



17 January 2020

Subject: Techspray REACH Statement

To Whom It May Concern:

Illinois Tool Works Inc. (ITW) and Techspray have been preparing for the requirements of the European Union (EU) Regulations on the Registration, Evaluation, Authorization and Restriction of Chemical substances (REACH) for quite some time. ITW has consulted with outside legal and technical experts regarding REACH compliance.

The ITW Corporate Environmental, Health and Safety Group (ITW EHS) has been working directly with ITW divisions in the United States to amalgamate EU export information for affected chemical substances. ITW EHS is working indirectly with the separate legal entities of ITW both within and outside the EU in regard to REACH.

Chemical substance totals from ITW divisional business units, including Techspray, have been collected and compiled. ITW has contracted ITW Performance Polymers Europe, an ITW company in Ireland, to act as Only Representative en masse for this group. Pre-registration of chemicals began 1 June, 2008 and ran through 30 November, 2008.

The current status of the REACH compliance program for Techspray is as follows:

- Affected Techspray substances have been pre-registered and will be registered per the relevant REACH registration deadlines --- December 2010, June 2013, or June 2018.
- We have identified ingredients imported into EU over 1 metric ton annual threshold and sent to ITW's Only Representative.
- Currently, the following are substances from Techspray that fall beyond the 1 metric ton threshold:
 - **Copper (braid)** (CAS #7440-50-8) – used in desoldering braid (wick)
Note that Techspray's desoldering braid is non-halogenated.
 - **Butyl acrylate, methacrylic acid polymer** (CAS# 27401-61-2) – used in a synthetic peelable solder mask
 - **2-propanol** (CAS# 67-63-0) – used in a variety of cleaning products
 - **Naphtha, hydrotreated light** (CAS# 64742-49-0) – used in a variety of cleaning products
 - **Ethanol** (CAS# 64-17-5) – used in a variety of cleaning products
 - **Trans 1,2-dichloroethylene** (CAS# 156-60-5) – used in a variety of cleaning products
 - **Propane** (CAS# 74-98-6) – used as a propellant
 - **Isobutane** (CAS# 75-28-5) – used as a propellant
- Substances imported into EU under 1 metric ton per year are not required to be registered under the current REACH regulation.



We have previously sent Techspray's summary to ITW corporate for inclusion with other wholly-owned subsidiaries. Note that as of 12/31/2010, Techspray is no longer considered a wholly-owned subsidiary. Techspray's EU substance totals per year will henceforth be included with other divisions of ITW and will be subsequently registered based on on-going REDACT updates to ITW Corporate EHS.

ITW plans to address other REACH requirements such as those pertaining to substances of Very High Concern (SVHC) and supply chain communication by the relevant REACH deadline. Techspray has only four products that **previously** contained SVHC. **1914-2.5S and 1720-G/5G/54G** contained dibutyl phthalate (CAS# 94-74-2). **3601-16SQ/G** contained benzyl butyl phthalate (CAS# 85-68-7). The **2211-8SQ/G/5G/54G** contained 4-nonyl phenol (various CAS numbers).

Currently only three products (**1743-QT/50PK, 2125, and 2127**) contain SVHC. 4-nonyl phenol, various CAS # is included in the **1743**. Octamethylcyclotetrasiloxane, CAS 556-67-2, is included in **all packagings of 2125 and 2127**. These will be replaced prior to the "sunset" date assigned to each.

Techspray is in compliance currently by supplying Safety Data Sheets with these products identifying dibutyl phthalate as a previous component and 4-nonyl phenol, benzyl butyl phthalate, and octamethylcyclotetrasiloxane as current components. If any user requests information on SVHC, Techspray must respond within 45 days.

ECHA prioritizes the candidates in Annex XIV based on their hazardous properties, the volumes used and the likelihood of exposure to humans or the environment. Dibutyl phthalate and benzyl butyl phthalate (above) are on the priority list. The final decision on the inclusion of the substances in the Authorisation List has been taken by the European Commission following the comitology procedure (regulatory procedure with scrutiny). Substances on this List will in future only be able to be used within the EU when "authorised" for specific purposes.

On 16 January 2020, the European Union Chemicals Agency (ECHA) announced that 4 additional substances had been added to the Candidate List. The ECHA Candidate List may be found at the following URL: <http://echa.europa.eu/de/candidate-list-table>. There are currently 205 candidates published over 23 lists. Note that some of the original candidates have been moved to the authorized list and are banned or restricted in some manner. Some were proposed because of their carcinogenic, mutagenic and/or repro-toxic (CMR) properties, having thus potentially serious effects on human health. Other substances are proposed to be identified as persistent, bioaccumulative and toxic and as very persistent and very bioaccumulative (PBT), having potentially serious negative effects on the environment. One substance is proposed because it is considered both CMR and PBT.

Please contact Pierce Pilon, Sr. Field Applications Engineer, or Ken Brown, Manager of Environmental and Chemical Compliance for ITW, for questions or discussion regarding REACH.



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Sincerely,

A handwritten signature in black ink that reads "Steve Cook". The signature is written in a cursive, flowing style.

Steve Cook
Director of Product Technology