



**TotalEnergies**

TotalEnergies Lubrifiants

HSEQ-DD Direction - Product Safety Department

Nanterre, June, 15th, 2022

Subject: Your inquiry concerning REACH

Dear customer,

The European Regulation 1907/2006 "REACH" (Registration, Evaluation, Authorisation and Restriction of Chemicals) concerns chemical substances and entered into force in the European Union (EU) on 1st June 2007. The objective of the REACH regulation is to "improve the protection of human health and the environment from the risks that can be posed by chemicals". To achieve this objective, new statutory obligations apply to all parties involved in the supply chain. In other words, the manufacturer, the importer, the blender and the downstream user of a chemical substance each have specific obligations under the REACH regulation.

### **Obligations as manufacturer, importer or blender:**

Chemical substances must be registered before any manufacture or import into the European Union (EU) if volumes exceed 1 (one) tonne per year.

All substances produced (or imported) by TotalEnergies Lubrifiants have been registered. For substances which are neither produced nor imported by TotalEnergies Lubrifiants we have obtained confirmation from our suppliers that registration has been made. Therefore we can guarantee that the products we sell to you are REACH compliant.

A REACH registration number is assigned for each substance and each legal entity: these registration numbers will be communicated by TotalEnergies Lubrifiants in section 3 of the SDSs as they become available.

Classification changes may occur as a consequence of REACH registrations. These changes will be taken into account in a new version of the safety data sheet.

As described in the Authorisation process of the REACH regulation the European Chemicals Agency (ECHA) establishes the candidate list of Substances of Very High Concern (SVHC). Inclusion of a substance on the candidate list may result in a need for an Authorisation at a later time, but it does not create any immediate limitation on the use of the substance.

Substances that are on the candidate list of SVHC and present in TotalEnergies Lubrifiants products above the regulatory threshold of 0.1% wt will be communicated via the section 15 of the Safety Data Sheet. When ECHA publishes a new update of the SVHC candidate list TotalEnergies Lubrifiants commits to update impacted product SDSs without delay from the date of list publication or reception of relevant supplier's information. These updated SDSs will be published without undue delay.

Furthermore we can confirm that products supplied to you by TotalEnergies Lubrifiants do not contain substances from annex XIV of the REACH regulation (Authorisation list).

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## Obligations as downstream user:

Registration of substances requires gathering information of the existing risks occurring during use as a substance or as part of a mixture. Risk analysis is twofold: exposure to humans and impact on the environment. This information must then be included in the substance or mixture Safety Data Sheet to ensure correct information is provided to all parties throughout the supply chain.

ATIEL members (Technical Association of the European Lubricants Industry) and ATC members (Technical Committee of the Petroleum Additives Industry in Europe) have developed generic exposure scenarios (GES) for known lubricant end uses. This information on GES and covered uses is available on the following web site: <http://www.atiel.org/reach/endusers>. If however you are unable to identify your specific use please inform us.

Should you require further information, please do not hesitate to contact the undersigned.

Kind Regards,



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