

The purpose of this letter is to provide an overview of our achievements and positions with regard to REACH (EC Regulation 1907/2006) and CLP (EC Regulation 1272/2008). Updated sections have been labelled with a ★

This letter can be shared with any Competent Authority (CA) if requested to confirm your downstream user status where applicable.

In addition to your usual Global Regulatory Services contact at Firmenich the **Registration team** can be contacted via email at clp.reach@firmenich.com.

REGISTRATION AND ENFORCEMENT INFORMATION

Firmenich ensures the REACH compliance for its perfumery ingredients sold as such or included in formulations that are on the EEA market. **This represents more than 500 registrations of substances submitted prior to the 2010, 2013, and 2018 deadlines.**

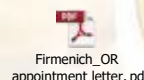
Our compliance is maintained by;

- the registration of required Firmenich ingredients by a Firmenich Only Representative or Firmenich European manufacturing sites,
- the registration of required purchased ingredients by all Firmenich concerned suppliers or by Firmenich when appropriate, and
- the monitoring of ingredients exempted from registration according to Articles 2 and 6

Firmenich has successfully passed several REACH inspections since 2009 and provided responses to a number of Authority questions with no adverse findings. These ongoing activities continue to confirm the REACH compliance of both our ingredients and our formulations.

ONLY REPRESENTATIVE

In accordance with Art.8 of REACH, **Firmenich UK Ltd, Hayes Road, Southall, Middlesex, UB2 5NN, United Kingdom**, was firstly appointed as the Only Representative (OR) for Firmenich manufacturing sites situated outside of the European Economic Area (EEA)¹. In the context of Brexit, the OR role was transferred to **Firmenich Grasse SAS, Parc Industriel Les Bois de Grasse, 06130 Grasse, France**. The new Only Representative appointment agreement letter is enclosed below.



BREXIT

Please refer to UK-REACH information letter for more information

EEA-BASED CUSTOMERS

The REACH conformance of our entire perfumery palette allows **all Firmenich customers located in the EEA to have downstream users' status for all Firmenich products.**

In accordance with Article 2 of REACH, substances used in medicinal products or in food or feeding stuffs, including flavours, are exempted from registration.

¹ The EEA comprises the Member States of the European Union (EU) as well as Norway, Iceland and Liechtenstein where the REACH Regulation is also in force.

NON-EEA BASED CUSTOMERS

For customers located outside of the EEA who export Firmenich substances or fragrances to the EEA, the status of **downstream users can only be ensured on the condition that suitable and accurate information has been provided in due time to Firmenich.**

An agreement has been developed by our legal department in order to formalize the conditions and obligations of this service and is available upon request. Any company interested in this service should contact the Compliance team via email: INDIRECT.IMPORTS@firmenich.com and copy in your appropriate GRS-PE contact point.

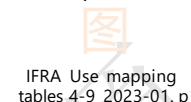
INTENDED USES INCLUDED IN THE REGISTRATION DOSSIERS★

The IFRA guidance document for substances exposure scenario developed and updated by the IFRA REACH exposure scenario taskforce within which Firmenich is an active member can be downloaded from IFRA website.

[REACH Exposure Scenarios for Fragrance Substances \(January 2023\)](#)

Whenever possible, Firmenich will develop its exposure scenarios (REACH, Art. 14.4) aligned with the uses listed in the mapping table attached below (extract from the abovementioned guidance).

This table is based on the use descriptors developed by the European Cosmetics Association (Cosmetics Europe), the International Association for Soaps, Detergents and Maintenance Products (AISE) and other intended uses that we have been made aware of by our Downstream Users.



Please contact the Compliance Team for further discussion or if your uses are not covered by those detailed in the table attached.

To ensure that fragrance uses are included in the chemical safety reports submitted, our intended uses are regularly communicated to our suppliers.

SDS / e-SDS

Firmenich generates SDSs in accordance with Annex II of REACH since 1st of December 2010.

A REACH registration number is assigned to substances after submission of the registration dossier to ECHA. When known, the registration number is being processed for inclusion into our systems and is indicated in Section 1 of the SDS. Some substances will not require any registration number if they are imported below 1 ton per year or are outside of the scope of the REACH regulation.

EU REACH AND CLP INFORMATION LETTER

March 2023

Our teams are involved in aligning our systems with the REACH dossiers submitted to ECHA. Incremental updates will solve gradually some discrepancies that may be noticed between information provided by ECHA dissemination tool and our documents.

Firmenich is working on an automated solution for e-SDS, which requires significant IT developments. A team has been set up and is actively working on this project.

For classified and registered substances marketed and sold within the European Union, Firmenich provides an eSDS in English only. We also provide a standard SDS in any of the EU member states' languages in accordance with the Regulation.

When available, the e-SDS should be used as the principal reference for safety and hazard control.

ADDRESSING CHEMICALS OF CONCERN ★

On January 17th, 2023, ECHA published an updated candidate list of 233 Substances of Very High Concern (SVHC) for authorisation. **We highlight that 6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol (RALOX 46) with EC# 204-327-1 in addition to 2-(4-tert-butylbenzyl)propionaldehyde (LILIAL®) with EC# 201-289-8 and to reaction mass of 5-(sec-butyl)-2-(2,4-dimethylcyclohex-3-en-1-yl)-5-methyl-1,3-dioxane and 5-(sec-butyl)-2-(4,6-dimethylcyclohex-3-en-1-yl)-5-methyl-1,3-dioxane (KARANAL®) with EC# 413-720-9 are the only substances in Firmenich Perfumery portfolio identified as SVHC that can potentially be added as such in our formulations.**

We also confirm that **none of the substances listed in Annex XIV and XVII are added as such in our mixtures or available in the Firmenich palette for creation except from the reaction mass of 5-(sec-butyl)-2-(2,4-dimethylcyclohex-3-en-1-yl)-5-methyl-1,3-dioxane and 5-(sec-butyl)-2-(4,6-dimethylcyclohex-3-en-1-yl)-5-methyl-1,3-dioxane (KARANAL®) with EC# 413-720-9 which has been included in Annex XIV on February 6th 2020. This substance has been removed from the creation palette and any historical use will be removed from existing formula before the sunset date (August 27th 2023).**

Finally, Firmenich continually assesses its creation palette against the following official and unofficial lists produced by ECHA and the Non-Governmental Organizations: Community Rolling Action Plan (CoRAP), Registry of Intentions, Public Activities Coordination Tool (PACT) list, Annex XIV and XVII of REACH, public consultations and ChemSec's SIN List.

Firmenich will inform you in due course if ECHA and member states activities lead to major changes in the Firmenich palette and formulations that are already on the market.

CLP REGULATION

Concerning notifications to the C&L inventory, we recommend that you identify your obligations according to article 40 and 41 of CLP. Upon request, a Firmenich proposal can be provided.

The information in the C&L inventory published by ECHA should only be considered to be indicative and is not legally binding. **We would like to remind you that our industry still believes that the IFRA/IOFI LM currently provides the most accurate information on the hazard classification of flavour and fragrance substances. This is due to the fact that the attributed classification provided in the LM is based upon available evaluated data and is peer reviewed.**