
Corporate Health, Safety & Environment
Dr. E. Michiels
Agfa-Gevaert NV
Septestraat 27 – B 2640 Mortsel

tel. +32 (0) 3 444 5500
fax +32 (0) 3 444 5488
e-mail eddy.michiels@agfa.com

22 December 2011

Registration, Evaluation and Authorisation and restriction of Chemicals (REACH)

Madam / Sir,

As you know, REACH entered into force on 1 June 2007 and will be implemented in three phases over eleven years.

Agfa-Gevaert is committed to meeting its obligations under REACH, in line with its general policy of strict legal compliance with all relevant legislation.

My coworker Lieve Galle, Coordinator Product Regulations, is your contact person for any questions or communication regarding REACH you might have. She can be contacted at lieve.galle@agfa.com or +32(0)3 444 5512.

Agfa-Gevaert is fully aware that pre-registration is a necessary requirement in order to benefit from the transitional periods for registration as foreseen in REACH, i.e. ranging from 3.5 to 11 years depending on hazard and substance tonnage bands. Agfa-Gevaert pre-registered all its phase-in substances that have to be registered according to REACH and has installed a process to cover so-called late pre-registration of substances.

In turn, Agfa-Gevaert has a big interest in an uninterrupted supply of the products for which Agfa-Gevaert itself is a Downstream User. In this respect Agfa-Gevaert has set up adequate communication with suppliers.

We are receiving many inquiries about the pre-registration and registration status of ingredients in our products. Often the format of these inquiries does not allow us to provide complete and accurate information about Agfa's REACH programme. For example, Agfa products are in many cases mixtures for which no pre-registration nor registration number exists because REACH does not provide these for mixtures but only for substances.

Regarding the pre-registration number of phase-in substances pre-registered by Agfa-Gevaert, there is neither a legal requirement to communicate pre-registration numbers in the supply chain, nor a benefit for actors down the supply chain.

In addition Agfa-Gevaert considers the exact full composition of the mixtures it supplies to be confidential business information.

Under REACH several provisions relate to substances in articles (as opposed to chemical substances on their own or in mixtures), including a duty to communicate information down the supply chain on substances of very high concern (SVHC) that are included in the so-called "Candidate List" in concentrations above 0.1% (w/w) .

A summary of the obligations resulting from inclusion in the Candidate List of SVHC for authorisation is available on ECHA's website:

http://echa.europa.eu/chem_data/authorisation_process/candidate_list_obligations_en.asp.

A total of 15 SVHC has been included in the first Candidate List which was published by the European Chemicals Agency (ECHA) on its website on 28 October 2008. Since then ECHA has included a total of 58 additional SVHC to the Candidate List, the last addition covered by this letter being the one of December 19th 2011.

The complete Candidate List which now contains 73 substances is available on ECHA's website: http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp.

Imaging articles supplied by Agfa-Gevaert, including all Agfa films, papers, printing plates, phosphor plates, phosphor screens and their cassettes, do not contain any substance appearing on the Candidate List in concentrations above 0.1% (w/w) and hence do not trigger the above mentioned REACH provisions for substances in articles.

Mixtures supplied by Agfa-Gevaert, including photographic processing solutions, prepress chemicals and inks, do not contain any substance appearing on the Candidate List with the exception of some photographic mixtures that require the use of either boric acid or borax (disodium tetraborate), substances that were included on the Candidate List in June 2010, and some mixtures that contain 1-methyl-2-pyrrolidone, included on the Candidate List in June 2011. For those mixtures supplied by Agfa-Gevaert the presence of the boron containing substance or of 1-methyl-2-pyrrolidone is mentioned in the safety data sheet.

Furthermore, all products supplied by Agfa-Gevaert, i.e. substances on their own, mixtures and articles, are in compliance with Annex XVII of REACH which imposes restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles.

As already mentioned we are dedicated to fully comply with REACH. We therefore plan to register the concerned substances within the foreseen extended registration periods, i.e. 2010 (registrations were submitted), 2013 or 2018, and intend to inform you in due time of our REACH-needs and -support to you.

We will gradually provide safety data sheets updated with information from the REACH registration.

With best regards,

Eddy Michiels

E. Michiels, Dr. Sc.,
AGFA-GEVAERT N.V.
Director Corporate Safety, Health & Environment
Septestraat 27
B-2640 Mortsel - België
phone.: +32(0)3.444.5500
E-mail: eddy.michiels@agfa.com