

To : Associations in the Plastics Value Chain

Ref: REACH: Generic Exposure Scenarios as a way to decrease registration cost and maximize uses coverage

Subject: Identification of uses and creation of Generic Exposure Scenarios in the plastics supply chain

Brussels, 28 July 2009

Dear Sir or Madam,

REACH implementation is speeding up and specific duties have to be fulfilled by the various actors in the supply chain. In order to comply with REACH article 37, plastics converters shall have the right to make their uses known to their suppliers at the latest by 1 December 2009. These uses will have to be taken into account in the Chemical Safety Assessments of the substances manufacturers. By 1 December 2010 those suppliers will have to register the uses they support to the European Chemicals Agency for larger volume substances (more than 1000T). This is a unique opportunity for converters to secure the future of their products. If a use is not supported, a converter will have the choice between developing his own Chemical Safety Report or discontinuing this use.

At the same time, substance manufacturers and importers are responsible to develop chemical safety assessments for their numerous substances and provide adequate information on which risk management measures are recommended for the control of exposure to humans and the environment. The plastics value chain faces the challenge to organize communication in a way that will cover the many plastics applications, monomers and additives used in the manufacture of plastic resins, compounds and products.

Therefore the leading European associations representing plastics additives, plastics compound & masterbatch manufacturers together with the European Plastics converters have set-up a Plastics Exposure Scenario Team Project (PEST Project). The objective of this project is to make an inventory of converters' applications and processes and to communicate Risk Management Measures advice in a manner that addresses the requirements of REACH while aligning with both the technical characteristics of the plastics sector and any jargon that Downstream Users in that sector may need to be familiar with. This is done by the Generic Exposure Scenario approach.

PEST is working with financial and manpower support of the attached list of EU industry federations on developing Generic Exposure Scenarios under which most of the plastics additives in applications and processes can be considered safe. Those Generic Exposure Scenarios shall be the basis for the manufacturers and importers registration dossiers to be submitted by 1 December 2010 to the European Chemical Agency. Frequent reporting will be made on the applications that can be considered as safe.

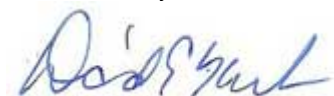
The first task of PEST is to map most end applications, processes and substances used in the industry. It is foreseen that only a limited number of unique or niche uses would not be considered in the scope of this project.

Substance manufacturers supporting the PEST project will benefit by obtaining the main converters applications and processes including operational conditions and practiced risk management measures, a standardized approach to Exposure Scenario building as well as a conceptual guidance document that includes reference documents on topics such as ,e.g., matrix inclusion effects. Downstream users will benefit by being able to identify their uses in a simple manner. They also will profit from the frequent feedback on the development of the areas of safe use and the continuous dialogue with the suppliers. All will benefit through the creation of a common language and a validated approach within the sector.

The fees to join the project are 6750 € max (in two years) for downstream user organizations not being member of EuPC or Plastics Europe, 2,500 € for EuPC member organizations, and 20,000 € max (in two years) for other Associations/Sector groups or consortia of Manufacturers/Importers producing plastics additives or monomers. For the latter category, the fee will decrease the more partners join in.

More information on the PEST activities can be obtained by contacting Tina Autenrieth e-mail at: tina.autenrieth@eupc.org

Yours sincerely,



David E Horst
Chair Plastics Exposure Scenario Team

Plastics Exposure Scenario Team Founding Members and contact list

LiSAO

Light Stabilisers and Anti-Oxidants Consortium, having its registered office at Avenue E. van Nieuwenhuyse 6, B-1160 Brussels, Belgium

Contact: Mr. David Horst dave.horst@cibasc.com



ESPA (European Stabiliser Producers Association), an international non-profit association, affiliated to Cefic, having its registered office at Avenue E. van Nieuwenhuyse 4, B-1160 Brussels, Belgium

Web: www.stabilisers.org

Contact: Mr. Alain Cavallero, Manager: aca@cefic.be



EFRA (European Flame Retardants association), a Sector Group of Cefic, having its registered office at Avenue E. van Nieuwenhuyse 4, B-1160 Brussels, Belgium

Web: www.flameretardants.eu

Contact: Mrs. Brigitte Dero, Director Plastic Additives: bde@cefic.be



PLASTICS EUROPE, having its registered office at Avenue Van Nieuwenhuyse 4, B - 1160 Brussels.

Web: www.plasticseurope.org

Contact : Mr. Wolfgang Siebourg, Manager Consumer & Environmental affairs : Wolfgang.siebourg@plasticseurope.org



EuPC (European Plastics converters), an international non-profit association, having its registered office at Avenue de Cortenbergh 66 box 4, B-1000 Brussels, Belgium

Web : www.plasticsconverters.eu

Contact : Mr. Geoffroy Tillieux, Head of Technical Department : Geoffroy.tillieux@eupc.org



German Masterbatch Association

German Masterbatch Association c/o Verband der Mineralfarbenindustrie e.V., having its registered office at Mainzer Landstraße 55, D - 60329, Frankfurt.

Web : www.masterbatchverband.de and www.vdmi.de

Contact : Dr. Heike Liewald, Managing Director : Liewald@vdmi.vci.de