



To whom it may concern

1ST December 2008

REACH Registration, Evaluation, Authorisation of Chemicals Pre-registration is on the Final Straight

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The new EU regulation REACH (No.1907/2006) concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals entered into force on the 1st of June, 2007.

This regulation concerns European manufacturers and importers of chemical substances in the EU area.

RIPOL is already in the process of assessing all chemical substances that uses in its manufacturing process, and which could fall under any of the provisions of the REACH Regulation, whether as substances on their own or as substances present in preparations. RIPOL is fully committed to work with its customers and suppliers along the entire supply chain to develop workable solutions to comply with REACH.

In terms of REACH legislation, RIPOL is mainly considered as "downstream user" as defined by REACH so it is not forced to pre-register substances. RIPOL has requested REACH-related information from all of its suppliers.

Data received shows that our suppliers are going to pre-register the substances so that the phase-in transition period defined by REACH legislation can be used. The phase-in registration requires pre-registration of the substances in the period from 1st of June, 2008 to 1st of December, 2008. Under some preconditions, chemical substances can be pre-registered after this preregistration period. The transition period will last between end of 2010 and end of 2018 depending upon the hazardous level of substances and their volumes involved. After pre-registration, the company which has carried out the pre-registration will receive a reference number intended for use in communication between the company and European Chemicals Agency.

However, **there will be no need to send this reference number** to other companies in the supply chain.

A list of all pre-registered substances will be published on the 1st of January, 2009, on the European Chemicals Agency's website <http://echa.europa.eu>.

Alterations to the Headlining of Material Safety Data Sheets MSDS

The REACH regulation has also partially changed the headlining of MSDS. RIPOL is in the process of updating its Material Safety Data Sheets (MSDS) to meet the requirements of the new REACH legislation. There is no need to renew all MSDS at once. Immediate renewal is required only when dangerous substances CMR, PBT and vPvB > 1% weight. Dangerous substances (i.e. CMR, PBT and vPvB > 1% weight) should be listed in MSDS, only.

However, all Material Safety Data Sheets must be renewed by the 1st of December, 2010 and only after release of the new updated edition GHS 2009/2010 (Globally Harmonized System of Classification and Labelling of Chemicals (GHS)).

Candidate List of Substances of Very High Concern for Authorisation (SVHC) - ECHA / REACH

Separate inquiries about Substances of Very High Concern for Authorisation (SVHC) can be addressed to suppliers.

RIPOL has already prepared a separate declaration in which states that all its products are free of any substance mentioned in the updated Candidate List available for consultation at

http://echa.europa.eu/chem_data/candidate_list_en.asp



RIPOL SpA - Powder Coatings

Via Donatori del Sangue, 25/A - I-20010 S. Stefano Ticino - Milan - Italy
Ph+39029748411 - Fax +390297484170 - info@ripol.it - www.ripol.com
Capital Euro 200.000 - VAT No. IT 12906600155



Paint Deliveries to Continue as Usual

As a “downstream user” RIPOL is prepared to meet the requirements under the new legislation, and is cooperating with its customers and suppliers. Since paints do not come under the REACH legislation, there is no need to register or pre-register them at the European Chemicals Agency.

This means that, after the pre-registration period, paints and coatings will be delivered in the same way as heretofore.

How does REACH Affect the End Users of Paints?

- There will be no significant changes in paint properties or availability in the coming years.
- The headlining of MSDS (Material Safety Data Sheets) will change in phases by 1st of December, 2010.
- Due to testing costs, pressure on raw-material prices can be expected in due course.
- Approximately 10–30% of the raw materials in use are likely to disappear during the next decade, whereupon alterations are expected both in the properties and prices of several paints.

REACH Registration, Evaluation, Authorisation of Chemicals - General information

For more background information, please consult the web-page of the European Chemical Industry Council CEFIC 1)

1) <http://www.cefic.org/Templates/shwStory.asp?NID=494&HID=444&PHID=441>

2) <http://europa.eu.int/eur-lex/lex/JOhtml.do?uri=OJ:L:2006:396:SOM:EN:HTML>

Yours faithfully

Gilberto Vercesi
International Sales Manager
RIPOL SPA

This information is based on our current level of knowledge. This information may be subject to revision as new knowledge and experience becomes available, and RIPOL makes no warranties and assumes no liability in connection with any use of this information. Since RIPOL cannot be aware of all aspects of your business and the impact the REACH Regulation has for your company, RIPOL strongly encourages you to get familiar with the REACH Regulation in order to comply with its requirements and timelines.



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