28 November 2016

DCC's REACH Authorisation Application for
C.I. Pigment Yellow 34 and C.I. Pigment Red 104

ECHA notification of your uses covered under DCC's Authorisation

Dear Customer and Downstream User,

Following the official approval of DCC's Authorisation request for the continued use of PY.34 and PR.104 in the EEA[1], as our valued customer we would like to draw your attention to the notification obligation to ECHA described under REACH Article 66.

According to Article 66, all downstream users of an authorised substance (such as PY.34 and PR.104) must notify ECHA within **three months** of the first delivery of an authorised substance following the publication in the Official Journal of the European Union (OJ). In its "News Alert"[2] of 16 September 2015 ECHA already made reference to this notification requirement for downstream users. This notification is free from any charge.

DCC's Authorisation was published on the Official Journal of the European Union on September 14th 2016. As such all DCC PY.34 and PR.104 received after this date must be notified to ECHA within three months of its receipt.

As downstream users may have stock of DCC PY.34/PR.104, we would advise you to act pro-actively by submitting your notification to ECHA as soon as possible.

In the following sections, we will provide you with some background information and a short practical guidance on how to submit your notification to ECHA.

What are your obligations as a Downstream User of an Authorised substance

a. *Communication down the supply chain*

HMG's Information letter summarised the assigned Authorisation numbers, one for each use. These authorisation numbers will be disseminated on HMG's SDS's and product labels.

As a downstream user, these Authorisation numbers must be communicated further down the supply chain by incorporating them on your SDS's and product labels as well.

b. *Notification to ECHA*

Besides the above supply chain communication, you also have to notify ECHA of your intended use of DCC PY.34 and PR.104.
Notification needs to be done via the REACH-IT[3] portal. This notification requires specific details on:
- the identity of your company,
- the authorisation number(s) which is (are) linked to your specific use(s) and
- contact information.

Note that information about your typical annual volume and the number of staff using the substance is not mandatory. However, this information can be submitted on a voluntary basis.

How to submit your information to ECHA

Before starting the process you must have an active REACH-IT account to be able to submit your notification. In the following steps we will guide you through the process step by step:
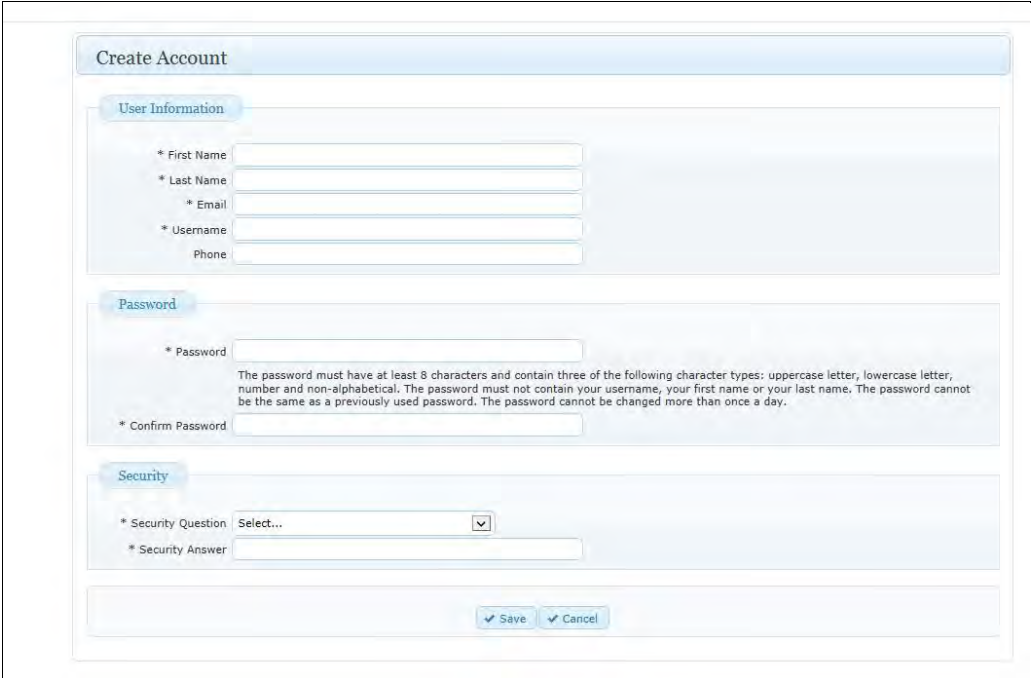
Step 1: Create a REACH-IT account

