

## To CEO of all suppliers

### Subject: New European Union (EU) Regulation on Chemicals (REACH)

As of June 2007, the European **Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)** entered into force.

REACH affects all industries, including the Automotive Industry (AI). As the AI is made up of vehicle manufacturers and many tiers of the supply chain, it has several roles and obligations under REACH. Action is required from the OEMs and suppliers, some immediately and some over the coming 11 years and beyond.

One of the requirements of REACH is that manufacturers and importers have a duty to register, for each legal entity, substances on their own, or in preparations that they produce or import in quantities over 1 tonne per year (per manufacturer/importer), unless the substance is exempt from registration. Registration requirements also apply to substance(s) intentionally released from articles under certain conditions, in which case the article producer/importer is responsible for the registration.

It is of key importance to take advantage of the pre-registration option in REACH. Pre-registration of substances on their own, in preparations, or substances intentionally released from articles will take place between 1 June and 1 December 2008. Taking advantage of pre-registration allows for a transitional period to the registration process and allows continued production and use of substances until 2010 to 2018, depending on annual tonnage. **Without pre-registration, substances have to be registered immediately. Without Registration, Substances can not be marketed in the EU. Pre-registration is free of charge and very simple, requiring only basic information.**

Please consider that:

- Companies that do not comply with REACH will have no market. REACH poses a threat to any company doing business in the EU (and businesses with customers who do business in the EU).
- Business continuity can be adversely impacted by REACH and supply chains can be disrupted.
- Companies that understand the business implications and impacts of REACH and develop strategic action plans will gain competitive edge over those that do not.

In order to be prepared for REACH, representatives of all the major vehicle manufacturers and the automotive supply chain around the world developed an "Automotive Industry Guideline on REACH" which can be used to get a quick overview of REACH, its requirements and the recommended actions arising. This guideline can be found at: [www.acea.be/reach](http://www.acea.be/reach).

This "awareness" letter with some recommendations and requests for information is considered to be the start of the communication in the AI supply chain required by REACH. There is more to come.

Please respond with the information by 30<sup>th</sup> May 2008 requested in the attached Standard Communication along the Supply Chain document.

Regards

**Richard Dunn**  
**UK General Manager**  
**PRELOK**

for more information visit - <http://www.prelok.com/reach.html>

8 May 2008

**REACH: 1. Standard Communication Along the Supply Chain<sup>1</sup>****Recommendation and Requests from Downstream User (Customer) to Suppliers  
regarding Pre-registration / Registration**

Concerning all products supplied to us are defined as Substances, Preparations or Articles according to the REACH terminology.

1. At this stage, we strongly recommend and expect that all substances, which require registration and are contained in the products you are supplying to us, will be **pre-registered** (between 1 June and 1 December 2008) by your company or by your upstream supplier.
2. At this stage, we also recommend and expect that all substances, which require registration and are contained in the products you are supplying to us, will be **registered**<sup>2</sup>.
3. Regarding the substances that are contained in the product and require registration – please take note of the crucial REACH **registration deadlines** for those substances which are decisive for the product properties.
4. We expect that your business will take organisational measures to manage the implementation of the REACH regulation requirements including appointing an only representative in the EU if applicable.
5. If you do not intend to pre-register any substance that is currently in use, please get in contact with our REACH contact person. (See 8 below).
6. We expect that you will appoint a single point contact for your company covering all legal entities.
7. Your single point contact details.  
Please provide full contact details for the person in your company responsible for REACH issues.

***Name, company, telephone & fax number mailing address and email***

8. Our single point contact details  
Please find below the full contact details for the person in our company responsible for REACH issues.

**Name** – Richard Dunn**Company** – Prelok**Telephone** – 01902 600000**Fax number** – 01902 600155**Mailing address** – as above**E-mail** – [richarddunn@prelok.com](mailto:richarddunn@prelok.com)

9. Please provide your response and questions to the person detailed in point 8.

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<sup>1</sup> The information contained in this letter expresses only the intention of the requester and does not constitute a legally binding obligation. Whilst the information is provided in utmost good faith, no representations or warranties are made with regards to its completeness or accuracy and no liability will be accepted for damages of any nature whatsoever resulting from the use of or reliance on the information

<sup>2</sup> See section 5.7 of the Automotive Guideline on “Registrations of substances in articles”