



For the attention of the Purchasing Department

Subject: **REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).**

Updated June 25, 2025

Pursuant to the REACH Regulation, ICEL SCpA . is qualified as a "downstream user", in particular as a "producer of articles" and "supplier of articles" (see art. 3.4 and 3.33), where according to 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 basic provisions of REACH as such, such as registration. Furthermore, 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 a "producer" 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.** maintains the necessary actions to constantly ensure compliance with all applicable provisions of the REACH Regulation. Specifically:
 - the management of communication channels in the supply chain with the aim of:
 - an update of the necessary information in relation to the evolution of the REACH regulation;
 - to ensure that the specific use of the cables is integrated into the registration dossier and possibly into the exposure scenario (if applicable),
 - find alternative suppliers with the aim of ensuring continuity of supply;
 - research and development of alternative processes or substances where the legislation limits or bans 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;
 - the evaluation of the substances used in the articles supplied, in order to identify and communicate to you, in accordance with art. 33 of the REACH Regulation, the possible presence of substances classified as SVHC (Substances of Very High Concern) and included in Annex XIV or in the Candidate

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

List (<https://echa.europa.eu/it/candidate-list-table>) and subsequent amendments, if higher than the concentration limits of 0.1% weight/weight.

With Helsinki Decision D(2025)4165-DC of 13/06/2025 the candidate list of substances of very high concern (SVHC) increases to 250 entries for chemical substances that may harm people or the environment.

- 1) **Tetra(sodium/potassium)7-[(E)-(2-acetamido-4-[(E)-(4-{[4-chloro-6-({2-[(4-fluoro-6-{[4-(vinylsulfonyl)phenyl]amino}-1,3,5-triazine-2-yl)amino]propyl}amino)-1,3,5-triazine-2-yl]amino}-5-sulfonato-1-naphthyl)diazenyl]-5-methoxyphenyl}diazenyl]-1,3,6-naphthalenetrisulfonate (Reactive Brown 51):** toxic for reproduction, used as a dye in the production of textiles, leather and fur.
- 2) **Decamethyltetrasiloxane:** flammable substance, very persistent and very bioaccumulative, used as an additive in industrial processes or as an intermediate for other products manufacturing.
- 3) **1,1,1,3,5,5,5-heptamethyl-3-[(trimethylsilyl)oxy]trisiloxane:** flammable substance, very persistent and very bioaccumulative, used as an additive in industrial processes, as an intermediate for other products manufacturing, in cosmetics and personal care products.

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

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

EuropaCable guide: <https://europacable.eu/>

For further information on the activity of **I.C.E.L. S.C.p.A.** . regarding the "REACH" Regulation, you can contact the Research & Development service - Tel. +39 0545 913111 – mirco.lacchini@icelscpa.it