

June 29, 2010

*To whom it may concern*

**Re: REACH Regulation  
REACH Status June 29, 2010 for INEOS polyolefinic products  
INEOS Low Density Polyethylene  
INEOS Linear Low Density Polyethylene grades  
INEOS High Density Polyethylene grades  
INEOS Polypropylene grades**

This statement provides the status of INEOS polyolefinic products with respect to the EU REACH Regulation, in particular regarding three aspects that may be of concern to our suppliers and customers:

- Preregistration/registration status
- substances of very high concern (SVHC)
- the use communication

### **1. Preregistration/registration status**

We can confirm that despite their exemptions of registration, all of INEOS polyolefinic products: HDPE, PP, LLDPE or LDPE have been at the centre of all our attention, and that, in particular, the following substances used by INEOS for the production of polyolefins have been preregistered by our suppliers, when required:

- monomers and comonomers
- additives of all kind
- catalysts
- all substances involved at whatever stage of our production processes

We have also fulfilled our obligations regarding any specific situation created by the EChA regarding polymers and re-imported substances or preparations.

**As a consequence, our current product offer won't be impacted by REACH or the non pre-registration of any of the substances used in our processes.**

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## 2. Substances of very high concerns

The European Chemical Agency (EChA) regularly updates a list of SVHC (Substances of Very High Concern):

[http://echa.europa.eu/chem\\_data/authorisation\\_process/candidate\\_list\\_table\\_en.asp](http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp)

Additionally, EChA publishes, from time to time, a list of potential SVHC for public consultation. There is no currently open consultation.

[http://echa.europa.eu/consultations/authorisation/svhc/svhc\\_cons\\_en.asp](http://echa.europa.eu/consultations/authorisation/svhc/svhc_cons_en.asp)

We hereby confirm that none of these substances is present in a concentration above 0.1% in any of the INEOS LDPE, LLDPE, HDPE and PP grades.

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### 3. Use Communication

We hereby confirm that all of INEOS LDPE, LLDPE, HDPE and PP grades are classified as non-dangerous substances (in accordance with Directives 67/548/EEC and 1999/45/EC) and are not assessed as PBT or vPvB substances <sup>1</sup>.

Therefore, INEOS are not registrant of these substances and, as a consequence, **communication of uses does not need to be performed**, and INEOS aforementioned products can be used in any application, when not used in conjunction with any third party material.

In order to waive concerns of our Downstream Users, we additionally provide some clarification about:

- monomers and other feedstock materials
- additives

#### a. Monomers and other feedstock materials

INEOS feedstock materials are used as intermediates under Strictly Controlled Conditions. Their life cycle ends at INEOS, and therefore communication further down the supply chain is unnecessary.

#### b. Additives

While the identification of uses for an Exposure Assessment is not required for our polyolefinic products, INEOS has been actively involved in the development of the Plastics Exposure Scenario (PEST). PEST has recently opened a website <http://pestpublic.plastics.net/public/> for all plastics value chain actors, where also our polyolefins customers can register, and check the mapping of applications and processes.

Would you require any further information or assistance, please do not hesitate to contact us at: [reach-po@ineos.com](mailto:reach-po@ineos.com)

Yours faithfully,



Corinne Rubin  
Product Stewardship Assistant

On Behalf of  
Jacques Breulet  
INEOS Olefins and Polymers Europe

#### Disclaimer

To the best of our knowledge, the information contained herein is accurate as of the date of publication. However, we do not assume any liability whatsoever for the accuracy and completeness of such information.

The Customer is responsible for the appropriate, safe and legal use, processing and handling of our products. No liability can be accepted in respect of the use of INEOS products in conjunction with other materials. The information contained herein relates exclusively to our products when not used in conjunction with any third party materials

<sup>1</sup> PBT: persistent, bioaccumulative and toxic; vPvB: very persistent and very bioaccumulative