



To whom it may concern,

On June 27th, the ECHA added ten additional substances to the candidate list of substances of very high concern. This includes the following:

- Octamethylcyclotetrasiloxane (D4)
- Decamethylcyclopentasiloxane (D5)
- Dodecamethylcyclohexasiloxane (D6)

Generally, silicone rubbers can contain those substances. **All typical HTV type Silicones exceed the permitted Level on the D6 chemical where the concentration can be  $\geq 0,1$  -  $< 0,5\%$ .**

According to 1907/2006 (REACH) this means that we as a silicone processor have the duty to inform you.

What does this mean for you?

At the moment many products exceed the threshold of 0,1% which for some customers and company policies can be problematic already. However, the method of testing on D6 and the results obtained are strongly contested by the raw material manufacturers and by the CES.

Please see additional information from Wacker and the CES. Silicone because of its physical properties is without any alternative. The compound companies will contest the decisions made by the ECHA and meanwhile work on reducing the content of cyclic compounds in their formulations.

However, there is an exception for the Rogers products HT800, BF1000 and HT6240. Those are made of LSR silicones which do not exceed the concentration levels and therefore can be considered REACH conforming.

The same typically applies for other LSR products as their chemistry differs from HTV Silicones.

We will keep you updated as soon as we get new information regarding this topic.

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**CUSTOMER INFORMATION FROM WACKER SILICONES about  
Octamethylcyclotetrasiloxane (D4)  
Decamethylcyclopentasiloxane (D5) and  
Dodecamethylcyclohexasiloxane (D6)**

July 2018

Dear Customer,

On June 27, 2018, following a decision by the EU Member State Committee, the European Chemicals Agency (ECHA) added the cyclic siloxanes octamethylcyclotetrasiloxane (D4), decamethylcyclopentasiloxane (D5) and dodecamethylcyclohexasiloxane (D6) to **the candidate list of substances of very high concern (SVHC)**.

WACKER SILICONES shares the assessment of CES Silicones Europe – the European trade organization of silicone producers – that this decision is disproportionate. In the opinion of the silicones industry, the assessment factors contained in various regulations overestimate the possible occurrence of D4, D5 and D6 in the environment. Neither the specific physico-chemical properties nor the various studies and scientific evidence relating to the degradation of these substances in the environment were given due consideration.

An SVHC listing brings with it a number of duties and rights concerning the communication of information, especially for

- Producers of silicones (e.g. WACKER SILICONES),
- Processors of our silicone products (our customers), and
- Consumers (our customers' customers).

Details of this are provided in the attached CES information leaflet "Consequences of SVHC listing." This leaflet also contains further background information that led to this decision.

For our part, it is our aim at WACKER SILICONES to keep you updated with information as it is received and to keep further consequences to a minimum. With this in mind, we are taking the following action:

- 1) Updating of the relevant EU safety data sheets (SDSs) for our silicone products  
The source of information about SVHC is the EU safety data sheet, which in the future will state the concentrations of D4, D5 and D6 where these exceed the threshold of 0.1 wt %. Updating the relevant SDSs will likely be finished by end of July. All customers in the EU who have received a relevant product from WACKER SILICONES within the last 12 months will automatically be sent an updated SDS.
- 2) Updating of product compliance sheets (PCSs)  
In the future, a PCS with respect to the SVHC status will contain a reference to the EU safety data sheet, where the content of D4, D5 or D6 may be specified in more detail. This reference to the SDS will be updated in the PCS as quickly as possible. Accordingly, the necessary information will be communicated as described under item 1).
- 3) Updating of REACH declarations due for imminent and future dispatch  
All current, active REACH declarations were already assessed as quickly as possible to see if they are affected by the SVHC listing. Where this is the case, the SVHC

information was amended in the same manner as the SDSs. Actual existing requests for REACH declarations will be processed as quickly as possible. Please note that there may be discrepancies for a short time between the declaration and the SDS of a given product while the documents are being updated. Unlike the case for reissuing SDSs, we very much regret that it is not feasible to automatically send updated declarations. Please refer to the updated data in the SDSs.

