



HumiSeal® Division
Chase Technology Center
500 Myles Standish Blvd.
Taunton, MA 02780
Telephone: 01-508-884-5025
Fax: 01-508-884-5026
E-Mail: TechSupport@HumiSeal.com

To all HumiSeal Customers

REACH Regulations

Dear Sir/Madam

Further to the recent introduction of the REACH regulations I am pleased to enclose the HumiSeal REACH Implementation Plan.

This plan has been compiled after careful study of the currently available guidance documents and represents our understanding of the REACH regulations.

If there are any changes to the regulations that affect the Implementation Plan between now and when the European Chemicals Agency becomes operational, we will re-issue as necessary.

Should you require further information on how HumiSeal will address the REACH regulations please feel free to contact your local HumiSeal office.

For further information on the REACH regulations go to http://ec.europa.eu/echa/reach_en.html

Sincerely,

Jeffrey A. Sargeant
Research & Development Director
Chase Corporation

HumiSeal REACH Implementation Plan

Overview of REACH

The REACH Regulation was formally adopted on 18 December 2006 by the Council of Ministers following the vote in second reading of the European Parliament on 13 December 2006.

The timeline for the implementation of REACH is :-

- REACH entered into force on 1 June 2007.
- June 2008: European Chemicals Agency becomes operational.
- June 2008 to November 2008: Pre-registration of phase-in *substances*.
- November 2010: Registration deadline for *substances* in quantities of 1000 tonnes and above as well as carcinogens, mutagens and substances toxic to reproduction (CMR category 1 and 2) above 1 tonne/year and *substances* classified as very toxic to aquatic organisms (R50/53) above 100 tonnes.
- May 2013: Registration deadline for *substances* in quantities of 100 tonnes and more.
- May 2018: Registration deadline for *substances* in quantities of 1 tonne and more.

Definitions from the REACH regulation (Reference : ECHA “Guidance on registration” June 2007).

Substance means a chemical element and its compounds. The term substance includes both substances obtained by a chemical manufacturing process (for example formaldehyde or methanol) and substances in their natural state (for example dried lavender heads).

Preparation means a mixture or solution composed of two or more substances. Typical examples of preparations include paints, varnishes, inks. Preparations can contain several substances.

Manufacturer: means any natural or legal person established within the Community who manufactures a substance within the Community.

Manufacturing: means production or extraction of substances in the natural state. It is a case by case decision to establish which steps of the synthesis of the end product lead to substances which need to be registered (e.g. different purification or distillation steps).

Downstream user: means any natural or legal person established within the Community, other than the manufacturer or the importer, who uses a substance, either on its own or in a preparation, in the course of his industrial or professional activities.

Use means any processing, formulation, consumption, storage, keeping, treatment, filling into containers, transfer from one container to another, mixing, production of an article or any other utilisation.

An important point to bear in mind is that the terms used in REACH to describe the various companies in the supply chain have very specific definitions and meanings which do not always correspond with how they might be interpreted in other areas.

Example: A company purchasing registered substances **from within the EU** and then formulating these into preparations (e.g. paints) would be regarded as a downstream user. In layman's terms this company might be considered to be a *manufacturer* of paints. However, within the context of REACH the company would not be a *manufacturer of a substance* and so would have no registration obligations for these substances.

As can be seen above, only *substances* have to be registered, preparations do not. Also substances that have been registered by the manufacturer and are being mixed into a preparation by a downstream user, do not need to be registered again by the downstream user.

HumiSeal Europe Ltd is classified as a downstream user and therefore does not have to register its products under REACH.

However we do have to ensure that our suppliers have registered the substances that we use in our preparations, and that we supply our downstream users with a Material Safety Data Sheet (MSDS) that includes the registration number for each registered substance used in the preparation.

Implementation Plan

HumiSeal being a responsible manufacture of conformal coatings for the electronics industry has the following implementation plan for REACH.

- Make sure we are fully informed by monitoring the emerging guidelines.
- Purchase and install software to assist in identification of products requiring REACH registration and inclusion on the MSDS.
- By 1st December 2008 have issued REACH compliant MSDS to all clients currently using our conformal coatings.

Ensure that our raw material suppliers have :

- Pre-registered all products supplied to us, coming under REACH by November 2008.
- That all products are registered by the deadlines of : November 2010 > 1000 tonnes, June 2013 >100 tonnes and June 2018 > 1 tonne.
- Work with our clients on all aspects of REACH relating to HumiSeal conformal coatings.
- Continue development of environmentally safe products that do not require registration under REACH.

Jeff Sargeant
R & D Director
Chase Corporation