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Voghera, 16<sup>th</sup> February 2008

Dear Customer,

The CE regulation No. 1907/2006, commonly named REACH, has become operative since 01/07/2007; from 01/06/2008 it has been 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 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 in attachment).

In our Company we don't produce polymers or substances, but we use them. Therefore it is our task and our interest to check with our suppliers that they are pre-registered by December the 1<sup>st</sup> 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.

Anyway, any component belonging to the VHC list (Candidate List of Substances of Very High Concern for authorisation) is available in a higher quantity than 0, 1% in the material used in our production, both for polymers and inks used for the offset print.

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 articles 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.

Available for any further information you may need, we remain

Best Regards

Paolo Bergaglio

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## Attachment 1

*Omissis ....*

TITLE II      REGISTRATION OF THE SUBSTANCES  
TITLE VI      EVALUATION

**The instructions included in the 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 carried out procedure, 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 weights are mainly ascribable to differences in the number of monomeric unities.