

Stepan

Stepan Company

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SUBJECT: REACH Compliance for our Non-EU Surfactant and Polymer Customers

Dear Customer:

The European chemical legislation on the Registration, Evaluation and Authorisation of Chemicals, REACH (Regulation (EC) N° 1904/2006), entered into effect June 1, 2007. In the past, if a substance was on the EU inventory (i.e., EINECS, NLP) then anyone could use that inventory number and manufacture or import that substance. REACH requires that each substance being manufactured or imported into the EU must be pre-registered or registered by the manufacturer or importer. The pre-registration number and registration number are specific to the substance and that manufacturer or importer.

GENERAL OBLIGATION: There is a general obligation for manufacturers and importers of substances to submit a registration dossier to the European Chemicals Agency (ECHA) for each substance manufactured or imported in quantities of 1 tonne or greater per year. Substances listed on the European Inventory of Existing Chemical Substances and pre-registered (between June 1 and December 1 of 2008) allows companies to continue manufacturing or importing or using those substances (Phase-in substances) until the deadline for registration with a minimum of information. The deadlines for registration are between November 30, 2010 and May 31, 2018 depending on the annual volume and hazard classification of the substances.

POLYMERS: Although polymers do not need to be pre-registered or registered under REACH, the monomers and the other reactants used to manufacture the polymers must be compliant with REACH. This means that the monomers and other reactants used in the manufacture of imported polymers must be pre-registered or registered if the aggregate volume of the monomer or other reactant exceeds one tonne per year in all imported polymers containing them.

The least complicated option is to purchase Stepan's products from Stepan Europe in the EU and use Stepan's products in the EU (downstream user). Purchasing Stepan's products outside of the EU and importing into the EU, either as is or in a formulated product, becomes much more complicated. Compliance with REACH is the importer's responsibility. However, as a manufacturer of chemicals outside of Europe, Stepan remains open to collaboration along the supply chain, and will continue to provide information to our customers as needed to support business impacted by the REACH legislation.

If you need more information regarding REACH, go to the ECHA website:
http://echa.europa.eu/reach_en.asp.

If you need more information about a Stepan product or application, please feel free to contact our Technical Service department at 1 800-745-7837 (Step) or via email at techservice@stepan.com.