

Statement Regarding EC Regulation 1907/2006 REACH

Dear Sir or Madam,

Regulation EC 1907/2006 for the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) entered into force in June 2007. This resulted in new obligations and tasks for the manufacturers, users and importers of substances / substances contained in preparations and creations.

REACH covers all substances of which at least an annual volume of 1 tonne is produced in the EU or is imported into the EU unless otherwise stipulated by the regulation.

REACH affects all sectors. Each company has various roles and obligations under REACH. All manufacturers and suppliers must take measures; some immediately and some within forthcoming years.

It is of extreme important that all participants in the supply chain promptly meet their obligations in order to prevent a chink in the supply chain.

We are aware of this issue and have immediately examined our potential duties towards our customers:

The EC Regulation 1907/2006 stipulates that a registration of the substances contain in articles is necessary if:

1. The substance in an article / creation is contained at a volume of more than one tonne annually per producers / importer unless otherwise stipulated in the regulation.
2. It is envisaged that the substance will be released under normal or reasonably foreseeable conditions of use.

Likewise, a range of substances are excluded from registration which also include polymers.

We are currently not affected as a producer or importer within the context of REACH. However, this does not mean that we are absolved from the obligation arising from REACH. We have asked our suppliers to arrange for the registrations that they are obliged to carry out and to submit this information to us in order to not endanger the further delivery capability of our creations. Furthermore, our General Terms of Purchasing contain the explicit request to our contract partners to exclusively supply us with articles that meet the relevant legal stipulations and the official directives.

In the improbable event of a change to our delivery capability caused by REACH or RoHS, we would promptly inform you and agree suitable measures with you.

The so-called Candidate List of the substances subject to mandatory registration has been published and is updated regularly.

A list of substances that must be registered can be found online at:

http://echa.europa.eu/chem_data/candidate_list_table_en.asp

If a substance contained on this Candidate List is used in an article at a level > 0.1%, this manufacturer must announce this without request. We will immediately forward this information on to our customers.

Insofar as we are an importer of creations that do not originate from a company based within the EU, we are actually obliged to register if a substance on the Candidate List is used to a level > 0.1% and to notify our customers of this. Accordingly, this would take place immediately.

Our REACH contact:

Christian Schulte

Tel. +49 (0)2933 / 831 - 100

Mail: christian.schulte@sk-s-germany.com

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SKS metaplast Scheffer-Klute GmbH
zur Hubertushalle 4
59846 Sundern
02933/831-0
02933/831-115