



June 1, 2021

General Information on the Application of REACH for Plenco Customers

This memorandum has been prepared as a standard response to questions we receive from our molding material customers about our position and activities regarding REACH, the chemical control law of the European Union and United Kingdom. Plenco has in place a REACH compliance program and has retained Ramboll's Global Product Safety and Stewardship practice to provide technical and regulatory support, and to serve as "Only Representative" in support of our business in Europe.

FOR OUR NORTH AMERICAN CUSTOMERS

As regards REACH, we believe that in virtually all cases, neither we nor our North American molding material customers will have any obligation to take any action. In drawing that conclusion, we have made the following assumptions:

- We assume that you are using our molding materials as sold to you and are not adding any additional substances to them.
- We assume you are actually molding our materials in North America, not shipping them unmolded to Europe.
- We assume you are using our materials to produce a molded part in a conventional manner, as opposed to using it in some other way.

Given the above assumptions, we believe neither you nor we have any obligations under REACH if the molded parts are shipped to Europe. (*)

FOR OUR EUROPE BASED CUSTOMERS AND CUSTOMERS SHIPPING UNMOLDED MATERIAL TO EUROPE

Plenco has fulfilled all applicable EU REACH compliance obligations, an overview of our current position is provided herein, and due to confidentiality considerations, further details are available upon request:

1. We have registered, as needed, the chemicals used as raw materials in our molding materials that are shipped to Europe using Ramboll as "Only Representative." These REACH registrations cover the total cumulative annual tonnages we currently ship to the EU and if the business exceeds the relevant REACH thresholds, the registrations will be updated by Plenco/Ramboll accordingly.
2. The REACH registration numbers are included in our EU compliant SDS's, along with relevant guidance to customers on safe use.
3. Plenco/Ramboll continually monitor the progression of substances onto the Candidate list and Annex XIV and Annex XVII. To date, Plenco molding materials do not contain substances on these lists.
4. Plenco has EU compliant SDS's to support its molding materials shipped to Europe and is available to support EU customers with fulfilling their Poison Control Center notification obligations since they are the EU duty holder.

If you have questions, please contact us as needed,

Plastics Engineering Company

(*)The obligations under REACH apply to manufacturers or importers in Europe of chemical substances or mixtures (called “preparations”), and in limited circumstances to manufacturers or importers in Europe of “articles.” The definition of “article” can be found at <https://echa.europa.eu>. Based on our review of this information, we believe that parts you make from our materials under the assumptions listed above will be considered “articles” under REACH.

An importer of articles into Europe has responsibilities under REACH only in two circumstances:

1. if the articles contain a “Substance of Very High Concern (SVHC)” above a specified threshold (usually 1/10 of 1%);

Or

2. if the articles have an “intended release” of a substance from them (there is a 1 ton per year threshold).

As far as SVHC’s, none of them are expected to be present above a concentration of 0.1% in articles molded from Plenco’s molding materials, and therefore under the assumptions above, we believe you certainly can conclude that your molded parts do not contain any in excess of the specified thresholds. See <https://echa.europa.eu> for a definition of REACH SVHC’s.

As far as “intended release,” we attach information on that issue from Appendix 1 of the Guidance on requirements for substances in articles. A review of that information, especially the listed examples of releases that are not considered intended (wear and tear, frictional erosion, combustion, accident, etc.), leads us to conclude that virtually all parts molded of our materials under the assumptions above would not have an accompanying “intended release.”

As a result, we believe any importer of parts molded from our materials will be free from obligations under REACH. If, after reviewing this memo, you find that the assumptions above are not true (for example, if you are shipping molding materials into Europe), please let us know; we may be able to offer additional thoughts or help.