

March 2010

Dear Customer,

Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)  
EU Regulation 1907/2006/EC

The first stage of REACH implementation, the pre-registration of “phase-in” substances, ended on December 1<sup>st</sup> 2008. Cristal Global (Cristal) completed pre-registrations of the volumes of substances in the commercial products that it manufactures, imports and sells in the EU.

Cristal is receiving many enquiries from customers about the pre-registration and registration status of our products. Often the formats of forms and spreadsheets devised for communications in the supply chain are not conducive to providing complete information about Cristal’s REACH program. Therefore we intend to provide uniform, up-to-date statements in response to our customer’s enquiries about the REACH status of Cristal products.

Please find our latest update on Cristal’s REACH compliance program in the following pages.

Sincerely,



Morris T. Cole  
European Regulatory Affairs Manager

**EUROPE**

Brielen 9  
B2830, Willebroek  
Belgium  
Phone: +32 3 860 4800  
Fax: +32 3 860 4801

**MIDDLE EAST**

(incl. Africa & Indian  
Continent)  
CRISTAL GLOBAL H/Q  
Future Business Centre - 9/10  
Floors  
Al Amanah Street, PO Box 13586  
Jeddah 21414, Saudi Arabia  
Phone: +966 2 652 9966  
Fax: +966 2 652 9933

**NORTH AMERICA**

20 Wight Avenue - Suite 100  
Hunt Valley, MD 21030 USA  
Phone: +1.410.229.4441  
Fax: +1.410.229.4415

**ASIA/PACIFIC**

53 Quill Way  
Henderson, WA 6186  
Australia  
Phone: +61.8.9411.1222  
Fax: +61.8.9411.1275

**LATIN AMERICA**

Av. Roque Petroni Jr.,  
999, 12<sup>th</sup> Andar São  
Paulo,  
SP 04707-910 Brasil  
Phone: +55.11.3296.1500  
Fax: +55.11.3296.1501

March 2010

## Cristal Global's Implementation of the EU REACH Regulation

### 1. How is Cristal preparing for REACH?

Cristal Global ("Cristal") has given a very high priority to preparing for and implementing the requirements of the European Union's Regulation 1907/2006/EC on Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). Cristal has followed the development of REACH from an early stage, and actively supports relevant industry groups dealing with REACH implementation.

Cristal has a global, multi-disciplinary REACH Implementation Team that coordinates the different elements of the program to ensure successful and timely (pre)registrations of the substances in our products. To date these elements have included the assembly of substance inventories and composition information, completing the pre-registrations, collection of information on substance properties, planning the gathering of required information on uses and exposure potentials, and participation in relevant (pre)SIEF and REACH consortia activities.

### 2. Will Cristal pre-register and register the substances that Cristal produces, imports and sells in the EU?

Cristal completed pre-registrations of all the products (substances) it manufactures, imports and sells in the EEA<sup>1</sup>. We intend to complete full registrations by the relevant deadlines. Cristal's product portfolio is subject to the normal periodic business review. Because the registration period for the lowest volumes extends until 2018, it is not possible for Cristal to provide statements guaranteeing full registration at this point. Cristal is intending to ensure that all products it currently manufactures, imports and sells in the EEA will be REACH compliant and we do not expect any of our products to be unavailable because of REACH.

<sup>1</sup> The European Economic Area: the 27 member states of the EU plus Iceland, Liechtenstein, and Norway.

### 3. Do Cristal's non-EU customers who incorporate Cristal products in preparations or articles they export into the EU have REACH obligations?

Each EU importer of a substance, whether alone or contained in a preparation (formulation) such as a paint or plastic compound, normally has an obligation to pre-register and register that substance. The non-EU manufacturer or formulator may appoint an EU-based REACH "only representative" to pre-register and register an importer's volumes under an agreement between the two parties. The arrangements for complying with REACH using an "only representative" are

#### EUROPE

Brielen 9  
B2830, Willebroek  
Belgium  
Phone: +32 3 860 4800  
Fax: +32 3 860 4801

#### MIDDLE EAST

(incl. Africa & Indian  
Continent)  
CRISTAL GLOBAL H/Q  
Future Business Centre - 9/10  
Floors  
Al Amanah Street, PO Box 13586  
Jeddah 21414, Saudi Arabia  
Phone: +966 2 652 9966  
Fax: +966 2 652 9933

#### NORTH AMERICA

20 Wight Avenue - Suite 100  
Hunt Valley, MD 21030 USA  
Phone: +1.410.229.4441  
Fax: +1.410.229.4415

#### ASIA/PACIFIC

53 Quill Way  
Henderson, WA 6186  
Australia  
Phone: +61.8.9411.1222  
Fax: +61.8.9411.1275

#### LATIN AMERICA

Av. Roque Petroni Jr.,  
999, 12<sup>th</sup> Andar São  
Paulo,  
SP 04707-910 Brasil  
Phone: +55.11.3296.1500  
Fax: +55.11.3296.1501

quite complex. If you export formulations containing Cristal product to the EU and require further information about these, please contact your Cristal Sales or Customer Service Representative.

