SASFORREACH Consortium
Information Letter 9
Synthetic Amorphous Silica EC 231-545-4:

Dear co-registrants,

On the basis of the recent ECHA final decisions circulated to registrants of SAS and published on the ECHA webpage

https://echa.europa.eu/documents/10162/35cb8bc0-f6ea-5be8-e771-53d8d19e3846;

https://echa.europa.eu/documents/10162/9562f33f-60ad-2de6-6225-28e1e993fd48

the SASFORREACH Consortium hereby asks all co-registrants to provide **physico-chemical and analytical information on nanoforms** of SAS which are placed on the EEA market by them. This information is needed to revise the boundary compositions given in the joint REACH registration dossier for SAS and to confirm that all nanoforms were allocated correctly since ECHA has refused to accept the information which is currently contained in the joint registration dossier.

In order to ensure safe handling of potentially confidential business information, SASforREACH GbR has requested knoell Germany GmbH (consultant) to act as a data trustee in the collection process for the data needed to address the topics identified in the ECHA final decisions. This means that the information provided by you will be treated confidentially and will not be made available to other co-registrants.

In the tables below you will find the boundary composition information which has been compiled based on the feedback from members of SASFORREACH. Please check that the SAS nanoforms of your company (and your affiliates who have registered SAS under REACH) are covered by the data below. If any of the products which are placed on the EEA market by you or any of your affiliates are **not** covered, please provide the relevant data to sasforreach@sasforreach.eu so that they can be included in the joint registration dossier. To meet applicable deadlines, your feedback, if any, must be received by

December 30, 2023

at the latest.

Set #1 untreated SAS

Section 1.2 "Composition" (proposed boundary composition)			
Endpoint	**unit**	**min**	**max**
Surface area			
BET	m^2/g	7	866
(Skeletal Density)	g/cm^3	1.80	2.39
(VSSA)*	m^2/cm^3	14.3	1970
Constituent particle size distribution **			
d_{10}	nm	2	54
d_{50}	nm	2.8	87
d_{90}	nm	3.9	165
fraction < 100 nm	%	>50	<100
Shape	spheroidal	spheroidal	spheroidal
Crystallinity	amorphous %	99.7	100
Composition			
SiO_2	%	94	100
Na_2SO_4 / NaCl / Na_2CO_3	%	0	6
Surface treatment	none		
Aggregates particle size distribution**			
d_{10}	nm	20	1130
d_{50}	nm	40	2420
d_{90}	nm	100	6650

*calculated from BET and skeletal density

** number based electron microscopy

Set #2 surface-treated SAS

Section 1.2 "Composition" (proposed boundary composition)			
Endpoint	**unit**	**min**	**max**
Surface area			
BET	m^2/g	15	300
(Skeletal Density)	g/cm^3	1.80	2.37
(VSSA)*	m^2/cm^3	29.9	687
Constituent particle size distribution **			
d_{10}	nm	2	54
d_{50}	nm	4	87
d_{90}	nm	7	123
fraction < 100 nm	%	>50	<100
Shape	spheroidal	spheroidal	spheroidal
Crystallinity	amorphous %	99.7	100
Composition			
SiO_2	%	94	100
Na_2SO_4 / NaCl / Na_2CO_3	%	0	6
Surface treatment	organosilyl(oxy) modified SAS		
Aggregates particle size distribution **			
d_{10}	nm	20	120
d_{50}	nm	60	300
d_{90}	nm	200	700

*calculated from BET and skeletal density

** number based electron microscopy