



REACH ONLY REPRESENTATIVE SERVICE

Chemical Importer of Record into Europe



EUROPEAN ENVIRONMENTAL REGULATION

REACH COMPLIANCE



CAPLINQ is a **REACH Only Representative (OR)** and understands the “Substances of Very High Concern” (SVHC) list. We develop products with the newest REACH regulation in mind.

ROHS COMPLIANCE



CAPLINQ has extensive knowledge on RoHS-compliance issues and has been deeply involved with the ins-and-outs of RoHS compliance. This knowledge is applied in our product development procedures.

ENVIRONMENTAL AWARENESS



From lead-free, to halogen-free to antimony-free, the European environmental landscape is continuously changing. CAPLINQ makes sure that our products are ahead of the latest environmental issues.

*“CAPLINQ is **very knowledgeable** of the European compliance regulations, and is adept at navigating what would otherwise be **complex environmental issues.**”*

Daniëlle van Noorden, CAPLINQ Supply Chain Manager

REACH REGULATIONS

What is the European REACH regulation?



What is REACH?

REACH is an abbreviation for the Registration, Evaluation, Authorization and Restriction of Chemicals and is a European regulation whose goal is to have a clear picture of the types and quantities of chemical substances that are manufactured or imported into the European Union. REACH requires all chemicals that are imported into the European market to be registered with the European Chemicals Agency.



Who does it concern?

REACH concerns all manufacturers of chemical substances who wish to import or sell these substances to European customers. This includes foreign manufacturers, but it also affects European manufacturers who wish to sell to their European customers.



How can I make my products REACH compliant

Products aren't REACH compliant or not, companies are. To be "REACH compliant" means that the substances in products that manufacturers import into Europe have either all been registered when imported in a quantity >1mt/year. If they are not, your Only Representative (OR) will have investigated your substances and have categorized them as exempt, supplier covered or imported in a quantity <1mt/year.

WHAT DOES REACH MEAN FOR ME?

A non-European manufacturer's options



What does this mean to non-European manufacturers?

If non-European manufacturers are not REACH compliant by June 1, 2018, they are no longer allowed to import their chemical substances into the European market. This means that non-European manufacturers will need to register their chemical substances with ECHA.



Why a REACH Only Representative?

Manufacturers of chemical substances outside the European Union (EU) are not allowed to submit REACH registrations to the European Chemicals Agency (ECHA). Non-European manufacturers have three options to get their chemical substances registered;

- Establish a European based company to take care of registration,
- Change their business model to include a European based importer that takes care of registration
- Appoint a representative to complete the registration process, an Only Representative (OR)

The first two options are costly, difficult to realize and require radical change. An OR on the other hand acts as an independent third party that takes care of REACH business.



What can CAPLINQ do for me?

As a European based company CAPLINQ can act as your REACH Only Representative. Besides acting as your OR, CAPLINQ offers a REACH Safety Data Sheets service that will make your Safety Data Sheets REACH compliant.

CAPLINQ OFFERS **TWO** DISTINCT SERVICES

REACH Only Representative and REACH Safety Data Sheets



REACH ONLY REPRESENTATIVE SERVICES

CAPLINQ will take care of your REACH compliancy and make sure you stay REACH compliant.



REACH SAFETY DATA SHEETS SERVICES

CAPLINQ creates REACH-compliant SDS Safety Data Sheets, and catalogs and tracks for you in a database.



REACH ONLY REPRESENTATIVE SERVICE

CAPLINQ REACH Only Representative Proposal



REACH ONLY REPRESENTATIVE SERVICES

CAPLINQ offers a two-part plan for their REACH OR Services

Your substances are listed and the information is analyzed by a professional toxicologist, to determine a specific REACH plan designed specifically for you.

**One time
organizational
setup**

**Annual
OR Service**

Your substances will be monitored and CAPLINQ will take care of communication, record keeping and annual compliance concerning REACH.

REACH ONLY REPRESENTATIVE PRICING



YEARLY OR FEE INCLUDES:

- Communication with authorities
- Reporting back to you, OUR customer
- Communication with YOUR customer & downstream users
- Record Keeping
- Annual review of registration requirements



ONE-TIME SETUP FEE INCLUDES:

- Expert advice for recommendations on which and how many substances to submit for registration
- Substance Identification
- Company and individual substance setup in internal database and ECHA REACH-IT

SINGLE

€1075

PER YEAR

+

€549/substance ONE-TIME
set-up fee

SINGLE SUBSTANCE

SMALL

€1,628

PER YEAR

+

€384/substance ONE-TIME
set-up fee

2-3 SUBSTANCES

MEDIUM

€3,998

PER YEAR

+

€274/substance ONE-TIME
set-up fee

4-10 SUBSTANCES

LARGE

€5,995

PER YEAR

+

€219/substance ONE-TIME
set-up fee

11-20 SUBSTANCES

MORE THAN 20
SUBSTANCES?
ASK FOR QUOTE



PROPOSAL ONLY REPRESENTATIVE SERVICES

What do I get with my yearly OR fee? The following is **included** in the services.



