



20th June 2016

Dear Customer,

Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)
EU Regulation 1907/2006/EC

The first stages of REACH implementation: the pre-registration of “phase-in” substances, ending on December 1st 2008 and the first two phase-in registration periods ending 30th November 2010 and 31st May 2013 have passed. Cristal completed pre-registrations of the volumes of substances in the commercial products that we manufacture, import and sell in the European Economic Area (EEA), and registrations of those substances that exceed 100 tonnes per year per Cristal entity.

Cristal is receiving many enquiries from customers about the pre-registration and registration status of our products. Often the formats of forms and spreadsheets devised for communications in the supply chain are not conducive to providing complete information about Cristal’s REACH program. Therefore we intend to provide uniform, up-to-date statements in response to our customer’s enquiries about the REACH status of Cristal products.

Please find our latest update on Cristal’s REACH compliance program in the following pages.

Sincerely,

A handwritten signature in black ink, appearing to read "M.T. Cole".

Morris T. Cole
Ti-SBU REACH Leader

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Cristal's Implementation of the EU REACH Regulation

1. How is Cristal managing REACH?

Cristal has given a very high priority to preparing for and implementing the requirements of the European Union's Regulation 1907/2006/EC on Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). Cristal has followed the development of REACH from an early stage, and actively supports relevant industry groups dealing with REACH implementation.

Cristal has a global, multi-disciplinary REACH Implementation Team that coordinates the different elements of the program to ensure successful and timely (pre)registrations of the substances in our products. To date these elements have included the assembly of substance inventories and composition information, completing pre-registrations, completing registrations of substances in the 100 tonnes and over phase-in categories, collection of information on substance properties, planning the gathering of required information on uses and exposure potentials, and participation in relevant (pre)SIEF and REACH consortia activities.

2. Will Cristal pre-register and register the substances that Cristal produces, imports and sells in the EU?

Cristal completed pre-registrations of all the products (substances) we manufacture, import and sell in the EEA¹ and Switzerland, and registrations of those substances at 100 tonnes or more per Cristal entity. We intend to complete full registrations of lower volume substances by the relevant deadlines. Cristal's product portfolio is subject to the normal periodic business review. Because the registration period for the lowest volumes extends until 2018, it is not possible for Cristal to provide statements guaranteeing full registration at this point. Cristal is intending to ensure that all products that we currently manufacture, import and sell in the EEA and Switzerland will be REACH compliant and we do not expect any of our products to be unavailable because of REACH.

¹ The European Economic Area: the 28 member states of the EU plus Iceland, Liechtenstein, and Norway.

3. Do Cristal's non-EU customers who incorporate Cristal products in preparations or articles they export into the EU have REACH obligations?

Each EU importer of a substance, whether alone or contained in a preparation (formulation) such as a paint or plastic compound, normally has an obligation to pre-register and register that substance. Cristal's registrations normally only cover the volumes that we place on the EEA and

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Swiss markets. The non-EU manufacturer or formulator may appoint an EU-based REACH “only representative” to pre-register and register an importer's volumes under an agreement between the two parties. The arrangements for complying with REACH using an "only representative" are quite complex. If you export formulations containing Cristal product to the EEA and require further information about these, please contact your Cristal Sales or Customer Service Representative.

4. Will you cover my use of Cristal’s product in the registration dossier?

Cristal’s registration of our TiONA® titanium dioxide pigment products supports all uses as set out in the European Chemical Agency (ECHA) use descriptor system.¹ For uses supported in the registrations of other substances please refer to our (extended) Safety Data Sheets (SDS).

¹ http://echa.europa.eu/documents/10162/17224/information_requirements_r12_en.pdf

5. Has Cristal updated the SDSs for Cristal products to comply with the REACH requirements on format and content?

SDSs for all Cristal products sold in the EEA and Switzerland comply with the REACH requirements on format and content.

The current versions of Cristal’s SDSs may be found at <http://www.cristal.com/products-and-services/Pages/default.aspx>

6. Will any Cristal products / substances be subject to authorization?

We do not expect any substances in Cristal products to be subject to the Authorisation stage of REACH.

7. Do any Cristal products contain substances of very high concern (SVHC)?

None of the 169 substances listed to date on the Candidate List of Substances of Very High Concern (SVHC) are present in our TiONA® and CristalACTiV™ titanium dioxide products, titanium tetrachloride, titanium oxychloride and titanium oxysulphate products, nor in our co-products at levels greater than 0.1% by weight. From our knowledge of the raw materials we use, and our processes, we do not expect any potential SVHC on future editions of the Candidate List to be in Cristal’s products. If in the unlikely event of any substance in Cristal products appearing on future updates of the Candidate List we undertake to inform our customers.

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8. What measures have you taken to ensure that your suppliers are REACH compliant?

Cristal is working closely with the suppliers of raw materials and other substances used in the EU manufacture of our products to ensure REACH compliance and supply continuity.

9. Can you provide me with more information about REACH and the obligations that it brings?

We encourage all stakeholders to familiarize themselves with the REACH requirements by visiting the European Chemicals Agency (ECHA) website where there are comprehensive guidance documents and REACH help tools available. The link to this site is: <http://echa.europa.eu/>

10. Should I have questions about Cristal’s REACH implementation, how should I contact the responsible person?

Please direct all enquiries about REACH to your usual Cristal Sales, Technical Service or Customer Service Representative.

You the reader, and the company you represent, must make your own independent evaluation of the information, recommendations or advice (“Information”) contained herein. You must make your own determination of the suitability, accuracy and completeness of the information for your own use, regulatory compliance, protection of the environment, and the health and safety of your employees and purchasers of your products. We strongly advise our customers to become familiar with their obligations under REACH.

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