

February 2010

## Implementation of REACH in the Vesuvius GmbH company

Ladies and Gentlemen,

We would like to take this opportunity to inform you of the current status of the implementation of the REACH Regulation (EC) Nr. 1907/2006 within our company and at the same time inform you about our previous and future implementation actions within the formerly named Foseco GmbH company, which is now **Vesuvius GmbH**.

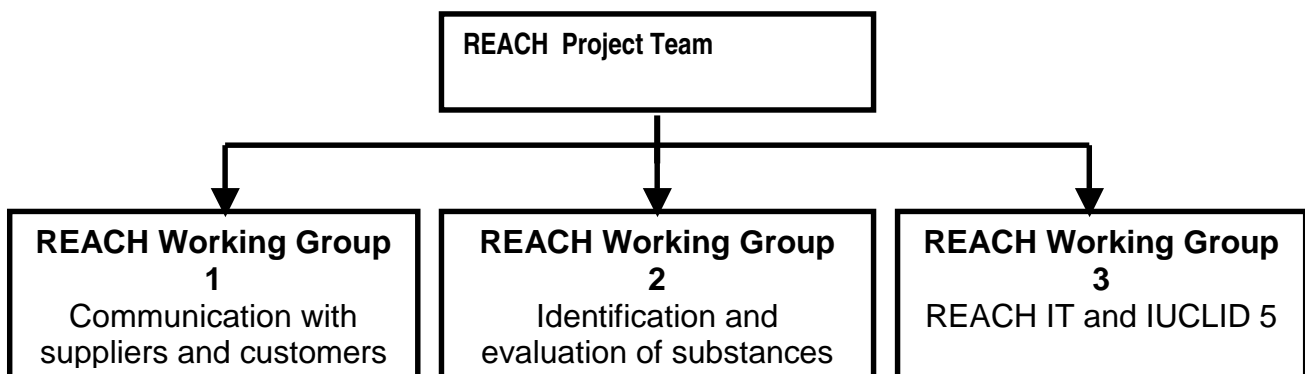
After being passed by the European Council of Ministers and the European Parliament in December 2006, the REACH Regulation became valid as per June 1<sup>st</sup> 2007. For more than 6 years however, Vesuvius GmbH employees have been watching the development of this regulation and the activities conducted by industrial associations, public organisations and committees.

We have improved our knowledge in the REACH sector, for example by

- ❑ Participation in informative meetings, seminars and workshops, mostly held by the German Chemical Industry Association (VCI), the Federal Institute for Occupational Safety and Health (BAuA), the Federal Environment Agency (UBA), the Federation of German Industries (BDI) and the European Chemical Industry Council (CEFIC)
- ❑ Membership in industry committees and panels
- ❑ Participation in meetings at the EChA in Helsinki

The REACH implementation phase in Vesuvius GmbH started in January 2007 with the establishment of a Project Team. This team consists of staff from different departments such as Research & Development, Health, Safety and Environment, Purchasing, Sales, IT and Manufacturing. Team members received in-house training on the content and effects of REACH.

The Project Team is sub-divided into 3 Working Groups (see below).



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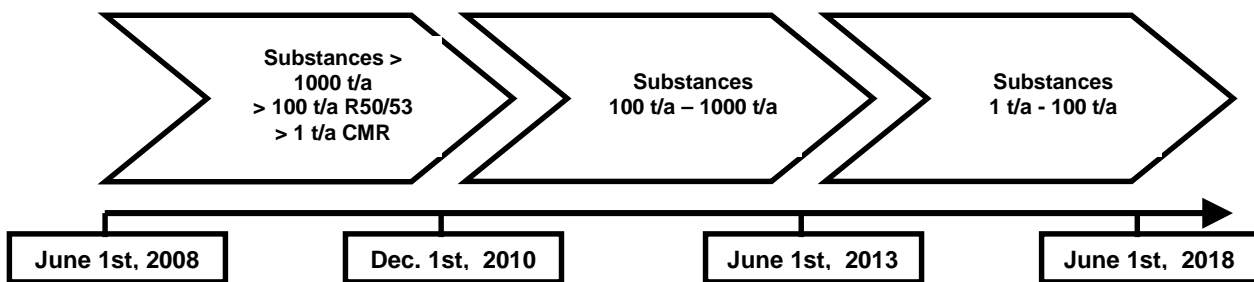
Managementsysteme  
DQS zertifiziert nach  
ISO 9001:2008  
VDA 6.1  
ISO 14001:2004  
Reg.-Nr. 001320

This project structure provides an efficient, feasible and legally compliant system for the treatment of REACH requirements within our company. Particularly with the help of Working Group 2, we were able to identify all substances relevant for the REACH Regulation

We can confirm that all substances used by the Vesuvius GmbH company have been pre-registered at the European Chemical Agency (ECHA) in Helsinki by ourselves. With this action we have provided the basis to maintain our ability to supply in the future.

Our strategy to pre-register all our substances enables us to make use of the specified registration periods to their full extent and it gives us enough time to work on a registration strategy with regard to the substances in smaller amounts.

Registration periods are as follows:



Furthermore, the communication with our suppliers will be increased in order to find out whether and when they intend to register their substances. In addition, we have fulfilled our commitment to communication as a downstream user according to Article 37 of the REACH Regulation, by informing our suppliers of all product usages occurring at our customers' plants.

Additionally we provide support to our strategic suppliers by participating in SIEF's, where we share our experience gained from the supply chain.

At the moment none of the substances used in our production process have been listed in the so called "Candidate List" (Annex XIV of the REACH regulation). In compliance with Article 33 of the REACH Regulation, we will inform you without delay if in future any of the products which we deliver to your company contain these substances in a concentration greater than 0.1 percent.

At the moment it is not possible to make a statement for all substances with regard to their future availability. Nevertheless, it is our intention to continue to offer you our entire product portfolio. Our REACH team continues to work towards this aim, in order to provide you, the customer, with fully satisfactory service whilst at the same time complying with the REACH Regulation.

Should you have any further inquiries in connection with REACH please do not hesitate to contact us via e-mail at: [customer.reach@foseco.com](mailto:customer.reach@foseco.com). We will deal with your questions as swiftly as possible and contact you without delay.

For general information on the REACH Regulation we would suggest visiting the internet homepage of the European Chemical Agency ([www.echa.europa.eu](http://www.echa.europa.eu)).

Yours sincerely



Two handwritten signatures in blue ink are present. The first signature is on the left and the second is on the right.