

Statement on Regulatory Documentation

Available and planned compliance documentation — ChemTech CTA Series and seed-coating programme

Doc. ID: CT-REG-011

Issue date: 2026-09-01

Version: 1.1 (supersedes v1.0 of 01.09.2026: document references and status wording aligned with CT-REG-010 v2.0)

Purpose

This Statement summarises the compliance documentation available today and the data packages currently being generated for ChemTech CTA Series pearlescent pigments (18 grades) 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; topic Statements take precedence for their subject matter. Documents in Table 1 are available immediately (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, FDA 21 CFR §175–178, Swiss Ordinance, BfR, GIO, EuPIA); Cosmetics Reg. 1223/2009; TSCA; GADSL; Nestlé Negative List. Links to the topic Statements below.	Doc. ID CT-REG-010, v2.0 issued 01.09.2026 (supersedes v1.0 of 18.08.2026)
Statement on the Absence of Microplastics — CTA Series	Regulation (EU) 2023/2055, Annex XVII entry 78 (SPM); status of dust-suppressed product forms; seed-coating transitional periods	Doc. ID CT-REG-001, v1.0 issued 01.09.2026
Heavy metals specification — guaranteed maximum limits per element	Guaranteed maximum total content per element, incl. Ni, Cr(VI), Ti; supports FPR 2019/1009 component evaluation. Formal Statement reserved as Doc. ID CT-REG-022, to be issued with accredited verification (see Table 2)	Specification limits available on request
Safety Data Sheets (SDS) and Technical Data Sheets (TDS)	Per grade, CLP-compliant; product form specifications	Available, maintained
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, certified by BM Certification	Valid, available
REACH registrations of constituent substances	Fluorophlogopite, titanium dioxide, iron (III) oxide — registration numbers stated in the Statements above	Active

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 data per product form	DIN 55992-1 (Heubach dustmeter) and dustiness classification acc. to EN 15051; all supplied forms of seed grades	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
Germination and vigour data	ISTA methods, accredited seed laboratory; 2–3 crops, SC Grade at recommended dosage vs. untreated control	Q4 2026
SC Grade product specification	Dedicated seed-coating form: dust-suppressed, biocide-free; water activity (aw) declared per batch; microbiological challenge test protocol on file	Launch 2026
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 current issue of every document listed above is available from our technical sales team; public documents are also published at www.chemtech.global.

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. Regulations, as well as recommendations, are subject to change. SIA Chemical Technologies assumes no responsibility for compliance with legal requirements if our products are processed or modified from their original form.

Viktor Denezhnikov
Chairman of the Board
Date: 01.09.2026

