



Seregno, May 31, 2009

**Object: New European Union (EU) Regulation REACH**

As of June 2007, the European Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) entered into force.

REACH affects all industries, including the Automotive Industry. One of the requirements of REACH is that manufacturers and importers of chemical substances have duty to register, for each legal entity, substances on their own or in preparations that they produce or import in quantities over one ton per year (per manufacturer/importer), unless the substance is exempt from registration.

The first important deadline of REACH (pre-registration) is now over. Pre-registration of substances on their own, in preparations, or substances intentionally released from articles took place between 1 June and 1 December 2008. As consequence, substances that are now pre-registered can take advantage of a transitional period to the registration process and can be produced and used in EU until 2010 to 2018, depending on annual tonnage production and hazardous properties. On the contrary, substances that were not pre-registered have to be registered immediately, since without Registration they cannot be marketed in the EU. **Only pre-registered or registered substances are now legal in the EU market.**

Please consider that:

- Companies that do not comply with REACH will have no market.
- Business continuity can be adversely impacted by REACH
- Companies that understand the business implications and impacts of REACH and develop strategic action plans will gain competitive edge over those that do not.

For a summary of the REACH regulation, please read the "Automotive Industry Guideline (AIG)", available in several languages at [www.acea.be/reach](http://www.acea.be/reach).

Moreover, **please review our requirements and recommendations and in the following document.**

Best regards  
dr. Fabio Esposito  
Sales and Accounting Director



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### **REACH: Requests from E.T.S. to Suppliers**

Concerning all products supplied to us, which can be Substances, Preparations or Articles according to the REACH terminology.

- 1 We expect that your business will take organizational measures to manage the implementation of the REACH regulation requirements. Please, take note of the crucial REACH registration deadlines for those substances that are decisive for the properties of the product you supply to us.
- 2 At this stage, we expect also that all substances that require registration and are contained in the product you supply to us were pre-registered by your company or by your upstream suppliers. Please, note that pre-registration (or alternatively registration) of substances you supply to us or that are used in preparations you supply to us is a mandatory requirement.
- 3 We recommend and expect that all substances that require registration and are contained in the products you supply to us will be registered for our use. Please inform us of your procedure for use identification.
- 4 All suppliers are required to inform us about their official responsible and compliance with REACH.
- 5 Please note that submitting your contact information to E.T.S., does not constitute fulfillment of your REACH legal obligations, including, but not limited to pre-registration or registration.
- 6 As the REACH regulation requires, we expect that you will provide us REACH compliant Material Safety Data Sheets for the products you supply to us and that you will inform us if Substances of Very High Concern are contained in a concentration above 0.1% w/w per separable part of the product (more information at [http://echa.europa.eu/chem\\_data/candidate\\_list\\_table\\_en.asp](http://echa.europa.eu/chem_data/candidate_list_table_en.asp)).