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Arendonk, December 2nd 2008.

Dear Customer,

Subject: Registration, Evaluation and Authorization of Chemicals (REACH) - position letter 3

REACH¹, the European Regulation on Registration, Evaluation and Authorization of Chemicals and the impact it has on the future availability of chemicals, is an issue of significant importance for RAVAGO Group, our suppliers and our customers. Joint collaboration across all supply chains was and will be required in the future. Today, at the end of the pre-registration, period we wish to take the opportunity to up-date our customers on our progress with respect to REACH.

Our first priority was and is to meet our legal obligations under REACH, as well as to ensure that the supply of materials to our customers is not interrupted². For that purpose RAVAGO Group has been intensively communicating with its suppliers to find out their intentions regarding the pre-registration and registration of the substances used in the manufacturing of materials they supply to us. We will continue this evaluation in order to identify any potential implication of REACH on the availability of the products in our product portfolio.

REACH and its implications for polymers / polymer preparations

Polymers are exempted from registration requirements under REACH. However, REACH does require registration of the monomers and other relevant substances used in the polymer, if they are part of the polymer for more than 2% and produced/imported in a volume of 1 ton or more per year.

Please also note that the polymeric end products as distributed by RAVAGO Group are in most cases preparations. Under REACH preparations do not need to be registered separately, only the substances (monomers, additives,...) on their own are subject to registration obligations.

Natural rubbers / latex

Natural rubber (**NR**) is a naturally occurring polymer that is not classified as dangerous in accordance with Directive 67/548/EEC and as such, **no registration obligations** apply and therefore no pre-registration is necessary.

This is also the case for the Natural Rubber "treated" grades (**NR-TG**) in our product portfolio : they have been reviewed according to the specific guidance documents and position papers developed by ETRMA (European Tyre and Rubber Manufacturer's Association – www.etrma.org) and **no registration obligations** apply to these grades.

For some Natural Rubber–Latex (**NR-L**) grades however, **registration obligations could apply** to certain stabilizing additives. ECHA has been asked to provide some clarification, but any official reply will presumably arrive after the end of the pre-registration period. Therefore **Ravago has pre-registered** the concerned substances to cover any possible scenario and to ensure future availability of the NR-L grades.

1 EU regulation N° 1907/2006

2 Important notice : the information contained in this letter expresses where relevant only the intention of Ravago Group and does not constitute a binding obligation. The information is provided in good faith and based upon the information and statements we received from our relevant up-stream suppliers. It is only applicable for active brands and its included grades. No legal rights can be derived from it and Ravago Group disclaims any liability for any errors or omissions.



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Off-grade / near prime material

From REACH point of view, off-grade or near prime grades can be regarded as prime grades for which not all quality standards or product specifications are met. In our opinion the starting materials are the same as for the intentional prime grade, and therefore all relevant monomers and substances will have to be treated as such. Meaning : they will have to be pre-registered and registered afterwards. In other words, **we tend to believe that the "REACH status" of off-grade or near prime material is the same as that of the prime grades which were intentionally meant to be produced.** Our suppliers of off-grade / near prime products have stated they agree with our point of view and confirmed REACH compliance for their material.

Industrial quality grades : recovered/recycled polymers (no longer waste)

REACH does not apply to waste, *but* recovered polymers, after being part of waste materials, are no longer waste. This means that **REACH obligations are applicable for recovered materials**, i.e. after recycling.

On October 28th the European Chemicals Agency finally published the draft guidance on "Waste and Recovered substances". According to this draft guidance document, polymer recyclers are strongly recommended to **pre-register monomers**, intentionally selected constituents and substances present in concentrations by more than 20% w/w.

All Ravago Group recycling plants have pre-registered the relevant substances for their recovered substances and industrial quality grades.

Pre-registration info

Today customers are sending us many requests for information on the pre-registration number and status of the products we supply to them. Since we are a distributor and manufacturer of a large variety of product grades and polymertypes, it is not an easy exercise to gather all relevant data. Customers should also be aware that a pre-registration number alone is not sufficient to guarantee REACH compliance and it cannot be tracked back to either the specific substance or the company submitting the pre-registration. Besides that there is even no legal requirement to communicate pre-registration numbers along the supply chain. With respect to this arguments Ravago Group decided not to communicate pre-registration numbers to its customers.

Nevertheless, customers will be able to consult an updated inventory on our company website www.ravago.com. This inventory informs customers about the REACH status and compliance of the RAVAGO product portfolio. Note however that complete information concerning final pre-registration was not available for all products until the pre-registration stage had been completed -December 1st 2008- so we are now compiling this inventory.

As Ravago Group we are able to confirm that our manufacturing plants have taken necessary provisions for its own manufactured/compounded RAVAGO brands* to comply to REACH Regulation.

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Substances of Very High Concern

Another important aspect of REACH, known as Annex XIV, will list the Substances of Very High Concern (SVHC) that will be subjected to the authorisation procedure. Once it is included in Annex XIV, a substance cannot be actively marketed or used after a date specified in the Annex (known as the "sunset date"), unless the company is granted an authorisation for its use. A Candidate List with **15 substances** identified as SVHCs and therefore likely to be included in Annex XIV, was **published on the ECHA website the 28th of October 2008**.

As your supplier, we are aware that this publication may have legal obligations for you and your downstream users / customers. Any supplier of an article in the EU/EAA will have to communicate the presence of any of the SVHCs in that article in an amount of more than 0,1% (w/w). Also, for materials not classified as dangerous, sufficient information should be available upon request when at least one substance on the Candidate list is present in an individual concentration of at least 0,1 % (w/w).

We do not expect any of these substances to be present in an amount of more than 0,1% (w/w) in the vast majority of our products. However, we are currently communicating with our suppliers on this issue and we will inform you via our website as soon as relevant information is available.

Intended use(s) and exposure scenarios

During the registration process we will be in contact and work closely together with our customers and suppliers to exchange information on the intended use(s) and exposure scenarios of the products in our product portfolio and to up-date our safety datasheets gradually.

In the mean time we wish to thank you for your continued patience. We do hope you understand that from a point of workload and efficiency, we cannot answer your questionnaires individually. As already mentioned we kindly ask you to consult our webpage, where a regularly up-dated REACH inventory will be available. It will also include information on the possible presence of SVHCs in the products that we supply.

Please pass this information on to the person in your organization responsible for REACH, and if you should have any further questions or remarks, don't hesitate to contact us.

Yours sincerely,

Gunther HENDRICKX

HSE / REACH coordinator

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* **RAVAGO MANUFACTURING BRANDS :**

DILAMID	RAVAGO ABS
ENESTER	RAVAGO ASA
ENFLEN	RAVAGO HDPE
ENFLEX	RAVAGO LDPE
ENLAC	RAVAGO LLDPE
ENSOFIT	RAVAGO MDPE
ENYLON	RAVAGO PA
FACTOR	RAVAGO PC
MABLEX	RAVAGO PC/ABS
MAFILL	RAVAGO PET
POLYFAST	RAVAGO POLYMER BLEND
PRYLTEX	RAVAGO PP
RAVAFLEX	RAVAGO PP COMPOUNDS
RAVALENE	RAVAGO PS
RAVAMID	RAVAGO TPE
SCOLEFIN	
SCONABLEND	
SICOBATCH	
SICOBLEND	
SICOFLEX	
SICOKLAR	
SICORAN	
SICOSTIROLO	
SICOTER	
VERPLEN	

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