

Nov. 13th 2020

To whom it may concern;

Subject: CLP for RP Agent

On behalf of the exporter of this product, MGC, MITSUBISHI GAS CHEMICAL CO, INC would like to inform that the entity who import this product into European Economy Area (EEA) and the entity who obtained this product in EEA should subject to CLP (EC) 1272 / 2008.

1) Importer Obligation about CLP regulation

The importer is obliged to classify, label, pack the product in accordance with the regulation and he need to notify hazardous substance to the C&L Inventory.

2) Downstream User Obligation about CLP Regulation

The downstream user should evaluate the classification, labelling and packing of the product is correct. He is also obliged to check the PCN, Poison Center Notification, (see below) is correct and eventually proceed a PCN on their own.

3) About PCN

The importer and the entity who import this product from other Member State should submit PCN to the Member State. Unfortunately, a representative is not allowed for PCN.

For the assistant with the above, please contact our EU legal entity.

The above mentioned obligation may not be conclusive, please check if you have further requirements.

4) EU legal entity of MGC

Please contact below;

MITSUBISHI GAS CHEMICAL EUROPE GmbH (MGCE)

Immermannstr. 13, 40210 Duesseldorf, Germany

Tel: +49 (0)211 - 36 30 80

Fax: +49 (0)211 - 35 44 57

E-Mail: reach@mgc-europe.de

Privacy policy: <http://www.mgc-europe.de/policy.html>

5) Who has obligation

Please refer to the below product flow and the table.

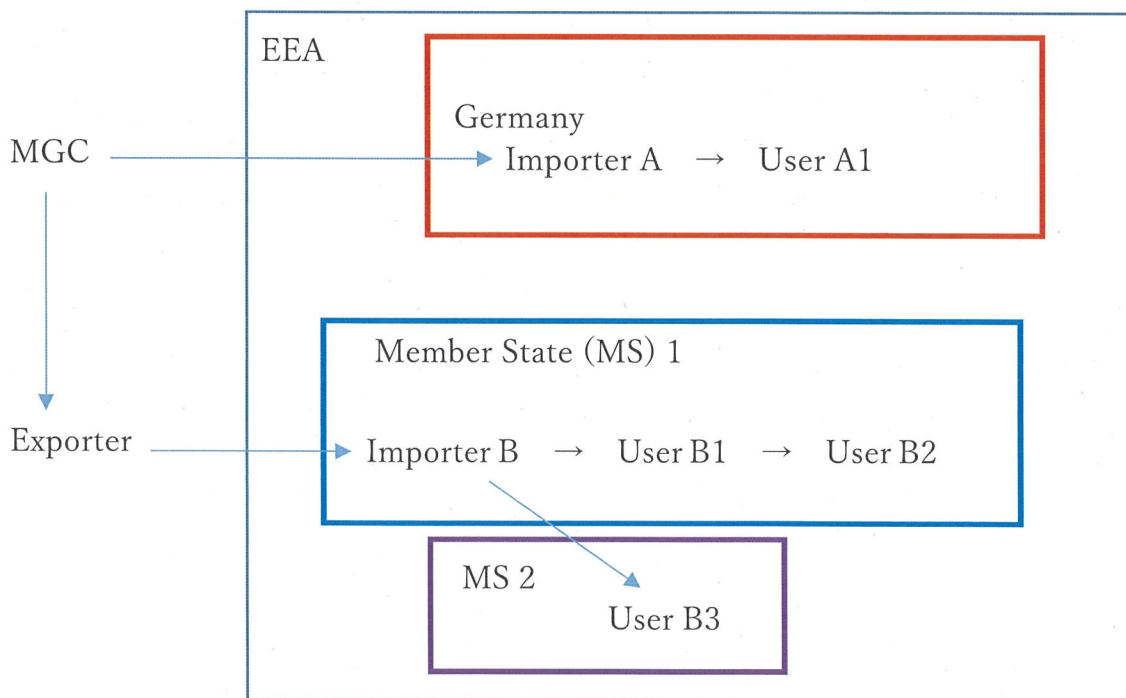


Table: Relationship between an Entity and a role under CLP

	Entity	Role under CLP	CLP	PCN
	MGC	Non-EU entity	No	No
	Importer A	Importer	Yes, please as MGCE for support	Yes
	User A	Downstream User	Check, if supplied information are correct, if not please check the ECHA guidance	No
	Exporter	Non-EU entity	NO	NO
	Importer B	Importer	Yes, please as MGCE for support	Yes (Submit to PC of MS1)
	User B1	Downstream User	Check, if supplied information are correct, if not please check the ECHA guidance	No
	User B2	Downstream User	Check, if supplied information are correct, if not please check the ECHA guidance	No
	User B3	Downstream User Importer of MS2	Check, if supplied information are correct, if not please check the ECHA guidance	Yes (Submit to PC of MS2)

Please also check relevant guidance.

If you have any question, please contact our representative MGCE without hesitation

Sincerely yours,



YOSHIZAKI, Kenji

General Manager / Sales Group

Oxygen Absorbers Division

Specialty Chemicals Business Sector