

## Giebelhaus, Natalie

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**Von:** Skala, Susanne [Susanne.Skala@grace.com]  
**Gesendet:** Dienstag, 28. Oktober 2008 11:05  
**An:** Giebelhaus, Natalie  
**Betreff:** REACH  
**Anlagen:** REACH Compliance.pdf; Pre-Registration Statement.pdf

Sehr geehrte Frau Giebelhaus,

bezugnehmend auf Ihr Schreiben vom 20.10.2008 erlauben wir uns, Ihnen in der Beilage unser Statement und Information betreffend REACH zu übermitteln.

Bei etwaigen Fragen stehen wir Ihnen selbstverständlich jederzeit gerne zur Verfügung.

Mit freundlichen Grüßen  
Susanne Skala

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# GRACE Davison

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## To Whom It May Concern

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August 6, 2008

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REACH Compliance.doc

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## REACH – Pre-Registration and Registration Status of GRACE Davison Substances

Dear Customer,

The REACH regulation is only dealing with chemical substances but not with our products as such, therefore only the substances forming our products are subject to pre-registration and registration.

GRACE Davison is using the XML or XML bulk pre-registration features of the European Chemical Agency's IT system, which, unfortunately, were delayed until end of July 2008. Due to this delay GRACE Davison started with the submission of its pre-registration files in August. All files will be presented to the ECHA until November 30, 2008 to meet the given deadlines and secure the supply chain.

GRACE Davison will exclude the pre-registration of those substances, which are clearly included in Annex IV and V of the REACH regulation (e.g. natural substances or polymers), as well as those, which are pre-registered and registered by our trustful upstream suppliers, e. g. caustic soda, sulfuric acid, sodium silicate, etc.

We kindly ask for your understanding that a submission of the pre-registration notification of a substance from ECHA to the individual entities of GRACE Davison to our customers will not be considered, due to the large number of customers and substances involved.

Best regards,  
GRACE GmbH & Co. KG



Dr. Jürgen Nolde  
Director EHS, Davison Europe

Grace GmbH & Co. KG  
Sitz der Gesellschaft/  
Registered Office: Worms  
Amtsgericht/Registration Court:  
Mainz, HR A 11356

Dresdner Bank Worms  
BLZ 670 800 50  
Kto-Nr. 1 846 231  
S.W.I.F.T.-Code DRESDE FF 670  
IBAN DE07 6708 0050 0184 6231 00

Commerzbank Worms  
BLZ 553 400 41  
Kto-Nr. 3 825 007  
S.W.I.F.T.-Code COBADE FF 553  
IBAN DE38 5534 0041 0382 5007 00

Geschäftsführer/Managing Directors:  
Robin F. Pearce  
Dr. Hans-Michael Huck  
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September 5, 2008

JN/gbl

Pre-Registration Statement.doc

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## REACH

### GRACE Davison Standard Reply for the Communication Process in the Supply Chain Pre-Registration and Registration Status of GRACE Davison Substances

Dear Customer,

Thank you for your enquiry regarding our status on REACH. In order to provide you with a timely response, we have prepared this standard letter that should give the answers to your query. We have an extensive customer base and many hundreds of products. Consequently, an individual reply to each request is not practicable and we ask for your understanding.

The REACH Regulation is only dealing with chemical substances but not with our products as such. Only the substances forming our products are subject to a pre-registration and registration within the defined deadlines of the Regulation.

GRACE Davison, as a global specialty chemical supplier, is currently pre-registering all substances, which form our products until November 30, 2008, unless substances are clearly exempted from REACH (Annex IV and V draft, natural substances or polymers), or upstream suppliers demonstrate their compliance with REACH in a trustful manner.

It is GRACE Davison's vital interest to ensure REACH compliance for all substances in use and to concentrate on the correct submission of the pre-registration and the ongoing preparation of the required registration dossiers.

As these dossiers in their majority will be prepared within Substance Information Exchange Forums and / or Consortia, we delegate our resources towards these important tasks.

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Therefore we kindly ask for your understanding that, due to the large number of substances as well as our very broad customer range, we have established an interactive Internet Web Page

**[www.grace.com/REACH](http://www.grace.com/REACH)**

Please follow the given guidelines on the front page so that you will receive an access code for the individual search portal of GRACE Davison pre-registration / reference numbers. The search function is based on the CAS no., which is provided in chapter 3 of the product MSDSs. The web page will be continuously amended and in a later stage also the registration numbers added.

Please do not hesitate to contact us in case of further questions about REACH, or contact your supply chain representative for supplementary information on our products.

Best regards,  
GRACE GmbH & Co. KG



Dr. Jürgen Nolde  
Director EHS, Davison Europe

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