

KFT Chemieservice GmbH Postfach 1451 D-64345 Griesheim

To companies placing PTBBA on the market

Griesheim, July 10<sup>th</sup>, 2012

### **Registration requirement for 4-t-butylbenzoic acid (PTBBA)**

Dear Sir/Madam,

KFT Chemieservice GmbH has been a worldwide provider of services for substance registrations, material safety data sheets and biocides for 17 years. We are also a member of ENES (European Network on Exposure Scenarios) at the ECHA. As part of our service agreement with PenPet GmbH, we have registered the substance

- 4-t-butylbenzoic acid (para-tertiary-butylbenzoic acid, EINECS 202-696-3)

successfully on 1 December 2010 in accordance with Article 10 of REACH in the tons range (>1000 t/year), to be as fair as possible to the customers in their individual applications, because there are some very significant legal aspects that must be observed.

Registration at this early point was required by law, as this substance is classified as reprotoxic, in category 2. This classification has not yet been published in the Official Journal, but it is all accessible on the ECHA website and is regarded by the industry and authorities as an agreed, harmonized classification. This classification must be used in safety data sheets, as because my role as manufacturer obliges me to consult all available sources. In the event of damage caused by this property of the substance, the investigations will look at whether the supplier had first pointed out this danger.

Every supplier of the substance must now therefore possess a valid registration in accordance with Article 10 of REACH or must have purchased it from a correspondingly manufacturer or importer. In addition, every supplier must provide an extended safety data sheet with relevant exposure scenarios. This must enable them, as users, to utilise this substance safely. If no such evidence is provided, a downstream user may not legally use this substance.

PenPet is the lead registrant; KFT is responsible for managing the SIEF data (Substance Information Exchange Fora) for the substance. We have no information that this substance has been registered by another manufacturer or importer in accordance with Article 10. Further current registrations for this substance are registrations in accordance with Article 18 (as an transported, isolated intermediate). These registrations cannot be used if the substance is not being used as a transported, isolated intermediate, **and** if it has not confirmed in writing that the substance is handled under strictly controlled conditions.

We are of course always available for any questions you may have about the matter.

Kind regards,



KFT Chemieservice GmbH

**VR Bank  
Pinneberg eG**

BLZ 221 914 05  
KTO 204 26 90

**Hamburger  
Sparkasse**

BLZ 200 505 50  
KTO 1365 130 887

**SWIFT/BIC**

HASPDEHXXX  
IBAN-Nr.: DE81 2005 0550 1365 1308 87

**Geschäftsführer/Managing Partner**

Dr. Karl-Franz Torges  
Sitz/Office: Griesheim  
Amtsgericht/District Court: Darmstadt  
HRB 87030

Steuernr.: 007 237 15163  
VAT-Nr.: DE260557989  
**mail@kft.de**  
**www.kft.de**  
**www.kft-academy.com**