



15 May 2025

Subject: Re-import exemption for downstream customers

Dear valued customer,

As you are aware, only EU-REACH compliant products can be imported to the European Union.

Non-EU customers exporting products within the scope of EU-REACH to the European Union must ensure that their EU-based importer(s) register all relevant substances, where applicable.

To avoid EU-REACH registration and to ensure compliance with the Regulation, EU-based importers can make use of the re-import exemption. Substances which have been registered according to Title II of REACH, exported and then imported back (re-imported) are exempted from registration under the following conditions¹:

- the substance must have been registered or exempt² before it was exported from the EU;
- the substance already registered and exported must be the same as the substance being re-imported (no chemical modification between registration and re-import);
- the substance must not only be the same, but it must actually proceed from the same supply chain in which the substance was registered (substance must come from the registered EU-source directly);
- the re-importer must have been provided with information on the exported substance, and that information must comply with the requirements established under EU-REACH for the provision of information down the supply chain.

Please note that Ashland does not cover third-party imports through an Ashland Only Representative. We can assist you with calculating volumes per your importer (some substances may remain below the registration threshold of 1 t/year) or provide you, if available, with (alternative) materials from European stock, which are EU- REACH compliant.

If you have questions regarding any REACH-related subject, please contact us via your Ashland customer representative.

Kind regards,

Tim McArragher
Snr. Regulatory Affairs Manager – EMEA

¹ This is information taken from ECHA's guidance. You should make your own assessment of what is required.

² Exemption other than <1t/year.

IMPORTANT DISCLAIMER: This information has been gratuitously provided by Ashland. Although it is intended to be accurate, Ashland DISCLAIMS ANY AND ALL LIABILITY, EITHER EXPRESS OR IMPLIED. This information is based on many factors beyond Ashland's control, including but not limited to the completeness and accuracy of information received, or the conditions prevailing when operations were observed and/or sampled. In choosing to rely on or use this information, you assume all risk including the results obtained and agree to indemnify Ashland against any and all claims. All recommendations or suggestions must be evaluated by you to determine their applicability or suitability for your particular program. Any information claimed by Ashland to be confidential or proprietary is not to be disclosed to any third party.

The United Kingdom has exited the EU, however REACH and/or REACH-type requirements still continue to apply. Please refer to "Ashland position on Brexit" Letter for further information.