

REACH POSITION STATEMENT (UK)

The REACH regulation 1907/2006/EC was adopted by the European Parliament on December 13, 2006 and was formally adopted by the Environment Council on December 18, 2006. The new EU chemicals legislation took effect on June 1, 2007.

For the most part AlphaGary can be regarded as a downstream user of chemicals (substances). Under REACH legislation our products (compounds) are classified as 'preparations' and as such do not require registration.

As a downstream user AlphaGary recognizes its obligations under REACH legislation. Since our products contain substances and/or substances used in preparations we have taken steps to confirm that our upstream suppliers have understood their obligations and have put in place actions to ensure the products they supply are REACH-compliant.

AlphaGary has reviewed its supply base for all substances and preparations that are critical to its processes and products. For the most part AlphaGary Ltd uses substances and preparations that are manufactured in Europe. According to EU law manufacturers and importers of substances and substances used in preparations above 1 metric tonne per year who wish to trade in Europe are obliged to ensure that their products are registered with the regulatory authority – the European Chemicals Agency (ECHA) in Finland. For manufacturers based in Europe they must take responsibility to register the substances they manufacture. For importers of substances manufactured outside Europe then they have the opportunity to appoint an Only Representative (OR) in Europe to register the substances they import. In some cases AlphaGary Ltd uses imported substances and/or substances used in preparations. In such cases we have evidence that these substances have been pre-registered with ECHA.

The pre-registration deadline for phase-in substances was 1st December 2008. This means that all manufacturers and importers of substances and substances used in preparations that wish to continue to manufacture and/or sell their products in Europe, had obligations to pre-register or register their substances/substances used in preparations with ECHA in order that they can continue to trade legally in Europe. It is on this basis that we consider the products we manufacture to be REACH-compliant.

The next REACH timeline is the first registration deadline for phase-in substances – 30th November 2010. We therefore plan to issue a new position statement before this deadline.

Principle REACH contacts;

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For and on behalf of AlphaGary Limited
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