

PIBERGROUP SRL
Sede Legale e Amministrativa
Piazza Carducci, 9 - 27058 VOGHERA (PV)
Tel. 0383.6901 - Fax 0383.690218
E-mail: info@pibergroup.com
Internet: www.pibergroup.com



Uffici di Milano
Via Cavriana, 3 - 20134 Milano - ITALY
Tel. 02.7391.1 - fax 02.7391.410
E-mail: centro.op@pibergroup.com

Voghera, 16th February 2009

Dear Customer,

The CE regulation No. 1907/2006, commonly named REACH, has become operative since 01/07/2007; from 01/06/2008 it has started the phase of pre-registration of the substances by the Companies who import them in Europe or who produce them or who use them, if they have not already been registered by their suppliers.

The Reach regulation refers to the management of the SUBSTANCES as they are, or as components of COMPOUNDS, or as contained in ARTICLES, and of their pertinent information.

It is well specified in section 2, paragraph 9, that the polymers (polypropylene and polystyrene, for example) must not be registered (please see an extract of the REACH Regulation in attachment).

In our Company we don't produce any polymers or substances, but we use them. Therefore it is our task and our interest to check with our suppliers if they are pre-registered by December the 1st 2008 and that the pertinent security files are updated in compliance with REACH according to the timing and to the modalities foreseen by the Regulation at issue.

Also the printing inks contain base substances that are subject to REACH registration. But even in this case our Company is included among the subjects named in the Regulation as "forward users", so it is not our task to register the ink substances and the ink components but again we need to check only that our suppliers are able to assure the continuity of supplying.

In any case, in the materials used for our production, being they polymers or inks used for the off-set print, no components belonging to the VHC list (Candidate List of Substances of Very High Concern for authorisation) are present in higher quantity than 0.1%

We would like to point out that REACH doesn't replace the existing regulation regarding the materials intended for the food contact; the polymers sold in order to produce items intended for the food contact are produced according to a POSITIVE list of substances already identified by the European authorities that will obviously be registered according to REACH by the suppliers of whom will use them, that's to say by the producers of monomers and other base substances.

Should any variation emerge in the positive list of substances intended for the food contact, our Company will comply with the legislative updates.

REACH doesn't have as an aim the regulation of the food packaging, for which are effective the specific rules.

Please don't hesitate to contact us for any further information you may need.

Best Regards

Paolo Bergaglio

PIBERGROUP SRL
Sede Legale e Amministrativa
Piazza Carducci, 9 - 27058 VOGHERA (PV)
Tel. 0383.6901 - Fax 0383.690218
E-mail: info@pibergroup.com
Internet: www.pibergroup.com



Uffici di Milano
Via Cavriana, 3 – 20134 Milano - ITALY
Tel. 02.7391.1 – fax 02.7391.410
E-mail: centro.op@pibergroup.com

Attachment 1

Omissis

TITLE II REGISTRATION OF THE SUBSTANCES
TITLE VI EVALUATION

The instructions stated in Titles II and VI are not applicable to polymers.

Omissis

To the aim of this regulation, it is meant for:

1) substance: a chemical element and its compounds, at the natural state or obtained by means of a fabrication process, included the additives necessary to maintain the stability and the impurities coming from the process used, but excluded the solvents that can be separated without compromising the stability of the substance or without modifying its composition

2) polymer: a substance the molecules of which are characterised by the sequence of one or more types of monomeric unities. These molecules must be distributed among a range of molecular weights in which the differences of molecular weight are mainly ascribable to differences in the number of monomeric unities.