



Ossona, December 2011

REACH and CLP Regulation status

Dear customer,

With this letter we like to inform you concerning the Regulations EC No. 1907/2006 (REACH), EC [No. 1272/2008](#) (CLP) and the status of our products.

Three years ago, on December 1st 2008, pre-registration phase of substances closed at the European Chemicals Agency (ECHA). At that time Mare had completed the pre-registration of any substance in the Mare portfolio that was not exempted from the obligation to register and that was either manufactured by Mare in the European Economic Area (EEA), or directly imported by Mare for sales or use in the EEA.

With respect to substances that MARE was obliged to register, we had made provisions to have these registered in time, e.g. in participating in substance specific consortia for REACH registration purposes. In 2010 we have submitted registration dossiers of our substances manufactured/imported > 1000 t/year. The dossiers all passed the completeness check of ECHA and meanwhile we have got the registration reference numbers which we communicate via our Safety Data Sheets. Now we are taking the necessary steps to compile registration dossiers of our substances which need to be registered within the next phases until June 2013 or until June 2018. We keep you informed.

Some substances within our products meet the definition of a polymer in terms of REACH. Pursuant to article 2 (9) of the regulation polymers in this mixture are exempted from obligation to register. Consequently it is neither necessary to register the chemical at the European Chemical Agency (ECHA) nor to identify the uses in a dossier.

Other substances within our product meet the criteria for exemption covered by article 2 (7b) and Annex V of the Regulation (EC) No. 1907/2006. Likewise it is not applicable to register the substance.

REACH is laying down specific communication and notification requirements for products containing > 0.1% (w/w) of substances on the Candidate List of substances of very high concern (SVHC). The Candidate List established in accordance with article 59 (1) of substances potentially subject to the authorization procedure has been published for the first time at the ECHA Website on October 28, 2008. None of the Mare products contains a substance of this Candidate List.

To meet the REACH communication requirements, the MARE Safety Data Sheets for products containing > 0.1% (w/w) of a substance on the Candidate List will be updated without delay. Thereby we will consider any update in the Candidate List.

Furthermore we have taken the necessary implementation measures in respect of EC [No. 1272/2008](#) (CLP). We will consider the new requirements of classification, labelling and packaging and we will move in a transition period until December 1st 2015 to the CLP label only. Even our Safety Data Sheet will consider the CLP requirement. They will be compiled following the requirements set out by Regulation (EC) No. 435/2010.

We hope that this information help to understand the role of our products under the REACH and CLP regulations. We understand any desire for information with regard to our substances and mixtures for REACH & CLP and assure you that we will undertake everything in order to supply you as usual in terms of procedure and quality under this chemical legislation. It is also in our interest that this position does not change. The satisfaction of our customers is of absolute priority. We look forward to continuing our business with you.

Sincerely,

Erich van Cuick
Manager Regulatory Affairs