

Rancate, 21.11.2024

**Subject: Declaration of conformity to the REACH Regulation**

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:

- welding solid metal wires has to be considered a mixture (alloy) under REACH, based on the Catalogue of borderline cases between articles and substances/mixtures <sup>(1)</sup> issued by the Borderline Working Group (BWG), consisting of representatives of the HelpNet, the Forum and the ECHA Secretariat;
- non-welding wires has to be considered as articles under REACH, based on the position adopted by all main steel/nickel/aluminium producers associations and similar <sup>(2)</sup><sup>(3)</sup>;
- the registration according to Article 7 par.1 of the REACH Regulation is not expected, as NOVAMETAL SA produces articles which do not contain substances intended to be released under normal or reasonably foreseeable conditions of use;
- Safety Data Sheets: Novametal SA have developed Safety Data Sheets, both for the welding solid metal wires and the wires aimed to non-welding applications, even if in this latter case it would not been expected;
- Candidate List for authorization (ref. art.57 of the REAH Regulation): Novametal SA is monitoring the substances on the candidate list and their presence in our products; at the date of issuing of the current document, we confirm that our products do not contain any SVHC substance above a concentration of 0,1% weight by weight.

We will continuously keep you informed about any change or updating of the regulatory prescriptions under the REACH scope.

We remain at your disposal for any further needs.



NOVAMETAL S.A.  
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Best regards.

Michele Lipari  
Head of Quality, EHS, ESG

<sup>(1)</sup> [Catalogue of borderline cases between articles and substances/mixtures](#)

<sup>(2)</sup> <https://www.eurofer.eu/assets/publications/position-papers/reach-position-papers/EUROFER-position-paper-determining-the-borderline-between-preparations-and-articles-for-steel-and-steel-products.-28-October-2008.pdf>

<sup>(3)</sup> <http://www.aluminium-reach-consortium.eu/>