An die interessierte Partei / To whom it may concern

Dr. Stefan Dreiheller
Quality Unit / Regulatory Affairs

Date of issue: 01.12.2015
Page 1/1
Doc.-No. EIP-3012
Revision 2

REACH
Meggle products:
- Co-processed excipients: MicroceLac® 100

The product is a mixture in the meaning of Regulation (EC) No. 1907/2006, Art.3 No. 2 of the substances lactose and the polymer cellulose wherein the crystalline regions are purified from amorphous regions.

The intended use of the above mentioned product is relevant regarding registration under REACh. According to Regulation (EC) No. 1907/2006, Art. 2 No. 5 (a) and (b), the provisions of Titles II (registration), V (downstream users), VI (evaluation) and VII (authorization) do not apply to the extent that a substance is used in medicinal products for human or veterinary use and to the extent that a substance is used in food or feedingstuffs.

Furthermore, lactose and cellulose pulp are included to Annex IV of Regulation (EC) No 1907/2006. According to Regulation (EC) No. 1907/2006 Art. 2 No. 7 (a), the provisions of Titles II (registration), V (downstream users), VI (evaluation) do not apply to substances listed in Annex IV as sufficient information is known about these substances that they are considered to cause minimum risk because of their intrinsic properties.

Freundliche Grüße / Best regards

Dr. Stefan Dreiheller