

REACH FACTS

1. Any product that contains substances (chemicals) that your company ships to Europe must be pre-registered with REACH between June 1, 2008 and November 30, 2008. Also, each substance in a preparation (blend) or in an article which is designed to release substances during use (air fresheners, pens) requires registration. By pre-registering you will not need to complete a full registration of your products until 2010-2018, depending upon the volume of material you export to the EU. By that time many of the questions, concerns, and issues will have been clarified. **Failure to pre-register means you will no longer be able to sell your product in the EU after November 30, 2008.** Furthermore, you will have to submit a full registration for your product before being allowed to resume EU sales.
2. **Do not** depend upon using a chemical manufacturers' REACH registration for the substances going into your finished products as an insurance that your REACH obligations will be satisfied. **You will not be covered** unless you have received a specific agreement and assurance from the manufacturers that your specific volume is included in their registration. Most likely manufacturers will not want to do this because it entails many things, not the least of which is a clear understanding of your export volume and eventually what **every one of your end use customers** does with your product.

Furthermore, depending on a manufacturer's registration means that in the future 100% of your purchases of that substance must come from that source. Should the manufacturer stop supplying that product or should the manufacturer decide that it no longer wants to fulfill your REACH obligations, you will not be eligible for a late pre-registration. The result will be that you will have to submit a full registration dossier before you can resume marketing your product.
3. Non-EU distributors, by law, are not allowed to register substances. Thus, Brenntag cannot register your products, or the raw materials we sell to you.
4. To pre-register your products, you will need the services of an EU based "Only Representative" (OR) or assistance from the importer of record for your products. If you decide to obtain the services of an OR they will be able to guide you through the process. Brenntag can supply you with contact information for several firms who are able to act as an OR for you.
5. For your OR or importer to pre-register your products on the ECHA web-site, **you will need your contact information, the substance name(s), CAS number(s), EINECS number(s), volume being exported, and expected full registration date.** This data may have already been supplied to you, however, Brenntag will be happy to assist you in getting any information that you might not have. It is important to note that pre-registration does not obligate you to submit a full registration or pay fees to the EU.