



April 2010

Dear Partner and Customer,

Please find below a detailed summary of the actions Azelis is taking to comply with REACH requirements.

Pre-Registration

Azelis is a Pan European chemical distributor, which supplies substances, which require registration under REACH. Azelis also supplies substances, which do not fall under the scope of REACH or are exempt from REACH compliance. We have confirmation from suppliers that all products supplied to Azelis will conform to the REACH regulation. Where required all the necessary substances have been pre-registered either by Azelis, our suppliers or their "Only Representative". Therefore, Azelis is in a position to confirm that we will continue to supply all our current product ranges. If in the future there is any change in these circumstances we will inform all our customers immediately.

REACH Pre-registration numbers, as generated by the European Chemical Agency (ECHA), are unique to the substance and supplier combination. Communication of the pre-registration number is not a requirement of the REACH regulation, as this is not a legal requirement; many manufacturers have not passed their pre-registration numbers down the supply chain. Pre-registration numbers are not required to continue using products, only the assurance that the products have been pre-registered.

Registration 2010

As Azelis supplies over 25,000 chemical products from over 2,000 suppliers to nearly 30,000 customers throughout Europe, communication on REACH requirements is a vital part of our organisation. Therefore, final statements on substances requiring registration in 2010 are being collected from the suppliers and/or manufacturers concerned. Azelis will collate all the statements and inform our customers of which third party products we supply will be involved in the 2010 registration.

Azelis appreciates your patience and understanding during this process.

Substances of Very High Concern (SVHC)

Where Azelis supplies SVHC we will communicate their presence in our products through the required Material Safety Data Sheets (MSDS). According to Article 31 of the REACH Regulation, from the date of inclusion of any substance in the Candidate List, suppliers have to provide their customers with a material safety data sheet.¹ Also, suppliers of preparations not classified as dangerous according to Directive 1999/45/EC have to provide the recipients, at their request, with a material safety data sheet (MSDS) if the preparations contain at least one substance on the Candidate List and its individual concentration is at least 0.1% (w/w) for non gaseous preparations and at least 0.2% by volume for gaseous preparations.

Azelis is aware of the 45 day limit that suppliers of articles have to respond to similar enquiries (Article 33) and we are doing our best to ensure that the information requested will be transmitted from our supplier/manufacturer to you as soon as is feasibly possible.

Azelis will meet all obligations under the communication requirements concerning Article 31 in combination with Article 33 for the specific substances as published on the ECHA website². Other substances mentioned on other lists but not on the ECHA's official list do not fall under Article 33 and will not be treated as such.

End Use Descriptors

As you know the REACH Regulation requires the development of a Chemical Safety Assessment (CSA) for all substances subject to registration in quantity of ten tonnes or more per year per registrant, demonstrating safe Use of a substance through it's lifecycle. Considering the number of substances and the various Uses that have to be identified, it should be stressed that a common framework is necessary to harmonise communication and to support effective and efficient information exchange on all Uses from all levels of the supply chain.



Azelis Group is following the recommendations from CEFIC/FECC/DUCC on the alignment on Uses, which is linked to the proposed Use Descriptor System developed by ECHA ^{*}.

Currently Manufacturers/Importers are preparing Exposure Scenarios (ES) in cooperation with selected customers and Downstream Users Associations. This should result in a list that includes most of the Uses, in a standard format that utilizes the ECHA's Use Descriptor System, and will be subsequently made available by each supplier to all his customers who are Downstream Users (DU).

Upon receipt of the list, the customer (the DU) is advised to verify that his Uses are included in the list. If this is the case no further action from the DU is needed. On the other hand, if a Use is missing the DU is well advised to use his right to make his use known. Specific forms based on the Use Descriptor System (including the ERC^{*}) will be provided, to allow a more effective flow of information on the non-covered Uses to the supplier.

We are collecting lists of Uses from our Manufacturers and we ask you to be patient. Your local SHEQ contact from the Azelis Group will send you direct Uses for your substances in order to verify them as explained above. Standardised processes and tools for Exposure Scenario development are required and the ECHA's Use Descriptor System should be followed for a more consistent communication. Uses as currently available will be covered with corresponding Exposure Scenarios and within the time frame required by REACH.

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Meanwhile, for more information please refer to the "*Guidance on ES development and Supply Chain Communication*" and the relevant tools published at the CEFIC website³.

If you have any questions on any of the matters above, please do not hesitate to contact us through your local contacts.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Michel Dubois", written over a horizontal line.

Michel Dubois
Group Director Strategy & Marketing

A handwritten signature in black ink, appearing to read "Ahmed Diboune", written over a horizontal line.

Ahmed Diboune
SHEQ Corporate Project Leader

¹ Please be aware that the Candidate List is different from the Authorization List. The Candidate List is the first step in the authorization process. The European Commission will then adopt decisions to include some of the Candidate List substances in the Annex XIV (Authorization List).

² http://echa.europa.eu/chem_data/authorisation_process/candidate_list_obligations_en.asp

³ <http://cefic.org/Templates/shwStory.asp?NID=719&HID=714>

(*) In the framework of the REACH "*Guidance on Information Requirements and Chemical Safety Assessment*", a "Use Descriptor System" based on four elements has been developed. Those elements are: sector of use (SU), chemical product category (PC), process category (PROC) and article category (AC). Additionally, a fifth element that should be considered is the Environmental Release Category (ERC). Information about downstream uses is required in the format of the "Use Descriptors System" and will be integrated in that format in the registration dossier.