



On June 1, 2007, the **REACH** regulation 1907/2006 (**R**egistration, **E**valuation, **A**uthorisation and **R**estriction of **C**hemicals) came into effect. **REACH** requires every marketable substance to be registered with the new European Chemicals Agency (ECHA). The implementation of **REACH** will have significant impacts on all actors involved in the supply and use chain for chemical products in the European Union. Companies manufacturing or importing chemical substances in the EU in quantities of 1 tonne or more per year will be required to register them under **REACH**. This also applies to companies producing or importing articles containing substances present in quantities of 1 tonne or more per year that are intended to be released.

How will REACH affect the products supplied to Casco Adhesives customers?

Casco Adhesives supplies bonding systems and other adhesive related chemical products to customers located within the EU, and outside of the EU. Having studied the legislation, it is at present our view that **REACH** will not affect:

- The supply of products to Casco Adhesives' customers within the EU
- The supply of products to Casco Adhesives' customers outside the EU

Casco Adhesives is knowledgeable of the **REACH** regulation, its timetable for pre-registration and registration of substances and the predictable consequences for downstream users of chemicals. **We have made sure that all substances, subject to REACH, in our products will be pre-registered, either by us or primarily by our suppliers.**

Casco Adhesives is mainly a downstream user of chemical substances and preparations (in a few cases a manufacturer or importer), just as you are a downstream user of the products we supply to you. We manufacture bonding systems (adhesives and hardeners), these products are defined as "Preparations" and as such are themselves exempted from registration under **REACH**. **REACH** applies only to the substances that we use to manufacture our products.

We are fully committed to meeting our responsibilities under **REACH** to ensure our customers' needs are met. We have mobilized a team that has been working on **REACH** for several years. As a company, our efforts are in agreement with the European Adhesives and Sealants Manufacturing Association (FEICA) and the European Chemical Industry Council (CEFIC).

The process of gathering and follow up on detailed **REACH** compliance information from our suppliers has been in process since 2007 and will continue through 2008 and, where necessary, beyond. We are committed to fulfill all of our obligations in order to support the products we supply to you, including submission of pre-registrations where necessary to secure existing or equivalent products.

At this stage in our preparations we foresee no problems in respect of pre-registration of any of the substances contained in the raw materials used in any of the bonding systems that we supply in the EU. **Additionally none of the substances in the raw materials that we use in Europe are included in the first Candidate List of substances (SVHC; Substances of Very High Concern) for inclusion in Annex XIV and thus none are currently subject to possible Authorization and/or Restriction of Use.**

Articles glued with bonding systems supplied by Casco Adhesives

An Article is defined in **REACH** as:

“An object which during production is given a special shape, surface or design that determines its function to a greater degree than its chemical composition”.

A glued Article will **only** be subject to registration obligations within **REACH** if:

- The substances contained are intended to be released from the produced or imported article(s) during normal and reasonable foreseeable conditions of use

OR

- After June 1, 2011, glued Articles produced in or imported into the EU contain any substance identified in Annex XIV (substances subject to Authorization) or the substance is included in the Candidate List for authorization (Article 59(1)) **and** if the following are both true:
 - The substance is present in those Articles above a concentration of 0.1% weight by weight,
 - the substance is present in those Articles in total (annual) quantities exceeding 1 tonne per year.

None of the European products supplied by Casco Adhesives contain any substances that are intended to be released.

None of the European products supplied by Casco Adhesives contain any of the substances in the first Candidate List for inclusion in Annex XIV, and therefore none will have any implications for **REACH registration of Articles.**

It is our belief that there is no requirement arising from the use of Casco Adhesives supplied products under REACH regulations for either:

Article 7: Registration and notification of substances in articles.

Article 33: Duty to communicate information on substances in articles. (Producers, importers and other suppliers of articles containing substances on the Candidate List may have to forward required information available to them down the supply chain (Article 33(1) and to consumers on request (Article 33(2)).)

If you have any further inquiries of Casco Adhesives' compliance or activities on **REACH**, please send an e-mail to our **REACH Coordinator** at reach.adhesives@akzonobel.com.