

## REACH

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The REACH means **Registration, Evaluation, Authorisation and Restriction of Chemicals**.

The basis for the law REACH is the EC ordinance 1907/2006. The REACH ordinance, which came into power on 1. June 2007, was published in the official EC gazette on 18. December 2006. Since then, the REACH ordinance is immediately and equally binding in all EC member states and this without the necessity of a national implementation.

The aim of the REACH ordinance is to guarantee a high level of protection for human health and for the environment. INGUN Prüfmittelbau GmbH regards this general social aim as being both very worthwhile and indispensable. For this reason, all business decisions and actions of INGUN Prüfmittelbau GmbH are always reviewed in this regard.

The question which needs to be clarified, however, is in what way do Test Equipment Products fall under this category of validity and are subsequently affected by the contents of the ruling REACH. After intensive reviewing of this ruling, we take the following standpoint:

Test Equipment Products only indirectly fall within the operative area of REACH. INGUN Prüfmittelbau GmbH in the sense of the EC ordinance 1907/2006 is only a „downstream user“.

Reason 1:

In regard to the products supplied by INGUN Prüfmittelbau GmbH these are not substances, but finished products.

Reason 2:

A „downstream user“ is, in accordance to article 3, No. 13, a natural or lawful person with a seat in the European Community, who, within his industrial or commercial work, uses a substance as such or during processing.

**INGUN Prüfmittelbau GmbH has studied the demands of a „downstream user“ within REACH and converted these.**

**All processes used by INGUN Prüfmittelbau GmbH were reviewed in regard to their usage by means of the enhanced safety data sheets from our suppliers. Subsequently, applicable processes at INGUN Prüfmittelbau GmbH are installed, which ensure that only the usages allowed by the manufacturer are abided by.**

**Because INGUN Prüfmittelbau GmbH does not manufacture any substances or import any substances from outside the European economic area, then no necessity exists, that demands that INGUN Prüfmittelbau GmbH should carry out preregistration or registration itself. Any demanded preregistration or registration is carried out by our sub-suppliers during the supply chain.**

**According to our present knowledge, we confirm that those finished products, which are supplied are conforming to REACH.**

INGUN Prüfmittelbau GmbH

Konstanz, September 2008



The Management