

Declaration of conformity to the REACH Regulation



Rancate, 25.02.2014

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 provisions on substances and preparations that shall apply to the manufacture, placing on the market or use of such substances on their own, in preparations or in articles and to the placing on the market of preparations.

On this regard and within this scope, NOVAMETAL SA hereby states that is fully aware of the prescriptions and the requirements defined by the Regulation, ensuring in the meanwhile full and continuous compliance to them.

In order to provide an overall overview of the NOVAMETAL SA position within the framework of the REACH Regulation, please consider the following items:

- according to Article 3 par.3 of the REACH Regulation, **NOVAMETAL S.A. produces articles¹**;
- according to Article 3 par.1, NOVAMETAL S.A. does not produce neither place on the market substances² of the REACH Regulation, either on their own or in one or more preparation(s); therefore it is not required to fulfill the related requirements as foreseen by the REACH Regulation;
- the registration³ according to Article 7 par.1 of the REACH Regulation is not expected, as NOVAMETAL S.A. produces articles which do not contain substances intended to be released under normal or reasonably foreseeable conditions of use;
- the notification⁴ according to Article 7 par.2 is not expected, neither the duty to communicate information according to Article 33 of the REACH Regulation is applicable, as NOVAMETAL S.A. produces articles that do not contain substances meeting the criteria in Article 57 of the above mentioned Regulation (SVHC⁵) above a concentration of 0,1% weight by weight;
- assuming the aforementioned premises, NOVAMETAL S.A., as being established outside the Community, has however decided to appoint the company Cogne Acciai Speciali S.p.A. as Only representative⁶, with the purpose of a further guarantee of compliance to the REACH Regulation requirements.

NOVAMETAL SA ensures that its Customers will be continuously kept informed about any change or updating of the regulatory prescriptions, under the REACH scope.

¹ 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).

² Substance: means a chemical element and its compounds in the natural state 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).

³ Registration in order to submit a registration, manufacturers and importers shall transmit to the European CHemicals Agency (ECHA) a dossier containing information on the substances that they produce or import, on the evaluation of the risks due to the substances and to the definition and recommendation of suitable measure to manage the risks.

⁴ Notification: in order to notify, manufacturers, importers or producers shall transmit to the Agency information on, at least: identity of the manufacturer, importer or producer of articles; the identity of the substance(s); the classification, if any, of the substance(s); the tonnage range of the substance(s) (Regulation EC n.1907/2006, art.9 par. 2).

⁵ SVHC: Substances of Very High Concern - substances that meet the criteria in Art. 57 of the Regulation EC n.1907/2006, identified and maintained updated within the "Candidate List for authorization" (<http://echa.europa.eu/web/guest/candidate-list-table>), established according to the procedures described in Art. 59 of the Regulation EC n.1907/2006.

⁶ Regulation EC n.1907/2006, art.8.