



REACH



**Information
for our customers**

REACH background



One of the European Union's objectives is to make the trade of chemical substances as safe as possible in order to protect consumers' health. To this end, the EU Commission introduced its so-called „White Paper“ on chemicals policy already in 2001 and adopted the draft for the new European legislative framework REACH (standing for the **R**egistration, **E**valuation and **A**uthorisation of **C**hemicals) in 2003. Following a long legislative process accompanied by much controversy the REACH regulation entered into force on June 1, 2007.

Reversing the burden of proof, REACH places the responsibility for proving a chemical substance's safety on producers and importers in the EU. From now on, they must convincingly demonstrate that their products can be safely handled and will have no adverse effects on downstream users' health or the environment.

REACH



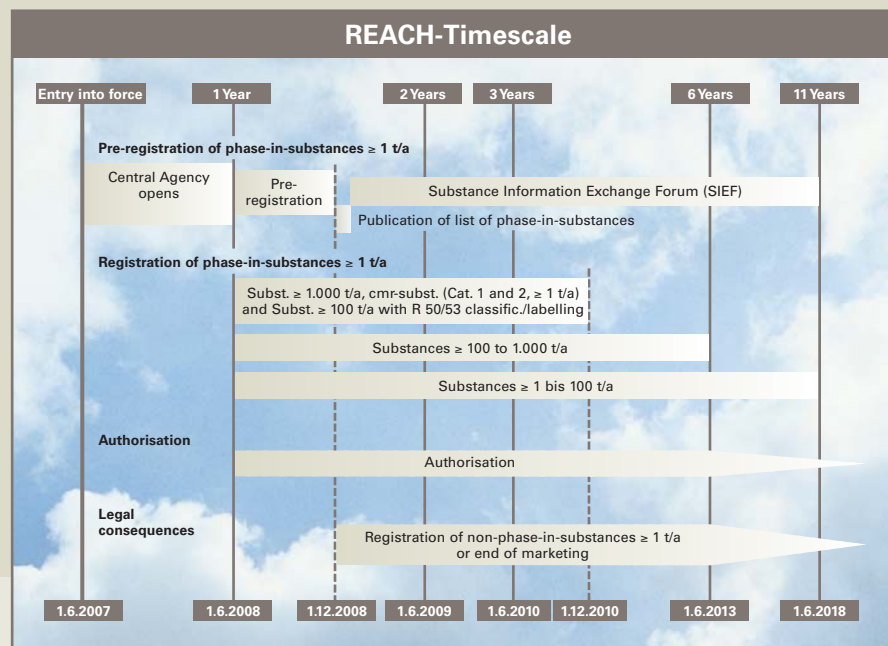
Registration and registration time limits

To do justice to this precautionary principle, REACH requires the registration of about 30,000 chemical substances sold on the European market. The registration must be effected within a time span of 11 years, and without it further use or marketing of the substances is prohibited. Anyone putting chemicals on the European market, i.e. any producer or importer who produces or imports a chemical substance into the European Union in amounts of more than 1 ton per year, has to register it within said 11-year period with the European Chemicals Agency – ECHA – in Helsinki. For this purpose, he will hand in a technical

dossier listing the substance's basic properties, its classification and labelling as well as intended use and guidelines for safe handling.

In addition, substances of very high concern (this includes substances that are carcinogenic, mutagenic and toxic to reproduction as well those with bio-accumulative properties) will be subject to authorisation, and this authorisation system will oblige companies to develop alternatives.

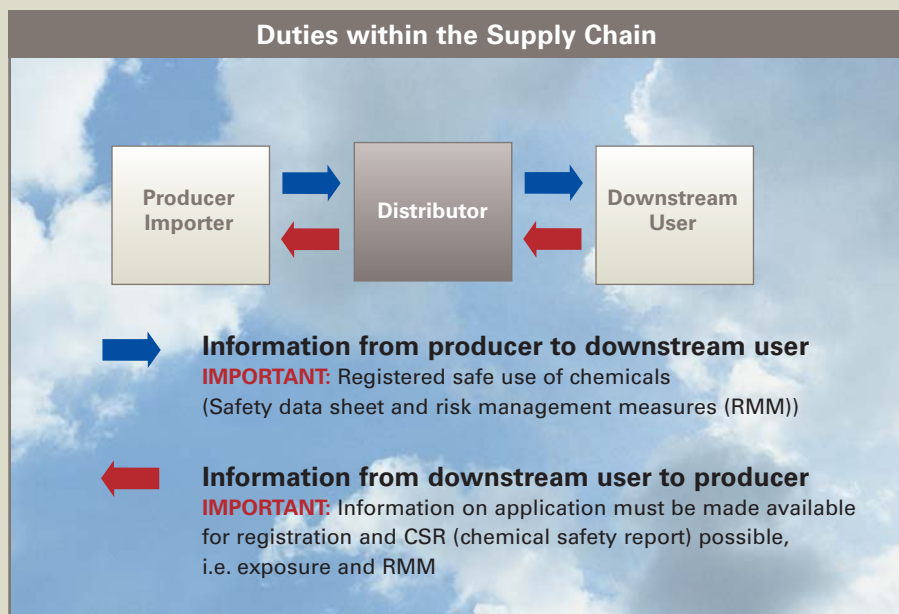
Depending on amounts (the so-called tonnage bands), there are certain time limits for registration:



REACH from an importer's/distributor's point of view

The registration process does not only concern the producer of a substance, but also the importers resp. distributors marketing it inside the EU. Within the above-mentioned time limits, they too must evaluate the risk potentials of the substances they are

importing, identify appropriate risk management measures and forward these to the downstream users. This will require intensive communication with their producing partners as well as corresponding exchange of information with their customers.



Pre-registration

For those substances that are already on the market (the so-called "phase-in substances"), a pre-registration phase was created which starts on June 1, 2008, and ends on November 30, 2008. Within this period, the registering companies have to inform ECHA about their identity, the identity of the substance and the intended registration period as per tonnage

band. As soon as the pre-registration is concluded, the registrants gain access to the Substance Information Exchange Forum (SIEF) where they will find other companies intending to register the same substance. Within the SIEF, all concerned parties can get into contact and consider a joint registration.

NRC activities

... in the past:

Since the introduction of the "White Paper," Nordmann, Rassmann has taken an active interest in the new chemicals policy, being involved in corresponding workshops and expert teams of the German Association of Chemical Trade and Distribution (VCH) as well as the European association FECC. Furthermore, NRC participates in seminars organised for instance by the chambers of commerce, by customers, producers, consultants or associated companies. The gathered information is internally communicated to NRC's management and the heads of our business units. Additionally, respective information meetings were held for our staff.

... at present:

After the EU agency has taken up work in summer 2007, the actual obligations NRC will face in its role as link between producers and users are becoming gradually clear. Already high administrative expenses and costs for human resources must be tackled.

In December 2006, NRC installed its REACH Project Team consisting of representatives from management and each business unit as well as from logistics, IT and quality management.

Our REACH Project Team is co-ordinating our next steps with regard to:

- Screening of the product portfolio – determine concerned products/producers (EU or non-EU producer) and imported amounts
- Involvement of the producers – inquire about their status with regard to:
 - a) knowledge of the REACH Regulation,
 - b) contact person from producer's side,
 - c) statement about further availability resp. possible phase-out of production lines,
 - d) availability of test data from producer

- IT organisation (e.g. availability of realtime figures for marketed substances and preparations)
- Customer communication, i.e.
 - a) replying to customer inquiries,
 - b) starting exchange of information on use and expositions as soon as suitable data-processing tools are available

... in future:

Nordmann, Rassmann wants to be able to offer its customers its customary wide product range also in future. Therefore, we intend to pre-register all substances from our non-European manufacturers. We will also appeal to our European producers to pre-register the substances NRC is marketing for them.

Which REACH duties must be observed already now?

Since June 1, 2007, safety data sheets have to be established in accordance with Regulation 1907/2006 Article 31. Among others, this includes an editorial re-design (e.g. stating the e-mail address of a contact person and replacing chapters 2 and 3).

NRC is consecutively re-editing its safety data sheets according to

REACH requirements. Registration numbers and data from the chemical safety report can however only be incorporated when the registration has been concluded. If necessary, we can supply our customers with safety data sheets in almost all official EU languages.

And what must the customer see to?

Our customers, the downstream users, may also be obliged to register if they are not only using chemical substances but also synthesize substances themselves or import them from a non-EU country. On principle, each user has to check whether his

individual application will be taken into account by the producer when he hands in his chemical safety report for future registration. The user should consider this point already today and, if necessary, should take it up with his supplier.

Information sources on REACH

- The EU website http://ec.europa.eu/enterprise/reach/index_en.htm – here you will find the wording of the law as well as a lot of additional information.
- The European Chemicals Agency ECHA's homepage (<http://ec.europa.eu/echa>) lists all facts about registration and the agency's methods of operation.
- Same refers to <http://www.reach-net.com/>. This site offers question&answer tools for a variety of REACH topics under item "Wissensdatenbank", however, it is only available in German language.
- Another REACH helpdesk is provided by BAUA, Germany's Federal Institute for Occupational Safety and Health (English version is to be found under http://www.baua.de/nn_41996/en/Homepage.html_nnn=true)



Your NRC sales contacts will be happy to assist you in all matters concerning REACH. Furthermore, our customers can get directly in touch with our REACH co-ordination team:

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