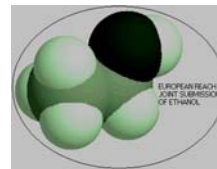


“EUROPEAN REACH JOINT SUBMISSION OF ETHANOL”

Development of REACH registration dossier of Ethanol

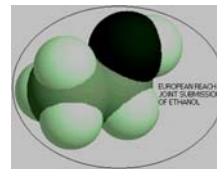
Date: February, 2nd 2009

EUROPEAN JOINT SUBMISSION OF ETHANOL
Ganduxer 5-15, 08021 Barcelona. Spain
Tel/Fax: (+34) 932414118. ethanol-reach@bbasesores.com
<http://ethanol-reach.vze.com>



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1. BACKGROUND

THE REACH Regulation requires the registration of all chemical substances manufactured/imported in more than 1 Ton per year, unless they are considered exempt by the Regulation.

On December the 1st 2008, the last day for pre-registration ended the first stage in the development of REACH, where the company began to diagnose its situation against this Regulation and to undertake the first action that was the pre-registration.

Now we are starting the second phase. The actions must be aimed not only to implement REACH within the company, but especially to meet the deadlines and requirements for registration of substances. Companies that manufacture or import more than 1,000 tonnes per year of a chemical substance have until November the 30th 2010 to submit the registration dossier. Developing this dossier is a job that requires long and complicated studies, it is time consuming and expensive, as well as requires sharing information with other competitors. The only way of preparing the registration dossier is by using the software IUCLID 5.

It is proposing the possibility of forming consortia to develop this dossier together that require a high initial cost, a written agreement to share any additional costs, attending to meetings, travels, and especially a good knowledge of English (language for all communications of REACH).

EUROPEAN JOINT SUBMISSION OF ETHANOL proposes an alternative to such consortiums, not only regarding the cost involved, but especially in the way of developing the steps to complete the registration dossier. EUROPEAN JOINT SUBMISSION OF ETHANOL assume all the work to be done and all actions to complete the dossier, without the need for attendance to meetings and travels, with minimal investment of time and resources, and continuous communications on the progress of the work and compliance with the established program in the language of your company.

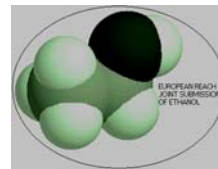
The only additional costs will be for studies/tests required. Before proposing any study/test EUROPEAN JOINT SUBMISSION OF ETHANOL will examine other alternatives to avoid that cost even communicate with other companies in the SIEF, consortia or associations, if they have to request this information and share costs. Your company will receive communications and may approve any proposal for studies (there will be provided three official proposals from GLP testing laboratories) that are required to share these costs among all the companies that constitute the "EUROPEAN REACH JOINT SUBMISSION OF ETHANOL", ensuring an exchange of information and an appropriate distribution of costs among all participants and a return in case of new participant companies.

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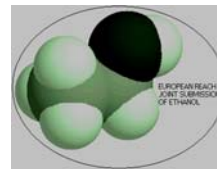
2. OBJECTIVES OF THE “EUROPEAN REACH JOINT SUBMISSION OF ETHANOL”

- ➔ Represent your company in the SIEF.
- ➔ Establish a timetable of actions and commitment to compliance.
- ➔ Coordinate communications regarding the substance to be registered internally in the "EUROPEAN REACH JOINT SUBMISSION OF Ethanol" in relation to other consortia created in the SIEF.
- ➔ Maintain strict confidentiality of your company, by signing a confidentiality agreement.
- ➔ Coordinate the collection of necessary information to complete the registration dossier within each company, among the group companies, including other companies or other sources (literature, Q-SARS, read-across, ...).
- ➔ Determination of the sample to be sent for testing.
- ➔ Analyze and present the best offers of trials / tests in case of need for approval and coordinate to obtain the information necessary for the registration dossier.
- ➔ Develop strategies to share costs of studies and efforts to validate them.
- ➔ Develop of tests proposals that are required to submit to ECHA for evaluation.
- ➔ Define the classification and labelling of the substance according to GHS.
- ➔ To realize the joint submission dossier of registration for all companies that constitutes the "EUROPEAN REACH JOINT SUBMISSION OF ETHANOL" without the necessity that your business has IUCLID 5.1.
- ➔ Developing the individual part of the dossier so that the company may submit it without having installed the IUCLID 5.1.
- ➔ Commitment to submit the dossier registration before November 30th , 2010.

3. DEVELOPMENT OF THE REGISTRATION DOSSIER

The EUROPEAN JOINT SUBMISSION OF ETHANOL will carry out all work and efforts to prepare the registration dossier of the substance. The individual part of the dossier required by REACH may be developed by the company or by EUROPEAN JOINT SUBMISSION OF ETHANOL.

