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Honorable Stephen L. Johnson
Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue (1101A)
Washington, DC 20460

Muttenz, 22.02.06

Dear Administrator Johnson:

This letter responds to your January 25, 2006 letter requesting Clariant to join EPA and other stakeholders in a global stewardship program, working to essentially eliminate emissions and product content levels of perfluorooctanoic acid (PFOA), its precursors and higher homologues. Clariant is committed to these goals and to participation in the global stewardship program.

Clariant has worked diligently over the past five years, independently, with other companies (including our colleagues in the Telomer Research Program "TRP") and with EPA to share research and data about PFOA and telomer products. We appreciate that EPA acknowledges Clariant's proactive contribution to a better understanding of the sources and pathways of potential exposure of PFOA and related chemicals. Both as a member of TRP and through Clariant-sponsored research, we will continue to share our research and results with U.S. EPA and other global regulatory authorities.

Clariant manufactures fluorotelomer-based products at our production facilities in Germany. Clariant's German site is operated in compliance with European and national German legal requirements. Clariant does not produce fluorotelomers in the United States. Further, Clariant does not anywhere (1) produce polytetrafluoroethylene (PTFE) plastics, (2) produce or supply PFOA, or (3) utilize PFOA in any manufacturing process.

Although Clariant's fluorotelomers are not made from PFOA, and PFOA is not added intentionally to our fluorotelomers either during manufacture or when they are used, trace amounts of PFOA might result as an unintended impurity. Clariant's evaluations have determined that potential risk to humans from exposure to PFOA through consumer goods treated with Clariant's telomer products is negligible.

Clariant already has significantly reduced the residual content of PFOA, PFOA precursors and higher homologues in our commercial products through continual improvement of our manufacturing processes. Progress also has been made in reducing facility emissions of these residual chemicals. The research and development efforts that have led to our existing reductions will continue and will support Clariant's progress in this stewardship commitment.

Clariant is committed to continue its efforts in order to further improve our products, processes and reduce emissions. Several products with reduced impurity levels have been submitted for regulatory approval to authorities – including the United States. Once these products are approved by the

appropriate regulatory agencies, they will immediately contribute to this stewardship effort. To effectuate further improvements we will count on the cooperation of EPA and other regulatory agencies.

We believe our continued collaboration with EPA and the other stakeholders will substantially contribute to achieving the common target of reduced emissions of PFOA and related chemicals.

We look forward to working with you on the implementation of this stewardship program.

Yours faithfully,
Clariant International Ltd.



Peter Piringer Uwe Wolfmeier
Head of Division TLP Head of Corp. Product Safety

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cc: Mr. Charles Auer
 Ms. Susan Hazen
 Ms. Erin Russell