

2010-06-03

## Confirmation of REACH Compliance

Dear Customer:

As you know, the European REACH regulation on the Registration, Evaluation, Authorization and Restriction of Chemicals [Regulation (EC) No 1907/2006] came into force on June 1, 2007. The chemicals currently produced in the EU or imported into the EU market should be pre-registered between June 1 and December 1, 2008. Companies that pre-register their substances can benefit from extended registration deadlines. The deadline depends on the tonnage band and the hazardous properties of the substance.

With this letter, I would like to confirm that all INEOS ABS products of the product lines **LUSTRAN**, **NOVODUR** and **TRIAx** are in full compliance with the REACH legislation.

### **Polymers and polymeric preparations produced by INEOS ABS in Europe:**

Polymers and polymeric preparations, this means all INEOS ABS products, are exempt from the obligation to register. Therefore, our polymeric products do not have to be pre-registered and will not receive a pre-registration number that could be reported to you.

But, we hereby confirm that all monomers forming the polymer in an amount of  $\geq 2$  % weight by weight, as well as all additives such as release agents or colorants have been pre-registered by us or our suppliers.

INEOS ABS has received confirmation of REACH compliance from all our suppliers. In addition, we adjusted our purchasing workflow in order to ensure that in the future only raw materials are used for the production of our polymer products, which have been (pre)registered by its manufacturer or importer.

We will closely monitor the intention of our suppliers to register our raw materials within the specified time periods.

## **Polymers and polymeric preparations imported by INEOS ABS into Europe:**

INEOS ABS decided to act as the importer for products produced in our non-EU legal entities and commercialised in the European market. An importer of a polymer has to register the monomeric substances and the additives if the total quantity of such substance sums up to 1 ton or more per year.

We hereby confirm that we have pre-registered all ingredients of the currently imported products that fall under this definition.

## **Candidate list or Substances of Very High Concern (SVHC) for Authorization:**

On the 30 of March 2010, ECHA has published the last version of the candidate list of substances of very high concern for authorization (SVHC). (see annex I). This list will be regularly updated when more substances are identified as SVHC.

INEOS ABS hereby confirms that none of the substances mentioned in this list has been intentionally added to or is known to be present in the products of our **Lustran ABS, Novodur and Triax** product lines.

We also confirm that our **Lustran ABS, Novodur and Triax** product lines comply with requirements of Directive 67/548/CE on "Classification, packaging and labeling of dangerous substances" and with the restrictions set by the REACH Regulation 1907/2006/CE, annex XVII and following amendments.

## **Communication along the Supply-Chain:**

In order to ensure a successful implementation of REACH, it is very important to ensure an open and efficient communication along the whole supply chain. I hope that this letter contributes to this goal.

In case you have additional REACH-related questions, please feel free to contact me directly in my role as INEOS ABS REACH Manager.

Please find my contact data below:

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**Annex I - List of Substances of Very High Concern**
*updated: 30.03.2010*

Substance name	EC (CAS No.)	Date of inclusion
2,4-Dinitrotoluene	204-450-0	13.01.2010
4,4'-Diaminodiphenylmethane (MDA)	202-974-4	28.10.2008
5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	201-329-4	28.10.2008
Acrylamide	201-173-7	30.03.2010
Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins)	287-476-5	28.10.2008
Aluminosilicate Refractory Ceramic Fibres		
<i>are fibres covered by index number 650-017-00-8 in Annex VI, part 3, table 3.2 of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, and fulfil the two following conditions:</i>		
<i>a) Al<sub>2</sub>O<sub>3</sub> and SiO<sub>2</sub> are present within the following concentration ranges:</i>		
<i>Al<sub>2</sub>O<sub>3</sub>: 43.5 – 47 % w/w, and SiO<sub>2</sub>: 49.5 – 53.5 % w/w,</i>		
<i>or</i>		
<i>Al<sub>2</sub>O<sub>3</sub>: 45.5 – 50.5 % w/w, and SiO<sub>2</sub>: 48.5 – 54 % w/w,</i>		
<i>b) fibres have a length weighted geometric mean diameter less two standard geometric errors of 6 or less micrometres (µm).</i>	-	13.01.2010
Anthracene	204-371-1	28.10.2008
Anthracene oil	292-602-7	13.01.2010
Anthracene oil, anthracene paste	292-603-2	13.01.2010

