



A HUBER COMPANY

Ved Banen 16
DK-4623 Lille Skensved
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Tel: +45 56 16 56 16
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March 10, 2008

Dear Customer

Thank you for your letter requesting information about CP Kelco's pre-registration and registration program for our food and bio gum products under the new European chemical regulation REACH.

As you know, any substances made or sold in Europe over the annual volume of 1 MT must be pre-registered and subsequently registered in order to continue sales/supply. The pre-registration will start 1 June 2008 to 30 November 2008. At this point, we plan to pre-register/register all of our products under REACH when required. These products are listed below:

Food Gums	Bio Gums, Xanthan	Gums, Others
GENU® Pectin	KELTROL® Xanthan Gum	KELCOGEL® Gellan Gum
SLENDID® Pectin	KELZAN® Xanthan Gum	KELCO-CRETE® Diutan
GENU® Carrageenan	KELZAN® XC Xanthan Gum	BIOZAN® Welan Gum
GENUGEL® Carrageenan	XANTURAL® Xanthan Gum	KELGUM® Blend
GENUTINE™ Carrageenan		
GENUVISCO® Carrageenan		
GENULACTA® Carrageenan		
GENU GUM® Locust Bean Gum		

Please note, however, that REACH registration does not apply to the extent that a substance is used as an additive in food and feeding stuffs or in a medical product. This will apply to the majority of the uses of our food and bio gum products.

Also, please note that our food and bio gums are naturally occurring biopolymers that do not meet the criteria for classification as dangerous. Therefore, our food and bio gums might be exempted from REACH registration in general and specifically, also, in industrial applications. However, this is currently under discussion among the relevant manufacturers and industry associations in the EU.



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CP Kelco together with our industry associations has submitted an application (Annex IV application) to the European Commission in December 2007 for exemption for REACH registration for carrageenan, pectin, xanthan, and gellan gum.

All Annex IV applications have not been considered by the European Commission, however, we expect to get an answer to our application in during the second quarter of 2008.

Later this year, we will be sending out questionnaires ourselves regarding the uses of our products in order to prepare our registration dossiers, if necessary. We plan to wait with this until we have a better clarification of biopolymers' status in connection to REACH. Also, if REACH registration is relevant, we will wait that the European Chemical Industry Council (CEFIC) has finalized the development of a web based IT Tool Box for the exchange of information up and down in the supply chains. Using the same IT Tool across the different industry sectors will reduce the administrative burden of REACH for everybody.

Please know that we have a team of personnel to work on REACH within CP Kelco to keep aligned and updated with the REACH process, see below for our primary REACH contact persons. If you have questions about CP Kelco's REACH programs, please feel free to contact us for any further information.

Best regards,

Kristina Elvebakken
EU Regulatory Affairs Manager



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Dear Customer

Thank you for your letter requesting information about CP Kelco's pre-registration and registration program for our carboxymethylcellulose products under the new European chemical regulation REACH.

As you know, any substances made or sold in Europe over the annual volume of 1 MT must be pre-registered and subsequently registered in order to continue sales/supply. The pre-registration will start 1 June 2008 to 30 November 2008.

Our carboxymethylcellulose products are based on naturally occurring polymers and are as such exempted from REACH registration. This is a consolidated interpretation of the Sector Group of European Manufacturers of Cellulose Ethers under the European Chemical Industry Council (CEFIC)¹.

The exemption applies to all our carboxymethylcellulose products as follows:

Carboxymethylcellulose, CMC		
CEKOL® CMC	CELLCOSAN® CMC	FINNFIX® CMC
CELFLO® CMC	CELPOL® CMC	NYMCEL® CMC
CELFLOW® CMC	CELLUFIX® CMC	REOMASTER® CMC

Please know that we have a team of personnel to work on REACH within CP Kelco to keep aligned and updated with the REACH process, see below for our primary REACH contact persons. If you have questions about CP Kelco's REACH programs, please feel free to contact us for any further information.

Best regards,

Kristina Elvebakken
EU Regulatory Affairs Manager

¹ http://www.cefic.eu/files/Publications/Cellulose_Ethers_Position_Paper.pdf



CP KELCO/ KOFG REACH INITIATIVE PRIMARY CONTACTS

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