



## REACH – How the European chemicals regulation affects MDC products

Dear Ladies and Gentlemen,

This document will give you an overview of the status of the REACH implementation at MDC Max Daetwyler AG.

Since June 1, 2007, the new European chemicals regulation REACH has been in effect. The principle of REACH is to have all chemical substances registered, to evaluate their risk to human health and environment, and to minimize risks when the substance is in use.

The products of MDC Max Daetwyler AG consist of various substances which are combined into a finished product by leading European raw material suppliers. Since MDC Max Daetwyler AG is a “downstream user“, we have asked all our suppliers / manufacturers to confirm that the chemicals used in our products are pre-registered with the ECHA (European Chemicals Agency) in Helsinki. Pre-registration has to be completed by November 30, 2008.

“Downstream users” are primarily responsible to maintain communication between their suppliers and customers.

Actual registration will commence in January 2009. Registration will be gradual, beginning with the largest producers and importers.

The implementation of REACH will result in some changes to the Safety Data Sheets. However, the SDS will not be affected until the submittal of the substance file by 2010.

MDC Max Daetwyler AG formed a team which is responsible to ensure that all MDC products are REACH compliant and that you, our customer, are kept up-to-date.

Our customers can be assured that implementation of REACH will not affect delivery of our products.

Kind regards

MDC Max Daetwyler AG

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Bleienbach, September 08

Attachment: REACH Chronology

## Fact Sheet REACH (Registration, Evaluation and Authorization of CHemicals)

### Situation/ Timeline

- The European legislation act has been adopted in December 2006 by the European parliament.
- The respective regulation has been published in the Official Journal of the European Communities “No. L 396” dated December 30, 2006.
- This European **regulation** 1907/2006/EG **will come in force on June 1, 2007**.
- The new European Chemicals Agency in Helsinki will become fully active 12 months after REACH has come into force.
- **June 1, 2008:** Companies from outside EU, which export substances or substances in preparations to European Community may appoint a natural or legal person established in the EU to fulfill the obligations under REACH; in the meantime the manufacturer or importer who manufactures or imports substances or substances in preparations in quantities of more than 1 ton / year, needs to have these items pre-registered.  
(In the case of MDC Max Daetwyler AG, the raw material suppliers should carry out the pre-registration of the substances)
  - o Non-Phase-in substances (New Substances which are not yet available in the European market) must be registered according to REACH standards.
  - o Phase-in substances (EINECS substances → existing substances, market release before 1981) may be registered. For this a **pre-registration** at the European Chemicals Agency is required. That means the Agency in Helsinki needs the following information:
    - Names of the substances to be registered, including identification feature such as the CAS number.
    - Name and Address of the designated person which will represent the company at the Agency.
    - Envisaged deadline for the registration

Without pre-registration, the registration of phase-in substances can not be accepted.

- **December 1, 2008: Pre-registration deadline for substances**
- **January 1, 2009:** Publication of the data in the Internet by the agency
- **June 1, 2010:** End of transition period for (amongst other things)
  - o R50/53 substances > 100 tons / year
  - o Phase-in substances > 1000 tons / year

Every manufacturer/importer has registered their „hazardous substances“ at the European Chemical Agency.

- **June 1, 2013:** End of transition period for the registration of phase-in substances with 100 – 1000 tons / year.
- **June 1, 2018:** End of transition period for the registration of phase-in substances with 1- 100 tons / year.