

Milano, February the 23rd 2015

**Subject: Vinavil Position on Dispersions labeling as per EUH-208**

Dear Valued Customer, from June the 1<sup>st</sup> 2015 regulation (EC) No 1272/2008 on classification, labelling and packaging (CLP) of substances and mixtures (EU 286/2011) will oblige all polymer dispersion producers to label all sensitizing substances to protect a number of individuals already sensitized above specific concentration limits. Normally these substances are utilized in our preservative systems and act as biocides for all our water based dispersions.

It is a main priority of Vinavil to continue preserve all our dispersions with a combination of active components (i.e. MIT, BIT, CMIT/MIT) specifically formulated and balanced to guarantee the bio stability of all the water based products produced by Vinavil for the in-can preservative. As known, all water based systems provide an environment that could promote the growth of microorganisms which could be further enhanced by the continuous reduction of VOC and reduction of free monomer contents.

The new limits that will lead to labelling are for example:

CMIT/MIT: 1,5 ppm

BIT: 50 ppm

MIT: 100 ppm

Vinavil have decided not to change the preservative systems in most of its dispersions as we want to guarantee to our customers the same protection as in the past minimizing the risk of bacterial contamination, therefore we will label most of our dispersions.

All our new material safety data sheets and packaging labels will include this new phrase from June the 1<sup>st</sup> 2015:

*EUH-208, contains (name of sensitizing substance). May produce an allergic reaction.*

Vinavil wants to point out that the eventual risk of allergic reactions will not increase due to this decision but it is just a change of legislation where the threshold limits have been lowered and obliges the manufacturer to label its products accordingly. In fact, this new legislation will make product handling safer and add transparency for the customers.

Vinavil R&D department will continue investigating in-can preservative with state of the art biocide technology and with the aim of preserving from microbial contamination all our water based products.

We will continue to follow closely the development of new legislations to offer to the market the latest approved and best preservative systems for dispersions.

In case you need any further clarification please contact via mail our Regulatory Affairs Department:

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Kind regards

  
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