



The One Source

Memorandum

April 1, 2011

SUBJECT: Registration, Evaluation and Authorization of Chemicals (REACH)

The European Union (EU) has implemented chemical regulatory policy called REACH (Registration, Evaluation, Authorization and Restriction of Chemicals). The European Chemical Agency (ECHA) is the official registrar for REACH and additional information can be found on its website at www.echa.europa.eu. The purpose of this communication is to respond to requests regarding REACH compliance of products purchased from EIS.

ECHA Guidance on Requirements for Substances in Articles (May 2008) indicates the following:

“2.1 Registration according to Article 7(1) (and 7(5))

A registration (Article 7.1) of substances in articles is obligatory for an article producer or importer only if the following conditions are met:

- The substances are intended to be released from the produced or imported article(s) during normal and reasonable foreseeable conditions of use
- The total amount of the substance present in the articles with intended releases produced and/or imported by that actor exceeds 1 ton per year per producer or importer.”

REACH does not apply to manufactured products which are referred to as “completed articles”. Substances (chemicals) are subject to REACH registration, **NOT** products.

EIS does not manufacture or produce any basic chemical substances. EIS has not shipped chemical substances in excess of 1 metric ton to the EU since 2008 and there are no known instances where any EIS customer has shipped chemicals supplied by EIS to the EU.

Distributors are not allowed to register substances, therefore, EIS cannot complete surveys or questionnaires regarding REACH. However, if you provide your local EIS sales office with specific information on chemicals purchased, including manufacturer name, we will make every effort to contact the manufacturer to determine if REACH registration is in process.

A handwritten signature in black ink, appearing to read 'Bill Knight', is written in a cursive style.

Bill Knight
SVP Operations and Logistics
EIS, Inc.