



TO WHOM IT MAY CONCERN

Gørløse, 13 October 2008

REACH Registration of Chemicals

Dear Sirs,

We are pleased to inform that PROCOM's production line is using "processing of materials" for production of our "articles or any other utilisation". The own production of PROCOM is therefore to be considered "downstream user" (in reference to EU's REACH Guidance of registration Article 3(13)).

The "substances" used in the major part of our products are supplied by sub-suppliers within the EU. PROCOM is therefore not obliged to register these substances.

For a few products we use substances supplied by sub-suppliers outside the EU. In these cases the PROCOM own production is therefore to be considered "Importer" (in reference to EU's REACH Guidance of registration Article 3(13)). The imported preparation contains less than 1 tonne of a substance per year and PROCOM is therefore not obliged to register these substances.

A few products are completely or in part imported from NON-EU countries. The substances in these products, along with the above mentioned quantities from sub-suppliers outside the EU, are limited to contain less than 1 tonne of a substance per year. PROCOM is therefore not obliged to register these products.

There is no obligation for importers of preparations to register the preparation themselves; indeed preparation cannot be registered.

The PROCOM distributors (not including our daughter companies), which sell/use PROCOM's products are not to be considered "Manufacturer or Importer", but is a downstream user and has no obligation to register used substances.



Our conclusion is therefore that:

None of PROCOM's products must be registered under REACH

None of PROCOM's products will be discontinued based on REACH

PROCOM's distributors buy a finished product from PROCOM and therefore from within the EU. The distributors are to be considered as downstream user and as such have no obligation to register used substances.

Yours faithfully
PROCOM A/S

Jens Jørgensen
