

REACH Statement

Date: 2021

Re-import exemption for downstream customers

Dear valued customer,

As you are aware, only REACH compliant products can be exported to the European Union which means that all substances contained in these products should have been either:

- registered or
- exempted from registration.

For polymers, all monomers requiring registration should have been registered.

Non-EU customers exporting products within the scope of REACH to the European Union must ensure that their EU based importer(s) register all relevant substances, where applicable.

Please note that INEOS Composites does not cover third-party imports through an INEOS Composites Only Representative. We can assist you with calculating volumes per your importer (some substances may remain below the registration threshold of 1 tpa) or provide you, if available, with (alternative) materials from European stock, which are REACH compliant.

When using materials from European stock, you could make use of the re-import exemption from registration.

To avoid REACH registration and to ensure compliance with REACH, EU based importers can make use of the re-import exemption. Substances which have been registered according to Title II of REACH, exported and then re-imported are exempted from registration under the following conditions¹:

IMPORTANT DISCLAIMER

This information has been gratuitously provided by INEOS Composites. Although it is intended to be accurate, INEOS Composites DISCLAIMS ANY AND ALL LIABILITY, EITHER EXPRESS OR IMPLIED. This information is based on many factors beyond INEOS Composites' control, including but not limited to the completeness and accuracy of information received, or the conditions prevailing when operations were observed and/or sampled. In choosing to rely on or use this information, you assume all risk including the results obtained and agree to indemnify INEOS Composites against any and all claims. All recommendations or suggestions must be evaluated by you to determine their applicability or suitability for your particular program. Any information claimed by INEOS Composites to be confidential or proprietary is not to be disclosed to any third party.

REACH will continue to apply in the United Kingdom until the United Kingdom exits the European Union. REACH or REACH-type requirements may continue to apply after the United Kingdom exits the EU, however this is unclear at the moment. Once the consequences of the exit become clearer, INEOS Composites will decide on necessary steps to be taken.

INEOS is a Trademark, the property of INEOS Capital Limited.

- the substance must have been registered before it was exported from the EU;
- the substance already registered and exported must be the same as the substance being re-imported (no chemical modification between registration and re-import);
- the substance must not only be the same, but it must actually proceed from the same supply chain in which the substance was registered (substance must come from the registered EU source directly);
- the re-importer must have been provided with information on the exported substance, and that information must comply with the requirements established under REACH for the provision of information down the supply chain.

For additional information on REACH at INEOS Composites, visit our website's Safety, Health and Environment (SHE) page at: www.ineos.com/composites-she

If you have questions regarding any REACH-related subject, please contact us via your INEOS Composites representative or send us an e-mail at reach.composites@ineos.com.

Kind regards,



Monica Adria

Product Regulatory Manager EMEA

¹ This is information taken from ECHA's guidance. You should make your own assessment of what is required.