

Chasse / Rhône, 19<sup>th</sup> September 2009

## **CONDAT's products compliance with REACH- September 2009**

Dear Sir or Madam,

The REACH implementation is part of CONDAT'S strategic projects. We wish to inform you of the progress of our action plan for this phase of REACH which will cover the existing substances registration period for the concerned usages and which began on 2 December 2008 following the end of pre-registration.

### **1. Preregistration**

**CONDAT pre-registered all the eligible substances for this procedure which are manufactured in our plant or imported from outside the EU. These substances may be placed on the market after the 2<sup>nd</sup> December.**

On the other hand, CONDAT is committed to pre-register all the eligible substances for new developments.

### **2. Raw materials sustainability**

For our raw materials, we depend on our suppliers. **We have asked for and have received the confirmation of their pre-registrations. This is part of our approval process for new references.**

We have developed with our suppliers a monitoring system to anticipate any changes because of the Reach implementation, regarding the products they deliver us.

However REACH may affect the availability of raw materials and we may have to deal with circumstances beyond our control as they arise. We have to do everything legally possible to limit these potential disruptions. We will inform you as soon as we can of any possible regulatory situations, which may cause supply disruption.

### **3. Substances of Very High Concern**

According to supplier information currently in our possession, CONDAT products contain no substances from the Candidate List of substances of very High Concern (SVHC) at the date of this letter. The CONDAT policy is to ban the use of such substances in the formulations and to impose the substitution of such materials in the case of new classifications.

### **4 Taking into account customer usages**

A manufacturer or importer has the obligation to take into account the uses of the substance along the downstream use chain unless he has not got this information twelve months before the registration deadline or unless the human or environmental risks are not controllable..

**CONDAT participates in the work done within the professional federations in order to establish generic use and exposure scenarios linked to its customers applications.**

We will inform our raw materials suppliers of all CONDAT lubricants usages, as described in our product sheets. If your application is different, we encourage you to contact us as soon as possible. If your application is confidential, you could inform the European Chemicals Agency (ECHA) directly and develop the exposure scenario yourself. If you require more information regarding the usages and their identifications, you could

consult REACH articles 37 to 39 and the downstream users or Risk assessment Guidances.

[http://guidance.echa.europa.eu/guidance\\_en.htm](http://guidance.echa.europa.eu/guidance_en.htm) ;

[http://guidance.echa.europa.eu/docs/guidance\\_document/Inforeq\\_CSR\\_R12\\_en.pdf](http://guidance.echa.europa.eu/docs/guidance_document/Inforeq_CSR_R12_en.pdf)

I would like to draw your attention to the fact that An usage non identified by yourself or by the substance importer or the producer won't be allowed.

**We may need information about the exposure during the CONDAT lubricants application: we ask you to send your email address by return.**

### **5° Registration**

**Condat is working on its registration files concerned by the 2010 deadline and prepare the registration for the other deadlines 2013 and 2018.**

Our Reach implementation covers all our manufactured and marketed products.

**The aim of Condat is to propose a product to you:**

- **that conforms with regulations**
- **that is safe for the health of your workforce and the Environment**
- **and that completely responds to the request on your application.**


If you have any questions, please don't hesitate to contact :

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We look forward to hearing from you in the future.

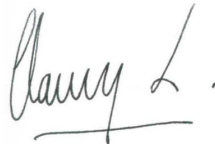
Thank you very much.

Yours faithfully



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Products Regulatory Affairs