



Date/Ref: 26 November 2008 / REAC-NU0808-02

For the Attention of: The REACH Coordinator / Reach Manager
Information To All Customers

Dear Sir / Madam

RE: REACH Regulations, Pre-Registration update from November 2008

Further to your recent correspondence to us regarding the implication of the REACH Regulation and our activity in pre registration and registration of substances, preparations and/or articles in line with the regulation please find the following update on progress;

Mac'Ants Abrasives Limited t/a Mac'Ants Group have the following REACH Registration ID Number :**ECHA-111f6a44-7fef-4361-ae2c-15f4ebbbdd55**

1. We have pre-registered the following substances directly for the noted specified reasons;

Products & Mac'Ants Group References: Alumac Brown (BA); Alumac Premium (PBA); Alumac White (WA); Alumac Premium White (PWA); Alumac Refractory (RB); Alumac Refractory White (RWA) and Alumac Ferro (FESI).

Reason for Pre Registration: These have been pre registered with Helsinki prior to the pre-registration deadline due to their high volume use / production (HVP), they do not pose any issue with regard to contents of concern they are being registered merely for their high volume production/importation within the EU.

Comment: After Pre Registration SIEF Bodies will be established and full registration will be required prior to 30 November 2010. Products will be available in compliance with the regulation during and after this period.

Our Pre Registration Submission No.: AQ348789-09

Special Note Regarding Polymers

Following late and direct advice from ECHA we have amended our declaration regarding polymers. The regulation states that polymers are exempt under the caveat that the monomers are registered. Indeed here has born some confusion since the monomers could not have been registered since we are still in the **pre registration phase**. Therefore as assistance to the ECHA we have pre registered the monomer components of all the polymers that we deal with, although these will also be pre registered by the original manufactures/suppliers/importers in the supply chain.

It is expected that once SIEF bodies are established that the full requirement to register the monomers will lie further back along the chain. However if this is not the case we will register fully as below;

Products & Mac'Ants Group References: Avialite Type 2 (T2C and T2M); Avialite Hybrid (T2H-A) – Urea Amino Polymer (UF)

Reason for Pre Registering: As per polymer declaration above



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Comment: Due to the volume, if we are obliged to continue after SIEF establishment we will fully register by 30 November 2010. These products will still be available throughout the period.

Our Pre Registration Submission No.: **PM571316-22**

Products & Mac'Ants Group References: Avialite Type 3 (T3C and T3M) – Melamine Amino Polymer (MF)

Reason for Pre Registering: As per polymer declaration above

Comment: Due to the volume, if we are obliged to continue after SIEF establishment we will fully register by 2013. These products will still be available throughout the period.

Our Pre Registration Submission No.: **SB571475-35**

Products & Mac'Ants Group References: Avialite Type 5 (T5C and T5M) – Acrylic Polymer (PMMA)

Reason for Pre Registering: As per polymer declaration above

Comment: Due to the volume, if we are obliged to continue after SIEF establishment we will fully register by 2018. These products will still be available throughout the period.

Our Pre Registration Submission No.: **XK571647-07**

Products & Mac'Ants Group References: Polyflash (PY_) – Polycarbonate Polymer (BPA)

Reason for Pre Registering: As per polymer declaration above

Comment: Due to the volume, if we are obliged to continue after SIEF establishment we will fully register by 2018. These products will still be available throughout the period.

Our Pre Registration Submission No.: **EX571792-03**

Products & Mac'Ants Group References: Nyflash (NX_) – Nylon 6 /6,6 , Polyamide Polymer (PA)

Reason for Pre Registering: As per polymer declaration above

Comment: Due to the volume, if we are obliged to continue after SIEF establishment we will fully register by 2018. These products will still be available throughout the period.

Our Pre Registration Submission No.: **UD572030-50**

2. The following products will be pre-registered by our supply chain:

Products & Mac'Ants Group References: Black Silicon Carbide (BSC) and Green Silicon Carbide (GSC)

Comment: Our supply chain has committed to Pre-Registration in compliance with REACH Regulations.

Products & Mac'Ants Group References: Metallic Abrasives; Chilled Iron Grit (CI); Steel Shot (SS); Steel Grit (SG, SGL and SGH); Stainless Steel Shot (S.S/S), Cut Wire Pellet (CWP) and Stainless Steel Cut Wire Pellet (SSCWP)

Reason for Not Pre Registering: These items are manufactured from metal products which are well understood and comprehended by European Chemical Authorities additionally any requirement for pre registration of any component substances will be made by our supply chain.

Comment: This also includes scrap metal materials.

3. The following items do not require pre-registration for the noted reasons:

Products & Mac'Ants Group References: Beadomac (GB); MilBead (GBMIL); Milbeads AGB Series (GB AGB), Beadomac Road (GBR)

Reason for Not Pre Registering: These items are articles which during manufacture are given a special shape, design or surface which determines its function to a greater degree than does its composition. It is also a function of the performance of glass beads that the shape determines their usage over other materials.

Comment: Additionally there is no intention that any substances contained in Glass Beads should be intentionally released during normal usage of the materials and in any event there are no dangerous or substances of concern contained in the article substances.

Products & Mac'Ants Group References: Beadomac Crush(CG); Beadomac Crush Recycled (RCG), MacBlast (MB); Expendable (EXP)

Reason for Not Pre Registering: These items are recycled entities and as such are exempt from the regulation Article 2 Paragraph 2 applies.

Comment: Items such as glass grit are manufactured from reclaimed and or recycled glass cullet. Expendable Abrasives such as MB and EXP are by products of Copper Refining processes and where applicable these will be pre registered by the supply chain above us unless exempt under Article 2 Paragraph 2.

Products & Mac'Ants Group References: Surface Finishing Equipment & Consumables

Reason for Not Pre Registering: These items are articles which during manufacture are given a special shape, design or surface which determines its function to a greater degree than does its composition.

Comment: Additionally there is no intention that any substances contained in finishing equipment should be intentionally released during normal usage of the materials /equipment. Any substances that are used will be pre registered by our supply chain.

Products & Mac'Ants Group References: Garnet (GAR); Vegetable Medias – Olive Stone Granules (OSG), Walnut Shell Granules / Prunus Media (WSG); Liteblast /Maize (LB).

Reason for Not Pre Registering: These items are naturally occurring minerals and or vegetable products and are exempt under REACH.

Comment: None.

Products & Mac'Ants Group References: Blastblend (MX and MXB; MXB-P)

Reason for Not Pre Registering: These items are either preparations utilizing substances either pre registered by us directly or by our supply chain and or maybe manufactured from reclaimed / recycled materials in which case Article 2 Paragraph 2 applies. Additionally these products may be classed under formulator registration.

Comment: None.

I hope you have found this revised update to proceedings to be useful and informative, if there is anything further we can assist with regarding the implementation of this regulation my team and I will be pleased to assist. Additionally we will be updating our website and a page at www.macants.co.uk/reach_regs.htm can be utilised.

Assuring you of our continued support and service, we remain

Yours Faithfully



Kent Martin
For & on behalf of Mac'Ants Group