4) Reduction in content of cyclic compounds

WACKER SILICONES has evaluated the need for, and feasibility of, further reducing the residual content of cyclic compounds in formulations to reflect the technical differences of individual product groups. In some cases, steps have already been taken to reduce the content. Further steps are being intensively checked out.

If you have any further questions, please contact your customer advisor at WACKER.

For additional information on this topic, visit the CES website at:

[https://www.silicones.eu/uploads/Modules/Newsroom/svhc-listing\\_decision-statement\\_june\\_2018\\_final.pdf](https://www.silicones.eu/uploads/Modules/Newsroom/svhc-listing_decision-statement_june_2018_final.pdf)

D4: Octamethylcyclotetrasiloxane, CAS 556-67-2

D5: Decamethylcyclopentasiloxane, CAS 541-02-6

D6: Dodecamethylcyclohexasiloxane, CAS 540-97-6

Best regards,

WACKER SILICONES

## MEDIA STATEMENT

27 June 2018

### The addition of D4, D5 and D6 to the Candidate list under REACH is disproportionate and endangers critical beneficial uses

The silicones industry strongly believes that the recent Member State Committee decision ([ED/61/2018](#)) to add D4, D5 and D6 to the list of Substances of Very High Concern (SVHC) does not take full account of the whole body of scientific evidence, should have recognised already applicable or on-going regulatory activities, and puts at risk numerous beneficial uses including in the healthcare, electronic and energy efficiency sectors.

The decision should have given more consideration to the following factors:

1. An SVHC listing does not result in any additional environmental benefit, considering the REACH [wash-off restriction](#) already adopted and the ECHA intention to consider further restrictions of D4, D5 and D6. Monitoring results show that concentrations of D4 and D5 in wastewater are already typically below the predicted baseline, and in the case of D4, already consistent with predicted post-restriction levels.
2. In order to consider [all the data available](#) on these unique hybrid organic-inorganic substances and appropriately address the concerns raised by some scientists on their persistence (P) and bioaccumulation (B) assessment, the industry believes that we need to find an appropriate platform to resolve scientific divergences and remaining uncertainties, to allow for an in-depth review of the science available on these substances in line with advancements in the understanding of persistence and bioaccumulation since the criteria were developed. Up-to-date scientific data demonstrate that these unique chemicals behave differently from what is predicted under current PBT regulatory criteria and that the methods used to assess P and B may need to be reviewed and updated, a position supported by several eminent scientific experts from around the world. For example, in the case of D4, D5 and D6, the methodology may significantly overestimate bioaccumulation using the bioconcentration factor (BCF) but there is also a risk of underestimating bioaccumulation in the case of other substances. Accurate PBT/vPvB assessment based on the latest science should be the prevailing policy driver.
3. Several other regions, including for example [Canada](#) and [Australia](#), have conducted a thorough environmental assessment based on the same data set and concluded there is no need to regulate D4, D5 and D6. Environment Canada, having reviewed the environmental data available for D4, has not imposed any product concentration restrictions on the use of D4 in any application.
4. Identifying D4, D5 and D6 as SVHCs is damaging to investments, innovation and competitiveness, as it causes considerable uncertainty for customers on a global level.

Silicone polymers rely on D4, D5 and D6 as building blocks (monomers) for their manufacturing. Silicone materials are widely used and difficult to substitute because of their durable, safe and highly effective mechanical, optical and thermal properties. Critical applications of strategic importance to the EU include construction, transportation, lighting, alternative energy, electronics and medical uses.

“The silicones industry is committed to responsible stewardship and will continue to promote environmental responsibility through developing and supporting independent science and monitoring studies. The industry will also continue to work closely with regulatory authorities around the globe to ensure that silicones can continue to be used with confidence and their innovation potential preserved”, commented CES’ general manager, Dr. Pierre Germain.

**For more information, please contact:**

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