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To whom it may concern

Declaration

Herewith we declare:

After having reviewed the complete product portfolio of

HUEGLI TECH AG [Ltd]
The Engine & Genset Control Company
Murgenthalstrasse 30
CH-4900 Langenthal, Switzerland

we came to the conclusion that according to article 7.1 of Regulation No. 1907/2006 (REACH), the import into the European Economic Area (EEA) of products of this company which are articles under the definition of the abovementioned regulation will not trigger any registration obligation for chemical substances.

Further, we satisfied ourselves that at this moment of time an EEA importer of products from HUEGLI TECH AG [Ltd] has no obligation to notify the European Chemical Agency according to article 7.2.

The abovementioned company committed by signing a formal obligation to pre-notify us about any significant change in its product portfolio in order to be assessed in view of the validity of the present declaration.

Date: July 22, 2008

Dr. Heiko Grosenick
Head Notifications

Dr. Jan Backmann
Regulatory Affairs Expert

Ciba Expert Services offers independent, knowledge based services to users and providers of chemicals and performance materials. Our solutions are based on a long history of practical experience in product lifecycle management and are delivered by a global team of more than 450 experts. For more info: <http://www.ciba.com/index/exs-index>

As a part of Ciba Expert Services, **Ciba Regulatory Services** with globally more than 150 experts provides a comprehensive regulatory support for developing and implementing **worldwide regulatory strategies**. It includes services related to new product introductions, data development as well compliance of existing products with local and global regulation.

The services are based on Ciba Expert Services **extensive global regulatory knowledge** and years of experience dealing with chemicals law. The organization has offices located around the world and has established a strong network with local as well as regional trade associations and government authorities. The service offering covers neat chemicals, polymers and end use articles to be commercialized in domestic and international markets.

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HUEGLI TECH AG (LTD)
The Engine & Genset Control Company

e-mail: sales@huegli-tech.com
www.huegli-tech.com

To whom it may concern

Date
February 9th 2009

Our reference
Andrea Meister

Appendix to Declaration

Obligations according to Article 33 of the REACH Regulation:

The aim of Article 33 is to ensure that sufficient information is communicated with articles to allow their safe use. Producers, importers and other suppliers of articles containing substances of very high concerns (SVHC) included on the candidate list for authorisation in a concentration above 0.1% (w/w) have to provide respective information available to them to the recipients of the articles.

Hügli Tech AG (LTD) has to fulfill its obligations under Article 33 of the REACH Regulations. Hügli Tech AG (LTD) has received no information from their suppliers that supplied articles contain SVHC substances. If any supplier notifies that any of the articles contain SVHC substance (according to Article 57, 59(I)), Hügli Tech AG (LTD) will provide this information to their customers and consumers (according to Article 33(I), 33(2)).

Sincerely,

Huegli Tech AG (LTD)


Andrea Meister
Quality System Manager