

October 15, 2024

Jim Conkey
Nexeo Plastics
JConkey@nexeoplastics.com

Dear Jim:

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 (New/Old)	Product
28209	5020005362 / 956176	ALPHAMED 2222C-68 CLEAR 0003

EU REACH SVHC

Article 56 of REACH (***REGULATION (EC) No 1907/2006***) requires that any substance identified in Annex XIV must have Authorization by the European Chemicals Agency, if it is to be used in the EU beyond its designated sunset date. The current authorization list contains 59 substances, with 54 of those past their sunset dates. 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 6/27/24, they number 241 substances. The latest addition was bis(α,α -dimethylbenzyl) peroxide, also known as dicumyl peroxide, CAS # 80-43-3, added as toxic for reproduction (Article 57c). Based on the declaration threshold of 0.1% (1000-ppm), the following SVHC is declared:

Di(2-ethylhexyl) phthalate, CAS # 117-81-7, EC # 204-211-0, 25.6%, on authorization list, sunset date 2/21/15

No other reportable SVHCs are present.

EU RoHS

Directive 2011/65/EC ("RoHS2") and ***Directive (EU) 2015/863*** ("RoHS3") restrict the use of certain hazardous substances and classes of substances in electronic and electrical equipment (EEE). There are ten restricted substances that include cadmium, hexavalent chromium, lead, mercury, polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), butyl benzyl phthalate (BBP), dibutyl phthalate (DBP), di-isobutyl phthalate (DIBP) and di(2-ethylhexyl) phthalate (DEHP). The threshold for restriction is 1000-ppm for all substances, except cadmium, which has a threshold of 100-ppm. This product is formulated with DEHP and because the level of DEHP is > 1000-ppm, it does not comply with EU RoHS.

Medium Chain Chlorinated Paraffins (MCCP)

We do not use or intentionally add any Medium Chain Chlorinated Paraffins (MCCP), CAS # 85535-85-9, nor do we expect any of the raw materials used in the manufacture of this product to contain it.

Phthalate

Phthalates are various esters of 1,2-benzenedicarboxylic acid. As stated above, this product is directly formulated using Di(2-ethylhexyl) phthalate, and thus would contain phthalates.

Sincerely,



Christopher Ptak
Regulatory Compliance Specialist

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