

To Whom It May Concern

April 9, 2026

GSI Creos Corporation  
Corporate Planning Department  
Planning & Public Relations Division,

**GSI Creos endorses the Nanotechnology Business Creation Initiative's position paper on amendments to REACH proposed by the German Federal Institute for Occupational Safety and Health**

GSI Creos Corporation (Minato-ku, Tokyo / Representative Director, President & CEO: Tadaaki Yoshinaga) hereinafter referred to as "the Company" has been working with external organizations to promote public acceptance of carbon nanotubes (CNTs).

In January 2026, the Nanotechnology Business Creation Initiative (NBCI) issued a position paper in response to the proposal by the Federal Institute for Occupational Safety and Health (BAuA) of Germany. BAuA has proposed the uniformly grouping of fibrous substances based on the WHO's definition of fibrous substances\* for risk assessment and regulatory decision-making of fibrous substances.

However, NBCI points out that, since CNTs exhibit significant physicochemical diversity, regulating them solely on the basis of shape and size lacks scientific justification. Given that CNTs are an indispensable material for a broad range of industries, the paper also expresses concern that such regulations may prevent European citizens and the global community from fully benefiting from the many advantages of CNTs. In view of these considerations, NBCI strongly calls for continued discussions grounded in scientific evidence.

The Company fully endorses this position paper and is actively disseminating it.

■ **Position paper issued by the Nanotechnology Business Creation Initiative**

[English version](#)

[Japanese version](#)

\*The World Health Organization (WHO) defines substances consisting of fibers longer than 5 μm with a diameter less than 3 μm and an aspect ratio greater than 3:1 as WHO fibers.

**【About GSI Creos Corporation】**

GSI Creos has 9 business locations in Japan and 24 overseas and is engaged in both the "textile" and "industrial products" businesses globally. It is a business creation-type trading company engaged in a wide range of fields, including textiles, raw materials, fabrics, apparel products, chemicals, hobby products, machinery, semiconductor components, and nanotechnology by making full use of our domestic overseas networks.

Our purpose is to "**As a "business producer" seeking quality of life for the next generation, we realize the happiness of all the people.**". Guided by this vision, we promote ESG management with the goal of addressing social issues and contributing to the realization of people's happiness.

**<Contact point for inquiries regarding this matter>**

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