

For the kind attention of the Purchase Department

Object: Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).

Lugo, 29/03/2021

Dear Sirs,

according to REACH Regulation, **ICEL 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 **ICEL 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. **ICEL 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. **ICEL 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:
 - a. updating of necessary information in reference to the evolution of the REACH regulation;
 - b. to make sure that the specific use of cables will be integrated in the registration dossier and eventually in the exposure scenario (if expected),
 - c. 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 **ICEL 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 and subsequent changes, if exceeding the concentration limits of 0,1% in weight/weight for each article that is part of the product.

Based on the EuropaCable guide and following related verifications, we can confirm that for cables manufactured by **I.C.E.L. S.C.p.a.** registration in the SCIP database is not necessary because the aforementioned products do not contain SVHC substances with a weight equal to or greater than 0.1%.

Link to the EuropaCable guide.

https://www.europacable.eu/?mailpoet_router&endpoint=track&action=click&data=WylxMjE4liwiNTUwYTg1liwiMTI2liwiMWMwMTNIYmQ4YzFklixmYWxzZV0

For further needs you may have on the ICEL's activity regarding the "REACH" regulation please contact R&D Dir. Mirco Lacchini, Tel +39 0545 913111, Fax +39 0545 913172 mail: mirco.lacchini@icelscpa.it

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