

REACH COMPLIANCE DECLARATION

REACH requires all companies manufacturing or placing a substance on the EU market in quantities greater than 1MT/year to register that substance with the European Chemicals Agency (ECHA). For legal reasons, only companies with a legal entity in Europe can submit a registration under REACH, however, non-EU companies may submit REACH registration by appointing an Only Representative to register on their behalf, in which case, their importers will be regarded as downstream user and do not need to do registrations.

Minipak S.A.S. exports more than 100 MT /year to MAG GORZELAK I JASINSKI SP. J of printed (and non-printed) PVC polymer films that are distributed in different references as follows:

Material -	Número de material	Cod Cliente 🔻	Cliente 🔻	Estructura <	Pelicula 🔹
L001360	G-47 GREEN MED. GOF 150mm 1A	4444400036	MAG-2000, Ltd	PVC PIGMENTADO	149/065/LSFAS
L002576	G-47 GREEN MED. GOF 60mm 1A	4444400036	MAG-2000, Ltd	PVC PIGMENTADO	149/065/LSFAS
L006264	G-80 GOLD METAL 90mm 1A	4444400036	MAG-2000, Ltd	PVC	125/110/LGNAG
L006265	G-80 GOLD METAL 60mm 1A	4444400036	MAG-2000, Ltd	PVC	125/110/LGNAG
L006266	G-80 SILVER 90mm	4444400036	MAG-2000, Ltd	PVC	125/110/LSNAS
L006267	G-80 SILVER 60mm	4444400036	MAG-2000, Ltd	PVC	125/110/LSNAS
L006269	G-20 WHITE 240mm 1A	4444400036	MAG-2000, Ltd	PVC PIGMENTADO	134/028/LSAAS
L007022	G-47 GREEN MED. GOF 90mm 1A	4444400036	MAG-2000, Ltd	PVC PIGMENTADO	149/065/LSFAS
L007510	G-100 GOLD METAL 90mm 1A	4444400036	MAG-2000, Ltd	PVC	125/133/LGNAG
L007972	G-80 GREEN MED. GOF 45mm 1A	4444400036	MAG-2000, Ltd	PVC PIGMENTADO	149/110/LSFAS

Based on the characteristics of the product regarded as an article without intentional release, and considering that our Ink supplier has demonstrated compliance under EU concerning regulations, Minipak S.A.S. also, finds consistent support on the following statements:

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THE EUROPEAN PARLIAMENT AND THE COUNCIL OF EUROPEAN UNION CONSIDER THE FOLLOWING:

(41)

For reasons of workability and because of their special nature, specific registration requirements should be laid down for intermediates. **Polymers** should be exempted from registration and evaluation until those that need to be registered due to the risks posed to human health or the environment can be selected in a practicable and cost-efficient way on the basis of sound technical and valid scientific criteria.

Furthermore, in Chapter 1, Article 2, number nine estates:

9. The provisions of Title II and Title VI shall not apply to Polymers. Being Title II Registration of Substances and Title VI Evaluation.

Article 138 Review, declares:

- 1. By 1 June 2019, the Commission shall carry out a review to assess whether or not to extend the application of the obligation to perform a chemical safety assessment and to document it in a chemical safety report to substances not covered by this obligation because they are not subject to registration or subject to registration but manufactured or imported in quantities of less than 10 tons per year.
- 2. The Commission may present legislative proposals as soon as a practicable and cost-efficient way of selecting polymers for registration on the basis of sound technical and valid scientific criteria can be established, and after publishing a report on the following:
- (a) the risks posed by polymers in comparison with other substances;



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(b) the need, if any, to register certain types of polymer, taking account of competitiveness and innovation on the one hand and the protection of human health and the environment on the other.

Based on the above declared, MINIPAK S.A.S. does not have Registration Numbers to communicate.

Minipak S.A.S. shall make you know any change, modification or progress on this matter, at any time it happens.

Very Truly Yours

Oscar fasialtacis

Oscar Palacios Technical Manager PC. Nr. 4005 released by Chemical Engineer Professional Council Minipak S.A.S.

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