherent properties of these substances, the potential exposure from their uses and their market volume, ECHA will draft a proposal of priority substances to be included on the list of substances subject to authorisation (Annex XIV of the REACH Regulation). After further evaluation and a public consultation, the Member State Committee will issue an opinion on this draft proposal. ECHA will propose to the European Commission by 1 June 2009 the first substances that in its opinion should be placed in Annex XIV (Authorisation List). The decision on the inclusion of a substance on this list will be made by the European Commission.

Substances that will be included in the Authorisation list cannot be manufactured or imported in the EU from a specific date set by the Commission, except if the companies have obtained an authorisation for their specific use(s). This authorisation can either be granted because the risks are controlled or because the socio-economic benefits outweigh the risks.

The aim of authorisation is to ensure that the risks from substances of very high concern are properly controlled and that these substances are progressively substituted by alternative substances or technologies.

Press contacts: press@echa.europa.eu

Links:

Candidate List (published later in October): http://echa.europa.eu/chem_data_en.asp

Registry of Intentions: http://echa.europa.eu/chem_data/reg_intentions_en.asp

About REACH: http://echa.europa.eu/reach_en.asp