



17 January 2022

REACH Regulation status

Dear Madam/Sir,

With this letter we like to inform you concerning the Regulation EC No. 1907/2006 (REACH) and the status of our products.

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. Meanwhile we have submitted registration dossiers of our substances manufactured/imported \geq 100 t/year. The dossiers all passed the completeness check of ECHA and registration reference numbers are assigned.

Furthermore we have submitted in 2018 to ECHA by the due date and third REACH deadline 31 Mai 2018 the registration dossiers of our substances which are manufactured/imported in the smaller tonnage band between 1 and < 100 t/year. Even these dossiers have passed the completeness checks at ECHA and registration reference numbers have been assigned. ECHA now is evaluating dossiers and substances and we are in a process of closing of gaps in knowledge concerning developmental and reproductive toxicity.

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. Monomer substances and any other substance chemically bound to the polymer have been registered by the supplier or another actor up their supply chain. Residual monomers are considered to be part of the polymeric substance and do not have to be registered separately.

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.

Regulation (EC) No. 1907/2006 furthermore is laying down specific communication and notification requirements for products containing > 0.1% of substances of very high concern (SVHC) as defined in Article 57. Currently none of the Mare products contains a substance > 0.1% identified of such very high concern and currently included in the ECHA Candidate list as last updated on 17 January 2022.

Even substances included in Annex XIV of REACH ("Authorisation List") are not knowingly present in our products. Some of our liquid products contain substances or are mixtures which are fulfilling the criteria for the hazard classes 4.1 as set out in Annex I to Regulation (EC) No 1272/2008 (Hazardous to the aquatic environment). For these substances restrictions apply according to entry 3 of Annex XVII of REACH ("Restriction List"), however which are not relevant for industrial use as paper chemical as they change their properties upon processing (e.g., become no longer bioavailable, undergo chemical modification) so that the hazard no longer applies.

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.



We hope that this information help to understand the role of our products under the REACH regulation. We understand any desire for information with regard to our substances and mixtures for REACH 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,

A handwritten signature in blue ink, appearing to read 'E. van Cuick', is enclosed in a light blue rectangular box.

Erich van Cuick
Manager Regulatory Affairs