

Declaration about Safety Data Sheets pursuant to art. 31 of the REACH Reg.



Rancate, 25.02.2014

The Article 31 of the Regulation (EC) No. 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency,

establishes that a safety data sheet shall be provided by suppliers of substances¹ or preparations² meeting certain criteria (dangerous, or persistent, bioaccumulative, toxic, or included in Annex XIV of the REACH Regulation).

The above mentioned Article 31 does not foresee any obligation to provide safety data sheets for suppliers of articles³.

Therefore, as **NOVAMETAL SA supplies only articles, no safety data sheets are expected to be provided by NOVAMETAL SA.**

Please, also consider the following reference documents, providing further explanations aimed to objectively motivate such a statement:

- in attachment - "NOVAMETAL SA declaration of conformity to the REACH Regulation";
- here linked - "[EUROFER position paper determining the borderline between preparations and articles for steel and steel products - 28.10.2008](#)";
- here linked - "[EUROFER position paper on steel welding wire - 07.01.2010](#)".

On the basis of the aforementioned premises, NOVAMETAL SA hereby states that each and every - if any - of the safety data sheets eventually transmitted in the past **must be considered as common information and not having any regulatory validity.**

Thereby, in order to avoid and prevent any misjudged interpretation of the NOVAMETAL SA position with respect to the REACH prescriptions, NOVAMETAL SA warns whoever has eventually received such a kind of document to make any use of them.

In the meanwhile, NOVAMETAL SA is ready to make all the best to support its Customers - but respecting the borders of its role within the REACH regulatory framework. It is possible to provide literature's documentation that can be used for reference purposes only.

¹ Substance: means a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition (Regulation EC n.1907/2006, art.3 par. 1).

² Preparation: means a mixture or solution composed of two or more substances (Regulation EC n.1907/2006, art.3 par. 2).

³ Article: means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition (Regulation EC n.1907/2006, art.3 par. 3).