

## **REGULATION (EC) No. 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH).**

Under the REACH Regulation, **I.C.E.L. S.C.p.A.** is classified as a "downstream user," specifically as a "producer of articles" and a "supplier of articles" (see Articles 3.4 and 3.33), whereas under the Regulation itself, any product, component, or semi-finished product could be defined as an article.

We hereby inform you that:

- 1.** The articles supplied by **I.C.E.L. S.C.p.A.** fall within the definition of "articles," as defined in Article 3.3, and are not covered by the core provisions of the REACH Regulation as such, such as registration. Furthermore, these articles do not release substances under normal or reasonably foreseeable conditions of use, pursuant to Article 3.4. 7 of the REACH Regulation;
- 2.** **I.C.E.L. S.C.p.A.** is not classified as a "manufacturer" or "importer" of substances, as defined in Articles 3.9 and 3.11 of the REACH Regulation; therefore, it is exempt from the obligation to register the substances used in its production processes;
- 3.** **I.C.E.L. S.C.p.A.** implements and maintains the necessary actions to ensure ongoing compliance with the applicable provisions of the REACH Regulation. In particular, the company:
  - manages supply chain communication channels with the aim of:
    - ensuring information is updated in line with developments in the REACH Regulation;
    - ensuring that the specific use of raw materials is integrated into the registration dossier and, where applicable, into the exposure scenarios;
    - identifying alternative suppliers to ensure continuity of supply;
  - research and development of alternative processes or substances when regulations limit or ban the use of certain substances from the market, in order to guarantee **I.C.E.L. S.C.p.A.** customers the continuity, quality, and performance of the products supplied;
  - evaluation of the substances used in the articles supplied, in order to identify and communicate to you, in accordance with Article 33 of the REACH Regulation, the possible presence of substances classified as SVHC (Substances of Very High Concern) included in the Candidate List (<https://echa.europa.eu/it/candidate-list-table>) and subsequent amendments, if they exceed the concentration limits of 0.1% w/w.

### **I.C.E.L. S.C.p.A.**

With the update to the Candidate List on February 4, 2026, the two substances listed below were added, increasing the list of Candidate Lists of Substances of Very High Concern (SVHC) to 253 for chemicals that can harm humans or the environment.

- 1) **n-Hexane**: A colorless, volatile, and highly flammable liquid, it is toxic, can cause skin irritation, and is suspected of being reprotoxic. It is mainly used as a nonpolar solvent in industry, in formulations, in the production of polymers and coatings, and as a cleaning agent.
- 2) **4,4'-[2,2,2-trifluoro-1-(trifluoromethyl)ethylidene]diphenol and its salts**: A reprotoxic substance. It is used as a process regulator and cross-linking agent in the production of polymers/elastomers.

The company also monitors REACH restrictions (Annex XVII), including recent updates regarding microplastics (EU Regulation 2023/2055).

4. **I.C.E.L. S.C.p.A.** is aware of the notification obligations to the SCIP (Substances of Concern In articles as such or in complex objects - Products) Database <https://echa.europa.eu/it/scip-database>, introduced as of January 5, 2021, by Directive 2018/851/EU for articles containing SVHCs above 0.1% w/w, and undertakes to provide the SCIP notification number where applicable.

For further information on **I.C.E.L. S.C.p.A.**'s activities regarding the REACH Regulation, please contact the Research & Development department - Tel. +39 0545 913111 - [mirco.lacchini@icelscpa.it](mailto:mirco.lacchini@icelscpa.it)

Lugo (RA) IT, 28/04/2026



**Mirco Lacchini**

R&D Director

## I.C.E.L. S.C.p.A.