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Conditions under which, the use of ROMBEST® masterbatches containing PY.34 and PR.104, DCC's lead and molybdate pigments is permitted.

Dear Customer and Downstream User,

We wish to inform you that on 7/9/2016, the European Commission has officially granted Dominion Color Corporation (DCC) an Authorization for the continued use of C.I. Pigment Yellow 34 (PY.34) and C.I. Pigment Red 104 (PR.104). The final Authorization decision, C(2016) 5644, was published in the Official Journal of the European Union (OJ) on September 14th, 2016, concluding the Authorization process. The Commission Implementing Decision C(2016) 5644 including the summary as published in the OJ, can be accessed from the following link:

http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.C_.2016.337.01.0003.01.ENG&toc=OJ:C:2016:337:TOC

Following the above, ROMCOLOR 2000 S.A. is able to continue to offer ROMBEST® color masterbatches containing DCC pigments PY.34 and PR.104 for Industrial and Professional uses.

The authorized uses for the plastics sector are:

	Use description	Continued use granted until	PY.34 Authorisation Numbers	P.R.104 Authorisation Numbers
USE 4	Distribution and mixing pigment powder in an industrial environment into liquid or solid premix to color plastic/plasticized articles for non-consumer use	21 May 2022	REACH/16/3/3	REACH/16/3/9
USE 5	Industrial use of solid or liquid color premixes and pre-compounds containing pigment to color plastic or plasticized articles for non-consumer use.	21 May 2022	REACH/16/3/4	REACH/16/3/10

Use 5 is related to you, plastics processors that use masterbatches with these pigments. The non-consumer uses are presented thoroughly in Annex I.

The Authorization decision includes understandable conditions and requirements to ensure that risks are controlled and uses are restricted to the ones applied for. As a follow up to the final decision, DCC has provided ROMCOLOR 2000 S.A. with a training session and information on the Authorization obligations of its European customers and Downstream Users. To promote compliance with the requirements of using color masterbatches, containing DCC PY.34 and PR.104, DCC has prepared additional supporting documents and guidance.

In summary, Downstream Users of masterbatches based on DCC's PY.34 and PR.104 are required to:

- ✓ Identify their use to the supplier/distributor to ensure all relevant exposure scenarios are taken into account (REACH, Article 37 (2)). See Annex II (point 4- Check list).
- ✓ Notify their use to ECHA (REACH, Article 66); see Annex II (Point 6- Check list) and Annex III.
- ✓ Verify the risk management measures and operational conditions listed in the MSDS (EC Decision C(2016) 5644, Article 1.3.a); see DCC's PY.34 & PR.104 Verification template. See Annex II (Point 7-Check list) and Annex IV.
- ✓ Maintain a personal protective equipment program on the selection/use/maintenance/ training (EC Decision C(2016) 5644, Article 1.3.b)
- ✓ Provide ECHA (EC Decision C(2016) 5644- Art. 3d/e): - Pb in blood data - Cr in air data - Surveillance record for each worker exposed to masterbatches containing DCC PY.34 & PR.104. Medical surveillance is carried out, if exposure to lead in air is > than 0.075 mg/m³ TWA 40 hours/ week or Blood-lead level > 40 mg PB/100 ml blood is measured in individual workers (by absorption spectrometry or equivalent method). See Annex II (point 8- Check list) and Annex IV.
- ✓ Notify the masterbatch supplier and/or DCC, if risk management measures assigned in the MSDS are not appropriate and/or new information on hazardous properties is available (REACH, Article 34). See Annex II (point 9- Check list).
- ✓ Prepare Assessment of alternatives by 30 June 2017 (Decision C(2016)5644 Art. 1.3.d and Art. 3.b). For each specific use they have to provide technical and economic considerations in order to explain why the alternatives are not a sufficient replacement. See Annex II (point 10-Check list).

For all the above actions ROMCOLOR 2000 S.A. provides extensive guidance and reporting templates (see note "Instructions", where Annexes II, III and IV are included). Annex IV can be downloaded in a convenient format for easiness of use at our web site at <http://www.romcolor.ro>

ROMCOLOR 2000 S.A. is ready to offer alternative heavy metals free masterbatches. Plastics processors wishing to replace Rombest® masterbatches containing PY.34 and PR.104, can contact their sales person and discuss with them about the optimum replacement solution.

For any questions please contact your sales person or the undersigned.

Yours faithfully,

Mr. Constantin OPREA
Quality and R&D Manager

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ANNEX I:

EXAMPLES OF AUTHORIZED USES

1. Manufacturing

Tool parts
Ladder feet
Security tags & locks
Display stands
Technical specialty parts
Safety helmets
Professional protective garments
Plastic fuses for military & explosive uses
Equipment stop/ emergency buttons & lights
Flammable & fire warning indicators
Equipment safety guards, stops & rails and fences

2. Agricultural

Agricultural equipment / tractor controls
Membranes, films & agricultural covers: for vehicles, manure, silage etc.
Mesh and fiber agricultural fencing
Flower pots, tubs, planters, troughs for agricultural use
Flexi tanks for agricultural / chemical use
Safety covers for agricultural equipment

3. Containers and covers

Tarps for truck & trailer covers
Cable & wire coating
Coated textile, tarp and canvas for inflatable boats & covers
High visibility canvas for protective industrial packaging
Coated textiles for tents, pergolas, awnings, sun shades, military covers
Industrial bags and covers: high visibility
Hospital waste bags
Recycling bins, boxes, garbage containers, storage bins (non household or consumer)
Collection boxes
Medical waste & sharps containers

4. Flooring

Wood polymer composite & decking
Flooring

5. Infrastructure and construction

Safety signs
Construction industry articles: totes, wheel barrows, buckets etc.
Plastic pipes e.g. for gas
Inflatable structural lifting bags: high visibility
Safety scrims, nets, fences
Tubing, ducting & ventilation for construction & mining
Flexible doors & dockings



Window & conservatory glazing parts
High visibility road side storage boxes / totes e.g. salt, sand
Traffic safety tapes
Traffic cones, road blocks, barriers & safety fences
Safety mesh traffic fence
Road Furniture

PY.34 and PR.104 must not be used for:

- Decorative/household/residential coatings
- Children's articles (including toys, paints, jewelry and equipment)
- Consumer products
- Printing inks for consumer products
- Food and food packaging
- Drugs and medical devices
- Ceramics and glassware
- Cosmetics and tattoos