In case you already have an active REACH-IT account, go to step 2

- Follow the link https://reach-it.echa.europa.eu/reach/public/welcome.faces
- Click '*Register a company*'

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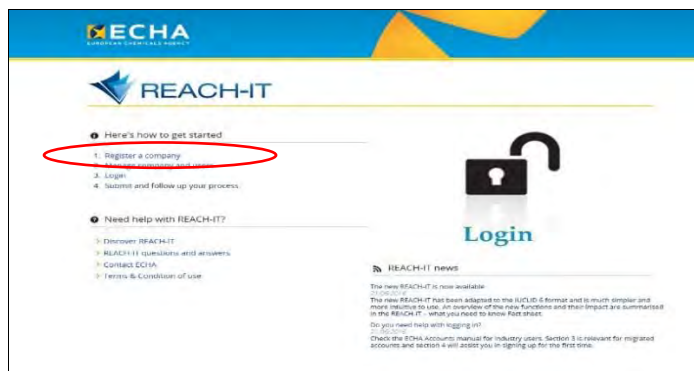
[3] REACH-IT is the central IT system that supports industry, Member State competent authorities and ECHA to securely submit, process and manage data and dossiers

- Complete the form and click on '*Save'*

- You will receive an email at the indicated email address.

Follow the link in your email or copy it in your browser and your email address will be verified.

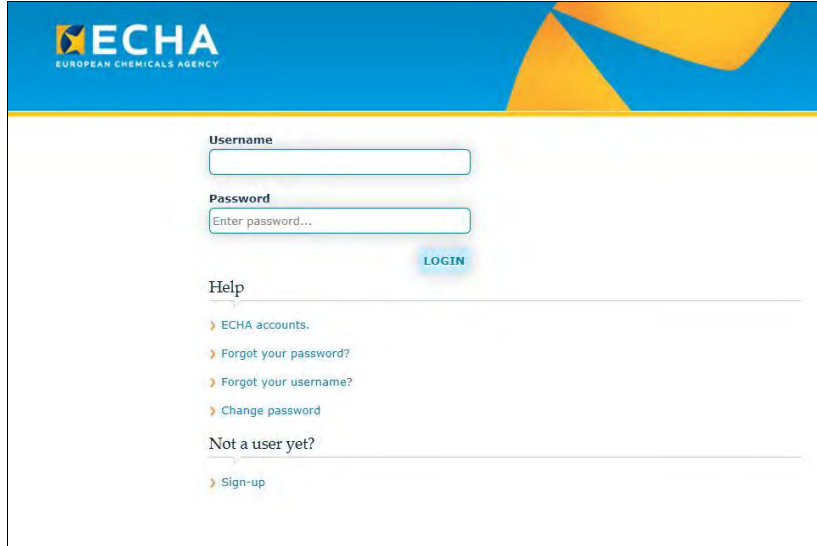- When completed, you receive the message below. Click on *'login'* to continue with the process

- Login with your personal defined Username and Password

- Click on '*Account, Users & Parties management'* to complete your company details

- For the purpose of this notification process, click '*Encode Legal Entity'*

- Complete the form. Billing information is required, but this is just a formality. There is **no fee** charged for this notification.

- After saving, your Legal Entity creation under REACH-IT is complete and you can close the website.

