

Reach Statement for EU Regulation No 1907/2006 on the Registration, Evaluation, Authorisation of Chemicals

REACH Article 6 requires manufacturers and importers to register with the European Chemical Agency any substances on their own, or in preparations that they produce or import in quantities over 1 tonne per year.

Martindale as a producer of articles is considered to be a 2nd level downstream user¹ as we do not manufacture or import substances or preparations. We therefore have no registration obligations for substances or preparations within the current requirements.

Reach Article 7 (1) requires registration of any substance present in articles in quantities totaling over 1 tonne per year and intended to be released under normal conditions of use.

Martindale has no products that meet these article substance registration requirements.

Reach Article 7 (2) defines notification parameters for substances in articles that meet the criteria in REACH Article 57 and are identified in the candidate list (REACH Article 59), are present in quantities totaling over 1 tonne per year and exceed a concentration of 0.1% by weight of the article.

Martindale products do not fall within this notification category.

REACH Article 33 requires suppliers of articles to inform their customers of the presence in the article of substances of very high concern (SVHC) included in the candidate list (REACH Article 59) above a concentration of 0.1% weight by weight. Article suppliers have to provide their recipients with sufficient information to allow safe use, including, as a minimum, the name of the substance. However, the presence of an SVHC in an article has no impact on the ability to sell a product into the EU, it only regulates the need to communicate SVHC in the product to the customer or consumer.

With the publication of the first candidate list (REACH Article 59) on 28 October 2008 Martindale is actively engaged in dialogue with our suppliers to identify any SVHC content in our products and will immediately notify our customers if the content exceeds the 0.1% concentration requirement. We will actively monitor the candidate list for changes and additions and will take all necessary steps to ensure that our customers receive updated information at the earliest opportunity

Signed Steve Dunning Date 11 December 2008

S.C.B. Dunning
Managing Director

¹For more information about REACH, please consult the Orgalime practical guide to understanding REACH, downloadable free of charge at:
<http://publications.orgalime.org>
