

m + b verpackungstechnik gmbh · lüssenweg 18 · 71701 schwieberdingen

REACH obligations pursuant to Art. 33 **"Duty to communicate information on substances in articles"**

Dear Sir or Madam,

Thank you for your enquiry regarding the duties to inform pursuant to Art. 33 of the REACH Regulation.

m+b verpackungstechnik GmbH, as processor and manufacturer of film products, deals with products that are considered goods under the laws governing chemicals and is considered to be a downstream user. On the basis of currently available information, the company is therefore exempted from the obligation to register its products. It is, however, compulsory that only such substances that are registered according to the requirements of the REACH Regulation may be contained in preparations or goods.

We primarily source the goods (the following products we supply: LPS, GPS, EFS, EXS, UPXS, ETES, ETS and constituents of our formulations and/or raw materials) *from European and non-European suppliers*. This means that we are subject to the duty to inform our customers pursuant to Art. 33 of the REACH Regulation, if one of the products we supply contains above 0.1 percent weight by weight of a substance of very high concern (SVHC).

The list of SVHCs is updated twice annually and can be found on the website of the European Chemicals Agency (ECHA) at http://echa.europa.eu/chem_data/candidate_list_table_en.asp.

In our own interests and in the context of ensuring a high level of delivery reliability and product safety, we take this duty to inform very seriously. We comply with the statutory requirements pursuant to Art. 33 of the REACH Regulation by observing the following procedure:

Our EU suppliers of goods are obliged to immediately, and without any request being necessary, inform us if the products they supply contain above 0.1 percent weight by weight of a SVHC. Should we receive such information from our suppliers we will immediately forward it to you pursuant to Art. 33 of the REACH Regulation.

We reach separate agreements with all of our non-EU suppliers because they are not automatically subject to the REACH duties to inform. For this reason, we obtain confirmation in writing from non-EU suppliers that they will inform us immediately if a product they supply to us contains above 0.1 percent weight by weight of a SVHC.

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From a current perspective and in the context of information from our suppliers, it is not expected that the products we supply contain above 0.1 percent weight by weight of a SVHC.

However, should we receive such information from any of our suppliers, we will immediately replace the respective product. In this respect this declaration remains valid until further notice and does not require modification, even when the ECHA Candidate List is updated and supplemented.

If, over and above this, you have any further questions on the implementation of the REACH Regulation at our company, we would be pleased to assist you at any time. You are also welcome to get in touch with our contact person for issues relating to REACH, Mr. Christian Lindner, e-mail: c.lindner@mbvt.de.

All of the statements made above are based upon the information currently available to us.

Schwieberdingen, 26.02.2019


Christian Lindner (QA)