You're in experts' hands
CAPLINQ staff are experts in specialty chemicals and plastics, and have their fingers on the pulse of REACH regulations.



Administrative setup
From the moment you sign the Only Representative contract with CAPLINQ, you will setup with use of our REACH OR setup checklist.



You're covered!
CAPLINQ sets up your company with REACH-IT and completes all necessary data collection.



Research & Testing
A REACH-certified toxicologist will test and report on your company's substances.



Peace of Mind
You are never stuck with us. We are so sure that you'll love what we do that if you are not, we will help you move to another OR. **Free.**



Detailed Record Keeping
A virtual file cabinet (Only Representative File) is created with all your company's products, substances & customer details. Upon completion, you are shared with the Only Representatives File.



CAPLINQ AS REACH ONLY REPRESENTATIVE

Why this is important and what this means for you



You're in experts' hands

CAPLINQ staff are experts in specialty chemicals and plastics and have years of experience in their import and distribution throughout Europe.



Your REACH obligations are met

By appointing CAPLINQ as REACH Only Representative, you make a good start in becoming a REACH-compliant supplier to European customers.



Trusted ORO Member

CAPLINQ is a member of the REACH Only Representatives Organization (ORO). ORO members are REACH experts that have their finger on the pulse of REACH regulations.



REACH-compliant EU SDS

CAPLINQ is able to produce and supply REACH-compliant EU SDS in multiple languages for all of your products.



Peace of Mind

Only ORO members are able to get insurance for REACH-related activities. You can relax knowing that your REACH obligations are covered.



Import & Coverage certification

CAPLINQ provides your European customers with certificates as needed. Any REACH-related question can be emailed to reach@caplinq.com

“Products are not REACH compliant, companies are. By appointing CAPLINQ as their REACH Only Representative, foreign companies ensure that they are REACH compliant and as such supply REACH-compliant products.”

Daniëlle van Noorden, CAPLINQ Operation Manager



REACH ONLY REPRESENTATIVE

Why should I appoint CAPLINQ as my REACH Only Representative?



WE ARE A BUSINESS WE UNDERSTAND YOU.

We hate bureaucracy as much as you do. We won't waste your time - or your money.



TRUSTED MEMBER OF ORO

ORO Members are REACH experts that have their fingers on the pulse of REACH regulations.

Also, **only** ORO members are INSURABLE for REACH Only Activities



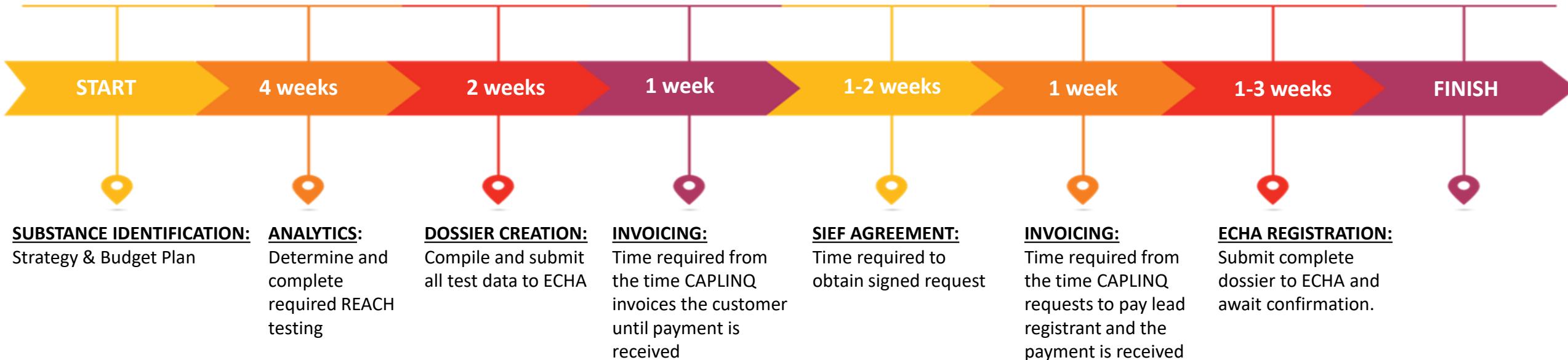
A MARKET PARTNER YOU CAN TRUST

CAPLINQ will take care of your REACH compliancy and make sure you stay REACH compliant.