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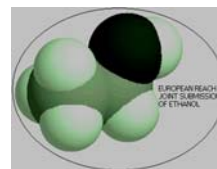


3.1. PREPARING THE JOINT PART OF THE REGISTRATION DOSSIER

- Preparation of "inquiry" prior to the registration to be sent to ECHA.
- Preparation of registration dossier using the IUCLID 5.1 tool.
- Coordination and management in the conduct of laboratory studies/tests.
- Development of an expert report to be attached to the registration dossier.
- Submit the joint registration dossier to ECHA.
- Coordination of payment of registration fees to ECHA and obtaining the registration number of the substance for your business.
- Distribution of your company's registration file and any attached documentation for your records.

3.2. PREPARING THE INDIVIDUAL PART OF THE REGISTRATION DOSSIER

- Preparation of the uses and exposure scenarios in all the supply chain of the substance.
- Preparation of the chemical safety report, necessary for the registration of a substance manufactured/imported in more than 10 tons/year.
- Continued expert advice on actions until the REACH registration number is obtained.
- Preparation of the safety data sheet adapted to the uses of your company and its customers for distribution.



4. ECONOMIC PROPOSAL

We present the following proposal which contains all the economic costs that may be involved in the development of the registration dossier. This proposal does not include the cost of tests/laboratory tests, if necessary these costs will be shared equally among all participants of the "EUROPEAN REACH JOINT SUBMISSION OF ETHANOL".

WORK/ACTIVITY	COST	ACCEPTANCE
1. Management and coordination of the EUROPEAN REACH JOINT SUBMISSION OF ETHANOL	6.000 € (six thousand euros) each legal entity*	Yes <input type="checkbox"/> No <input type="checkbox"/>
2. Development of the joint submission registration dossier of ethanol	20.000 € (twenty thousand euros) **to be divided by each legal company participating in the group	Yes <input type="checkbox"/> No <input type="checkbox"/>
2.1. Development of the individual part of the registration dossier of ethanol	2.500 € (Two thousand five hundred) ***	Yes <input type="checkbox"/> No <input type="checkbox"/>
2.2. Development of chemical safety report for your company	5.000 € (five thousand euros) each legal entity	Yes <input type="checkbox"/> No <input type="checkbox"/>
2.3. Preparation of the new Safety Data Sheet	1.500 € (fifteen hundred euros) each legal entity	Yes <input type="checkbox"/> No <input type="checkbox"/>

* Since the acceptance until the date of submission of the dossier.

** This cost will be shared between all legal entities participating in the EUROPEAN REACH JOINT SUBMISSION OF ETHANOL. In the case of new company entry it will apply to the company the equivalent cost, paying the difference between all participants.

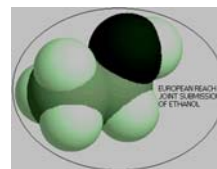
*** The preparation of chemical safety report is not included. Nor the registration fees.

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5. CONDITIONS

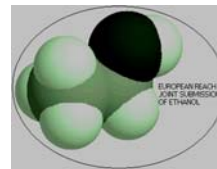
This proposal does not include obtaining information and testing requirements for the for registration dossier of the ethanol (though the work in collecting and managing information for the tests).

The proposal does not include any additional work or travel outside of Catalonia, Spain.

6. PAYMENT

WORK/ACTIVITIES	PAYMENT
1. Management and coordination of the EUROPEAN REACH JOINT SUBMISSION OF ETHANOL	An invoice will be issued for the total amount at the time of the proposal acceptance to each participating company.
2. Development of the Ethanol joint submission registration dossier	After 6 months from the acceptance, an invoice will be issued to each participating company on the proportionate cost.
2.1. Development of the individual part of the Ethanol registration dossier	After 9 months from the acceptance, an invoice will be issued to each participating company.
2.2. Development of the chemical safety report for each participating company.	After 9 months from the acceptance, an invoice will be issued to each participating company.
2.3. Development of the safety data sheet for each participating company.	After 9 months from the acceptance, an invoice will be issued to each participating company.

Payment will be made when receiving the invoice.



7. EXECUTION TIME

The management and coordination of the work will be developed since the acceptance of this proposal until the submission of the registration dossier of ethanol to ECHA that will be performed before November 30th 2010.

EUROPEAN JOINT SUBMISSION OF ETHANOL will devote to this project all the time and resources necessary to ensure compliance with established program and all the requirements for the involved work.

8. CONFIDENCIALITY

All data, documents and reports that may be generated from data collection, will be treated confidentially accepting JOINT SUBMISSION OF EUROPEAN ETHANOL such confidentiality for its entire staff.

Barcelona, February 2009

ACCEPTED SIGNATURE

Company:

Rosa Beaus

**“EUROPEAN JOINT SUBMISSION OF
ETHANOL” COORDINATOR**