Anthracene oil, anthracene paste, anthracene fraction	295-275-9	13.01.2010
Anthracene oil, anthracene paste, distn. lights	295-278-5	13.01.2010
Anthracene oil, anthracene-low	292-604-8	13.01.2010
Benzyl butyl phthalate (BBP)	201-622-7	28.10.2008
Bis(2-ethylhexyl)phthalate (DEHP)	204-211-0	28.10.2008
Bis(tributyltin)oxide (TBT0)	200-268-0	28.10.2008
Cobalt dichloride	231-589-4	28.10.2008
Diarsenic pentaoxide	215-116-9	28.10.2008
Diarsenic trioxide	215-481-4	28.10.2008
Dibutyl phthalate (DBP)	201-557-4	28.10.2008
Diisobutyl phthalate	201-553-2	13.01.2010
Hexabromocyclododecane (HBCDD) and all major diastereoisomers identified:	247-148-4 and 221-695-9	28.10.2008
Alpha-hexabromocyclododecane	(134237-50-6)	
Beta-hexabromocyclododecane	(134237-51-7)	
Gamma-hexabromocyclododecane	(134237-52-8)	
Lead chromate	231-846-0	13.01.2010
Lead chromate molybdate sulphate red (C.I. Pigment Red 104)	235-759-9	13.01.2010
Lead hydrogen arsenate	232-064-2	28.10.2008

Lead sulfochromate yellow(C.I. Pigment Yellow 34)	215-693-7	13.01.2010
Pitch, coal tar, high temp.	266-028-2	13.01.2010
Sodium dichromate	234-190-3 (7789-12-0 and 10588-01-9)	28.10.2008
Triethyl arsenate	427-700-2	28.10.2008
Tris(2-chloroethyl)phosphate	204-118-5	13.01.2010
Zirconia Aluminosilicate Refractory Ceramic Fibres		
<i>are fibres covered by index number 650-017-00-8 in Annex VI, part 3, table 3.2 of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, and fulfil the two following conditions:</i>		
<i>a) Al<sub>2</sub>O<sub>3</sub>, SiO<sub>2</sub> and ZrO<sub>2</sub> are present within the following concentration ranges:</i>		
<i>Al<sub>2</sub>O<sub>3</sub>: 35 – 36 % w/w, and</i>		
<i>SiO<sub>2</sub>: 47.5 – 50 % w/w, and</i>		
<i>ZrO<sub>2</sub>: 15 – 17 % w/w,</i>		
<i>b) fibres have a length weighted geometric mean diameter less two standard geometric errors of 6 or less micrometres (µm).</i>		
	-	13.01.2010
1) The substance does not meet the criteria for identification as a carcinogen in situations where it contains less than 0.005 % (w/w) ber		
2) The substance does not meet the criteria for identification as a carcinogen in situations where it contains less than 0.005 % (w/w) ber		
3) The substance does not meet the criteria for identification as a mutagen in situations where it contains less than 0,1 % w/w benzene		

Updated on 30/03/2010

Best regards,



Dr. Wolfgang Schulz-Schlitte

This information of and our technical advice- whether writing or by way of trials- are given in good faith but without warranty and this also applies where proprietary rights of third parties are involved. Our advise does not release you from the obligation to check its validity and to test our products as to their suitability for the intended processes and uses.

The application use and processing of our products and the products manufactured by you on the basis of our technical advice and beyond our control and, therefore, entirely your own responsibility. Our products are sold in accordance with the current version of our General Conditions of Sale and Delivery.