



An Acument™ Global Technologies Company

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To whom it may concern.

REACH Regulations 2007

As a leading producer of industrial fasteners we have long been aware of the Registration, Evaluation and Authorisation of Chemicals (or REACH) Regulations from the EU which come into force on 1st June last year. Looking at the timetable imposed by REACH the pre registration phase runs up until the 1st December 2008 with registration deadlines set based on quantities manufactured and certain hazards of the material.

In order to track REACH and to allow us to assess its impact on our products and customers we have set up a data base and assigned a REACH Co-ordinator within Avdel. As part of this exercise we are consulting with our suppliers as to their compliance to REACH.

At this stage it is not possible to predict if we will have to register our activates under REACH,

But we will ensure that customers are kept abreast of any changes which may affect them.

We will examine this once pre-registrations are complete.

Avdel takes its duties under REACH and associated legislation very seriously and will endeavor to consult with suppliers and customers as REACH has its full impact on EU industry.

Yours sincerely

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Angela Clay

REACH Co-ordinator

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REACH: Standard Communication Along the Supply Chain¹

[Date]

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 [x]

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

Yes [x] 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 [x] 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 [x] (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.

Yes [ ] No [ ] N/A [ ]

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 [x] 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).

Yes [ ] No [ ] None expected [x]

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 [x] No [ ] None expected [ ]

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 [x]

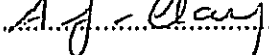
¹ The information contained in this letter expresses only the intention of the respondent and does not constitute a legally binding obligation. Whilst the information is provided in utmost good faith, no representations or warranties are made with regards to its completeness or accuracy and no liability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

Further comments (use additional sheets if necessary)... we will be sending out our declaration letter to our obligation to REACH the second week in October.

Regards  
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