



For the kind attention of the Purchase Department

Object:

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

Updated November 07, 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;

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

- 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% weight by weight (w/w) for each article that is part of the product.

The latest update of the Candidate List is dated 07 November 2024 with the introduction of Triphenyl phosphate (C<sub>6</sub>H<sub>5</sub>O)<sub>3</sub>PO to the SVHC list. ECHA highlights that the added chemical has endocrine disrupting properties (Article 57(f) - environment) and is used as a processing aid, for example as a flame retardant". The inclusion follows the Commission Decision (EU) 2024/2779 establishing the expert group on ecodesign of sustainable products and energy labelling. The current list of SVHC therefore increases to 242 substances.

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 January 5, 2021, by Directive 2018/851 / EU for articles containing SVHC substances over 0.1% weight by weight (w/w) 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% weight by weight (w/w).

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](mailto:mirco.lacchini@icelscpa.it)