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Statement on Regulatory Documentation

Available and planned compliance documentation — ChemTech CTA Series and dedusted seed-coating forms OSC Grade and SC Grade

Doc. ID: CT-REG-011

Issue date: 2026-10-29

Version: 1.4 (supersedes v1.3 of 08.10.2026: Statements CT-REG-031 and CT-REG-030 v1.1 (renamed "Statement on the Anti-dusting Treatment"), CT-REG-010 v3.1 and CT-REG-002 v1.3 referenced; SDS, TDS and batch declarations of OSC Grade and SC Grade moved to available documentation; aw specification limit added; comparative water-activity test and photo dust test added; heavy-metal wording aligned; role of the base document clarified)

See also: Doc. ID CT-REG-010 (base document for the pigment), CT-REG-031 and CT-REG-030 (anti-dusting treatment)

Purpose

This Statement summarises the compliance documentation available today and the data packages currently being generated for ChemTech CTA Series pearlescent pigments (25 grades) and their dedusted seed-coating forms OSC Grade and SC Grade, intended for seed treatment and seed coating applications in the European Union. It is issued to allow customers, formulators and their regulatory reviewers to plan supplier qualification with full visibility of what exists, what is underway and when it will be available.

The Statement on the Composition of Raw Materials (Doc. ID CT-REG-010) is the base compliance document for the CTA pigment, including the pigment contained in OSC Grade and SC Grade. The anti-dusting treatment of OSC Grade and SC Grade is covered by Statements CT-REG-031 and CT-REG-030. Topic Statements take precedence for their subject matter. Documents in Table 1 are available now (for download or on request, as indicated). Data packages in Table 2 are in progress with the stated target dates; this Statement is re-issued as packages are completed.

Table 1 — Documentation available

Document	Scope	Status / reference
Statement on the Composition of Raw Materials — CTA Series (base document)	REACH Annex XVII restricted substances; Packaging Reg. (EU) 2025/40; PFAS / fluorine position; RoHS / ELV / WEEE; POP; ODS; food contact (Reg. 10/2011, US FDA status, Swiss Ordinance, BfR, GIO, EuPIA); Cosmetics Reg. 1223/2009; TSCA; GADSL; Nestlé Negative List. Applies to the pigment, including the pigment in OSC Grade and SC Grade	Doc. ID CT-REG-010, v3.1 issued 29.10.2026 (supersedes v3.0 of 02.10.2026)
Statement on the Absence of Microplastics — CTA Series	Regulation (EU) 2023/2055, Annex XVII entry 78 (SPM), as amended by Regulation (EU) 2026/1168; seed-coating transitional periods	Doc. ID CT-REG-001, v2.0 issued 02.10.2026 (supersedes v1.0 of 01.09.2026)
REACH Compliance Statement — all products	Regulation (EC) 1907/2006: registration status of constituent substances, SVHC Candidate List, Annex XIV and Annex XVII; applies to all products manufactured and/or placed on the market by Chemical Technologies SIA, including OSC Grade and SC Grade	Doc. ID CT-REG-002, v1.3 issued 29.10.2026 (supersedes v1.2 of 08.10.2026)
Statement on the Anti-dusting Treatment — OSC Grade	Nature and regulatory status of the components of the anti-dusting treatment of OSC Grade: no synthetic polymer microparticles, no preservatives, no biocides; REACH, Regulation (EU) 2023/2055 and compatibility with Regulation (EU) 2018/848	Doc. ID CT-REG-031, v1.1 issued 29.10.2026 (supersedes v1.0 of 08.10.2026); available on request
Statement on the Anti-dusting Treatment — SC Grade	Nature and regulatory status of the components of the anti-dusting treatment of SC Grade: food-grade components; no synthetic polymer microparticles, no preservatives, no biocides; REACH and Regulation (EU) 2023/2055	Doc. ID CT-REG-030, v1.1 issued 29.10.2026 (supersedes v1.0 of 08.10.2026); available on request
Safety Data Sheets (SDS) and Technical Data Sheets (TDS)	Per grade, CLP-compliant; product specifications, including the aw specification limit of OSC Grade and SC Grade	CTA grades: current issues published at www.chemtech.global. OSC Grade and SC Grade: supplied with samples
Batch declarations — OSC Grade and SC Grade	Water activity (specification limit aw ≤ 0.30) and particle size, declared per batch	Supplied with each batch
Water activity (aw) test reports — OSC Grade and SC Grade	Independent laboratory (LATSERT laboratory, Riga), ISO 18787:2017, 25 °C: CTA82 OSC Grade 0.201 (report No 262073); CTA82 SC Grade 0.110 (report No 262074); tested 07.10.2026	On file, available on request (complete reports only)
Comparative water-activity test — water-wetted pearlescent pigment	Commercial water-wetted pearlescent pigment, 5–30 µm, for comparison: aw 0.997; LATSERT laboratory, ISO 18787:2017, 25 °C; tested 12.10.2026	On file, available on request (complete report only)