**4. Will you cover my use of Cristal's product in the registration dossier?**

Cristal expects to support all major uses of our products known to us and will contact our customers for more information as required concerning product uses and applications.

**5. What measures have you taken to ensure that your suppliers are REACH compliant?**

Cristal is working closely with the suppliers of raw materials and other substances used in the EU manufacture of our products to ensure REACH compliance and supply continuity.

**6. Has Cristal updated the M/SDSs for Cristal products to comply with the REACH requirements on format and content?**

M/SDSs for all Cristal products sold in the EEA comply with the REACH requirements on format and content.

The current versions of Cristal's M/SDS may be found at [www.cristalglobal.com](http://www.cristalglobal.com).

**7. Will any Cristal products / substances be subject to authorization?**

The identification of a substance as a Substance of Very High Concern (SVHC) and its inclusion in the Candidate List is the first step of the authorization procedure. None of the substances in Cristal products are considered as substances of very high concern and none are on the candidate list as updated by ECHA on 13<sup>th</sup> January 2010 or on the list of substances for public consultation issued by ECHA on 8<sup>th</sup> March 2010. Cristal has no reason to believe that any of our products/substances will be subject to authorization.

**8. Can you provide me with more information about REACH and the obligations that it brings?**

We encourage all stakeholders to familiarize themselves with the REACH requirements by visiting the European Chemicals Agency (ECHA) website where there are comprehensive guidance documents and REACH help tools available. The link to this site is: <http://echa.europa.eu/>

**EUROPE**

Brielen 9  
B2830, Willebroek  
Belgium  
Phone: +32 3 860 4800  
Fax: +32 3 860 4801

**MIDDLE EAST**

(incl. Africa & Indian  
Continent)  
CRISTAL GLOBAL H/Q  
Future Business Centre - 9/10  
Floors  
Al Amanah Street, PO Box 13586  
Jeddah 21414, Saudi Arabia  
Phone: +966 2 652 9966  
Fax: +966 2 652 9933

**NORTH AMERICA**

20 Wight Avenue - Suite 100  
Hunt Valley, MD 21030 USA  
Phone: +1.410.229.4441  
Fax: +1.410.229.4415

**ASIA/PACIFIC**

53 Quill Way  
Henderson, WA 6186  
Australia  
Phone: +61.8.9411.1222  
Fax: +61.8.9411.1275

**LATIN AMERICA**

Av. Roque Petroni Jr.,  
999, 12<sup>th</sup> Andar São  
Paulo,  
SP 04707-910 Brasil  
Phone: +55.11.3296.1500  
Fax: +55.11.3296.1501

**9. Should I have questions about Cristal's REACH implementation, how should I contact the responsible person?**

Please direct all enquiries about REACH to your usual Cristal Sales, Technical Service or Customer Service Representative.

\*\*\*\*\*

You the reader, and the company you represent, must make your own independent evaluation of the information, recommendations or advice ("Information") contained herein. You must make your own determination of the suitability, accuracy and completeness of the information for your own use, regulatory compliance, protection of the environment, and the health and safety of your employees and purchasers of your products. We strongly advise our customers to become familiar with their obligations under REACH.

**EUROPE**

Brielen 9  
B2830, Willebroek  
Belgium  
Phone: +32 3 860 4800  
Fax: +32 3 860 4801

**MIDDLE EAST**

(incl. Africa & Indian  
Continent)  
CRISTAL GLOBAL H/Q  
Future Business Centre - 9/10  
Floors  
Al Amanah Street, PO Box 13586  
Jeddah 21414, Saudi Arabia  
Phone: +966 2 652 9966  
Fax: +966 2 652 9933

**NORTH AMERICA**

20 Wight Avenue - Suite 100  
Hunt Valley, MD 21030 USA  
Phone: +1.410.229.4441  
Fax: +1.410.229.4415

**ASIA/PACIFIC**

53 Quill Way  
Henderson, WA 6186  
Australia  
Phone: +61.8.9411.1222  
Fax: +61.8.9411.1275

**LATIN AMERICA**

Av. Roque Petroni Jr.,  
999, 12<sup>th</sup> Andar São  
Paulo,  
SP 04707-910 Brasil  
Phone: +55.11.3296.1500  
Fax: +55.11.3296.1501