

REACH

REACh is a European Regulation, (EC) No 1907/2006, on chemicals, that has been adopted by the European Parliament in December 2006 and took effect on June 1st, 2007. This legislation will, over the coming years (2010-2018), regulate the registration and risk analysis of chemical substances. It will have a major impact on all manufacturers, importers and downstream users of chemicals in the European Union.

CRC is part of the European Operations steering group (CRC REACh team) under the leadership of the European President, tasked with the implementation of the new requirements, and to evaluate the implications of this new legislation on its products and business.

The steering group's initial conclusion is that the availability of the CRC product range is not likely to be impacted by REACh and will continue to be available in the long term.

Since December 1st, 2008 all substances produced or imported are required to be preregistered by the manufacturer or importer. This means that the products you buy from CRC contain only substances which are pre-registered, registered or are exempted.

REACh has now moved into the "registration phase". This will last between two and nine years (from 2010 until 2018) depending on the quantities of chemicals produced or imported. For all dangerous substances produced or imported above 10 tonnes, a new extended safety data sheet will be distributed as they become available, and coinciding with the timeline for registrations. The Safety Data Sheets will contain one or more exposure scenarios describing the uses, conditions of use, and the risk management measures. Again, CRC will work closely with its suppliers to make sure that all the substances are registered for the applications and exposure scenarios relevant to our customers are described. However, CRC cannot be held liable if certain product use scenarios, instigated by the customer, are not specifically described.

In order to avoid an unnecessary flow of communication from downstream users to their suppliers, different stakeholders (CEFIC, DUCC and FECC: representing manufacturers, downstream users and distributors) have been developing and transferring information on uses, in cooperation with downstream user associations and with selected customers. CRC is a downstream user and we have communicated to our suppliers the uses needed to cover our applications and also the relevant information coming from our customers.

In case a downstream use is not covered, CRC will have the opportunity to inform the ECHA (European Chemical Products Agency) through a standardised procedure.

CRC's goal is to make the transition to the new legislation as smooth as possible for its customers and we are confident we will be able to continue to supply products as usual.

B. Hereman President

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