



5 February 2016

Customer Letter 7

Dear Customer,

Subject: REACH and DuPont

DuPont's Polymer Businesses position concerning the communication of pre-registration numbers

This communication concerning REACH focuses on DuPont's position concerning the request to communicate pre-registration numbers.

Important remarks:

The following comments refer to DuPont Performance Materials business only. Other DuPont Businesses may operate in other business environments and therefore have to adopt other approaches than our Polymers Businesses.

Pre-registration

Pre-registration under REACH is made for 'phase-in substances' which have been on the European market before 1st June 2007. Any manufacturer or importer interested to further use such substances had to pre-register before 1st December 2008. If no pre-registration had been made, then a registration is required immediately. The advantage of a pre-registration is a transitional period during which the substance can be manufactured / imported with a registration at a later time (last date in 2018).

A manufacturer / importer has received a submission number and a 'reference number' for each substance from ECHA when he has submitted his pre-registration (*ref: 7 Duties of the Agency in guidance for registration*). These are administrative references to follow through the substance from pre-registration to the final registration. The registrant / substance specific pre-registration numbers will not be made publically available. Thus they cannot be used to 'prove' pre-registration to third parties as they are not verifiable at ECHA.

In addition, in some cases no pre-registration / registration will be required (e.g. where import volumes are less than 1 tonne per annum).

The pre-registration / registration is linked to the registrant and the substance registered. Under REACH there is no longer a general listing of chemicals, (as there was before under EINECS) but the registration is specific to the individual registrant.

DuPont Polymers products, with very few exceptions, are preparations (mixtures of several substances). As such, no pre-registration / registration numbers will be available, since REACH is at the level of substances, not preparations.



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Compositional information of DuPont Polymer products is considered 'Confidential Business Information' (CBI). Therefore neither CAS numbers of components of the polymers / polymer compounds nor pre-registration numbers will be communicated to customers.

DuPont will prepare and provide appropriate conformation that pre-registration is complete for those customers who have requested it.

Should you have any question regarding the content of this letter, or any other REACH related subject, please do not hesitate to contact us.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "Stefan Dully".

Dr. Stefan Dully
Regulatory Affairs Manager, DPM, EMEA

This information is based on our current level of knowledge and expresses only our intention. It does not constitute a binding obligation. Whilst the information is provided in good faith, no representations or warranties are made with regards to its completeness or accuracy and no liability will be accepted for damages of any nature whatsoever resulting from the use of or reliance on the information. As we cannot be aware of all aspects of your business and the impact REACH Regulation may have on your company, we strongly encourage you to get familiar with REACH, its requirements and timelines.

DuPont has no intention to change its product portfolio of polymer offerings due to the introduction of REACH under the condition, that REACH does not impose commercial or technical burden, which could impact the health of our business. However, since DuPont depends on its suppliers, DuPont is not in full control of this decision. Based on industry assessments, it is likely that a certain number of chemicals will no longer be available to the European market. This may necessitate product reformulation, and subsequent product / article re-qualification, or, in more critical cases, to a complete product change.

For your information, please see also the REACH web site of the EU commission:
http://ec.europa.eu/environment/chemicals/reach/reach_intro.htm