

ASSESSMENT REPORT PROPOSAL IN COMPLIANCE WITH REACH

NO. RC-SVHC-010-0900115

DATE: Jun. 11, 2009

We have been commissioned by our client to conduct REACH compliance assessment on their products (Contract No.: RC-SVHC-010-0900115). We have assessed our client's product under the European Regulation 1907/2006(EC) (hereinafter referred as REACH Regulation), including product categories, substances list, SVHC (Substances of Very High Concern) as well as our client's responsibilities and obligations for this product under REACH Regulation. The result and findings of the assessment and our proposals are described as follows:

1. Client's Information

Name:	Star Seals Co., Ltd.
Address:	Guizhou Road, No.65, Qingdao, P.R. China
Name of the contact person:	Steve
Tel:	+86- 532-82671605
Fax:	+86- 532-80615035

2. Product Identification

Product name:	Rubber handle
Type/ model:	N/A
Physical appearance/colour/ odour:	Solid/black /odourless
Product type:	Article

3. Product Substances Information

3.1 Substance on its own or in preparations

Index	Substance name	CAS No.	EC No.	Tone
N/A	N/A	N/A	N/A	N/A

3.2 Substance in article intended to be released

Index	Substance name	CAS No.	EC No.	Tone
N/A	N/A	N/A	N/A	N/A

3.3 SVHC (Substance of Very High Concern) in article (Details see Annex 1)

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4. Responsibilities and Obligations (related laws and regulations see Annex 2)

4.1 Registration

4.1.1 According to the definition in Article 3(3), Chapter 2, Title I, the client's products, rubber handles are regarded as "Article" under REACH Regulation.

4.1.2 According to Article 7(1), Chapter 2, Title 2 of REACH Regulation, there is no substance intended to be released under normal or reasonably foreseeable conditions of use in the client's product. Therefore, registration is not required.

4.2 Notification

As the concentrations of the SVHCs defined in Article 57 of REACH Regulation in the client's products are less than 0.1% weight by weight (w/w), the obligation of notification is not required according to Article 7(2) under REACH Regulation.

4.3 Information Communication down the Supply Chain

As the concentrations of the SVHCs in the client's product are less than 0.1% weight by weight (w/w), the obligation of communicating information down the supply chain is not required in accordance with Article 33 of REACH Regulation.

4.4 Others

4.4.1 Authorisation

Since the manufacture of this product is based outside the EU, and the lifecycle of related substances outside EU is irrelevant with respect to REACH Regulation, there is no obligation of authorisation required for our client's product.

4.4.2 Restriction

Title VIII and Annex XVII of REACH Regulation will apply from 1 June 2009, however, our client should follow the restriction conditions outlined in Directive 76/769/EEC before then.

5. Assessment Conclusions

According to the product information provided by our client and related Articles of REACH Regulation, we draw the conclusion that:

The products supplied by the client comply with REACH Regulation as it currently stands.

6. Proposal for REACH Compliance

6.1 The client should inform his downstream users as soon as possible that the products mentioned above comply with REACH.

6.2 The client should pay constant attention to the SVHCs in the candidate list and fulfill related obligations if necessary. This list may be updated regularly and it is important to monitor any changes to it.

6.3 The client should ensure the exported products are consistent with the sample provided to Chemical Inspection & Regulation Service Limited in material, vendors and production process.

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Managing Director

Date: June 12, 2009

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