

## REACH Statement for Polypropylene and Polyethylene

On June 1, 2007, the European Commission's new regulatory system (EC 1907/2006) for the **Registration, Evaluation, Authorization and restriction of Chemicals (REACH)** went into effect. TOTAL Petrochemicals USA, Inc. (TOTAL) produces polypropylene and polyethylene. Under REACH, these products are considered preparations, as well as polymers.

Many of TOTAL's polypropylene and polyethylene customers outside of Europe manufacture articles, which in most cases will not require registration or notification under REACH to be imported into Europe. Article 7 of REACH, defines circumstances under which article producers and importers are required to register or notify of substances in articles and details the requirements. Along with other requirements, Article 7 requires that any producer or importer of articles to notify the European Chemical Agency when an article contains Substances of Very High Concern (SVHC) in a concentration above 0.1% (w/w).

At this point in time, TOTAL's polypropylenes and polyethylenes do not contain any substances specifically identified as SVHCs\* at levels greater than 0.1 %.

TOTAL has REACH pre-register the monomers associated with its production of polypropylene and polyethylene polymers using an Only Representative (OR).

However, due to potential anti-trust and competition law issues, TOTAL can only commit to support through REACH pre-registration those European customers who import our polypropylene and polyethylene products directly into Europe.

This means that TOTAL will not support third party sales into Europe with our OR, at this time. TOTAL customers outside of Europe who still wish to send either unmodified polypropylene or polyethylene products, or a compound made from our polypropylene or polyethylene products into Europe, will need to comply with REACH obligations on their own. However, if you send unmodified polypropylene or polyethylene products into Europe, please contact your TOTAL representative to discuss alternative means of supplying your customers in Europe.

TOTAL's OR for polyethylene and polypropylene is:

Franky Wylin  
Regulatory Affairs Manager  
TOTAL PETROCHEMICALS RESEARCH FELUY  
Zone Industrielle C - B7181 Feluy  
Tel: +32 64 51 4254  
[Email:frank.wylin@total.com](mailto:frank.wylin@total.com)

If you have questions regarding REACH as it applies to TOTAL products, please contact:

Paul Bradley  
Manager Product Stewardship  
P.O. Box 674411  
Houston, TX 77267-4411  
Phone 713-483-5633  
[Email:paul.bradley@total.com](mailto:paul.bradley@total.com)

Disclaimer: This REACH Statement for Polypropylene and Polyethylene does not constitute legal or business advice. Statements about REACH are provided for informational purposes only; they are based upon the information available at this time regarding REACH and are subject to change at any time. TOTAL makes no warranties or representations either express or implied with respect to the information provided in this REACH Statement. Every customer should review REACH and determine what actions they should take, if any, to comply.

---

\* These currently include (see Article 57 of REACH) substances which are Category 1 or 2 Carcinogens, Mutagens, and Reproductive toxins (CMRs) in accordance with Directive 67/548/EEC; substances which are Persistent, Bioaccumulative, and Toxic (PBTs) or very Persistent and very Bioaccumulative (vPvBs) in accordance with Annex XIII of REACH; or substances on the recent candidate list (updated October 29, 2008).