- Follow the link https://echa.europa.eu/support/dossier-submission-tools/reach-it/downstream-user-authorised-use
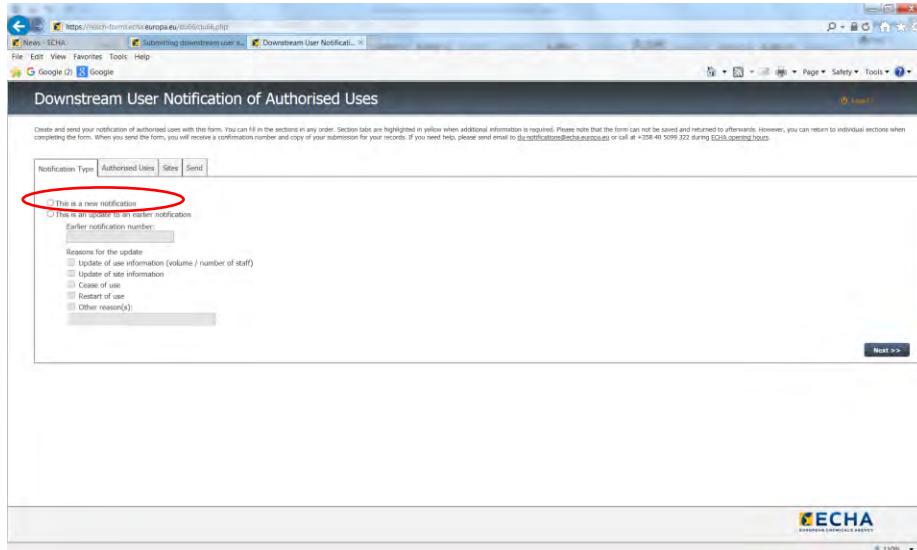
- Click '*Downstream user notification webform* ' at the bottom of the page
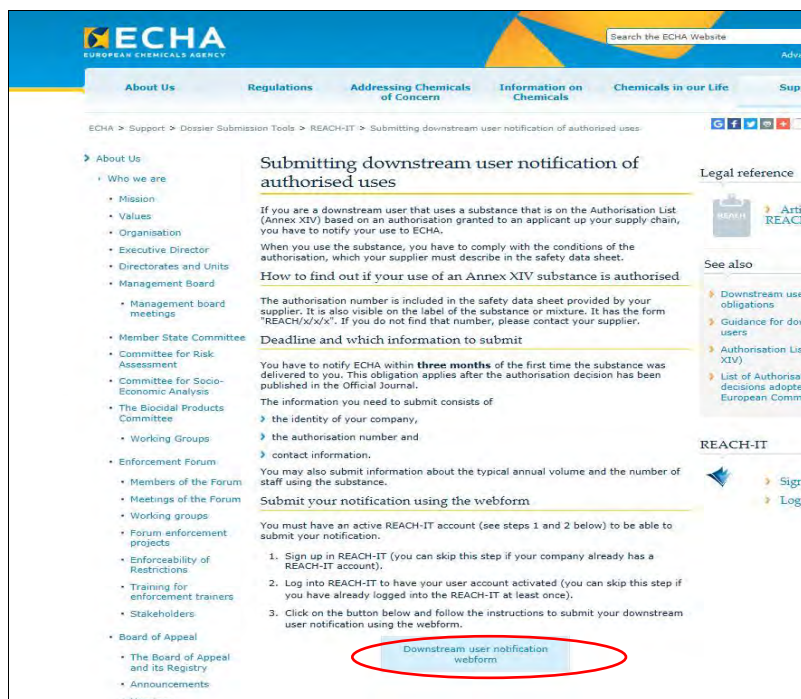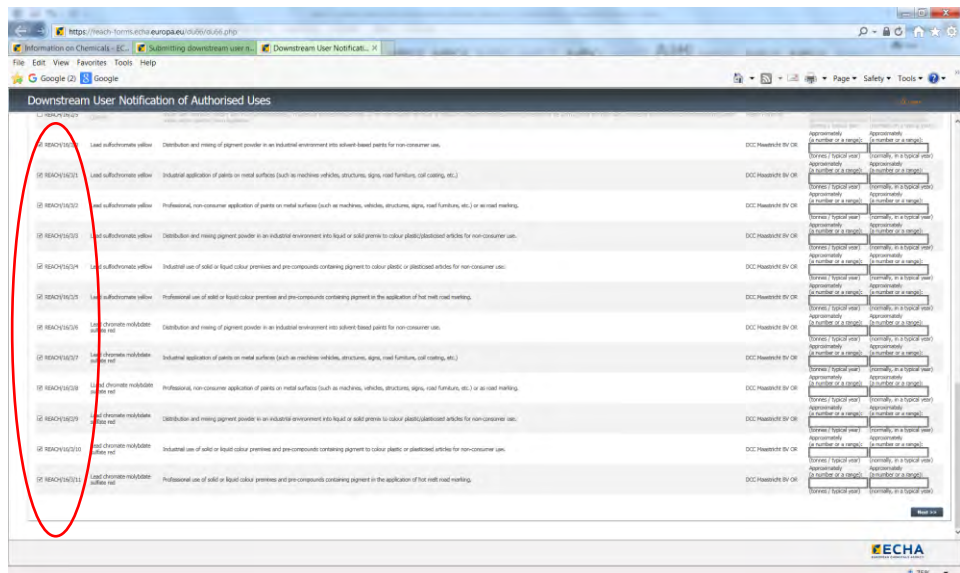
- Log in with your personal defined Username and password

