

July 2021

## REACH – Candidate List Substances of Very High Concern (SVHC)

Dear customer,

According to REACH (Art.7), the products manufactured by Fedrigoni Self-Adhesives and supplied to our customers are defined as “articles”<sup>1</sup> which do not fall under the compliance to be registered according to REACH.

As a producer of “articles”, according to REACH our Company is a so called „downstream user“, of potential substances. “, and therefore, also does not fall under the compliance to be registered according to REACH. An obligation for registration only exists for downstream users in case of direct imports of substances or preparations from outside the European Union. For our company, this is not the case.

Following the criteria of the REACH Regulation, our Company has the status of a downstream user in the supply chain and a manufacturer of articles, which do not release substances under regular conditions. Due to this status, we are not directly affected by the registration of chemical substances. The duties of registration are binding for our Suppliers or their (pre-)suppliers. Our suppliers have assured us that the substances contained in the products that we use, are already registered at the European Chemical Agency (ECHA).

According to Article 33 of the REACH Regulation, there is the obligation to inform the customers regarding any substances of the valid SVHC-candidate-list, which exceed the concentration of 0,1 % in our products.

The prohibition or reporting requirement doesn't apply when a chemical substance, that is, non-desired occurrence in very low concentrations, not exceeding 0,1% by mass under any circumstances.

Fedrigoni Self-Adhesives confirms that during manufacture of the products not any of the “Candidate List Substances” is intentionally added, and in consideration of the information from the supply chain, we are confident that our products do not contain any “Candidate List substances” as for the **updated version 08/07/2021** in a concentration exceeding the 0.1 % w/w:

We are disclosing this information, to the best of our knowledge, based upon data from our manufacturing processes and from our raw material manufacturers.

Please note that we do not analyse the raw materials used in the manufacturing process of the Fedrigoni Self-Adhesives products or analyse the referenced products for the presence of any substances included in the ECHA's current list of Substances of Very High Concern and cannot guarantee the absence or level of these substances to the given threshold value.

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**Direzione  
e coordinamento  
da parte  
di Fedrigoni  
Holding Limited**



# FEDRIGONI

This statement is valid for the self-adhesive product as such, as supplied and does not cover subsequent transformations of the Fedrigoni Self-Adhesives products.

Our Company is committed to communicating any changes to the production process involving substances included in the “Candidate list” and any eventual amendments to the present declaration if necessary, when new items are added to the “Candidate list”.

We trust that this information will meet your requirements.

<sup>1</sup> An article is the legal term under REACH and is defined as “an object which production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition” Article 3(3).

## REGULATORY AFFAIRS OFFICE

### Disclaimer:

This information is for guidance only, it is based on our most up-to-date knowledge and experience and we cannot assume any liability for damage caused through its use. This statement does not constitute any warranty, express or implied and is only intended for the recipient and cannot therefore be transferred to any third party. We cannot assume any liability for using our products in conjunction with other materials.

All our products are sold subject to Fedrigoni Self-Adhesives general sales conditions and please additionally note that you should ensure that any existing laws are observed. This publication replaces all previous versions published and any and all information is subject to change without notice.

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