

REACH Statement

Effective date: 1st September 2019

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.

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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.

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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:

- 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.