

REACH regulatory requirements for Imports to Europe

The European Union has passed legislation, which became effective June 1, 2007, requiring a new chemical regulatory policy, known as REACH (for **R**egistration, **E**valuation, and **A**uthorization of **C**hemicals).

All chemicals produced in or imported into Europe (either on their own or in physical mixtures) in amounts greater than 1 ton per year must be pre-registered by December 1, 2008 for both importers and European manufacturers to be able to continue to sell the products into Europe.

Full registration of the products will be required over the next several years and the time frame will depend upon the annual tonnage of each product shipped. Registrations are to include a detailed technical dossier on toxicological/chemical/environmental hazards, uses and exposures. Registrations must also be accompanied by a risk assessment (Chemical Safety Report), to include a comprehensive assessment of hazards, exposures and risks based on "exposure scenarios" that address all "identified" uses (the registrant's and any uses made known by downstream users). Food and pharmaceutical uses are exempt from REACH registration since they are regulated by other entities.

Innophos will pre-register some of our products which are imported from us into Europe, and will determine at a later date as to whether we will support full registration. In the meantime, customers who use our products as a component in physical blends, dilutions or mixes (unless reacted to form a new compound) may not be able to export to Europe unless the Innophos product is pre-registered prior to December 1, 2008.

At this point we plan to pre-register the following products:

- Polyphosphoric Acid
- Phosphoric Acid
- Diammonium Phosphate
- Monoammonium Phosphate
- Sodium Tripolyphosphate
- Tetrasodium Pyrophosphate
- Tricalcium Phosphate
- Monocalcium Phosphate, Monohydrate
- Monocalcium Phosphate, Anhydrous
- Dicalcium Phosphate, Dihydrate
- Dicalcium Phosphate, Anhydrous
- Sodium Acid Pyrophosphate
- Sodium Hexametaphosphate (Sodium Polyphosphate, Glassy)
- Tetrapotassium Pyrophosphate

Please advise your sales representative no later than Sept 26, if you expect to use any Innophos product as a component in a product exported to Europe, in a fashion that

would require REACH pre-registration. If so we will need to know for each Innophos product, the application and estimated, annual quantity sold in Europe.

If you have any questions or need further information, please contact Roy Lyon, Regulatory Manager, at 609-366-1282 or via E-Mail at roy.lyon@innophos.com.