

## Communication to Downstream Users of DEHP and Other Interested Parties

### RE: UPDATE ON THE REGISTRATION OF bis (2-ethylhexyl) phthalate under REACH

CAS N°: 117-81-7

EINECS N°: 204-211-0

The members of bis(2-ethylhexyl) phthalate industry association in Europe (European Council for Plasticizers and Intermediates) have formed the DEHP REACH Consortium in order to promote the registration of this important product. This letter is being sent on behalf of the DEHP REACH consortium for bis(2-ethylhexyl) phthalate for which you have submitted a pre-registration and is a follow-on to the initial e-mail pre-sief survey sent out in May and the communication mail sent out in August with the results of this survey. Supported by the leading manufacturing companies, Arkema France volunteered to act as the Lead registrant and informed all pre-sief members who responded in the categories Passive, Involved or Leading. As no negative vote was received from pre-sief members, Arkema France nominated itself to ECHA as the Lead Registrant for bis(2-ethylhexyl) phthalate.

The test substance composition that has typically been used in toxicology tests used for the registration dossier is that of a mono-constituent substance with a content of >99% pure DEHP and does not contain any impurity at concentration levels that would impact the classification of bis(2-ethylhexyl) phthalate or would require a PBT or vPvB assesment. The composition considered by the DEHP REACH consortium for bis(2-ethylhexyl) phthalate is typically >99.5%.

If you have a substance composition which deviates from the above and which you believe will not change the existing EU classification of bis(2-ethylhexyl) phthalate and will not require PBT / vPvB assesment, please submit this to us by e-mailing to [arkema.reach-dopp2@arkemagroup.com](mailto:arkema.reach-dopp2@arkemagroup.com). If we can confirm that it will not adversely affect the hazard and risk assessments which will be included into the registration dossier, we will then accommodate it.

The DEHP REACH Consortium which is administered by ReachCentrum is developing all individual parts of the registration dossier ( IUCLID data set , CSR including Exposure scenario development, classification proposal and Substance identity) and Arkema as the Lead registrant is planning to submit the joint registration dossier by September 2010.

Today, from amongst the huge number of 1245 references, the DEHP REACH Consortium has identified all Key studies for registration, confirmed their availability and is in the process of completing the IUCLID data set. DNELS have been developed and PNECS should be available very soon.

Concerning Exposure scenarios, the DEHP REACH Consortium has identified descriptors for bis(2-ethylhexyl) phthalate uses and developed surveys at producer and downstream user levels to collect information relating to Exposure, Emissions, Operational Conditions and Risk Management Measures.

Letters of Access to the full registration dossier will be made available to SIEF members through ReachCentrum, for each volume band. The DEHP REACH Consortium will also offer Letters of Access for individual studies. The DEHP REACH consortium does not have yet the final cost for the purchase of Letters of Access since this will depend on the actual number of registrants for each tonnage band. Therefore SIEF members will shortly be requested to confirm their data requirements in terms of Annex in order to identify the number of registrants per tonnage band and the resulting costs per registrant..

ARKEMA, as the lead registrant for bis(2-ethylhexyl) phthalate, has developed an implementation plan with milestones and intends to communicate every two months to inform SIEF members of the progress made completion of the registration dossier for bis(2-ethylhexyl) phthalate.

Thank you for taking the time to read this letter and for your support in responding to the next communication about your data requirements in terms of Annex.

If you have any questions or concerns or need more information , please contact [arkema.reach-dopp2@arkemagroup.com](mailto:arkema.reach-dopp2@arkemagroup.com)

Best regards

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