

**April 2020**

Dear Eastman customer,

Eastman has published this EU REACH statement/FAQ document to answer EU REACH-related customer questions. Here, you will find more detailed information about Eastman's position with regards to EU REACH.

## **Eastman Chemical Company's position on EU REACH**

### **1. Has Eastman registered substances that Eastman produces, sells and imports in the EU?**

Eastman confirms that it (or its suppliers) has registered all substances it currently manufactures in or imports into the EU unless registration is not required. Through the successful registration, Eastman expects no disruption in the manufacturing and supply of such substances due to EU REACH.

However, consistent with our typical business practices, Eastman's product portfolio is always subject to review and change.

### **2. Where can I find information about Eastman's registered substances?**

Substances:

EU REACH registration numbers for substances will be published in the safety data sheet (SDS) of the registered product. SDSs can be found on the specific product page via <http://www.eastman.com> or obtained via your Eastman sales representative.

Polymers:

Polymers are exempt from registration according to EU REACH Article 2.9. For this reason, you will not find a registration number or eSDS with exposure scenarios in the annex for this product. However, REACH dictates that the monomer(s) of the polymer need to be registered instead. Eastman confirms that all monomers used in the manufacturing of its polymers are either registered or exempt from registration.

Mixtures:

Mixtures themselves are exempt from registration. However, the incoming substances must be registered in case they are not exempt from registration. Eastman confirms that all substances used in the manufacturing of its mixtures are either registered or exempt from registration.

### **3. Can Eastman provide an EU REACH statement for specific products supplied?**

As noted above, Eastman (or its suppliers) has obtained the relevant EU REACH registrations to be able to supply its products as REACH compliant. As long as the products you purchase are supplied by an Eastman EU legal entity, you are considered a downstream user under EU REACH and can expect that Eastman has fulfilled its REACH obligations. As a result, Eastman does not plan to provide any separate product-specific statements regarding EU REACH compliance.

Please keep in mind that if you are supplied with substances from Eastman, the EU REACH registration number is available on the SDS. As the SDS is the primary communication tool under EU REACH, this is a statement by itself.

#### **4. Do Eastman's customers located outside the EU that use Eastman products in formulations they export into the EU have EU REACH obligations?**

Yes, if their importers choose not to register. The importer of formulations into the EU has the obligation to register each of the substances in the formulation. Examples of such formulations are inks, coatings and adhesives. If these formulations contain a polymer, its polymer building blocks will need to be registered (i.e., usually the monomers).

Customers residing outside the EU cannot register because registration is only possible for EU-based legal entities. However, a non-EU-based formulator or manufacturer can establish an EU-based "only representative" (OR) in accordance with EU REACH Article 8(3) to carry out its EU REACH registration obligations on behalf of their importers.

#### **5. How does Eastman support non-EU customers to fulfil their EU REACH obligations?**

Although Eastman has now registered, where applicable, the substances manufactured by its legal entities inside and outside the EU, this only covers the substances manufactured by Eastman in the EU or imported by Eastman into the EU. Products purchased from Eastman outside the EU and subsequently exported into the EU (i.e., indirect imports) will not be accounted for in Eastman's substance registrations. Non-EU customers of Eastman products who ultimately export these products to the EU will need to take steps to ensure that products imported into the EU are EU REACH compliant (e.g., register the substances through an OR, verify that their importers have registered, or request OR coverage from Eastman).

Eastman's OR will only cover imports into the EU managed by Eastman. Indirect imports are, therefore, not covered by Eastman's OR unless OR coverage is explicitly granted by Eastman. Indirect imports may occur when substances produced and sold by Eastman outside of the EU are exported to the EU by our non-EU customers as part of a formulation. In such cases, our non-EU customers should ensure products imported into the EU are EU REACH compliant by either submitting registrations via their importers or via their own OR or requesting OR coverage from Eastman via their Eastman sales representative.

To enable our non-EU customers to fulfill their own registration duties, Eastman is willing to provide EU REACH compositions for most of their products. In the event Eastman regards the EU REACH composition of the product as confidential, Eastman may consider executing a nondisclosure agreement (NDA) before the EU REACH composition can be provided. Customers needing EU REACH composition information should contact their Eastman sales representative.

#### **6. Who should I contact at Eastman with my REACH questions?**

The best way to contact Eastman is via your Eastman sales representative. For more information and further developments, visit [www.eastman.com/REACH](http://www.eastman.com/REACH).