

In REACH the responsibility for the management of the risks of substances lies with the natural or legal persons that manufacture, import, place on the market or use these substances in the context of their professional activities. Therefore, the registration provisions require manufacturers and importers to generate data on substances they manufacture or import, to use these data to assess the risks related to these substances and to develop and recommend appropriate risk management measures. To ensure that companies fulfil their obligations, as well as for transparency reasons, the registration provision of REACH require them to submit a Registration Dossier containing information in accordance with Article 10 to the European chemicals Agency. The deadline for the Registration dossier is dependent on the hazardous classification of the raw materials and the tonnage band of which they fall into. Registration obligations apply to substances' manufactured in quantities of 1 tonne or more per year.

Deadlines for Registration

Substances falling under the scope of the REACH regulation and not exempt from the registration obligation must be registered before they can be manufactured or placed on the market (including import) in the EU. The substances which have long been on the EU market (named phase-in substances), and the non-phase in substances have different timelines for registration. Substances classified as 'non-phase in' are substances which have not previously been placed on the EU market. Non-phase in substances and phase in substances that have not been pre-registered, must be pre-registered before manufacture or import by 1st June 2008. With regards to products manufactured by Rozone Limited all suppliers of raw materials incorporated within cleaning solutions have fulfilled the criteria of 'phase in' substances and were pre-registered before 1st December 2008.

From this point forward the registration provisions are applied in a stepwise manner to facilitate the transition to REACH. The deadline which have been set by ECHA for the registration of phase in substances have been based on the tonnage manufactured or imported per manufacture or importer of producer. This follows the assumption that chemicals manufactured in greater volumes will in many cases present an increased risk or likelihood of exposure to humans and the environment. A greater priority has been given to substances of high concern, such as carcinogenics, mutagenic and reprotoxic substances (CMR) and substances which are very toxic to aquatic environments, that may cause long term effects in the aquatic environments (classified R50/53). The 'phase in' deadlines are presented in figure 1, which are applicable only if substances have been pre-registered. As the raw materials for the formulations of Rozone Limited products have been pre-registered these deadlines are applicable.

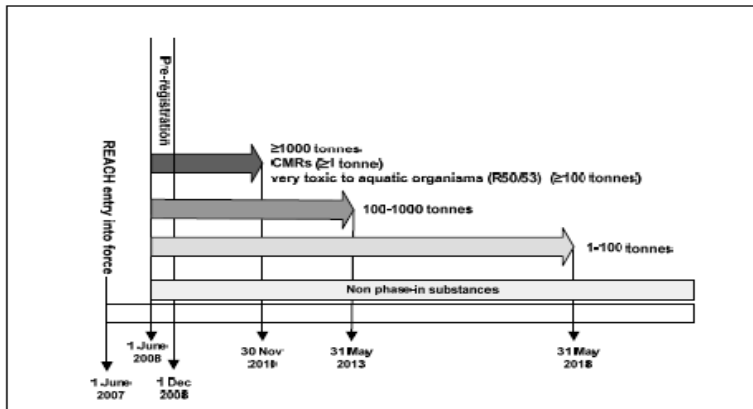


Figure 1.

Registration Deadlines for Implementation of REACH. Modified from ECHA (2008) Guidance for Registration.

In order to maintain manufacturing, importing and marketing of phase-in substances in quantities greater than 1 tonne or more per year must have pre-registered raw materials by now. As Rozone Limited has proceeded to register all of their raw chemicals we are now in a position to take advantage of the transitional registration period. This allows companies to continue manufacturing and importing their phase in substances for several years until the registration deadline is reached. During this period manufacturers and importers of the same substances will initiate the data sharing process.

After the pre-registration phase the main obligations of downstream users of Rozone Limited users are to:

- Follow the instructions in the safety data sheets you receive and the exposure scenarios which may be attached to some safety data sheets. If your use is not covered in an exposure scenario, you must communicate this back to your supplier (Rozone Limited).
- Contact Rozone Limited if you have new information on the hazard of the substance or preparation or if you believe that the risk management measures are not appropriate

In conjunction with REACH most of the current legal requirements that apply to the use of substances and preparations, for instance those related to the protection of workers, consumers and the environment, will continue to apply alongside REACH.

If you require any further information please don't hesitate to contact me on: clare.rowe@rozone.co.uk