



Lamberti Group

Health & Product Safety Department

Albizzate, May 2009

To whom it may concern

Subject: REACH - Lamberti Group Position May 2009

Dear Customer,

REACH is the acronym for the **R**egistration **E**valuation and **A**uthorization of **C**hemicals, the new European Regulation which objective is to establish a responsible handling of chemical substances, ensured by preventive health and environmental reviews.

Starting from June 1st, 2008, any chemical substance manufactured or imported into the European Union (EU) in quantities over one ton per year has to be registered, unless exempt, to comply with REACH. The substances that have been pre-registered from June 1st to December 1st, 2008, will benefit of transitional period related to the quantity and/or the hazard, in which production and/or import are allowed while the relevant dossiers are being prepared for final registration.

All the Companies belonging to Lamberti Group have completed the pre-registration of all not-exempt substances manufactured or imported into the European Union, including products that are imported to Europe by our non-EU Companies for which Lamberti SpA operates as O.R. (Only Representative)

In particular, we pre-registered all manufactured substances, imported substances as such and as component in preparations, monomers and "other reactants" of imported polymers, monomers of produced polymers even if bought in Europe.

REACH regulation does not require the registrant to communicate their respective pre-registration numbers. Nevertheless we would like to assure all our Customers that all Lamberti Group products are REACH compliant.

About SVHC issue, the substances classified as:

- carcinogenic, mutagenic or toxic to reproduction category 1 or 2;
- vPvB or PBT;
- endocrine disruptors

can be included on Annex XIV of EU Regulation 1907/2006 (REACH) in order to subject them to the authorization procedure. Inclusion in that Annex is preceded by the issue of a "candidate list" of substances meeting the aforementioned criteria.

ECHA (European Chemicals Agency) communicated the inclusion of 15 substances of very high concern (SVHC), published on the ECHA website (http://echa.europa.eu/chem_data/candidate_list_en.asp)

Companies may have legal obligations resulting from the inclusion of the substances in the Candidate List from the date of inclusion. These obligations are linked to the listed substances on their own, in preparations and in articles. Details are indicated in ECHA website.



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In particular, under the communication obligations covered in article 33(2) of the REACH regulation, retailers and manufacturers must upon request be able to provide consumers with information about the hazardous substances contained in the product within 45 days. This will include all substances on the proposed candidate list that are present in a concentration above 0.1% (w/w).

Considering current candidate list, **no substances** manufactured or imported by Lamberti Group Companies are part of this list, so **no actions are required for us and for our Customers, in any case we will follow the further update of the list with appropriate communication along the supply chain in agreement with REACH requirements**

As regards information on the exposure scenarios, we are awaiting the publication by the ECHA final list of Sector Use (SU), chemical product category (PC), process category (PROC) and article category (AC) that describe how the chemical is used. We are also working with various associations and Consortia to develop standards for exposure scenarios that cover the possible uses of our substances in your business: for the moment any information about sector uses or other descriptors **will not be communicated** waiting the final and definitive **Use Descriptor System**.

For your information we are starting to register some of our substances for which registration is expected in 2010 and we expect a number of requests for clients involved in the second half of 2009. We will not provide general information about our deadlines for all substances, but we provide timely information and will request the information necessary for registration through specific contacts.

In conclusion:

- **Substances in the Lamberti Group portfolio were all pre-registered;**
- **Will not be release the number of pre-registration ;**
- **No substances present in current "Candidate List" of SVHC substances are manufactured or imported by Lamberti Group ;**
- **Information about Use Descriptor System will be communicated after the ECHA revision;**
- **For substance registration we will contact you according to the information needs and according to the registration deadline**

We will continue to dedicate our resources to ensure a complete implementation of REACH and in particular to continue to supply you with the products you are buying today.

Should you have any further question, Lamberti Group - Health & Safety Product Dept. is the contact point for REACH activities, please contact us at the following e-mail address: REACH_Lamberti@lamberti.com

Yours sincerely

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