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Dear valued Customer,

Enthone is one of the founders of the European chromium trioxide authorization consortium CTAC, managed by the law firm Jones Day, Brussels and is an active member in the technical committee and the leadership team.

The European Enthone REACh team is working closely with consortia, associations and authorities to achieve the desired outcome.

As part of the consortium Enthone is a member in the following use groups:

- **Use 1: Formulation of Mixtures**
- **Use 2: Functional Chrome Plating**
- **Use 3: Decorative Plating**
- **Use 5: Surface Treatment with No Cr(VI) present on Surface**

We point out, that we are do constantly research on replacement of CMR substances and SVHCs from our products if possible to make our products safer, our customers processes more productive and the electroplating industry more sustainable.

Today, Enthone can offer following unique and valuable entirely Cr(VI) – free processes:

- Trivalent Decorative Chrome Processes
 - o **TRILYTE[®], OEM approved, production proven for several finishes, Chrome-free post treatment available.**
- Cr(VI) – free passivates
 - o **PERMA PASS[®] Trivalent Passivates to improve corrosion resistance of electroplated coatings of zinc, zinc-iron alloys, zinc-nickel alloys, also cobalt-free available.**

Never the less, we see that a number of uses of CrO₃ cannot be replaced by technically and economically feasible alternatives for the time being. Therefore Enthone is not only looking for alternatives but is also deeply involved in the authorization process.

If you have any questions on our SVHC-free products or on REACh authorization, please contact your local sales representative.

The European Chemicals Law REACH requires, that to continue using a substance listed on Annex XIV of the law, an authorization has to be granted to at least one member of the respective supply chain, which correctly and in detail describes

- how the substance can be used in an acceptably safe way,
- if there are no alternative technologies, and that
- the benefit of using the substance is bigger than the risk.

Every member in the supply chain, after a transition period, will have to comply with the requirements outlined in the authorization for his area of responsibility.

The Member State Committee (MSC) has made its decision, on December 21, 2011 ECHA announced that chromium trioxide and chromic acid will be entered with high priority into Annex XIV of the REACH regulation. This now requires all uses of the substances to submit applications for authorization, it is currently expected that the latest date for submission February 2016, with a sunset date of August 2017. Chromium Trioxide must not be used after that date without authorization by ECHA.

What are the objectives of the European consortium for the authorization of Chromium Trioxide?

- Create one common authorization application dossier for Chromium Trioxide for the Importers/Suppliers/Downstream Users to file, which will cover the majority of surface treatment sectors
- Distribute the authorization application dossier to all members, so that those that are not covered by the common authorization can file their own application with the best available documents at the lowest costs.
- Communicate with the authorities in a way that compromises found can be converted into planning safety for the surface treatment industry as soon as possible.

Other uses are supported by members of the consortium and are being developed with help from their downstream users.

Enthone are unable to guarantee that application for authorization of all our customers' uses will be supported be granted by the EU Commission. For this reason and the ones outlined above we would encourage customers to take following actions.

We would kindly ask you to evaluate the situation for your enterprise with the help of these documents and decide, which is the best way for your enterprise to be represented in the authorization process to safeguard the use of chromium trioxide in your plant.

Timeline and milestones:

- | | |
|--|---|
| 1. Inclusion on Annex XIV | March 2013 (expected) |
| 2. CTAC Core dossier ready for LOA purchase | September 2014 |
| 3. Latest application date | March 21 st 2016 |
| 4. Sun set date
necessary for using CrO3 in the future) | September 21 st 2017 (Authorization by ECHA) |

It is possible to apply for authorization after the application date and sunset date. It is not possible to use CrO3 after the sunset date without a submitted application for authorization or without authorization.

How do I enter the authorization process?

It is not possible to join the consortium after June 2012. After milestone No.2 Enthone will communicate with its customers, for which uses Enthone will submit an application for authorization. In case you are not covered by us or you feel that you need an own authorization for your company, you can purchase a Letter of Excess for the core dossier. The dossier will contain all documents, which are required by ECHA, including a

Chemical Safety Report, Report on Analysis of Alternatives and Socioeconomic Study. Feel free to change or extend the content in the dossier to the specific scenario in your company and apply for an own authorization at ECHA. You will have 20month for changes until the latest application date (Milestone 2. – 3.).

Where can I purchase a letter of access?

You can purchase an LoA at the consortium manager Ms Ursula Schliessner; Jones Day; Tel. +32-2 645 14 60 or uschliessner@jonesday.com.

Yours faithfully



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EH&S, Regulatory and REACH Manager



Dirk Wiethölder
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Chairman of the Technical Committee
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