

## **Information letter on the position of Hi-Tech Coatings International concerning Regulation (EC) No.1907/2006 REACH**

30 May 2018

Dear customer,

Regulation (EC) NO.1907/2006 concerning the Registration, Evaluation and Authorisation and Restriction of Chemicals (REACH) came into force on June 1<sup>st</sup> 2007. It requires all chemicals used in the European market to be registered by the new European Chemicals Authority (ECHA) for their respective uses. Depending on the annual volume, the registration must have been completed by 2010 for materials used in volumes greater than 1000 Tones pa, by 2013 for materials used in volumes greater than 100 Tones pa and by 31th May 2018 for chemicals greater than 1ton. This was the last step and the pre-registration phase for all chemicals is closed.

The regulation affects everybody in the European Union who is part of the supply and downstream user chain of coatings. Close co-operation of all parties is required, especially regarding the exchange of information.

In terms to REACH Hi-Tech Coatings International is “downstream users” and we will not be required to register products ourselves within REACH. We are in close contact with our raw material suppliers and also with potential raw material suppliers to provide them the necessary information about the use of our products. We can confirm that all starting products used to prepare our formulations and products are registered by our raw material suppliers.

We will communicate the use of our products to the raw material industry (descriptors of use) to make sure that all products will be correctly registered within REACH.

CEPE, the European trade association, has prepared tables of common use descriptors, covering both the manufacture and application of coatings and inks. These details cover all uses relevant to our manufacturing processes and to the application of our products by our immediate customers and uses.

These tables can be accessed on the REACH Descriptors of Use page on the CEPE website:

<http://www.cepe.org/wp-content/uploads/2018/01/ajns0183.pdf>

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Printers are also “downstream users”. They supply customers with articles not chemicals, and thus are not obliged to register. Printers only come into scope of REACH if they buy coatings, varnishes and sundries from non-EU manufacturers who don't register their product ingredients under REACH. The use of non-registered products will not be allowed in the EU from Dec. 2008 onwards.

Hans van 't Veen

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