



SUBJECT: REACH Regulation (CE) n. 1907/2006 **(European Regulation for Registration, Evaluation and Authorisation of Chemicals)**

POINT 1 - Introduction

Dear Customer,

since 1 June 2007 entered into force the REACH Regulation (CE) n. 1907/2006 of the European Parliament and Council. In accordance with the provisions of REACH, who manufactures or imports from outside the EU a substance on its own or contained in a preparation, in quantities equal to or greater than one tonne per year, is obliged to register it on the European Chemical Agency.

In reference to the provisions of the REACH Regulation, we communicate you that we have adapted to this standard and all our products are in accordance with REACH Regulation.

POINT 2 – Standardization

- For the rigorous legal application of the REACH Regulation, the only reference text on a legal basis is the text published in the Official Journal.
- The ECHA guidelines provide information that does not constitute legal advice. However, guidelines, sheets, practical guides and more issued by ECHA are valuable operational tools in the implementation of REACH Compliance.
- Other documents such as the "Position Papers" of EUROFER, (European Confederation of Iron and Steel Industries), represent a significant point of reference for us and for our suppliers (steel mills) in the application of the Regulation in question.

POINT 3 – Position of the steel mills

- **The wire rod used for the production of our welding consumables is considered an Article without intentional release of substances for which REACH Registration is not foreseen.**
- **As of today, even after a recent guideline published by ECHA in March 2023 on borderline products between Articles and substances/mixtures, all steel mills continue to consider welding wire rod as an Article without intentional release of substances. This is because there is, to date, no final decision at EU level on whether welding wire is a special product/article or mixture.**
- **Consequently, welding consumables (wires and rods) also continue to be considered as Articles.**
- Our suppliers (steel mills) have assured us, through a written declaration, that they have fulfilled all the obligations established by REACH for the products they manufacture and supply to ITALFIL S.p.A., ensuring, in turn, that their suppliers have undertaken adequate actions for the purpose of fulfilling the obligations imposed by the Regulation



POINT 4 – ITALFIL Position

- **ITALFIL does not manufacture or import chemicals but only performs a drawing activity of the wire rod received from the steel mills, so ITALFIL is not subject to REACH registration.**
- EUROFER (European Confederation of Iron and Steel), with a “position paper” on the website, declare its position, explaining why, to consider “Articles” both welding rod and welding wires and rods. This is because an item cannot be made into a preparation or mixture and the wire rod, as article, can be used or worked for specific scopes, welding included. Wires and tig rods for welding has got standard dimensions (EN 544), so an exactly defined shape, which is an indispensable precondition for their further function in the welding process. While using, the article “all-weld metal” become a part of a different article, namely a structural components.
- REACH Regulation required that the suppliers of articles that contain one or more substances classified as SVHC, in concentration higher than 0.1% by weight, must provide adequate informations.
- The wire rod used by ITALFIL to produce the welding consumables and, so, ITALFIL welding consumables, **DOES NOT contain chemical substances classified as SVHC and/or substances under authorization** according to Annex XIV of REACH and, in any case, in concentration higher than 0.1% by weight. Published list of SVHC substances on ECHA website.
- The wire rod used by ITALFIL to produce the welding consumables and, so, ITALFIL welding consumables, except of Note 1 (conditions for the restriction), DOES NOT contain substances under use restriction according to Article 67 and list in Annex XVII of REACH Regulation.

Note 1: Nichel (restriction n° 27) – Do not use Nichel Alloys (EINECS 231-11-4) for uses included in Annex XVII (example: manufacturer of objects / metallic articles intended to come into direct and prolonged contact with skin such as earrings, bracelets, etc.)

- Safety data sheets (MSDS) have been developed for all our welding consumables and are updated in accordance with the Regulations and Directives in force.

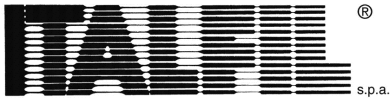
In addition, we declare you that we have issued an inventory of all substances purchased from us and used in our production processes (such as lubricants, materials for packaging, etc) and, based on the declarations we received from our suppliers we confirm you that:

- **All chemical substances have been registered by our suppliers or by their pre-supplier**
- **None of the products purchased by ITALFIL and used in its processes contain chemical substances classified as SVHC and, in any case, in concentration higher than 0.1% by weight, according to Annex XIV of REACH and following edits. Published list on ECHA website**

POINT 5 - Conclusion

Based on the above, and on the declarations recently received from our raw material suppliers, wire rod, as of today, continues to be considered an Article without intentional release of substances, on the basis of the official documents available and on the " Position Papers" issued by EUROFER.

Consequently, even the welding wires and rods produced by ITALFIL S.p.A. through drawing operation, are, as of today, considered Articles.



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Naturally, the REACH Regulation, although it has been in force since 2007, as stated above, is constantly updated, revised, implemented and the commitment on the part of ITALFIL S.p.A. is that of continuous training and periodic discussion with its suppliers, so as to be constantly informed about it and be able to consequently update our documents to be issued to customers in order to ensure correct communication within the entire supply chain.

If we discover that, or our suppliers information on changes of dangerous substances, we will notify you immediately.

This document cancel and replace all the previous versions.

Gazzo, 04/09/2023

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