

Statement about the new EU chemicals policy (REACH)

The new EU chemicals policy (REACH), which was agreed by end of last year, is effective since June 1st 2007. It results in new responsibilities for suppliers of chemicals as well as their customers. We are intensively dealing with REACH and the implementation processes (RIPs), which are to some extent still under preparation.

With exception of the so called “New Substances”, substances – as long as there are no special regulations – have to be first pre-registered and afterwards registered to be marketed further.

From June 2008 on the pre-registration phase will start. The relatively simple process is the prerequisite to make use of the transition phases of 3½ , 6 or 11 years, depending on the production volume. We plan to pre-register all substances we manufacture on our own or import directly and we will also ask our suppliers to do so. As a consequence there will be no need until mid of 2010 to change our product portfolio caused by the REACH policy. Anyhow at the moment it is still too early to make any final statement about marketing of our products.

The respective associations (e.g. VCI) have already made proposals for communication standards (questionnaires etc.) between customers and suppliers. But as a matter of fact the implementation processes (RIPs) for exactly these issues are still under preparation, so that changes to the questionnaires are likely. This is especially true for the categories of use and the exposition scenarios.

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Despite this uncertainty we have decided to fill in the questionnaires so far proposed by the associations with regard to statements about pre-registration as well as registration and exposition scenarios. We have done our best to list all exposition scenarios according to the information we have on the uses of our products. We would now like to ask our customers to have a look at this documentation, which we have put on our internet site. Should a relevant exposition category for one product not be listed, we ask our customers to provide the respective information to us. With this procedure we hope in our mutual interest to simplify and accelerate the communication with our customers, but also to get and provide all necessary information, which is needed in the REACH process.

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' demands will remain our top priority.

In case you have any questions, please do not hesitate to contact us.