



Position statement on the new EU Chemicals Regulation (REACH)

The new EU Chemicals Regulation (REACH) entered into force on June 1, 2007. It imposes various obligations on both chemical suppliers and their customers. We have been closely involved in REACH and the implementation projects, some of which are still in preparation. The pre-registration phase begins in June 2008. This process is a requirement for taking advantage of the transition deadlines of 3½, 6 or 11 years, depending on tonnage and hazard potential.

We are planning to pre-register all company-manufactured or directly imported substances/preparations, and will call on our suppliers to do the same.

As a non-EU manufacturer, we will be implementing REACH through an in-house agent, acting as our only representative, who will be based in Liechtenstein (EFTA – country that ratified REACH in May 2008). This will put us in a position to fulfill all REACH obligations for our customers relating to imports or re-imports to the EU. As a result, there will be no reason prior to mid-2010 to change or product range on account of the REACH regulation. At present, however, it is too early to make conclusive statements about the future marketing of our products. The critical REACH Implementation Projects (RIPs) are still ongoing, meaning that we currently cannot commit ourselves to specifics with regard to the development of exposure scenarios or our final communications structure with suppliers and customers. As soon as these provisions are available, we will adapt the draft versions of our exposure scenarios and communications structure to them, and implement accordingly. All Safety Data Sheets for our products already are available on our Internet site in the new format as per EC 1906/2007.

We will make every effort to continue to supply our customers with the accustomed service and quality under this new chemicals legislation. It is in our interest to maintain our standards as well, because the satisfaction of our customers is our number one concern. If you have any questions, please feel free to contact us.