



April 26, 2007

Re: REACH -- New Landmark EU Product Regulation

Dear Sir/Madam:

As you know, the European Union (EU) adopted in December 2006 new revisions to its laws regulating chemical substances that will take effect on June 1, 2007. Entitled Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), the new chemical management regime will significantly impact both EU and U.S. domestic chemical management practices, policies, and business relationships.

As an EU regulation, REACH is directly effective against companies. Its scope is sweeping and reaches essentially all products containing chemicals and covers almost all items manufactured in, or imported into, the EU marketplace. While REACH is presently a uniquely EU regulation, its presence will almost certainly impact global markets, and its relevance to U.S. domestic chemical management policies is already the subject of vigorous discussion.

Bergeson & Campbell, P.C. (B&C) has long focused on chemical management law and policy, and has represented chemical manufacturers, formulators, and consortia for over two decades. For these reasons, B&C has been closely monitoring REACH's development, and working closely with our consulting affiliate, The Acta Group EU, Ltd (Acta EU) located in the United Kingdom (U.K.). Jointly, we offer a solid set of skills that are available to assist your company in addressing your REACH obligations. B&C and Acta EU professionals are available to assist your company:

- Evaluate REACH's application to your company's chemical products;
- Assess your company's compliance obligations under REACH;
- Analyze the pre-registration options available to your company and identify the most promising strategy;
- Evaluate the advantages and disadvantages of participating in a chemical consortium;

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- Assess and address the legal issues that your company will confront while navigating REACH implementation and compliance strategies; and
- Consider “only representative” options and related confidential business information strategies.

We enclose several issue papers that explain in more detail the depth of the REACH services B&C and Acta EU offer, and invite you to call Lynn Bergeson at (202) 557-3801 or Steven Green at 011-44-1928575950 in the U.K. if you have any questions about how we can assist your company in REACH-related activities.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn L. Bergeson", is written over a horizontal line.

Lynn L. Bergeson

Attachments