

REACH

A brief overview from LEONHARD KURZ GmbH & Co. KG

Current: June 2007

KURZ





The purpose of this document is to give our customers a brief overview of REACH and the related activities at KURZ.

KURZ is wholly committed to the obligations arising from the objectives of REACH and its implementation for all affected industry sectors.

1. What is REACH?

REACH is the new EU chemicals regulation that will serve as the chemicals legislation EU-wide.

The name derives from:

Registration
Evaluation
Authorization } of **Chemicals**

2. Why REACH?

The main objective of REACH is to protect human health and the environment.

There were found to be weaknesses in this regard in past chemical policies, in particular as a result of information gaps in the area of „old“ chemical substances: While the previous system required the comprehensive evaluation of so-called „registered substances“ (these are substances introduced since September 1981) with regard to their hazard to the environment and health, the so-called „old substances“ (substances introduced prior to September 1981) were never subject to such comprehensive testing regulations.

These old substances were taken up in the EINECS list (European Inventory of Existing Commercial Chemical Substances)

and could previously be marketed without restriction. Even substances that were previously considered to be polymers, but later not (so-called No Longer Polymers), could still be sold and were considered old substances.

The intention of REACH is to reverse the burden of proof and eliminate the inconsistent treatment of so-called old substances and new substances:

- Manufacturers and importers of old substances will be obligated to perform a hazard assessment.
- Substances requiring mandatory registration, and substances not registered by the manufacturer will no longer be allowed to be marketed. Processors will not be allowed to use them either.

3. Timeframe for REACH

REACH came into force on 1 June 2007 and provides the following timeline:

During the first 12 months, the agency in Helsinki will be made operative.

From 1 June 2008 pre-registration of all substances according to REACH will commence. Thereafter, various transitional periods can be utilized for old substances (depending on quantity and potential hazard). This pre-registration period ends on 1 December 2008.

The substance can continue to be marketed until the relevant transitional period expires. In the absence of pre-registration, the substance will be regarded as a new substance and must be registered immediately.



4. Registration, evaluation and approval

The following transitional periods apply for the registration of „old substances“:

1 December 2010 (three-and-a-half years after coming into force)	<ul style="list-style-type: none"> • Substances > 1,000 t.p.a • Carcinogenic, mutagenic or repro toxic substances of category 1 and 2 (so-called „CMR substances“) > 1 t.p.a • Substances with the classification R 50/53 („very poisonous for aquatic organisms“) > 100 t.p.a
1 June 2013 (six years after coming into force)	<ul style="list-style-type: none"> • Substances > 100 t.p.a
1 June 2018 (eleven years after coming into force)	<ul style="list-style-type: none"> • Substances > 1 t.p.a

Evaluation of the submitted material data is performed by the European Chemicals Agency. Where the data suggests an increased hazard to humans or the environment, the agency can arrange for further studies.

The mandatory authorization requirement applies to substances whose properties give particular cause for concern: carcinogenic, mutagenic, repro toxic/embryotoxic and/or particularly environmentally hazardous substances will be subject to an approval process by the new EU authority;
Objective: To ensure the substance is only utilized in applications with a minimal or reasonable risk to humans / the environment



Regardless of priority level, details in regard to hazard potential, use and risk management measures will need to be provided when registering each chemical substance.

Safety data sheet:

The SDS remains the key element with regard to handling/usage/safety issues associated with substances and preparations throughout the product life cycle. It is anticipated that the SDS will be extended by an annex containing a substance safety assessment for the ingredients in relation to the specified usages.





5. What measures is KURZ taking in preparation for REACH?

- Participation in the public Internet consultation on the first draft of the REACH Regulation
- Participation in the resolution of the „Energy and Environment“ committee of the IHK (German Chamber of Commerce) on the new European Chemicals regulation
- Participation in a project of the Bavarian Ministry of the Environment to assess the impact of the draft regulation on the manufacture of highly innovative products
- Close contact and exchange of information with material suppliers and manufacturers with regard to a successful implementation of REACH
- Intensive evaluation of the impact of REACH at KURZ prior to its coming into force, for example:
 - Preparation of a list of all materials processed to produce our products, the suppliers of those materials, and the available information and data for them
 - Evaluation of the collected data, in particular with regard to future purchasing risks and, where applicable, the registrations that would be required.

Our preliminary results have shown that the entire range of polymers that we use does not fall within the scope of the REACH regulations. As we predominantly use raw materials from the polymer group in the manufacture of our stamping foils, we do not anticipate any restrictions in this area.

The range of substances classified as CMR (carcinogenic, mutagenic, repro toxic) are not relevant to KURZ either at present since we do not employ these CMR classified substances in the formulation of our foil products, as evident from the information provided by our raw material suppliers.

Our „STAMPING FOIL“ product itself is considered a product according to the REACH Regulation and therefore does not need to be registered.

Should you have any further questions, please feel free to call one of your regular contact persons in our sales departments.

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Neufirmierung
Change of Company's Name
ab / from 1. November 2007

LEONHARD KURZ Stiftung & Co. KG