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Document	Scope	Status / reference
In-house dust tests — OSC Grade and SC Grade	ChemTech in-house drop test, CTA82 OSC Grade and CTA82 SC Grade compared with loose powder, 05.10.2026: dust released markedly lower than from the loose powder; photo comparison, CTA82 SC Grade and loose powder poured onto a black sheet, 13.10.2026. Not a classification under EN 15051	On file, available on request
Heavy metals — specification limits per element	Specification limits per element, incl. Ni, Cr(VI), Tl; support FPR 2019/1009 component evaluation. Guaranteed limits will be stated in Doc. ID CT-REG-022 after accredited verification (see Table 2)	Specification limits available on request
Third-party test report — acid-extractable metals and metalloids	Council of Europe Resolution AP (89) 1: As, Ba, Cd, Cr, Hg, Pb, Sb, Se — all not detected (RL 0.001 %)	On file, available on request
ISO 9001:2015 and ISO 14001:2015 certificates	Quality and environmental management systems (production and sales of chemical products), certified by BM Certification SIA, Riga	Valid until 14.07.2028 (certificates MSC-9-581 and MSC-14-580), available for download
REACH registrations	Fluorphlogopite, titanium dioxide, iron (III) oxide — registration numbers stated in CT-REG-010 and CT-REG-001. Components of the anti-dusting treatment — registered by their EU suppliers or exempt (see CT-REG-031 and CT-REG-030)	Active
Full technical dossier — OSC Grade and SC Grade	Full composition of the anti-dusting treatment, supplier documents and test data	Under a non-disclosure agreement; where required, also to the customer's control body or input-list evaluator

Table 2 — Documentation in progress

Document / data package	Method and scope	Target
Statement on Heavy Metals Content (Doc. ID CT-REG-022) and Certificate of Analysis per batch	ICP-MS after aqua regia digestion at an accredited (ISO/IEC 17025) European laboratory; guaranteed limits incl. Ni, Cr(VI), Tl; water-soluble fluoride; RL ≤ 0.5 mg/kg	Q4 2026
Dustiness classification — OSC Grade and SC Grade	EN 15051-3:2025 (continuous drop method) at an independent laboratory; loose powder as reference	Q4 2026
Storage stability — OSC Grade and SC Grade	Water activity and flow behaviour after storage at elevated temperature and humidity; confirmation of the aw specification limit and of the shelf life	Q4 2026
Comparative dust-off data in model seed coating	Heubach test acc. to the current Euroseeds reference method (post-July 2026 revision) at a ring-test-qualified laboratory; pigment dosages 0–3 % in commercial MPF film former	H1 2027
FiBL Input List — OSC Grade	Application for listing of OSC Grade in the FiBL Input List; listing decision by FiBL	Application Q4 2026; decision date not yet known
Sustainability documentation	EcoVadis assessment; product carbon footprint (PCF) for key grades	2027

Standing commitments

- Guaranteed specification limits, once verified by the accredited analyses above, will only be tightened, never relaxed, in future revisions.
- Any change of raw material source, manufacturing process or product composition triggers re-verification and a revised issue of the affected Statements before affected lots are shipped.
- Customers are notified of revised issues of the Statements applicable to grades they have qualified.
- The composition of the anti-dusting treatment of OSC Grade and SC Grade is confidential. The Safety Data Sheets name components only to the extent required by Annex II of REACH; the full composition is disclosed under a non-disclosure agreement and, where required, to the customer's control body or input-list evaluator.
- The current issue of every document listed above is available from our technical sales team; public documents are also published at www.chemtech.global.

Version history. Version 1.2 was first issued on 02.10.2026 and re-issued on 05.10.2026 under the same version number; version 1.3 superseded both issues.

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DISCLAIMER: This information is the result of our product evaluation based on the best knowledge at the time of publication and the regulations currently in force. Since we do not have information on the exact formulations, conditions of use, manufacturing processes, applications and other relevant parameters of our customers, we cannot indicate the suitability of the product for a particular application. It is the responsibility of the manufacturer of the final product to determine whether the raw material is suitable for the intended use. OSC Grade is not an organic certification; the eligibility of the complete coating for organic production must be checked with the competent control body. Regulations, as well as recommendations, are subject to change. Chemical Technologies SIA assumes no responsibility for compliance with legal requirements if its products are processed or modified by third parties.

Viktor Denezhnikov
Chairman of the Board
Date: 29.10.2026

