

Information on the printing inks and related products supplied by European member companies of the hubergroup with regard to the REACH Regulation

June 2010

1. Pre-Registration

Regulation (EC) No 1907/2006 (the REACH Regulation) requires that substances (chemicals) must be registered. Preparations (such as printing inks and related products) cannot be registered. Hence, all substances which are part of the raw materials **hubergroup** member companies use to formulate printing inks and related products must first be pre-registered and later registered either by ourselves or by our upstream raw materials suppliers.

This pre-registration and registration work is conducted by MHM Holding GmbH on behalf of all European member companies of the **hubergroup**. We hereby confirm that all substances in raw materials imported from non-EU suppliers have been pre-registered by the deadline of 1 December 2008 either by MHM Holding (in the case of substances imported directly from non-EU countries) or by an "Only Representative" nominated by the non-EU manufacturer.

Responsibility for pre-registering and registering the substances the European member companies of the **hubergroup** purchase from raw materials suppliers from within the EU lies with said suppliers. As it is not permissible to place on the market chemicals that have not been pre-registered, we can assume that our suppliers have pre-registered all substances contained in the raw materials supplied to us.

There is no provision or obligation to disclose or communicate pre-registration numbers to downstream users.

We are in contact with our suppliers in order to ensure that the raw materials we require continue to be available and we are able to supply our customers with our products without interruption. There will be no supply restrictions for the period up to and including 30 November 2010, the deadline for registering chemical substances placed on the market in annual quantities of 1000 tonnes or more. Nor are any such restrictions to be expected after that date the way things stand at the moment. If problems arise with regard to the availability of substances used in quantities between 100 and 1000 t/a (registration deadline: 31 May 2013), we will adjust our formulae accordingly and notify our customers in due course.

2. Substances of Very High Concern (SVHC)

The European member companies of the **hubergroup** are committed to not using chemical substances identified by EU member states for listing in the Candidate List of substances of very high concern (SVHC) or have been placed on this list by the European Chemicals Agency (ECHA), or raw materials that, according to the information given to us by our raw materials suppliers, contain such substances, as intentionally added ingredients in the manufacture of printing inks and related products.

As soon as new substances are proposed for inclusion in the Candidate List, we immediately check to see if one or more of them are contained in raw materials we use. Under the provisions of REACH, we are obliged to notify our customers of all substances on the SVHC Candidate List that are present in our products in concentrations greater than 0.1%.

We hereby confirm that we do not use any substances included in the Candidate Lists published to date (18 June 2010) in the manufacture of printing inks and related products. We can also exclude the presence of traces of > 0.1% in any of the products we supply, including the packaging.

Almost all of the chemicals that have been entered in the SVHC Candidate List so far have been substances that are toxic, very toxic, carcinogenic, mutagenic, and/or reprotoxic. Substances so classified are not considered for use as a raw material for printing inks anyway, because they are already excluded by the EuPIA Exclusion List.

However, we are not in a position to foresee potential future classifications. Should the case arise that, based on new findings, the European bodies responsible place a substance on the SVHC Candidate List that has until now been regarded as being of no concern, we will of course inform all customers affected without delay and immediately begin a project to substitute the substance in question with an acceptable alternative.

3. Safety Data Sheets / Information in the Supply Chain

As was the case before the REACH Regulation came into force, the Safety Data Sheet is the central instrument for communicating safety-related information between suppliers and customers. The Safety Data Sheets provided by **huber**group companies are already compiled in accordance with the current provisions of the REACH Regulation and hence fulfil the legal requirements.

According to the REACH Regulation, Safety Data Sheets are to be supplemented by an annex that provides information on the safe use of substances or preparations taking account of exposure of humans and the environment to such substances. These Exposure Scenarios are intended to cover uses by customers.

After the first registration phase has drawn to a close (30 November 2010), our raw materials suppliers will begin sending us "extended Safety Data Sheets" (eSDSs) for those raw materials containing substances manufactured or imported in quantities of 1000 tonnes or more per annum. We will incorporate this information into our system and, step by step, compile REACH-compliant "extended Safety Data Sheets" for our own products (inks and coatings).

We support the descriptors of use for the manufacture and application of coatings, inks and artists' colours as published by the CEPE (European Council of the Paint, Printing Ink and Artists' Colours Industry) under the following link:

http://www.cepe.org/EPUB/easnet.dll/ExecReg/Page?eas:template_im=100087&eas:dat_im=101AED

These descriptors cover the uses and Exposure Scenarios of all products supplied by the European member companies of the **huber**group. This procedure has been approved by the European associations of the users of printing inks and related products. All of the products supplied by the European member companies of the **huber**group are recommended by us solely for the uses specified in these documents.

We would also like to point out that after 1 December 2010, downstream users will still be able to notify the European Chemicals Agency (ECHA) of additional uses not cited in the extended Safety Data Sheets and to prepare their own Chemical Safety Reports.

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