

Communication to Downstream Users of DEHP and Other Interested Parties

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

CAS N°: 117-81-7

EINECS N°: 204-211-0

Following our first letter sent October 18th, 2009, in which Arkema on behalf of the [DEHP/2EH/n- and i-Butanal REACH consortium](#) for bis(2-ethylhexyl) phthalate stated that it would act as Lead registrant and was informing pre-Sief members upon substance identification, we are now proceeding to our next communication.

The purpose of this Reach letter n°2 is to provide SIEF participants and other interested parties with updated information on the status of The DEHP REACH consortium efforts to compile the test data and other information required for REACH registration.

Consortium update

3 new European producers have signed a Declaration of Accession to become members of the DEHP REACH consortium, increasing the consortium members to 7.

Technical Progress Toward Registration

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.at the latest .

Substance identity

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 assessment. The composition considered by the DEHP REACH consortium for bis(2-ethylhexyl) phthalate is typically >99.5%.

Data Gaps

All data gaps have been fulfilled for a registration as a substance > 1000 tpa and access to all necessary third parties studies obtained by the DEHP REACH consortium

IUCLID V

The draft IUCLID V data set including DNELs and PNECs will be available for review within the consortium by end of January 2010

CSA/CSR

During 2009, the DEHP REACH Consortium has collected information from downstream users regarding uses, Operational Conditions, Risk Management measures, associated human exposure levels and environmental emissions. Sufficient information related to the uses listed in the enclosed document was collected to derive Exposure Scenarios and document those uses as acceptable risk.



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CSR completion is expected by end of March 2010

Joint Submission

Letters of Access to the full registration dossier will be made available to SIEF members through ReachCentrum, for each volume band upon condition of signing a SIEF Agreement. 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 Arkema as the Lead registrant for bis(2-ethylhexyl) phthalate will be requesting SIEF members to confirm their data requirements in terms of Annex in order to identify the number of registrants per tonnage band and to be able to provide the resulting costs for letters of access. Therefore, if you intend to register bis(2-ethylhexyl) phthalate, please ensure that you respond to the SIEF Registration request by the stated deadline.

If you have any questions or concerns or need more information, please contact arkema.reach-dopp2@arkemagroup.com

Best regards

Didier Vanhoye
Arkema
Product Steward