

GENOMER* 4293 – USA Regulatory Information

What is the status of the PMN?

On 25 October 2021, the U.S. EPA issued a TSCA Section 5(e) Order (Consent Order) for GENOMER* 4293. RAHN signed and returned the Order to the EPA on 3 November 2021.

When is the final SNUR going to be published?

Our current expectation is that the SNUR will be published in November/December 2022. The publication of the final SNUR starts the 75-day clock for the termination of certain obligations in the Consent Order. If all goes to plan, full commercialization can be expected come March 2023.

What does it mean?

Based on there being insufficient hazard data for the product, the EPA has concluded that the substance may present a risk of injury to health or the environment. As a result, restrictions have been placed on the use of the product.

These restrictions are described under 'Summary of Consent Order for GENOMER* 4293' on Page 2.

Summary of Consent Order for GENOMER* 4293

The comments made herein reflect our own assessment and are not meant to be a legally binding opinion. RAHN has provided this summary in good faith and disclaims any warranty on the correctness and completeness of the content shared below.

Terms of Use:

- Substance may NOT be used in consumer products.

Export Notification:

- Substance will now be subject to export notification provisions of TSCA Section 12(b). Exporters of products containing GENOMER* 4293 at concentrations $\geq 1\%$ must notify the EPA of such exportation.

Hazard Communication Requirements:

- SDS and Label Hazard Warnings: Skin irritation, Eye Irritation, Skin Sensitization and Respiratory Sensitization. These hazards must appear on the SDS and label.

PPE Requirements:

- Engineering/administrative controls can be used to mitigate risk. Ensure that each person subject to inhalation of the product is provided with, and is required to wear, a National Institute for Occupational Safety and Health (NIOSH)-certified respirator with an Assigned Protection Factor (APF) of 50 or APF 1,000 if spray applied.
- A respirator is ONLY required when exposure is certain or when the product is spray-applied
- Impervious gloves and other protective equipment are to be used to prevent dermal exposure

Record Keeping:

- Ensure workplace requirements were / are followed (PPE, hazard communication etc.).
- Demonstration of "imperviousness" of gloves.
- Hazard Communication program – file copies of labels, SDS, etc.
- Compliance with Terms of Use.