



5th May 2023

Subject: Re-import exemption for downstream customers

Dear valued customer,

As you are aware, only REACH compliant products can be exported to the European Union. Which means that all substances contained in these products should have been either:

- registered or
- exempted from registration.

For polymers, all monomers requiring registration should have been registered.

Non-EU customers exporting products within the scope of REACH to the European Union must ensure that their EU based importer(s) register all relevant substances, where applicable.

Please note that Ashland does not cover third-party imports through an Ashland Only Representative. We can assist you with calculating volumes per your importer (some substances may remain below the registration threshold of 1 tpa) or provide you, if available, with (alternative) materials from European stock, which are REACH compliant.

When using materials from European stock, you could make use of the re-import exemption from registration.

To avoid REACH registration and to ensure compliance with REACH, EU based importers can make use of the re-import exemption. Substances which have been registered according to Title II of REACH, exported and then re-imported are exempted from registration under the following conditions¹:

- the substance must have been registered before it was exported from the EU;
- the substance already registered and exported must be the same as the substance being re-imported (no chemical modification between registration and re-import);
- the substance must not only be the same but it must actually proceed from the same supply chain in which the substance was registered (substance must come from the registered EU source directly);
- the re-importer must have been provided with information on the exported substance, and that information must comply with the requirements established under REACH for the provision of information down the supply chain.

If you have questions regarding any REACH-related subject, please contact us via your Ashland customer representative.

Kind regards,

Ryan Hamilton, PhD, DABT, ERT

Sr. Manager, Product Safety & Global Chemicals Management

¹ This is information taken from ECHA's guidance. You should make your own assessment of what is required.

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The United Kingdom has exited the EU, however REACH and/or REACH-type requirements still continue to apply. Please refer to "Ashland position on Brexit" Letter for further information.