



STATUS OF GRAFIL & PYROFIL CARBON FIBRE

PRODUCTS UNDER REACH

(Registration Evaluation Authorisation of Chemicals EU Regulation (EC) No 1907/2006)

As a result of discussions between our parent company Mitsubishi Rayon Co Ltd of Japan (MRC), the Japan Carbon Fibre Manufacturers Association (JCMA), and the EU legislative bodies involved with REACH the status of all the products we import into the EU has been confirmed as follows:

CONTINUOUS CARBON FIBRE

Pyrofil and Grafil continuous carbon fibre products in their raw form (i.e. unsized) are considered to be articles under REACH since they are given a specific shape and design during manufacture. These features determine the fibres' function to a significantly greater degree than their chemical composition. They also contain no chemical substances that could be released during use of these fibres.

Therefore, under the terms of REACH, as articles, our continuous carbon fibre products in their raw form do not require pre-registration or registration.

SIZED CONTINUOUS CARBON FIBRE

For Grafil and Pyrofil continuous carbon fibre products that contain sizing agents (e.g., epoxy resins) the intent is for the sizing to remain on the fibre during normal use. The sizing exists only to improve the processability of the carbon fibre.

In this case, the sizing agents would not be subject to the registration provisions of REACH and like raw continuous carbon fibre, sized continuous carbon fibre is also considered to be an article under REACH.

Therefore, under the terms of REACH our sized continuous fibre products do not require pre-registration or registration.

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PRECISION CUT FIBRES

Precision cut fibres include chopped and milled carbon fibres. Even in chopped or milled form the fibres keep their shape and, as their shape is more important to their function than the chemical composition, they are classified as articles.

On the basis of the above and inline with the current regulation we can confirm that the precision carbon fibres we supply do not require pre-registration or registration under REACH. In reaching this conclusion we have made our best efforts to provide you with the most up-to-date information, but please accept that we cannot be held liable for any changes in REACH legislation occurring after the dispatch of this letter.

We can also confirm that our carbon fibres and associated packaging material do not contain any substances or preparations of high concern or that are designated 'CMR' toxins under REACH.

MRC and Grafil are committed to meeting the ongoing requirements of REACH and, should the legislation and classification of our products change, we will take the actions necessary to meet the new requirements, thus ensuring continuity of supply.

GRAFIL, INC.
March 2009

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