



The REACH Regulation EC No. 1907/2006 came into force on June 1, 2007.

Many of our customers are currently asking us to inform them which of the products we supply are registered under REACH and which products contain SVHC substances.

We would like to point out the following:

Unfortunately, many companies are often still unclear about what this registration and information obligation actually entails.

Obligation to register our products:

As a company that manufactures mixtures and articles in the sense of chemical law, we are a downstream user according to REACH and are therefore not subject to any obligation to register our products. Consequently, there is no registration number for our products in section 1 of the safety data sheet.

REACH requires manufacturers and importers in particular to register chemical substances in certain cases.

The chemical substances contained in our products that may be subject to registration must therefore be registered exclusively by our upstream suppliers. This registration has been completed and we have included the necessary information and registration numbers of the raw materials in our safety data sheets (note: if the raw material is less than 1t/year or is not a hazardous substance, there will still be no registration number and extended safety data sheets with exposure scenarios for this raw material).

MR Chemie is not obliged to prepare extended safety data sheets, as no exposure scenarios are prepared for mixtures.

Duty to inform SVHC substances:

We are obliged to inform our customers in accordance with Article 33 of the REACH Regulation if a product supplied by us contains a substance of very high concern (SVHC substance) in a mass concentration of more than 0.1 percent.

The list of SVHC substances is updated twice a year and is published on the website of the European Chemicals Agency (ECHA) under the following link: http://echa.europa.eu/chem_data/candidate_list_table_en.asp

We comply with the legal requirements under Article 33 of the REACH Regulation by:

- Regularly informing our European and non-European suppliers of substances and articles of their legal obligations to notify us of changes to formulations or new findings on the substances used.
- Maintaining close contact with our suppliers of the relevant raw materials that are processed in our products and obtaining binding information on whether listed SVHC substances above 0.1% by mass are contained in the raw materials.

The suppliers of products/raw materials are also obliged to inform us without request and without delay if the products they supply contain an SVHC substance above 0.1% by mass.

If we receive such information from our suppliers and thus become aware that the 0.1% by mass threshold for an SVHC substance is also exceeded in our products, we will of course inform you immediately.

In our own interest and against the background of a high level of supply and product safety, we take these information obligations very seriously and also constantly check the candidate list ourselves.

POP Regulation:

The POP Regulation concerns persistent organic pollutants, also known as persistent organic pollutants (POPs), which are regulated by the Stockholm Convention on Persistent Organic Pollutants (POP Convention). The legal implementation in the European Union is carried out by the POP Regulation (Regulation (EC) No. 850/2004). The POP Regulation prohibits the placing on the market of these substances. This means that it can be ruled out that these harmful substances are contained in our products.

Duty to inform conflict materials:

In July 2010, the following laws „Dodd-Frank Wall Street Reform“ and „Consumer Protection Act“ (Wall Street Reform Act) were passed to end the extraction of conflict minerals. This requires the minerals (tin, tantalum, tungsten and gold) not to be used.

To the best of our current knowledge, our suppliers do not use conflict minerals originating from the Democratic Republic of the Congo and neighboring regions. We ourselves do not directly import minerals or so-called „conflict minerals“. The company is aware of its social responsibility towards the environment, safety, health and human rights, which is why we do not use any materials containing these minerals and expect the same from our suppliers and their upstream suppliers.

It is often correctly assumed that REACH contains an obligation to pass on information along the supply chain. This is not the case. However, this assumption leads to companies along the supply chain feeling obliged in this sense and asking each other to confirm the „REACH conformity“ of deliveries and to complete the corresponding documents.

Such declarations of conformity are not provided for by the REACH Regulation and do not fulfill the prescribed obligations.

They only cause considerable additional work for companies, but do not create legal certainty or any other real benefit for the parties involved.

Please understand that we will not be completing any special questionnaires due to the very large increase in the number of inquiries. However, we hope that this letter contains the information you require and would like to thank you for your trust and cooperation.

If you have any questions, please do not hesitate to contact the person responsible for REACH.

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