



**Date:** July 11th, 2014

**Concerns:**

SACHEM Europe BV is appointed as Only Representative (OR) for SACHEM's production sites outside the European Union in compliance with the REACH Regulation EC 1907/2006.

**Dear customer,**

Please be informed that in line with the REACH Regulation EC 1907/2006 our company:

SACHEM Europe BV  
Van Voordenpark 15  
5301 KP Zaltbommel  
The Netherlands

has been appointed as Only Representative (OR) for SACHEM's production locations in Asia and America.

We will assume all responsibilities and meet all obligations related to pre-registration and have the intention to complete in due time before the relevant deadline the registration for the substances supplied by our non-community producers. Under the conditions explained in this letter, it will allow your company to import these products in the European Union (EU) in the role of downstream user, whereby you don't have a registration requirement as Importer under REACH.

**SACHEM Europe BV as Only Representative (OR)**

Our company has been granted a power of attorney from our non-community producers from to inform the relevant EU Customers of such appointment, according to Article 8 of REACH.

It is recognized that a mechanism for ongoing communication between the EU Customers of our non-community producers and our project office will be necessary to ensure that we will comply with our obligations as OR and the Customers can demonstrate the coverage of their Registration requirements via our OR and, as such, become a downstream user under REACH.

The Only Representative maintains an overview of the EU Customers and volumes supplied in an annual Substance Volume Tracking (SVT) process to keep track on the Registration requirements under REACH. At Q2 of each year, an update of the products registered under REACH and intended to be registered is published on the company's website.

The EU Customer can store this documentation as proof that our products supplied by the SACHEM producers from America and/or Asia are covered by an Only Representative.





In Q2 of each year an updated overview of the products registered by SACHEM Europe BV (also as OR for the non-community producers) is made public on our website. Once our registration dossier(s) is completed, the Customers will receive an update of our safety data sheet via the normal distribution routes.

On request, a “Declaration of REACH Conformity” (DRC) can be provided to an EU Customer with the annual product volumes supplied by the Non EU Supplier and covered in the registration strategy via the Only Representative. The DRC-OR is valid for the period of one year, from the Date created to the Expire date. On request, in Q2 of every year, a new DRC-OR can be provided with the product volumes supplied of the previous year.

The EU Customer can file and/or process the DRC-OR(s) for any appropriate legal entity / entities to be regarded for the volumes supplied by the Non EU Supplier in line with REACH Article 8 as downstream user and not as Importer. As such he does not have to take these volumes into account for registration under REACH.

Herewith all parties involved can organize and demonstrate their compliance with REACH.

### **What does it mean for you?**

If you know or believe that you have received products from our non-community producers in America / Asia and you would like to receive a “Declaration of REACH Conformity” (DRC), please contact the contact person of our Company or our REACH project office.

Customers, that have legitimately received this OR Letter of appointment and, if desired, further DRC communications, can demonstrate to the Member State Competent Authority on request that they are downstream user under REACH and not an Importer. As such, the Customer does not have to include the imported volumes covered under the OR construction in their own registration volumes & requirements.

Please be aware that as Only Representative we are not entitled to submit a notification to the Classification & Labeling Inventory on your behalf in line with the requirements of the CLP Regulation EC 1272/2008. Please check if you are for the CLP Regulation falling under the Importer definition and requirement to submit your own CLP Notification (deadline 1 month after the first Import). On request, we can send you as a service our CLP label details as input for your own CLP Notification.

Don't hesitate contacting us when something is not clear, you have questions or we can be of any further support.

Kind regards,

The SACHEM REACH Team

Email: [REACH@sachemeurope.nl](mailto:REACH@sachemeurope.nl)

