

March 13, 2024

Kelly Murphy
Nexeo Plastics
kamurphy@nexeoplastics.com

Dear Kelly:

This letter provides regulatory information for the following Alphagary product as requested:

Nexeo Plastics (Customer ID # 55207, 55208, 55209, 55210, 55211, 55212)		
NEXEO P/N	AG P/N	Product
28211	956218	ALPHAMED 2222C-90 CLEAR 0003

PFAS

Per- and Polyfluorinated Alkyl Substances (PFAS) are synthetic organic chemicals containing fluorine atoms bonded to carbon. There are thousands of these substances, with perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) being two of the more well-known and studied members. PFAS are often referred to as “forever chemicals” because of their persistence in the environment.

Regarding our product above, it is not intentionally formulated with, nor known to contain any PFAS. Furthermore, to the best of our knowledge, the raw materials we use in this product do not contain PFAS, or any other organo-fluorine substances.

EU POPs

Regulation (EU) 2019/1021, the so-called POP recast regulation, was a substantial modification to **Regulation (EC) No. 850/2004**, for regulating persistent organic pollutants. The list of substances from the Stockholm Convention on POPs and subsequent additions are identified in Annex I, Part A of the recast regulation. Annex III, Part B identifies substances that are subject to release reduction provisions. The product above is not formulated with, nor known to contain any Annex I or Annex III substances.

EU REACH SVHC

Article 56 of REACH (**REGULATION (EC) No 1907/2006**) requires Authorization by the European Chemicals Agency for any substances identified in Annex XIV, if they are to be used in the EU beyond their designated sunset date. Article 57 sets forth the requirements for the candidate list of substances subject to authorization in Annex XIV. These candidates are known as **Substances of Very High Concern (SVHC)** and as of 1/23/24, new substances were added, bringing the total number of substances to 240. Based on the declaration threshold of 0.1% (1000-ppm), the following SVHC is declared for the product above:

Di(2-ethylhexyl) phthalate, CAS # 117-81-7, EC # 204-211-0, 33.8%, on authorization list, sunset date 2/21/15

No other reportable SVHCs are present.

EU REACH Annex XVII

Article 67 of REACH (Restrictions on the Manufacture, Placing on the Market and Use of Certain Dangerous Substances, Preparations and Articles) places restrictions on substances, groups of substances, or substances in mixtures in accordance with Annex XVII. There are 71 unique entries/substances for which the manufacturing, placing on the market, or use is limited or banned. Some changes were made to the list of substances by **REGULATION (EU) No 2020/2096** and **REGULATION (EU) No 2021/1199**. As noted above, this product contains Di(2-ethylhexyl) phthalate, CAS # 117-81-7, which is restricted for use.

Sincerely,



Christopher Ptak
Regulatory Compliance Specialist

Cc: Joyce Jones (Alphagary)
Troy Brantley (Alphagary)