

## Valued Customer To Whom It May Concern

January 2021

### REACH with Nalco Water

Dear Valued Customer,

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).

To view the Candidate List of SVHC, please visit: <https://echa.europa.eu/candidate-list-table>

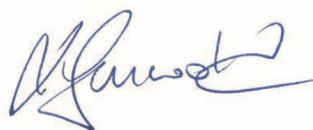
This table reflects the affected Nalco Water products. There were no additional Nalco Water substances or products affected by the updated Candidate List as of **19 January 2021**.

CAS #	Products
107-15-3	EC1045A, NALCO EC3461A
10043-35-3	NALCO 71760, GEO991
1303-96-4	NALCO 77335
1330-43-4	NALCO 73361, NALCO D-4642 , LCS-60, TRASAR TRAC100, TRASAR TRAC102, TRASAR TRAC107 PLUS, TRASAR TRAC109, NALCO WT-1000, NALCO WT-1002, NALCO WT-1007, NALCO WT-1009, TRAC114PLUS
26523-78-4	EC3435A
68-12-2	NALCO® EC3376A
9016-45-9	NALCO 7846-1, NALCO 85342
98-54-4	EC3377A, EC3158A, EC3325A, EC5208A, EC3053A, EC5208G
9002-93-1	EC9092A

Nalco Water tracks the percentage of products in our portfolio that contain SVHCs. Currently less than 2% of our product portfolio is affected.

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

Sincerely yours,



**Dr. Ludger Grunwald**  
Director Regulatory Affairs  
REACH Centre of Excellence



**Agnieszka Wieczorkowska**  
Regulatory Specialist  
REACH Centre of Excellence

## Valued Customer To Whom It May Concern

January 2021

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

Dear Valued Customer,

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 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate (DOTE)	15571-58-1	<ul style="list-style-type: none"> <li>• 3D TRASAR Pasteurizers Systems</li> <li>• 3D TRASAR DAF Systems</li> <li>• 3D TRASAR Thermal Desalination Systems</li> <li>• Dosing Pump Cabinets</li> <li>• PURATE Generators</li> <li>• PURATE Containerized solutions</li> <li>• Ultrafiltration Equipment</li> <li>• Customized RO and Pretreatment Equipment containing PVC-C piping / fittings</li> </ul>	The products contain <b>CPVC</b> articles manufactured with <b>DOTE</b> . This substance is one of the most efficient 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.

<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.

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.
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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>

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

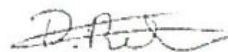
SCIP database for information on **S**ubstances of **C**oncern **I**n articles as such or in complex objects (**P**roducts) established under the Waste Framework Directive (WFD).

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,



**Dr. Ludger Grunwald**  
**Director Regulatory Affairs**  
**REACH Centre of Excellence**



**Daniel Rodriguez**  
**Staff Engineer**  
**Equipment, Regulatory Affairs**