

To: Novacciai Martin Customer

Subject: Declaration of compliance with Regulation (EC) No 1907/2006 "REACH"

In relation to the provisions of Regulation (EC) No. 1907/2006 and subsequent amendments and supplements, concerning the registration, evaluation, authorisation and restriction of chemicals, hereinafter the "REACH" Regulation, highlight the following points:

1) Classification of our products

According to the definitions of the REACH Regulation (substance, mixture of article), the products we supply are considered ARTICLES without intentional release of substances, for which registration is not required under art.7

2) Fulfilments of Novacciai Martin SpA

The REACH Regulation does not require the registration of substances recovered from scrap metal if the same comes from EU countries or is purchased from non-EU countries as waste. Considering that all the scrap metal we use falls into these categories, we have not had to proceed with any registration (exemption provided for by art. 2 par. 7 letter d of Regulation (EC) No. 1907/2006)

3) Restrictions on the use of certain substances (Annex XVII)

The products manufactured do not fall under the regime of restriction of use provided by art. 67 and the list in Annex XVII of REACH Regulation.

4) Substances of very high concern "SVHC"

Substances meeting the criteria in Art. 57, identified in accordance with Art. 59 of the REACH Regulation are "substances of very high concern" known as SVHC. Considering that:

- according to the declarations received from our suppliers, these substances have not been intentionally added to the substances/mixtures purchased by us;
- they are not intentionally added by us in the production process;
- traces are present in concentrations not exceeding 0.1% w/w;

We declare that in its articles there are no substances SVHC included in the updated list of candidate substances for inclusion in Annex XIV in concentrations above 0.1% w/w.

Consequently, the following do not apply

- the downstream communication obligation (Art. 33 par.1);
- the obligation to notify the ECHA (Art.7 par.2 letter b) under the REACH Regulation.



NOVACCIAI
MARTIN

Also the obligation to notify to the SCIP database of ECHA of the REACH regulation. Legislative Decree No. 116/2020 art.180 par.3; for suppliers of articles that contain at least one "SVHC in Candidate List" in a concentration above 0.1% w/w, is not applicable.

The safety data sheet of our products shows the presence of traces of some SVHC in contraction not higher than 0.01% w/w to which the above mentioned obligations are not applicable.

Updates on the inclusion of substances in the Candidate list of SVHC or changes received from Our suppliers or concerning Our products will be promptly communicated by Us.

The above statement applies to substances listed on the Candidate List of SVHC as published to date on the ECHA website (www.echa.europa.eu).

We remain at your disposal for further information and would like to take this opportunity to express our sincere appreciation to you.

Ing. Andrea Riccardi
HSE Manager
18/06/2021

Novacciai Martin S.p.A. Società a Socio Unico
Società unipersonale sottoposta a direzione coordinamento di O.R.I. Martin S.p.A.

Via Verdi 26, 28060
S. Pietro Mosezzo NO, Italy
P. IVA IT01229090038

C.F. e R.I. 07535870153
R.E.A. Novara 159506
Cap. Soc. € 5.500.000 i.v.

Tel. +39 0321 530611
Fax +39 0321 530627

info@novacciaimartin.it
www.novacciaimartin.it

