

Candidate List of Substances of Very High Concern for authorisation published by ECHA on October 28th 2008 according to REACH

This is to declare that the following substances

Substance name	CAS number	EC number
Triethyl arsenate	15606-95-8	427-700-2
Anthracene	120-12-7	204-371-1
4,4'- Diaminodiphenylmethane (MDA)	101-77-9	202-974-4
Dibutyl phthalate (DBP)	84-74-2	201-557-4
Cobalt dichloride	7546-79-9	231-589-4
Diarsenic pentaoxide	1303-28-2	215-116-9
Diarsenic trioxide	1327-53-3	215-481-4
Sodium dichromate, dihydrate	7789-12-0 10588-01-9	234-190-3
5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	81-15-2	201-329-4
Bis (2-ethyl(hexyl)phthalate) (DEHP)	117-81-7	204-211-0
Hexabromocyclododecane (HBCDD) and all major diastereoisomers	25637-99-4	247-148-4 221-695-9
Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins)	85535-84-8	287-476-5
Bis(tributyltin)oxide (TBTO)	56-35-9	200-268-0
Lead hydrogen arsenate	7784-40-9	232-064-2
Benzyl butyl phthalate (BBP)	85-68-7	201-622-7

or raw materials containing these according to the information given to us by the raw materials suppliers, are not used as intentionally added ingredients in the manufacture of printing inks, varnishes and related products supplied by European members of **huber**-group.

However, the presence of traces of these substances in the products coming from raw material impurities, from the process or as adventitious contaminant cannot be excluded, we confirm that the content of any of these substances will not exceed 0,1%.

Generally, "substances of very high concern" according to the REACH Regulation (article 57a-f) are not used in the manufacture of products supplied by European member companies of **huber**group. All products supplied by European **huber**group companies are formulated strictly in accordance with the EuPIA "Exclusion List for Printing Inks and Related Products" which excludes, among others, the usage of raw materials classified as toxic or very toxic or known to be carcinogenic, mutagenic or toxic to reproduction cat. 1 and 2.

Kirchheim, January 09, 2009

MHM HOLDING GmbH



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Information with respect to article 33 of the REACH-Regulation (EC) 1907/2006 regarding SVHC in articles

On October 28, 2008 the European Chemicals Agency (ECHA) published the first official Candidate List of Substances of Very High Concern (SVHC) for the appendix XIV of the REACH regulation.

http://echa.europa.eu/chem_data/candidate_list_table_en.asp.

With respect to article 33 REACH regulation, suppliers of articles which contain substances on the Candidate List in concentrations above 0,1% (w/w) must provide information, available to them, to their customers. This information must be sufficient to ensure safe use of the article and, as a minimum, include the name of the substance.

Therefore, we want to inform our customers that the thin plastic sheet used to protect the surface of sheetfed offset inks supplied by European member companies of hubergroup in cans or containers contains > 0,1% of the following substance on the candidate list (published: October 28, 2008):

Substance name	CAS number	EC number
Bis (2-ethyl(hexyl)phthalate) (DEHP)	117-81-7	204-211-0

No specific measures for the handling of the inks are necessary, as the protective sheet will be removed from the ink surface and disposed of. The use of DEHP in everyday products does not pose a health risk according to the existing EU risk assessment, and the protective sheet is not intended to be used as toy or a baby article.

Kirchheim, January 20, 2009

MHM HOLDING GmbH

A handwritten signature in black ink, appearing to read "W. Kirchberger".

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

January 2009

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.

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

MHM Holding is also in contact with all European raw materials suppliers to European **hubergroup** companies. Many of them have already confirmed to us that they or their respective suppliers have pre-registered all relevant substances. As supply of chemicals without pre-registration would be illegal, and no supplier has announced to stop delivery, we expect that all substances in the materials supplied to us from December 1, 2008 on have been pre-registered.

With these pre-registration activities we intend to ensure continuous supply of our customers with our products. Thus, at least before December 2010, REACH will not restrict availability of products supplied by European member companies of **hubergroup**.

As there is no obligation in REACH for suppliers to disclose the pre-registration numbers of the substances supplied, and the numbers are of no use for downstream users, most of our suppliers will not transmit pre-registration numbers. Therefore we are not in the position to transmit pre-registration numbers for the constituents of the products supplied by us.

2. Substances of Very High Concern (SVHC)

Substances listed in the Candidate List of Substances of Very High Concern (SVHC) published by ECHA on October 28th, 2008 or raw materials containing these according to the information given to us by the raw materials suppliers, are not used as intentionally added ingredients in the manufacture of printing inks, varnishes and related products supplied by European members of **hubergroup**. We confirm that the content of any of these substances will not exceed 0,1%.

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However, we want to inform our customers that the thin plastic sheet used to protect the surface of sheetfed offset inks in cans or containers contains > 0,1% of the substance bis(2-ethylhexyl)phthalate (DEHP, CAS-N° 117-81-7, EINECS-No. 204-211-0), which is on the SVHC candidate list.

No specific measures for the handling of the inks are necessary, as the protective sheet will be removed from the ink surface and disposed of. The use of DEHP in everyday products does not pose a health risk according to the existing EU risk assessment, and the protective sheet is not intended to be used as toy or a baby article.

3. Safety Data Sheets / Information in the Supply Chain

Now as in the past, the safety data sheet is the central instrument of communication between suppliers and customers where safety and uses are concerned. According to the REACH regulation, safety data sheets will be supplemented by an annex describing exposures of humans and the environment in the use of a substance or preparation and information on safe use. These so-called "exposure scenarios" are intended to cover uses by our customers. For the time being, we provide up-to-date safety data sheets that already today are prepared with respect to the REACH regulation and hence fulfil the legal requirements.

The so-called "extended safety data sheets" are required not until the first registration deadline December 1st, 2010.

Your assistance might be needed to help us compile the above mentioned exposure scenarios by providing us with information of your use(s). In this context, we think that companies should wait for the results of the ongoing REACH Implementation Projects (RIPs) that will bring, inter alia, guidance for the exact course of action to be followed in the elaboration of exposure scenarios. Relevant activities are not completed as yet.

Kirchheim, January 20, 2009

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