

This is a generic letter about costs of letters of access to dossiers of the LOA REACH Consortium. The substance-specific cost information will be made available to SIEF members through the LOA SIEF management systems.

Cost of Letters of Access

Dear Member of LOA-Managed SIEFs:

This message, which is sent to you on behalf of the LOA REACH Consortium, provides information on the cost of letters of access to the Consortium's dossiers. We recognize that you, as a SIEF member and potential registrant, have a keen interest in understanding the cost you will incur for such access. The LOA REACH Consortium represents the vast majority of the European manufacturers and some leading non-EU manufacturers of the covered substances, and has been working on preparing dossiers for the substances falling within its scope since June 2008. For further information, please see www.loa-reach.com

This communication explains, in simple terms, what access rights we intend to offer, what methodology we used in determining letter of access cost, and what the next steps will be. Before we go into these details, however, below we first explain the key principles underlying the cost structure for letters of access.

1. Two Key Principles: Industry-leading Expertise, Cost Neutrality

The LOA REACH Consortium applies two important principles: its work products (dossiers) reflect expertise on the chemicals concerned, and in sharing cost it aims to operate on a fair, non-discriminatory, and transparent basis.

- *Fair, non-discriminatory cost-sharing:* The amounts charged by the Consortium for letters of access are intended to strike a fair balance, in a non-discriminatory way, between the interests of all SIEF members, whether they are members of the Consortium or not.
- *Industry-leading expertise:* The Consortium brings together industry leaders, with all of their technical resources, and is assisted by a team of technical experts with many years of experience in the petrochemical industry. Thus, the Consortium has access to the best available technical information, including proprietary studies from leading petrochemicals companies both within and outside Europe. The registration dossier is prepared based on the principles of sound science and technical judgment, and cost-effectiveness.

2. What Do We Offer?

The LOA REACH Consortium intends to offer, whenever it can, a "one stop shop" turnkey solution to your REACH registration needs. Specifically, the Consortium will endeavour to obtain full rights to grant data access to the full joint registration dossier required for REACH registration, including optional elements (but excluding, of course, all elements that must be submitted individually). In addition to data required at the highest tonnage level, we will also provide access to the Chemical Safety Report. The dossier will cover the major uses and related Exposure Scenarios, but in some instances, where the use is either specialised or proprietary, additional information and data may need to be added by an individual registrant.

The Consortium will endeavour to provide REACH access rights to all studies included in its dossiers. With respect to studies provided by the Consortium's Members, the Consortium Agreement provides that third parties may be granted access. With respect to studies provided by third parties, the Consortium will seek the right to grant access to third party REACH registrants. Of course, we may not always succeed in securing such rights. In any event, we will indicate clearly the scope of the data access we are offering.

3. How Letter of Access Costs Were Derived

Costs for letters of access were based on the total costs the Consortium expects to incur in generating the dossiers, together with an estimate of the number of Consortium members and other SIEF members who are expected to source the dossiers from the Consortium. As further explained below, the unit costs were then placed into three cost bands.

To reduce complexity and administrative cost for all potential registrants, the Consortium provides a simple three-tier cost structure in which access to a dossier for the majority of substances covered by the LOA REACH Consortium will be charged at one of three cost levels (EUR 5,000, 10,000 or 20,000), with a 50% discount for an intermediate dossier.

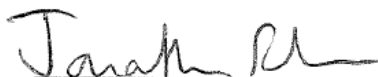
Note, however, that we have not yet been able to determine a letter of access cost for each substance. For some substances, the available information is not sufficiently certain, due, in part, to the current stage of the technical work. These substances are typically those for which the number of potential registrants is small, and for which there is a lot of proprietary data. Consequently, we are not yet able to offer a letter of access cost. As soon as we have better information, we will inform all SIEF members concerned. This process will be completed by September 2009.

4. Next steps

If we have been able to determine letter of access cost for the substance(s) you have within the scope of the LOA REACH Consortium, you will be notified via the SIEF management system in the next few days. We will ask you to confirm your interest in securing access to our dossier(s), so that we can add you to the register of interested companies.

The substance-specific timeline and plan will also be available through the SIEF management systems. This will include details of dossier completion, dossier access, and payment processes, as they develop.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan Forbes-Lane".

Jonathan Forbes-Lane,
Chairman, General Assembly
LOA REACH Consortium