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AAK Zhangjiagang Ltd.

No.550 East Changjiang Rd, Zhangjiagang Free Trade Zone, Jiangsu Province, China

2017-03-17

## Confirmation Letter of REACH Pre-Registration

Dear Madam/Sir,

With the authorisation of AAK Zhangjiagang Ltd., we act as Only Representative to fulfil the obligations of EU importers under TITLE II "REGISTRATION OF SUBSTANCES" of "Registration, Evaluation, Authorisation and Restriction of Chemicals, Regulation (EC) No 1907/2006" (hereinafter referred to as "REACH") for the chemical substance listed in Annex of Power of Attorney (No.: CSPM-COP-017-1700178).

After successfully submitting the pre-registration dossier(s) to ECHA, we are pleased to inform you to confirm obtaining 2 submission report(s) with corresponding pre-registration number(s) listed in Annex.

Congratulations on your successful pre-registration under REACH regulation and wish you well in your export business.

### Important Notice: Application of REACH Tonnage Coverage Certificate

It shall be noted that we, as only representative, shall maintain the list of importers and keep up-to-date information on quantities imported and customers sold to according to article 8 of REACH. When appointing an only representative, it is necessary that the "non-Community manufacturer" provides his only representative with up-to-date information on the list of EU importers which should be covered by the registration of the only representative and the quantities imported into the EU.

You shall inform us of your customers in Europe and quantities imported by applying for a REACH tonnage coverage certificate from CIRS.

It is also recommended that importers get their chemical products certified by applying for REACH tonnage coverage certificate for their imports from CIRS free of charge. The certificate confirms that imported chemical products are covered by the (pre)registration(s) of Chemical Inspection and Regulation Service Limited (OR) and the importers will be regarded as downstream users (DU) and do not need to do their own REACH registration. A sample REACH tonnage coverage certificate is available here.

[http://www.cirs-reach.com/REACH/REACH\\_Certificate\\_Of\\_Compliance.pdf](http://www.cirs-reach.com/REACH/REACH_Certificate_Of_Compliance.pdf)

### Why REACH Tonnage Coverage Certificate Is Important?

Firstly, there are many practical questions associated with documenting compliance at the point of entry of goods into the Customs territory of the European Union (EU), particularly with respect to valid pre-registrations, whether the substances are exempt or not from registration, whether the pre-registration obligation was taken over by the importer, the only representative of the exporter, or the only representative of the exporter's supplier and whether the quantities imported have exceeded the tonnage band registered. A certificate of compliance issued by OR will solve those issues.

Secondly, ECHA Guidance on Registration 1.5.3.4 clearly states "In cases where an importer is also importing quantities of the same substance directly, then both the only representative and the importer must be able to clearly document to enforcement authorities which imports are covered by the registration of the only representative (OR); and which are covered by the importer; otherwise, the importer remains responsible for all his imports."

Thirdly, CEFIC guidance document also states that an Only Representative (OR) must have an available and up-to-date record of those importers that are covered by his registration and therefore become Downstream Users (DU). In addition, all the importers covered by an OR must be aware that such OR exists and that he covers his substance and volume in his registration.

#### Further Help

If you need further help, verify the validity of any document or apply for new REACH tonnage coverage certificate for your new exports/imports or previous exports/imports, please contact:

Ms Alice Qian, Supply Chain Communications Officer

[info@cirs-reach.com](mailto:info@cirs-reach.com)

Very truly yours,

A handwritten signature in black ink that reads 'Walt Lin'.

Walt Lin

Vice president, CIRS

ANNEX I: List of Pre-registration Number

List of Pre-registration Number

No	Name	CAS-No	Pre-Registration No.	Tonnage band
1	Soybean oil, hydrogenated	8016-70-4	17-2120246651-59-0000	Between 10 and 100 tpa
2	Oils, palm, hydrogenated	68514-74-9	17-2120246657-47-0000	Between 10 and 100 tpa

-----End of the list-----



## Reference number report

Current reference status: [Active](#)Reference date: [17/03/2017](#)Reference number: [17-2120246651-59-0000](#)Company name: [CHEMICAL INSPECTION & REGULATION SERVICE LIMITED](#)Company UUID: [ECHA-e88928ff-ba2a-4f6b-a1ad-57f6edf64360](#)

## Substance

Substance name	EC number	CAS number
Soybean oil, hydrogenated	232-410-2	8016-70-4

## Dossier type

Pre-registration dossier

## Reference number history

Date	Event	Description	Event status	Submission number	Owner	Reference status
17/03/2017	Initial submission	-	Succeeded	JT771648-99	CHEMICAL INSPECTION & REGULATION SERVICE LIMITED (Large)	Active

## Reference number report

Current reference status: [Active](#)Reference date: [17/03/2017](#)Reference number: [17-2120246657-47-0000](#)Company name: [CHEMICAL INSPECTION & REGULATION SERVICE LIMITED](#)Company UUID: [ECHA-e88928ff-ba2a-4f6b-a1ad-57f6edf64360](#)

## Substance

Substance name	EC number	CAS number
Oils, palm, hydrogenated	271-056-3	68514-74-9

## Dossier type

Pre-registration dossier

## Reference number history

Date	Event	Description	Event status	Submission number	Owner	Reference status
17/03/2017	Initial submission	-	Succeeded	JY771654-96	CHEMICAL INSPECTION & REGULATION SERVICE LIMITED (Large)	Active