



August 15, 2008

Dear Nease Customer,

The REACH (Registration, Evaluation, Authorization and Restriction of Chemical substances) Act that the European Union is putting into place is a very complex piece of legislation. REACH is different from TSCA as chemicals are registered into REACH by manufacturer and end use. There is no system in REACH where a compound can be given a blanket registration like there is in TSCA.

The REACH registration process consists of two steps. The first is pre-registration that closes on December 1, 2008. Starting in 2009, chemicals will be required to be submitted for registration based on usage levels. More information on REACH can be found at the official EU website for REACH at [http://echa.europa.eu/reach\\_en.asp](http://echa.europa.eu/reach_en.asp).

Under the requirements of REACH, only European Companies can register or pre-register. For companies that are exporting products into Europe, it is the importer's requirement (your customer) under REACH to register each chemical compound they import or is contained in the formulation that they are importing.

For US companies directly exporting to EU customers, REACH allows that US company to use an Only Representative (OR) to handle the registration requirements. The OR will work with your company to handle the pre-registration process for the company you are exporting to in the EU. There are several companies that offer this service. If you would like a recommendation please feel free to contact me.

Because of the requirements within REACH, no chemical manufacturer can register or pre-register products that are sold to a US company and exported to the EU. It is the responsibility of the company that is importing into the EU to register these materials.

Nease will provide technical assistance by supporting your requirements or those of your customer by supplying Safety Data Sheets (SDS) and existing chemical fate data. MSDS sheets do not fulfill the requirements of REACH as European SDS sheets are required. Pending your specific request, a confidentiality disclosure agreement (CDA) may be required.

I would be happy to discuss your company's specific requirements by telephone or email if you contact me directly.

Phil Benes  
Director of Technology and Product Development  
[Phil.benes@neasecorp.com](mailto:Phil.benes@neasecorp.com)  
513-587-2804

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NEASE CORPORATION  
Performance Chemicals

Philip C. Benes  
Director of Technology and Product Development

4480 Lake Forest Drive, Suite 312  
Blue Ash, Ohio 45242  
Tel: 513-587-2804  
Fax: 513-587-2828  
[phil.benes@neasecorp.com](mailto:phil.benes@neasecorp.com)