



12 September 2016

Dear Customer,

Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) came into force June 1, 2007. REACH covers chemical substances manufactured in, or imported into, the EU.

REACH is an integral part of our ongoing business activities in the EU. Nye Lubricants has accounted for all the chemical substances contained within the products that we import into the EU. For substances whose volumes are above the tonnage ban guidelines within REACH, Nye has appointed:

**ITS Testing Services UK Ltd
Health, Environmental & Regulatory Services
Intertek Chemicals & Pharmaceuticals
Bainbridge House
86-90 London Road
Manchester M1 2PW
United Kingdom**

as its Only Representative (“OR”) according to Art. 8 (1) REACH Regulation for pre-registration and registration on Nye’s behalf.

Administrative contact person: Lorraine Dene
Email: lorraine.dene@intertek.com

Nye’s work with Intertek Expert Services, along with analysis of the volume of substances, shows that all Nye products imported into the EU via our EU distribution channels (EU importers of record) are currently in compliance with the reporting requirements of the REACH Regulation.

Regarding Substances of Very High Concern (SVHC’s): none of the substances imported by Nye Lubricants into the EU are present on the current proposed list with the exception of: 500, 500R, 500-3R, 500B, 500NH, 500MZ, 500S, 500SF, 500TCP, 2001X, NPE-UC4, NPE-UC7, and 132, that contain a small percentage of trixylyl phosphate, CAS#25155-23-1 as an additive. This is including the addition of Benzo [def] Chrysene (Cas #=50-32-8). The safety precautions outlined in the Safety Data Sheet are adequate for protection and a user has no further REACH obligations as long as the total amount of trixylyl phosphate in the final article (component) is less than 0.1 weight percent. Nye Lubricants can help with that calculation.

Nye Lubricants will continue to monitor the substances maintained on the SVHC list as that information is up-dated by the European Chemicals Agency (ECHA).

Due to the overwhelming variety of REACH declaration forms that many companies are using and the complexity of making sure our responses are accurate, both technically and legally, we are not able to fill out company-specific forms. However, upon request, we can provide specific documentation regarding whether a product contains any SVHC’s.

Nye is committed to our customers in the EU and our compliance with the REACH legislation. If you have any questions regarding Nye’s REACH program, please contact our compliance team at: REACH@nyelubricants.com.

Sincerely,

George B. Mock, III
President

Jay Weikel
EU Business/Engineering/Development Manager

