

For the attention of the Purchasing Department

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

Updated January 21, 2025

Pursuant to the REACH Regulation, **NRG Cables Srl** is qualified as a "downstream user", in particular as a "supplier of articles" and "supplier of articles" (see art. 3.4 and 3.33), where according to the regulation itself, any product, component or semi-finished product could be defined as an article.

We hereby inform you that:

1. The articles supplied by **NRG Cables Srl** fall within the definition of "articles", as defined in Article 3.3, and are not covered by the basic provisions of REACH as such, such as registration. Furthermore, such articles do not release any substance under normal or reasonably foreseeable conditions of use.
2. **NRG Cables Srl** is not qualified as a "supplier" or "importer" of substances, as defined in articles 3.9 and 3.11 of the REACH Regulation; therefore it is exempt from the obligation to register the substances used in its production processes;
3. **NRG Cables Srl** maintains the necessary actions to constantly ensure compliance with all applicable provisions of the REACH Regulation. Specifically:
  - management of the supply chain communication channels with the objectives of:
    - updating the necessary information in reference to the evolution of the REACH regulation;
    - ensuring that the specific use of cables is integrated into the registration dossier and possibly into the exposure scenario (if foreseen);
    - finding alternative suppliers with the aim of ensuring the continuity of the offer;
  - the search for alternative products, where the regulation limits or bans the use of certain substances from the market, in order to guarantee **ICEL SCpA** customers the continuity, quality and performance of the products supplied;
  - the evaluation of the substances used in the articles supplied, in order to identify and communicate to you, in accordance with art. 33 of the REACH Regulation, the possible presence of substances classified as SVHC (Substances of Very High Concern) and included in Annex XIV or in the Candidate List (<https://echa.europa.eu/it/candidate-list-table>) and subsequent amendments, if higher than the concentration limits of 0.1% weight/weight.



With Helsinki Decision D(2024)7663-DC of 17/12/2024 the candidate list of substances of very high concern (SVHC) increases to 247 entries for chemical substances that may harm people or the environment.

- 1) **6-[(C10-C13 ) -alkyl- (branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid:** Toxic to reproduction and used in lubricants, greases, and metalworking fluids .
- 2) **O,O,O- triphenylphosphorothioate:** used in lubricants and greases .
- 3) **Reaction mass of terphenylthiophosphate and butylated tertiary phenyl derivatives:** It is not registered under REACH. It has , however, been identified as SVHC to avoid deplorable substitution .
- 4) **Octamethyltrisiloxane:** very persistent, very bioaccumulative, used in cosmetics, pharmaceuticals, cleaning products and sealants and adhesives .
- 5) **Tris(4-nonylphenyl, branched and linear) phosphite:** UPDATED ENTRY, has endocrine disruptor properties that affect the environment and is used in polymers, adhesives, sealants and coatings .
- 6) **Perfluamine:** very persistent, very bioaccumulative, used in the manufacture of electrical, electronic and optical equipment and machinery and vehicles .

4. **NRG Cables Srl** is aware of the notification obligations to the [SCIP Database](https://echa.europa.eu/it/scip-database) ( *Substances of Concern In articles as such or in complex objects - Products* ) <https://echa.europa.eu/it/scip-database> , introduced, starting from 5 January 2021, by Directive 2018/851/EU for articles containing SVHC substances above 0.1% weight by weight and undertakes to provide the SCIP notification number where required.

Based on the EuropaCable guide and following related checks we can confirm that for all cables supplied by **NRG Cables Srl** no registration in the SCIP database is required because the aforementioned articles do not contain, within them, SVHC substances with a weight equal to or greater than 0.1% weight/weight

EuropaCable guide: <https://europacable.eu/>

For further information on the activity of **NRG Cables Srl** regarding the "REACH" Regulation, you can contact you can contact the following references + 39 333 2685936 or [info@nrgcables.it](mailto:info@nrgcables.it).

  
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