



TELEFAX

von from de de	MCM REACH Team	Abt. Dept. Depto Dépt.	Material Compliance Management	E-Mail	reach@klueber.com
an to a à	Klüber customers			Datum Date Fecha Date	20. 11. 2008

Your inquiry "REACH compliance of Klüber products"

Dear Sir or Madam:

We are pleased to confirm you that we have successfully completed the REACH pre-registration:

- All substances in Klüber products sold in the EU which have the phase-in-status have been pre-registered by our suppliers.
- Our suppliers confirmed us in writing that pre-registration has been conducted by themselves or by the producers / importers; in some cases, we have a confirmation of exemption according to Annex IV / V.
- We have ourselves pre-registered substances we produce, import or re-import.

Therefore, all Klüber products we distribute on the EU market are compliant with REACH.

Please find also information on products and activities concerning REACH on our website www.klueber.com>service>REACH.

Please contact us at any time for further questions.

Sincerely yours,

KLÜBER LUBRICATION MÜNCHEN KG

i.V. Dr. Luciana Husfeld
Material Compliance Management

i.A. Dr. Bernhard Kammermeier
Material Compliance Management

i.A. Uwe Zimmermann
Material Compliance Management

REACH: Standard Communication Along the Supply Chain¹

Klüber Lubrication München KG

REACH contact person: Uwe Zimmermann

REACH contact address: Geisenhausenerstrasse 7; DE-81379 München

REACH contact telephone: 0049 89 78 76 - 1479

REACH contact email: reach@klueber.com

Declaration of intent for REACH implementation

You may have different responses for different “products” supplied to us (which can be Substances, Preparations or Articles according to REACH terminology) and you may need to send a separate sheet for each category of products. Please tick the box(es) for the products covered by this sheet:

Substances

Preparations

Articles

1. We (the supplier) confirm that we understand our obligations under REACH.

Yes

No

2. If our company is located outside the EU/EEA we will ensure that you, our customer, do not need to act as importer under REACH e.g. by nominating an only representative. We answer questions 3-8 on behalf of our importer/only representative.

Yes

No

3. The intention is that all substances in the products we supply to you, which require registration, will be pre-registered by us or an actor further up our supply chain.

Yes (If yes, go to Q5)

No

4. ~~We will send a list of “products” supplied to you for which there are substances that are not intended to be pre-registered.~~

5. We confirm, or have confirmed with the actors in our supply chain, that the intention is to register for your use(s) the substances that we/they pre-register.

Yes

No

6. By 30 November 2008, we will send you a list of all “products” that contain substances likely to be included in the candidate list (see guidance and tools in step 6.1 of the AIG compliance schedule and REACH Article 57). → See comment

Yes

No

None expected

7. We will send you a list of all “products” that contain substances on the candidate list within 45 days of its publication, or confirmation that there are none (see step 6.3 of the AIG compliance schedule and Article 57).

Yes

No

8. We will have a dialogue with you and our suppliers regarding safe use and risk management measures (RMMs) for the substances and preparations we supply to you.

Yes

No

Not applicable

Further comments (use additional sheets if necessary) **Q6: Dependent on publication date of candidates list**

¹ The information contained in this letter expresses only the intention of the respondent and does not constitute a legally binding obligation. Whilst the information is provided in utmost good faith, no representations or warranties are made with regards to its completeness or accuracy and no liability will be accepted for damages of any nature whatsoever resulting from the use of or reliance on the information



TELEFAX

von <i>from</i> <i>de</i> <i>de</i>	Abt. <i>Dept.</i> <i>Depto</i> <i>Dépt.</i>	Telefon Telefax E-Mail
an <i>to</i> <i>a</i> <i>à</i>	Lfd. Nr. <i>No.</i> <i>No.</i> <i>Nº</i>	Datum <i>Date</i> <i>Fecha</i> <i>Date</i>
Seiten <i>Pages</i> <i>Páginas</i> <i>Pages</i>	Teilnehmer-Nr. <i>Receiver No.</i> <i>Receptor No.</i> <i>Destinataire Nº</i>	

Your inquiry „SVHC substances in Klueber products”

Dear Sir or Madam,

We would like to thank you for contacting us trustfully concerning REACH. The SVHC candidate list contains entries **estimated** to be listed in the annex XIV of the REACH regulation. The listing of substances in the annex XIV proceeds in a defined schedule, to be seen in the REACH regulation (article 59 for the stage 1, as well as article 58 for the stage 2).

Ultimately, substance entries listed in the annex XIV count only.

The current list (dated 13.01.2010) to be found on http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp is the candidate list. According to the REACH legislation companies have the following obligations:

1. Obligation to report according to art. 7 (ingredients in products) as well as
2. Communication for goods in the product chain according to art. 33 par. 1 .

Klueber has examined its product recipes after the publishing of the SVHC candidate list and states that

1. according to formulation no SVHC substances as raw materials are used in our products, and
2. the raw materials do not contain SVHC substances in quantities to be indicated in the material safety data sheet according to the preparation directive.

Hence we can inform you at present time that Klueber products do not contain SVHC substances in the meaning of the REACH regulation.

Please find also information on products and activities concerning REACH on our website ***www.klueber.com>service>REACH.***

We hope to have answered your SVHC questions to your satisfaction. Please contact us at any time for further questions.

Sincerely yours,

KLÜBER LUBRICATION MÜNCHEN KG



i.A. Dr. Bernhard Kammermeier
Material Compliance Management



i.A. Dr. Sylvia Huber
Material Compliance Management



i.A. Uwe Zimmermann
Material Compliance Management

REACH: Standard Questionnaire for Communication Along the Supply Chain¹

01-12-2008

Part I Questions from Downstream User (Customer) to Supplier REACH: Pre-registration / Registration

Concerning the Product (trade name): all Klüber products

Substance

Polymer

Preparation

Article

1. At this stage, do you expect that the substances, which are contained in the product above and require registration, are **pre-registered** by your company or by your upstream supplier?

yes

no

too early to decide. Reply probably by (expected date of reply)*

2. At this stage, do you expect that the substances, which are contained in the product above and require registration, will be **registered**?

yes

no

too early to decide. Reply probably by (expected date of reply)*

3. If questions 1 or 2 are answered with "yes": Regarding the substances that are contained in the product and require registration – please mark the crucial REACH registration deadlines for those substances which are decisive for the product properties.

immediate registration

3.5 years

6 years

11 years

Can not be answered today. Depends on the information of our Raw material supplier

* Stating a date is desirable, but this is left to the discretion of the seller.

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4. Contact details

Please provide full contact details for the person in your company responsible for REACH issues

Dr. Kammermeier, Head of Regulatory Stewardship,
089 / 7876 – 1848, reach@klueber.com
Hr. Zimmermann, professional worker,
089 / 7876 – 1479, reach@klueber.com

Email: REACH@klueber.com

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Deutschland

Please return this questionnaire to:
Business/supply chain contacts to be inserted