

Fusignano, 01.10.2010

Object: REACH 1907/2006

Dear Sir and Madam,

As everybody knows since 1st June 2007 the REACH Regulations 1907/2006 has come to force concerning the registration, evaluation, authorisation and restriction of chemicals.

This kind of regulations are referred mainly to producers and importing companies of substances, but it also contains instructions that involve distributors of substances and downstream users.

G.Ecol Cables S.r.l. qualifies, up to REACH Regulations, as "downstream user", especially for substances, and "articles producer" where as articles has to be intended as each product, component or semi-finished product.

Herewith to inform you that:

1. All the articles supplied by G.Ecol Cables S.r.l. are not subject to the instructions reported by the REACH Regulations and they can not be qualified as "articles that intentionally release substances".
2. G.Ecol Cables S.r.l., at the moment, can not be qualified as producer/importer of substances according to the REACH Regulation. For this reason it is not forced to register substances used during producing process.
3. G.Ecol Cables S.r.l. started all necessary actions in order to comply with REACH Regulation. Particularly:
 - Introduction of communication channels with the entire supplying chain in order to value if substances involved are pre-registered/registered from their own suppliers and importers; in order to assure that the specific use of G.Ecol Cables S.r.l. will be included in a registration file and eventually in the exposure scenario (when predicted) so that eventual alternative suppliers could be detected and the supplying continuity could be granted.
 - Research and development of alternative producing process and substances in the chance the Regulation will limit or ban some substances use from the market in order to guarantee to G.Ecol Cables S.r.l.'s customers continuity, quality and performances of the supplied products/components.
 - Evaluation of the substances involved in the supplied products to your company. As required by the REACH Regulation art.33, this action will allow to identify and communicate presence of substances classified as SVHC (substances of very high concern) and include them in the "candidate list" that will be published on 1st June 2009 (Annex XIV of REACH Regulation) and continuously updated over the 0,1% concentration weight limit allowed.