

To Whom it may concern

REACH Regulation - (EC) No. 1907/2006

Registration, intended uses and exposure scenarios, SVHC

We would like to inform on the current status (**01/2021**) of the REACH implementations at Nuova Tecnodelta Spa.

The following statements are related to all different products supplied by us.

Pre – Registration / final registration:

On December 1st 2008 the pre – registration period ended. For us as producers of articles (we are in all cases downstream users) exists no obligation of registration of any of our products. We have already informed all suppliers of concern about the use of their products in our technology. In this context we have advised them of the necessity of registration and their responsibility in the supply chain. We are now depending on their proceeding.

Although their responses are not yet complete we can state today that we do not fear any delivery bottleneck caused by missing pre – registration.

There will be, however, a possibility due to REACH that a limited number of special formulations might no longer be offered due to potential raw material restrictions. In any case we have alternatives available.

Where our suppliers have given their statements as a letter of intention this is not legally binding. We are sure you will understand that we ourselves can not sign a legally binding document on such a basis

The substance used / purchased by Nuova Tecnodelta are **INSIDE** the ECHA “List of substances identified for registration in 2010” (**current revision**)

This list is published to give downstream users, manufacturers and importers the opportunity to check that registrations are being prepared for substances which need to be registered in 2010. This is important because substances that should be registered by the end of the year but are not, cannot legally be manufactured, imported or used within the EU after 1 December 2010

Intended Uses and Exposure Scenarios:

In connection with the registration processes, which will take place during the next years, the “Intended Uses” and “Exposures Scenarios” of chemical substances must be developed. We are working on these scenarios in close cooperation with our Supplier and we will communicate this along the supply chain accordingly.

SVHC - Substances of Very High Concern:

The updated official candidate list of “Substances of Very High Concern (SVHC)” has been published on the website of the European Chemicals Agency (<http://echa.europa.eu>) **revision 19/01/2021**

Special duty to give information of the SVHC content in articles follows from article 33 of the REACH regulation, as articles had not been covered by the old chemical legislation even if they might contain hazardous substances.

Based on our analysis **our articles** contains substances from the **actual** candidate list as part of our recipe list. In case that any of additives or auxiliary substances would contain SVHC constituents, they would definitely occur in our articles below the limit of 0.1 % weight by weight, as mentioned in the regulation:

Lead	231-100-4	7439-92-1	27/06/2018
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The content of the previous substances are contained in our articles according to product applicable legislation (DIRECTIVE 2000/53/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 September 2000 – Annex II current revision).

Thus you have now all needed information available concerning substances as listed in the SVHC candidate list related to our articles.

It goes without saying that we will fulfil all legal obligations of information under REACH in future.

According to the information we received and to our own investigations we assume, that the packaging of our products also does not contain any of the substances included in the candidate list in a concentration above 0.1 % weight by weight. Should we receive contrary information – which we do not expect – we will advise you immediately.

Yours sincerely

Massimo Allais
(Chief Executive Officer - CEO)

