



Tecnocap REACH Statement

REACH Background

The new European Chemicals regulation (REACH) entered into force in June 2007. REACH stands for Registration, Evaluation, Authorizations and Restriction of Chemicals. The REACH regulation requires substances manufactured or imported into the European Union (EU), including substances in preparations in quantities over one metric ton per year, to be registered unless exempt.

There is a transitional period to complete the registration process for existing substances with phased-in deadlines of 2010, 2013, and 2018, depending on the annual amounts imported and the hazard of the substance. To benefit from these phased-in deadlines, EU manufacturers and importers must pre-register existing substances by 1st December, 2008. Pre-registration allows continued manufacture and import into the EU prior to the registration deadline.

Tecnocap's REACH Initiatives

Tecnocap supports the objectives of REACH, including protecting human health and the environment. Tecnocap is aware of the requirements of the REACH regulation.

We have established through links with our suppliers that, all raw materials used by us are expected to be supported by the REACH legislation. At the present time we do not use any raw materials that fall into highest health and environmental risk categories which require authorisation. We shall therefore continue to pass on existing information through material safety data sheets, as required as part of REACH.

The Company also recognizes that substances manufactured and sold by Tecnocap entities outside of the EU may be imported into the EU by our customers. In such case, it is the customer's obligation to evaluate its registration requirements and to take the necessary steps, if any, to comply with REACH.



Tecnocap' s REACH Compliance Declaration

We hereby also certify that Tecnocap S.p.A. is fully comply with the related requirements of European Union Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH):

- ✓ Under the structure of REACH regulation, Tecnocap S.p.A. don't manufacture "substances" or "preparations" and the caps don't involve the "intentional release of substances". Accordingly, we foresee no registration or pre-registration or Authorization requirement for the products we supplied.
- ✓ With regards to the requirements of Article 33 of REACH: duty to communicate information on substance in articles. We declare that none of the SVHCs is present in Tecnocap' s products in quantities totalling in a concentration equal or above 0.1%.
- ✓ About the requirements of Article 67 of REACH: a substance on its own, in a preparation or in a product, for which Annex XVII, contains a restriction shall not be manufactured, placed on the market or used unless it complies with the conditions of that restriction. We declare that none of substances in the conditions of restriction is present in Tecnocap' s products.

As REACH regulation is updated frequently, for the major changes afterwards, such as the addition of SVHC substance in Annex XIV, the addition of restricted substance in Annex XVII, Tecnocap S.p.A. will evaluates the further revise in time and update this declaration to reflect these changes.

Annex XIV: <http://echa.europa.eu/web/guest/addressing-chemicals-of-concern/authorisation/recommendation-for-inclusion-in-the-authorisation-list/authorisation-list>

Annex XVII: <http://echa.europa.eu/addressing-chemicals-of-concern/restrictions/list-of-restrictions>
(http://ec.europa.eu/enterprise/sectors/chemicals/documents/reach/review-annexes/index_en.htm#h2-8)

We further declare that all the statements in this letter are true and accurate. We are also aware that we will be liable for any direct damage incurred by your company arising from our breach of any declarations in this letter. The amount of damage shall be determinate by an irrevocable judgment of competent judicial or relevant authorities.



Tecnocap and its customers and suppliers will work as a team in order to satisfy the requirements of REACH. The REACH regulation puts responsibility on users of substances to ensure that the uses of the substance are identified and included in the registration and to provide relevant risk assessment data. Over the next several years, Tecnocap will contact its customers requesting identification of uses and other relevant data for substances and preparations manufactured or imported into the EU by Tecnocap for inclusion in REACH submissions.

Additional information regarding Tecnocap's REACH activities will be communicated to our customers directly.

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Approved: Corporate R&D Manager – M. Coccoresse