

Registration, Evaluation and Authorisation of Chemicals (REACH)

Effective 1st January 2021, some raw materials used in PennWhite products are subject to two REACH (Regulation, Evaluation and Authorisation of Chemicals) regimes; EU REACH managed by the European Chemicals Agency (ECHA) and UK REACH managed by the Health & Safety Executive (HSE).

EU REACH

Under EU REACH PennWhite was classed as a “downstream user” and was not required to submit its blended products for registration. However, any raw materials used in our products which fell within the scope of EU REACH were registered with the ECHA prior to the May 2018 deadline by their manufacturer or Only Representative. Following Brexit, any EU REACH registrations for our raw materials held by our UK based suppliers have been transferred to an EU based entity to retain their European registration. PennWhite's blended products using such substances therefore remain compliant with EU REACH.

UK REACH

Under UK REACH PennWhite is still classed as a “downstream user” and is not required to submit its blended products for registration. However, any raw materials which fall within the scope of UK REACH must be registered with the HSE by 27th October 2026, 2028 or 2030, dependent on tonnage*. Most of our EU based raw material suppliers have told us that they have begun the process of registering applicable substances with UK REACH, either by establishing a UK entity or via an Only Representative. Substances provided by suppliers who had not made this commitment were included on a *Downstream User Import Notification* (DUIN) submitted to the HSE by PennWhite prior to the 27th October 2021 notification deadline. Our DUIN number is UK-20-5797188073-7-0000. As a result of this submission, we can continue importing these raw materials in anticipation of their eventual registration. PennWhite does not anticipate acting as an Only Representative or intend to pursue UK REACH registration of any substance itself.

Our UK based raw material suppliers have advised us that they initiated the “grandfathering” process of their EU REACH registrations into UK REACH prior to the 30th April 2021 deadline and will complete registration within prescribed HSE timescales.

* Revised registration deadlines established by *The REACH (Amendment) Regulations 2023*, issued 28th June 2023, effective 14th July 2023.

This document has been approved by the senior management team of PennWhite Ltd

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