

REACH – Registration, Evaluation & Authorisation of CHemicals

The European regulation has been effective since June 1, 2007. Among others, it demands the registration of all chemicals brought onto the EU market. Thereby, improving the protection of human health and the natural environment against the risks of using chemical substances. The registration is intended to help the spread of information about risks and hazards and respective protective measures throughout the supply chain. REACH presupposes that the companies concerned share the available data of a substance for registration.

In order to do so, all companies concerned need resources and competences in:

- Legal and business consulting
 - Competition law (monitoring)
 - Chemical and toxicological expertise
 - Testing and generation of a technical dossier
 - Administration and project management
 - Financial services
 - Foreign languages
- as well as for
- Clarification of open questions with public administration, including ECHA
 - Trusteeship for the cooperation with other producers in a SIEF – Substance Information Exchange Forum – or for the joint submission of data

K&L assesses if, and in which manner, your company is affected by REACH. On the basis of your REACH obligations, K&L shows you the right path through the articles and processes and leads you all the way through the whole registration process.

Support for REACH Obligations: Consulting, Services, Legal Safety

As for WEEE, RoHS and other directives and regulations of the European Union, K&L offers complete service packages for compliance with REACH. Avail yourself of the competence and experience K&L can offer on the basis of a long-term involvement with the European environmental legislation and of the practical work of a comprehensive REACH pilot project.

K&L GmbH

Dorfackerstraße 26

72074 Tuebingen, Germany

Phone +49 7071 257000-0

Fax +49 7071 257000-9

E-Mail: reach@kl-cc.de

www.kl-cc.de

www.kl-cc.de

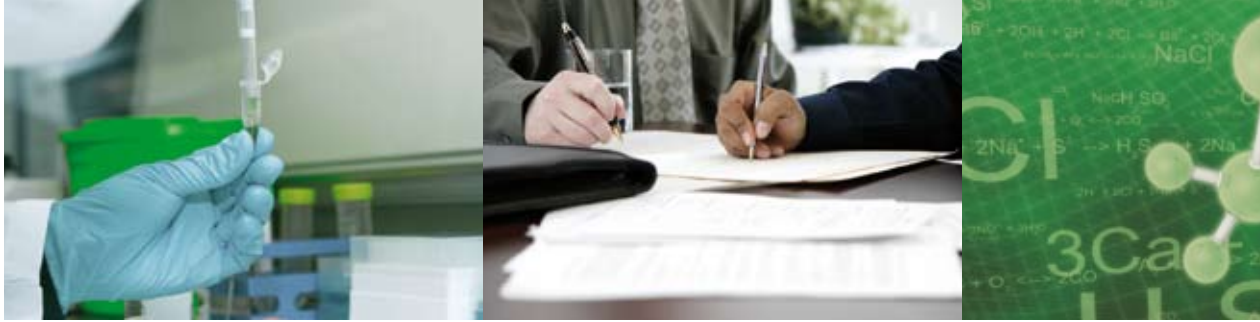


K&L GmbH, Tuebingen, Status February 2009



REACH – Consulting and Services

Comply with the Regulation as
Producer, Dealer, and Downstream User



Reduce Effort and Costs

Complying with the regulation demands various competences

The REACH regulation of the European Union (EU) affects almost any enterprise in almost any industry. After the deadline of the pre-registration period has elapsed, the partly long-term REACH processes have started: SIEF communication, formation of co-operations and consortia as well as the information in the supply chain. It's time to make provisions for ensuring internal and external resources for compliance.

Which competences do you need, what effort are you going to face?

REACH services for companies all over the world

Producers and importers with registration tasks for substances

- K&L represents companies in the necessary negotiations in pre-SIEFs, SIEFs and cooperations
- K&L consults downstream users if their applications have to be considered in a registration dossier of a producer
- K&L coordinates data sharing between companies
- K&L conducts individual as well as joint registrations in cooperations
- K&L supports consortia by project management, legal advice and administration
- K&L represents EU and non-EU companies for (late) pre-registrations and for full registrations of their substances
- K&L mediates as trustee between companies and versus public authorities
- K&L protects, as trustee, confidential data and safeguards adherence to competition law

Producers and dealers with information tasks according art. 33

- K&L consults in all information obligations about hazardous substances in articles
- K&L manages to obtain all relevant data from suppliers
- K&L evaluates data and provides plausibility and analytical tests
- K&L fulfils all communication tasks and provides information for customers and end-users

REACH – a Challenge for Producers and Downstream Users

Companies must register chemical substances they produce or use in their products with the European Chemical Agency (ECHA). Tasks even ensue if companies do not need to register substances – tasks of information, marking as well as active contribution for registration. The full-scale and very demanding registration of substances always requires dialogue between producers, downstream users and dealers. Any information exchange and agreement on the basis of private law should be mediated by a third party. In case a company does not comply, the law foresees a sales ban for the respective substance. Intentional disregards will be prosecuted by the jurisdiction, in Germany, for example, as a criminal act. The question of the obligations of a company can only be clarified by an individual assessment.

Practical Experience with REACH

In 2007 and 2008, K&L conducted a pilot project of substance registration according to REACH together with the industry branch association TEGEWA (association of textile chemicals within the Association of German Chemical Industry/VCI) and 13 member companies. The objective of the project was to test cooperation under the preconditions of REACH in real practice. The Baden-Wuerttemberg Ministry of Environmental Affairs and the Baden-Wuerttemberg State Institute for environment, measurements and protection of nature supported the project with scientific advice.

By cooperating with K&L, you can profit from our experience and from the methods generated in the pilot project, which result in cost reductions from as early on as the first few project steps of the registration process.

Industrial environmental protection und the implementation of legal provisions in the design, marketing and recycling of products have been the business focus of K&L for many years. This has resulted in tailor-made consulting and service packages for producers and importers, in order to ensure compliance - next to the REACH regulation – with the following directives of the European Union: Batteries, EuP, Packaging, RoHS, and WEEE.

