

DATE: March 5, 2014
TO: Chlorinated Paraffin (CP) Customers in Canada
FROM: Dover Chemical Corporation
RE: Update on Canadian Chlorinated Paraffin (CP) Regulatory Activities

Some of Dover Chemical's CP customers may have been recently contacted by Environment Canada (EC) regarding an annual reporting requirement that is now in place for short-chain chlorinated paraffins (SCCP) or what EC refers to as short-chain chlorinated alkanes (SCCA). Under Canadian regulations, SCCA are chlorinated alkanes that have the molecular formula $C_nH_xCl_{(2n+n-x)}$ in which $10 \leq n \leq 13$.

Here are the key facts regarding this issue:

- SCCP/SCCA manufacture, use, sale and import are prohibited in Canada. More information about this regulation can be obtained at: <http://laws-lois.justice.gc.ca/eng/regulations/SOR-2012-285/index.html>
- Dover Chemical no longer manufactures or sells SCCP/SCCA.
- This annual reporting requirement impacts companies that manufacture, use, sale, offer for sale or import products that contain SCCAs in quantities and concentrations greater than 1kg and 0.5%.
- None of Dover's current CP products contain concentrations of SCCA >0.5% and therefore should not be subject to this reporting requirement under the Prohibition of Certain Toxic Substances Regulations.
- Products and formulations made with current Dover Chemical CP products will likewise not contain SCCA >0.5% and therefore should not be subject to this reporting requirement.

If you have questions or concerns, please contact Thomas Kelley of Dover Chemical Corporation at 330-365-3674 or tkelley@doverchem.com or Andrew Jaques of CPIA at (202) 419-1504 or ajaques@regnet.com.