

For the kind attention of the Purchase Department

Object: **Regulation (EC) No 1907/2006 concerning the registration, evaluation, authorisation and restriction of chemicals (REACH).**

Update: 23 January 2024

according to REACH Regulation, **I.C.E.L. S.C.p.A.** is qualified as a “downstream user”, in particular as “articles producer” and “articles supplier” (see art.3.4 and 3.33), where according to the regulation itself, could be defined an article any product, component or semi-treated product.

We inform you herewith that:

1. Products supplied by **I.C.E.L. S.C.p.A.** are complex object consisting in an assembly of several components that fall under the definition of articles (art.3.3). Such articles do not release any substance under normal or reasonably foreseeable conditions of use;
2. **I.C.E.L. S.C.p.A.** is not qualified as “producer” or “importer” of substances, as defined in art.3.9 and 3.11 of REACH Regulation; therefore, it is not obliged to register the substances used in its production processes;
3. **I.C.E.L. S.C.p.A.** maintains active the necessary actions enabling the company to continually grant compliance with all the applicable dispositions of REACH Regulation. Specifically
 - the management of communication channels with the supply chain with the aims of:
 - updating of necessary information in reference to the evolution of the REACH regulation;
 - to make sure that the specific use of cables will be integrated in the registration dossier and eventually in the exposure scenario (if expected);
 - to find alternative suppliers with the aim to guarantee the supplying continuity;
 - the research and development of alternative processes or substances should the regulation restrict or banish the use of some substances from the market, in order to guarantee to the **I.C.E.L. S.C.p.A.** customers the continuity, the quality and the performances of the supplied products;
 - the assessment of the substances used in the supplied products, in order to identify and communicate to you, according to the provisions of the art. 33 of REACH Regulation, any presence of substances classified as SVHC (Substances of Very High Concern) and included in the annex XIV or in the Candidate List (<https://echa.europa.eu/it/candidate-list-table>) and subsequent changes, if exceeding the concentration limits of 0.1% in weight/weight for each article that is part of the product.

The last update of the Candidate List is dated 19 December 2023 with the introduction of five new substances to the SVHC list, with decision D(2023)8585-DC which entered into force on 23 January 2024, the reasons for the introduction are reported in the articles 57c, 57d and 57e.

4. **I.C.E.L. S.C.p.A.** is aware of the notification obligations to the [SCIP Database](https://echa.europa.eu/it/scip-database) (*Substances of Concern In articles as such or in complex objects - Products*) <https://echa.europa.eu/it/scip-database>, introduced, starting from January 5, 2021, by Directive 2018/851 / EU for articles containing SVHC substances over 0.1% by

I.C.E.L. S.C.p.a.



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

P.IVA / COD. FISC. / REG.IMPRESA RA N.00432110393
ALBO SOC. COOP.:N° A104985
SEZ.: A MUTUALITA' PREVALENTE
CAT.:PRODUZ. E LAVORO
SDI: MZ02A0U
C.C.I.A.A. R.E.A. N.90455
N. DITTA OP. CON ESTERO RA005537



weight/weight and undertakes to provide, the SCIP notification number where applicable.

Based on the EuropaCable guide and following related checks we can confirm that for all the cables produced by **I.C.E.L. S.C.p.A.** no registration in the SCIP database is necessary because the aforementioned products do not contain SVHC substances with a weight equal to or greater than 0.1% by weight/weight.

Link to the EuropaCable guide.

<https://europacable.eu/>

For further needs you may have on the **I.C.E.L. S.C.p.A.** activity regarding the “REACH” regulation you can contact the Research & Development service Tel +39 0545 913111 - mirco.lacchini@icelscpa.it

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