



February 7, 2009

Subject: European Union Chemical Legislation - REACH

To whom it may concern,

EU regulation 2006/1907/EC concerning the registration, evaluation, authorization and restriction of chemicals (REACH) entered into force on June 1, 2007.

This legislation is designed to ensure a high level of protection of human health and the environment through an extensive evaluation of all chemical substances placed on the market in the EU. EU manufacturers and importers of chemical substances in quantities of 1 ton or more are required to submit a registration dossier to the European Chemicals Agency (ECHA) according to the following timetable: June 2008 to November 2010 for high-volume (>1000 tons) or high hazard chemicals; November 2010 to June 2013 for moderate-volume (>100 tons) chemicals; and June 2013 to June 2018 for lowest-volume (>1 ton) chemicals.

The first step to achieving REACH compliance is preregistration. Chemical preregistration submittals are due between June 1, 2008 and November 30, 2008. Preregistration is a simple process requiring limited data on chemicals that meet REACH thresholds. This submittal will include: identification of the legal entity that manufactures or exports any threshold chemical to the EU, the identity and amount of each chemical exported to the EU in quantities over 1 ton, and the expected use of the products containing the chemicals.

ITW Chemtronics has begun preparations to become fully compliant with REACH requirements. Preregistration is being coordinated through the ITW EHS Department. All chemicals contained in products exported to the EU in 2007 have been reported and chemicals over the applicable REACH thresholds have been identified. ITW's EHS Department will consolidate this information to prepare a preregistration submittal to the ECHA. In January 2009, a list of preregistered substances for REACH will be published and Substance Information Exchange Forums (SIEFs) will be formed by potential registrants to ensure that one substance is registered with one dossier and that animal test data will be shared.

ITW Chemtronics has conducted an evaluation of our raw material list and identified all critical chemicals, and will work with our suppliers to solicit their support for registration of these materials. A dossier will be prepared providing information about the chemical's uses, toxicology profile, and environmental effects. The dossier may also contain a Chemical Safety Report and Exposure Assessment. Specific exposure scenarios may be required for some substances, specifically chemicals classified as dangerous. Once the

dossiers have been submitted, Safety Data Sheets must also be expanded to include the information about the chemical that was contained in the dossier.

The REACH legislation replaces the EU Safety Data Sheet Directive (91/155/EEC) and all of the current provisions have been transferred into REACH with specific changes to the Annexes to include the additional information that will become available from the chemical dossiers.

ITW Chemtronics has invested in an upgrade to our MSDS Management System that allows us to incorporate all relevant chemical information as it becomes available over the next ten years.

If you have any questions please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Sue Max". The signature is written in a cursive, flowing style.

Sue Max  
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ITW Chemtronics  
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# SENJU

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8<sup>th</sup> August  
Ref; Reach gen

To Whom It May Concern:

**Ref; Senju Manufacturing Europe Reach status**

In compliance with the Reach legislation Senju Metal Industry Co Ltd is undertaking a review of the relevant materials affected by this legislation. The intention is for pre-registration of the required materials by December 08.

This will be followed by an official materials listing defined by the Reach organisation early 2009.

Following this the next stage is full registration of all the relevant materials by 2010 in line with the legislation requirements.

Best Regards



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