

July, 2024

## Dear Valued Customer To Whom It May Concern

### REF: REACH with Nalco Water

Based on current and available information, only a very small segment of Nalco Water products sold within the European Union contain Substances of Very High Concern (SVHC) as listed on the Candidate List published by the European Chemicals Agency (ECHA) and Health and Safety Executive (HSE).

To view the Candidate List of SVHC, please visit <https://echa.europa.eu/candidate-list-table> for the EU REACH list and [candidate-list.xlsx \(live.com\)](#) for UK REACH.

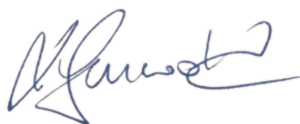
This table reflects the affected Nalco Water products. No additional Nalco Water substances or products were affected by the updated Candidate List as of **27<sup>th</sup> June 2024**.

| EC #      | CAS #                                   | Products   |
|-----------|---|--|
| 203-468-5 | 107-15-3                                | NALCO EC3461A  |
| 203-856-5 | 111-30-8                                | NALCO 73500  |
| 233-139-2 | 10043-35-3                              | NALCO® 71760   |
| 215-04-3  | 12179-04-3,<br>1303-96-4,<br>1330-43-4; | LCS-60, NALCO 77335, TRASAR™ TRAC100,<br>TRASAR™ TRAC102, NALCO® TRAC109,<br>NALCO® TRAC114 PLUS   |
| 237-560-2 | 13840-56-7                              | TRAC118  |
| 247-759-6 | 26523-78-4                              | NALCO® EC3435A   |
| 200-679-5 | 68-12-2                                 | NALCO® EC3376A   |
| 211-989-5 | 732-26-3                                | NALCO® EC3053A PROCESS ANTIFOULANT,<br>ACTRENE® EC3267A, ACTRENE™ EC3269A,<br>NALCO® EC3341A, NALCO® EC3336A,<br>NALCO® EC3377A, LongRun™ EC3469A,<br>NALCO® EC5208A, NALCO® EC5208G, EC3670G, |

|           |         |   |
|-----------|---------|---|
|           |         | VIA4600   |
| 202-679-0 | 98-54-4 | NALCO® EC3053A PROCESS ANTIFOULANT,<br>ACTRENE® EC3267A, NALCO® EC3377A,<br>NALCO® EC5208A, NALCO® EC5208G,<br>EC3670G, VIA4600 |

If you would like more information regarding our position on REACH, please visit our website at <https://www.ecolab.com>. If you have further questions, please contact me directly or send your query to [REACH@ecolab.com](mailto:REACH@ecolab.com).

Sincerely yours,



**Dr. Ludger Grunwald**  
Sr. Director Regulatory Affairs  
Global Substance Center of Excellence



**Joanna Dudek**  
Sr. Regulatory Specialist | REACH Team  
Global Substance Center of Excellence

## Dear Valued Customer To Whom It May Concern

July 2024

### REACH with Nalco Water: Substances of Very High Concern (SVHC) in Articles

The obligations from the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Regulation (EC) No. 1907/2006 for manufacturers, formulators and the final downstream users differ according to their role. Nalco has an active program in place to secure customer's processes through REACH Regulation.

According to Article 33 of REACH, suppliers of articles have the obligation to inform downstream customers of the presence of Substances of Very High Concern (SVHC)<sup>1</sup> in articles<sup>2</sup> when the concentration is above 0.1% weight by weight (w/w). Article suppliers are required to communicate actively in order to provide sufficient information to allow the safe use of the article, including as a minimum, the name of the substance.

Based on information received from our upstream suppliers, only a small subset of products is assembled with articles containing SVHC exceeding 0.1% (w/w) concentration. The table below includes the identified SVHC, as well as Nalco Water products where this substance is present above 0.1% (w/w):

| Substance Name  | CAS #      | Products   | Safe Use  |
|---|------------|--|---|
| 2-ethylhexyl<br>10-ethyl-4,4-<br>dioctyl-7-oxo-<br>8-oxa-3,5- | 15571-58-1 | <ul style="list-style-type: none"> <li>3D TRASAR Pasteurizers Systems</li> <li>3D TRASAR DAF Systems</li> <li>Dosing Pump Cabinets</li> <li>PURATE Generators</li> <li>PURATE Containerized solutions</li> </ul> | The products contain <b>CPVC</b> articles manufactured with <b>DOTÉ</b> . This substance is one of the most efficient |

<sup>1</sup> The REACH Regulation (EC) 1907/2006 defines substances of very high concern ("SVHCs") as substances that are classified as: carcinogenic, mutagenic or toxic for reproduction ("CMR") Category 1A or 1B, persistent, bioaccumulative and toxic ("PBT"), very persistent and very bioaccumulative ("vPvB"), endocrine disruptors, or raise other equivalent health and environmental concerns.

<sup>2</sup> An article is defined by REACH Art.3 as an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition.

|                                      |           |                       |  |
|--------------------------------------|-----------|-----------------------|--|
| dithia-4-stannatetradecanoate (DOTE) |           |                       | stabilizer and is enclosed in the polymer matrix, <b>no exposure to this chemical is foreseen</b> during the installation and the use phase of these products.   |
| Lead                                 | 7439-92-1 | Clora Online Analyzer | The product contains LEAD. This substance is use as a shield for X-ray. According to Manufacturer, no exposure to this chemical is foreseen during the installation and the use phase of these products. |

We will keep monitoring the presence of SVHCs in our articles and updating the previous information as needed.


You can refer to the Candidate List of SVHC at: <https://echa.europa.eu/de/candidate-list-table>

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SCIP database for information on **Substances of Concern** In articles as such or in complex objects (Products) established under the Waste Framework Directive (WFD).

From 5 January, 2021 companies supplying articles containing substances of very high concern (SVHCs) on the Candidate List in a concentration above 0.1% weight by weight (w/w) on the EU market have to submit information on these articles to ECHA. Nalco Water has submitted dossiers to SCIP database for the impacted articles. We are aware this new duty ensures that the information on articles containing substances of very high concern (SVHCs) on ECHA's Candidate List is available throughout the whole lifecycle of products and materials, including the waste stage.

Sincerely yours,



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Global Substance Center of Excellence



**Daniel Rodriguez**  
Regulatory Affairs Manager  
Equipment & Digital Compliance