

Object: European Regulation REACH (CE 1907/2007)

The purpose of the herewith letter is to declare MARTIN S.R.L. position against the European Regulation CE 1907/2008.

First it is useful to remind the purposes of the REACH: the Regulation is aimed to evaluating, monitoring and limiting the chemical risk that could follow by stocking, transforming, usage and disposing of hazardous chemical substances to the health and environment.

Also we would like to remind the following:

1. applications which are considered by the Regulation are MANUFACTURERS, IMPORTERS and END USERS of substances and/or chemical prepared (title I, cap 1, art 1, paragraph 3 Reg. CE n. 1907/2006)
2. END USERS, being producers of items which shape, surface or particular drawing determinate their function more than their chemical composition are defined PRODUCERS (title I, cap 2, art 3, paragraph 3 Reg. CE n. 1907/2006)
3. each PRODUCER or IMPORTER must register if:
 - a. the product carries a total amount of substances higher than 1 ton/year
 - b. the substance will be released under normal or predictable conditions.

(Title II, cap 1, art.7, paragraph 1, letter a + b)

In virtue of what is indicated by point 3, Martin products have to be considered registration exempt, because the lubrication oil used in our products is less than 1 ton/year and their reasonably predictable usage dismisses the release of hazardous substances for the environment. It will be us who will take care of asking to our distributors all the necessary information such as: eventual registration number, authorization, restrictions, security tables and their position concerning such Regulation.

To whoever will ask for this Regulation, MARTIN S.R.L. will supply the relative security table.

Regards, 