

4 November 2020

CB4REACH Consortium

Update on nanoform-specific information requirements in accordance with Commission Regulation (EU) 1881/2019 of 3 December 2018

Dear Co-registrant,

In a previous communication to all co-registrants (16 June 2020), we informed you of the actions of the lead registrant, Orion Engineered Carbons GmbH (“**Lead Registrant**”) to comply with new information requirements for nanomaterials as laid down in Commission Regulation (EU) 1881/2019 of 3 December 2018. These actions cumulated in the submission of a revised carbon black dossier on 16 June 2020.

ECHA concluded after the first technical completeness check of the dossier that the June version of the carbon black dossier was technically incomplete and requested that the lead registrant provide within 4 months (deadline 28 October 2020), a revised carbon black dossier.

We are glad to inform you that a revised dossier has been submitted to ECHA via REACH IT on 27 October 2020. This version now contains revised versions of the justifications for the grouping of nanoforms within the respective identified sets of similar nanoforms.

As indicated in our communication letter of 16 June 2020, the Joint Submission for carbon black covers the following forms of carbon black:

- 1 Carbon black (solid: particulate/powder): Non-nanoform or bulk form of carbon black
- 2 Carbon black (solid: nanoform, no surface treatment): grades of carbon black that meet the definition of a nanoform given in Annex VI REACH and which have not been subjected to post-manufacture treatment.
- 3 Carbon black (solid: nanoform, surface-treated): grades of carbon black that meet the definition of a nanoform given in Annex VI REACH and which have been subjected to post-manufacture treatment with the oxidation agents, nitrogen oxides, N₂O₄, nitric acid, ozone.

The attached zip-file (2020-11-03-Carbon black - boundary composition_IUCLID 6.5.2) contains a IUCLID file with information on the boundary compositions for the respective sets. Furthermore, we attach to this communication, the grouping justifications related to the sets identified under 2 and 3 above. Please note that a justification for the set identified under point 1 (non-nanoforms of carbon black) is not mandated under REACH and hence not developed.

The IUCLID file also contains a template (template legal entity composition) to guide you in the completion of your legal entity composition. Fields highlighted in yellow need to be populated with data specific to your company’s (nano)forms for the following characterisers:

Member Companies

Cabot Corporation, Cancarb Limited, Columbian Chemicals Company Inc., Continental Carbon Company, Orion Engineered Carbons GmbH, Tokai Carbons USA Inc., Imerys Graphite & Carbon

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1. Composition (components and impurities)
2. Particle size distribution and range
3. Specific surface area
4. Surface functionalization (if applicable)

The entries in the nano-characterisers, shape and crystallinity do not have to be modified as they are considered common to all carbon blacks.

Also appended in the IUCLID file is a template of section 1.4 on analytical data. Please be advised that you must populate this section with data specific to your grades of carbon black e.g. results on particle size distribution, TEM, etc.

We urge you to review these documents carefully to ascertain whether your nanoforms are covered.

If you have any questions, our consortium manager will be happy to assist you.

Updates on the outcome of submission will be posted on the website of the Consortium as they become available

Sincerely,
Orion Engineered Carbon GmbH
Lead Registrant for the Carbon Black Joint Submission

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Orion Engineered Carbons GmbH, Tokai Carbons USA Inc., Imerys Graphite & Carbon