Step 3:   Complete the ECHA webforms
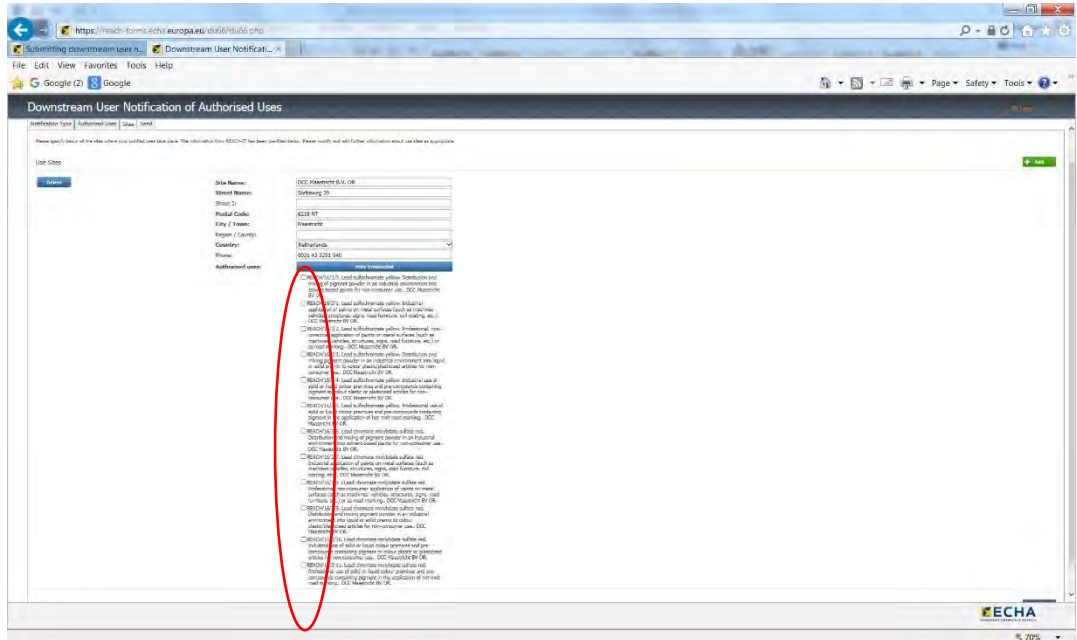
- Form 1 ('Notification type'): tick the box '*This is a new notification*' ; tick '*Next*'
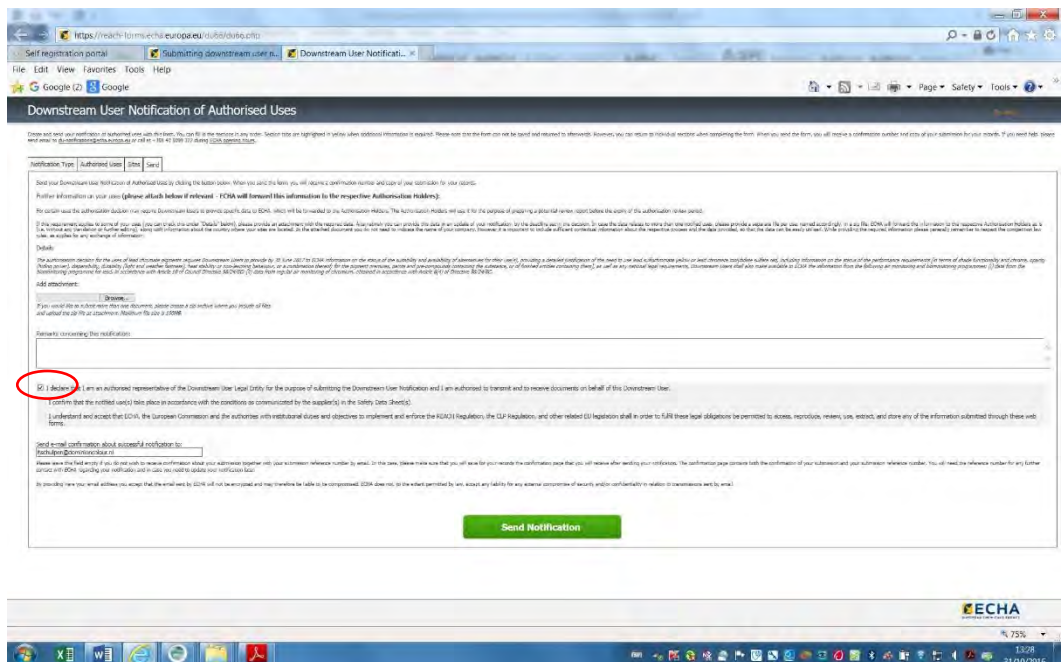
- Form 2 ('Authorised uses'): tick those box(es) relevant to your specific use(s). Note there are separate Authorisation numbers for PY.34 and PR.104. For details on the assigned Authorisation numbers, see HMG's Information letter, SDS and labelling. Information on site volume and staff is not mandatory.

