

January 2007

## Statement about the new EU chemicals policy (REACH)

The new EU chemicals policy (REACH) was decided by the responsible authorities at the end of last year and will be implemented by June 1<sup>st</sup>, 2007. This will lead to new responsibilities for chemical manufacturers as well as for their customers. We are dealing with REACH and with the implementation processes (RIPs), of which some still are under preparation. Since the beginning of the REACH process we worked on influencing it on different levels and via associations (VCI, DIHK, etc.). To which extend we were successful in bringing in the interests of small and medium sized companies as well as the interests of our customers cannot be assessed before the implementation processes (RIP) will be completed.

Therefore final statements about the future marketing of our products can not yet be made. It is expected that associations (for example VCI) will propose methods of communication (questionnaires etc.) between customers and suppliers as soon as the final details of the REACH process will be known. We will wait for these proposals and we will decide afterwards if further actions will be necessary. With the exception of so called new substances, all substances – as long as they do not fall under exemptions – will first have to be pre-registered and they will have to be registered afterwards under REACH in order to be marketed further.

One year after the effective date of REACH, approximately summer 2008 the pre-registration phase will start. This relatively simple process is the prerequisite for the utilization of the transition periods of 3½ , 6 or 11 years – depending on the volume of a substance. As a precautionary measure we will therefore pre-register all substances manufactured or directly imported by our company, and we will also ask our suppliers to do so as well. Consequently – at least until mid of 2010 - there will be no need to change our product portfolio due to REACH.



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In the course of the time consuming and cost intensive registration process also information on exposures and risk potentials in downstream applications will be required. Therefore we may get in contact with customers as soon as the implementation processes will be known in order to ask for further information about the utilizations and applications of our products. This information is required to be able to register the chemical substance according to the rules.

Also under the new chemicals legislation we will do whatever is possible to supply our customers with high quality service and products. Satisfying our customers will remain our top priority.

If you have further questions, please do not hesitate to contact us.

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