



March 2008

REACH – Effects of the EU chemicals policy on products of Henkel Adhesives Technologies

Dear Customer,

We would like to comment on the current status of REACH implementation at Henkel Adhesives Technologies.

With a date of 1st June 2007 the new European Chemicals Regulation REACH¹ came into force. REACH requires to register and classify chemical substances and to improve the communication in the added value chain significantly. The REACH process begins with the obligation of registration by 1st of June 2008.

A pre-registration phase begins for so-called “phase-in substances”² which will end with 1st of December 2008. The registration deadlines of the following registration phases differ and are dependent on the quantities of the substances produced or imported. With the registration the intended use of the substances must be mentioned. Different working groups are still developing the details of the categories of use and exposure. Therefore, questions relating to this cannot be reasonably answered at the moment.

In the REACH process the Henkel Company is mainly concerned as downstream user of chemical substances. In addition Henkel is also producer and/or importer of some substances. As producer and importer the Henkel company intends to pre-register all substances produced by the company and imported from non-EU countries.

The intentions and decisions of our raw material suppliers concerning pre-registration and registration will lead to consequences for the use and availability of raw materials, which Henkel uses as a downstream user. Henkel is already attempting to clarify the availability of raw materials with the raw material suppliers. If we become aware that some substances will not be pre-registered by our suppliers then Henkel intend to do the pre-registration. That gives us the possibility to use the volume dependant REACH transition periods for registration. During this time –depending on the tonnage up to the year 2018- we are allowed to place products on the market.

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It goes without saying that for Henkel the wishes of our customers – even under REACH – are first priority. However, we expect a possible limitation of individual, special formulations by REACH, which maybe can no longer be offered, due to possible potential raw material restrictions. As soon as we will have exact information about a possible phase-out of raw materials from our suppliers we will check if there is an alternative raw material, enabling us to produce the same high-quality formulation or if we can offer a similar product consisting of registered substances. If we lack product data and are unable to receive it, we will decide on a case-by-case basis depending on the quantity. However, at the moment we expect that this will be the case only in very few instances.

We hope you will understand that we can only make the above-mentioned extensive check of the raw materials used by us in view of the current status of the REACH process. A binding answer to your questions cannot be given until the EU processes are brought to a conclusion.

Please note that our statements in this letter refer to all products of Henkel Adhesives Technologies. With regard to the number of more than 30000 different products we ask you for some understanding that we cannot provide individual questionnaires for each item.

Yours Sincerely,
Henkel Norden AB – Adhesives Technologies

¹ Regulation (EC) No 1907/2006

² Substances, which are listed in the European register of existing chemical substances (EINECS) or substances, which are produced or imported into the EU, but have not been traded in the last 15 years before REACH came into force.