- Form 3 ('Sites'): check the information and complete where needed. To re-confirm, tick again the boxes identified for your specific use(s). Tick '*Next'*.

- Form 4 ('Send'): tick the declaration box and send. You will receive a confirmation number and a copy of your submission for your records.

- You have successfully completed your Notification process.

What happens next

As far as known, ECHA will not share these use notification details with DCC. However you are encouraged to keep DCC informed as this could help them when reviewing the Authorisation dossier.
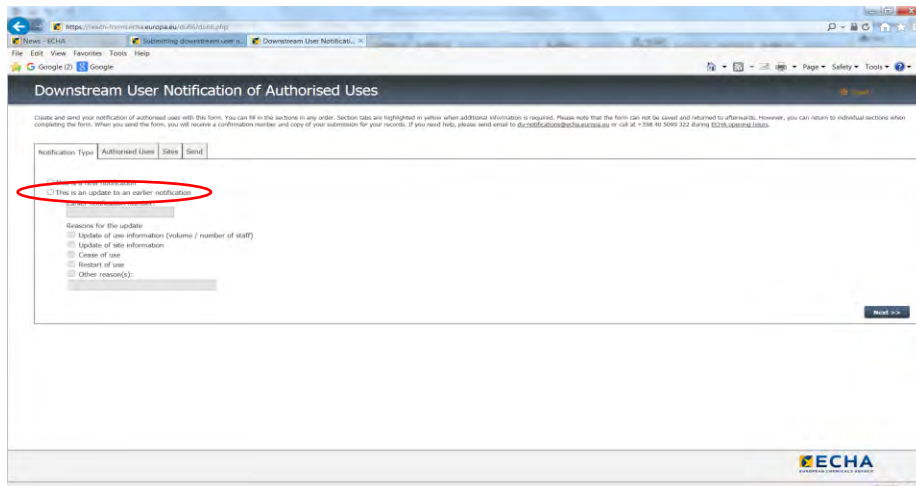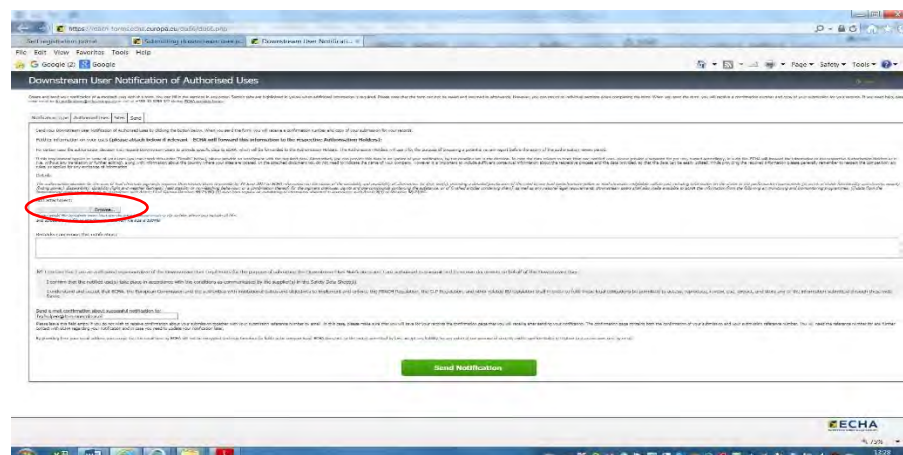
This HMG guideline describes the process of notifying your use to ECHA. Following the official publication in the Official Journal, each downstream user also has an obligation to provide monitoring data to ECHA (blood Pb values / air measurements of Cr) as well as a justification of use report by the end of June 2017. ECHA requests these documents to be attached to this use notification webform. To add these documents:

- login again to the ECHA webform as described under Step 2 via https://echa.europa.eu/support/dossier-submission-tools/reach-it/downstream-user-authorised-use
- In Form 1 ('Notification type') tick '*This is an update to an earlier notification'* and include the earlier received notification number.

- Attach the documents in Form 4 ('Send') by browsing your computer and send the notification

Further background information on the general requirements as a downstream user under REACH can be found in the ECHA Guidance:
http://echa.europa.eu/documents/10162/13634/du_en.pdf

I hope you find this information helpful.
For any questions, don't hesitate to contact the undersigned

With kind regards,

Hella Schulpen
Regulatory Affairs and Safety Coordinator
DCC Maastricht B.V.
The Netherlands

Only Representative

hschulpen@dominioncolour.nl