

LANXESS Deutschland GmbH / 51369 Leverkusen, Germany

## REACH

Ladies and gentlemen,

The European Union's new chemicals legislation known as REACH (Registration, Evaluation and Authorization of Chemicals) has come into force on June 1<sup>st</sup>, 2007. From this day on, new substances have to be registered according to the new requirements uniform for all of Europe.

Transition periods of 3<sup>1/2</sup> to 11 years are provided for the substances already being on the market.

It is expected, that a certain percentage of chemical substances will become no longer available on the European market during this period because producers or importers consider the cost for registration too high. This counts as well for preparations in which these substances are used.

To make use of the transition period, a pre-registration has to be finished 18 months after the coming into force. We allow us to inform you, that

### **Lanxess Leather intends to pre-register all substances it markets today.**

The registration deadlines of the pre-registered substances depend on the quantities of each manufacturer/importer:

- The registration period for
- all substances in quantities > 1000 tonnes/year,
  - substances dangerous for the environment, classified N (R50/53) > 100 tonnes/year and
  - substances classified CMR, Cat. 1 or 2 > 1 tonne/year
- ends 3<sup>1/2</sup> years after the REACH regulation comes into force, i.e. end of 2010.

The registration period for substances manufactured or imported in quantities above 100 tonnes/year ends 6 years after the REACH regulation comes into force, i.e. mid of 2013.

September 24, 2007

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The registration period for substances manufactured or imported in quantities < 100 tonnes/year but above one tonne/year ends 11 years after the REACH regulation comes into force, i.e. mid of 2018.

Dr. Martin Kleban

September 24, 2007

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Substances will no longer be available after the respective deadlines, if the registration trials and documents have not been completed before. From a legal point of view this means, that REACH will not directly affect the supply, processing and use of any of our products until end of 2010, more likely 2013.

Of course Lanxess leather will continue to develop and update its complete product portfolio independently from REACH. We will contact you, whenever a relevant change in our product portfolio is scheduled.

We are preparing for the new legislation by evaluating internally all used substances. As REACH obliges us to consider the whole life cycle of the chemicals for supplying evidence for safe use we will need exchange of information externally as well, upstream and especially downstream.

As we develop and market products for the complete production process of leathers and fur, we will concentrate on this application as the minimum registration scope. If you are using one of our products for a distinctively different application please make sure that we will be informed about it to consider this for registration as well.

**We will contact you for information exchange after we have finished the internal evaluation.**

To facilitate this information exchange we would kindly ask you to complete the address information (especially E-mail) for the person responsible for REACH implementation in your company:

Name

Title

**Company**

**E-mail**

Phone

Fax

Of course we will inform you as early as possible whenever remarkable changes on supplies are predictable, but again, this will probably not be necessary before 2013.

Yours sincerely,

LANXESS Deutschland GmbH

Martin Kleban