

Informations to REACH 01-2009

Dear Ladies and Gentlemen,

At this point, Dr.-Ing. Max Schlötter GmbH & Co. KG likes to give some answers to the further progress about the realization of the REACH regulation.

1. Pre-registration

The pre-registration phase ended at **01.12.2008**.

Dr.-Ing. Max Schlötter GmbH & Co. KG received of all pre-suppliers a confirmation, that products delivered will be pre-registered. Therefore the further production of our additives is guaranteed and therefore it is no risk in an interruption of the supply chain.

2. Pre-registration number

In the REACH regulation it isn't planned, to publish pre-registration numbers respectively pass it on in the supply chain. The pre-registration number, assigned by ECHA (European Chemicals Agency based in Helsinki) is used as a confirmation for the registrant, that the pre-registration took place. A downstream user has no possibility to check if under the assigned pre-registration number, of a relevant chemical, a pre-registration has taken place, because ECHA doesn't publish these numbers (on the contrary to the registration numbers assigned in the future). The forwarding of a pre-registration number isn't an additional assurance about a performed pre-registration of a relevant chemical even if it is confirmed by a producer / importer. The manufacturers of chemistry, aligned in the organization "Verband der chemischen Industrie e.V." (VCI) decided not to communicate the pre-registration numbers.

A list with all pre-registered substances can be accessed or downloaded on the ECHA website

<http://apps.echa.europa.eu/preregistered/prsDownload.aspx>

3. Registration

The registration periods for the substances are as follows:

01.12.2010: CMR substances (Carcinogenic, Mutagenic or Reproductive toxic) of > 1000 tonnes per annum and manufacturer as well as chemicals dangerous for the environment, classified R 50/53, in volumes of > 100 tonnes per annum and manufacturer produced or imported and in addition substances that require registration.

01.06.2013: Registration of substances manufactured or imported in volumes of > 100 tonnes per annum and manufacturer.

01.06.2018: Registration of substances manufactured or imported in volumes of > 1 tonne per annum and manufacturer.

As a part of the registration process, the manufacturer has to provide a Chemical Safety Report if the substance is manufactured or imported in volumes of > 10 tonnes per annum. Measures for the risk management are derived from this report, which are communicated within the supply chain in the Material Safety Data Sheet as application of the substance or category of exposition. Meeting our obligations according to Article 31 of the REACH regulation we will forward this information immediately as soon as we received it from our pre-supplier.

First information to the pre-registration according to the mentioned registration periods are available after the registration phase at the earliest. That means after **01.12.2010**.

Substances of Very High Concern (SVHC substances)

As soon as a new list of SVHC substances will be published, Dr.-Ing. Max Schlötter GmbH & Co. KG informs all customers who order additives which contain one or more of the listed substances in accordance with Article 33.