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Aspen Aerogels REACH Statement

Aerogel Blankets Are Considered Articles Under REACH

Items regulated under the REACH Directive are divided into three main categories: substances, articles, and preparations. An **Article** is any object that has been given a specific shape, surface or design which determines its function to a greater degree than does its chemical composition (e.g. manufactured goods such as textiles, electronic chips, etc.). Aspen Aerogels' products are synthetic amorphous silica impregnated fabrics. The function of the product is to insulate. The physical nature of the product (i.e. aerogel void space) determines its function. Therefore, Aerogel insulation blankets are considered an article, not a substance or preparation, under the REACH directive.

Aerogel Blankets Are Articles Without "Intended Release"

Registration for substances in articles by producers outside the EU is required only if:

- The substances are "intended to be released" from the produced or imported article(s) during "normal and reasonable foreseeable conditions of use"

Per REACH Implementation Guidance¹, only substances that are intentionally released from articles should be considered for registration. Although Aerogel blankets can be dusty, the blanket dust is not an intended release. Articles without intended release do not need to subscribe to any registration or pre-registration requirements under REACH. Therefore, Aerogel blankets are exempt from REACH registration requirements because the products are articles without intended release.

Aerogel blankets do not contain any material listed in the "Candidate List of Substances of Very High Concern for authorization" dated December 15, 2010.

Aspen Aerogels Pre-Registration

Although Aspen Aerogels firmly believes that Aerogel blankets are exempt articles, as a precaution, Aspen pre-registered the base silica aerogel monomer under Silanamine, 1,1,1-trimethyl-N-(trimethylsilyl)-, hydrolysis products with silica (Submission No. XT373528-91). Aerogel is a polymer formed from this base monomer. Polymers are exempted from the registration provisions of Title II of REACH (Article 2(9)).

¹ Guidance for Requirements for Substances in Articles (May 2008); Guidance for the Implementation of REACH