REACH REGISTRATION

Timeline

Without any delay, 10 to 12 weeks is the total Registration lead time from releasing substance samples to the lab.



REACH REGISTRATION COSTS

How are REACH registration costs build up? Explanation

Final registration costs per substance



Letter of Access Cost

In short this is the buy-in to the Registration costs made by the Lead registrant for each of the substances.



Lab Fee

Each substance that needs to be registered needs a Sameness Study including substance identification.

This study can be performed by our 3rd party laboratory, but you can also use your own laboratory.



ECHA Fee

This is an administrative fee per substance set by ECHA. The amount of the fee depends on the company size and registration volume.



Dossier Fee

This is an administrative fee per substance for preparing and submitting a Dossier to ECHA in REACH-IT.


The fee includes:

- Advice in the registration process
- Creation of the registration dossier
- Communication with lead registrant and the SIEF/consortium
- Data gathering
- IUCLID 5 (ECHA tool) dossier preparation and submission

REACH OR: WHAT DO I NEED TO BUDGET?

What to expect? Annual fee depends on the number of substances

EXAMPLE FOR 1 SUBSTANCE



	2020	2021	2022
One time organizational setup costs per substance	€549		
Annual OR service fees	€1075	€1075	€1075

The costs and procedures for the Letter of Access (LoA) will be the most significant part of this fee. The LoA fees are different for each substance and are still changing depending on the number of co-registrants at the time of registration. It is prudent and cost-effective to delay registration until you reach the 1mt/year registration limit and are sure of your registration.


The final registration fee will consist of the Letter of Access (LoA) fee, the ECHA fee and the Dossier fee. After completion of the organizational setup we will be able to give an estimate of these final registration costs for your company.

€ ?
One time final
registration fee per
substance

REACH OR: WHAT DO I NEED TO BUDGET?

What to expect? Annual fee depends on the number of substances

EXAMPLE FOR 5 SUBSTANCES



	2020	2021	2022
One time organizational setup costs per substance	5 x €274 = €1,370		
Annual OR service fees	€3,998	€3,998	€3,998

The costs and procedures for the Letter of Access (LoA) will be the most significant part of this fee. The LoA fees are different for each substance and are still changing depending on the number of co-registrants at the time of registration. It is prudent and cost-effective to delay registration until you reach the 1mt/year registration limit and are sure of your registration.

The final registration fee will consist of the Letter of Access (LoA) fee, the ECHA fee and the Dossier fee. After completion of the organizational setup we will be able to give an estimate of these final registration costs for your company.

€ ?
One time final
registration fee per
substance

MSDS = SDS
Safety Data Sheets



REACH SAFETY DATA SHEETS (SDS)

CAPLINQ Safety Data Sheet Service

REACH SAFETY DATA SHEETS SERVICES

CAPLINQ offers a two-part plan for their REACH SDS Services

⋮ CAPLINQ will create a company template SDS, create an SDS and label database and enter your substances into the database.

**SDS database
setup**

**Additional
SDS & label
services**

⋮ CAPLINQ can create a REACH compliant master SDS for the EU in English. Additionally CAPLINQ can translate it for you in any language you need.

REACH SDS: WHAT DO I NEED TO BUDGET?

What to expect?



	Database setup	REACH SDS	REACH Product Label
<u>One time</u> organizational database setup costs	€600		
Entry fee per substance	€250		
Master SDS in English per product		€335	
Translation fee per EU language		€160	
Fee per product label for EU (incl. GHS, H&P in 6 languages)			€80



Budget example

4 products, containing:
8 substances in total

4 Master SDS in English for each product
2 Translations for each product (FR,DE)

$$\text{€600} + (8 \times \text{€250}) = \text{€2,600}$$

One time database setup and substance entry



$$(4 \times \text{€335}) + (8 \times \text{€160}) = \text{€2,620}$$

4 REACH Master SDS's
8 Translations

Total: €5,220

12 REACH Compliant SDS's in three languages (English, French & German)

NEXT STEPS TOWARDS REACH COMPLIANCY

Established process when CAPLINQ acts as **REACH Only Representative & SDS** service provider

