

VIOLA DIREKT
Lindenbrunnenstr. 4
77855 ACHERN (DE)

Object: Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Compliance "POP" n. 1021/2019/CE, PFAS, PFCA Regulation UE 2021/1297. TSCA-EPA (California 65).

15th, April, 2025

Dear Sirs,

according to REACH Regulation, Fanton S.p.A is qualified as a "downstream user", in particular as "articles producer" and "articles supplier" (see art.3.4 and 3.33), where according to the regulation itself, could be defined an article any product, component or semi-treated product.

We inform you herewith that:

1. Products* supplied by Fanton S.p.A. consisting in an assembly of several components that fall under the definition of articles (art.3.3). Such articles do not release any substance under normal or reasonably foreseeable conditions of use.
2. Fanton S.p.A. is not qualified as "producer" or "importer" of substances, as defined in art.3.9 and 3.11 of REACH Regulation; therefore it is not obliged to register the substances used in its production processes;
3. Fanton S.p.A. maintains active the necessary actions enabling the company to continually grant compliance with all the applicable dispositions of REACH Regulation. Specifically:
 - the management of communication channels with the supply chain with the aims of:
 - a. updating of necessary information in reference to the evolution of the REACH regulation;
 - b. to make sure that the specific use of Fanton S.p.A. will be integrated in the registration dossier and eventually in the exposure scenario (if expected);
 - c. to find alternative suppliers with the aim to guarantee the supplying continuity;
 - the research and development of alternative processes or substances should the regulation restrict or banish the use of some substances from the market, in order to guarantee to the customers Fanton S.p.A. the continuity, the quality and the performances of the supplied products;
 - the assessment of the substances used in the supplied products, in order to identify and communicate to you, according to the provisions of the art. 33 of REACH Regulation, any presence of substances classified as SVHC (Substances of Very High Concern) and included in [the Candidate List](#) and subsequent changes, if exceeding the concentration limits of 0,1% in weight/weight for each article that is part of the product.

FANTON S.p.A.

4. Fanton S.p.A. is aware of the notification obligations to **SCIP Database** - Substances of Concern In articles as such or in complex objects (Products) introduced, starting from 5 January 2021, by Directive 2018/851/EU for articles exceeding the SVHC concentration limits of 0,1% in weight/weight and undertakes to provide, through the table below, the SCIP notification number where required;

The table below shows the results of our investigations, updated to the date of the present communication, about the possible presence in our articles of substances identified as SVHC or listed in the Annex XIV and Annex XVII of the regulation.

Topic	Family of products involved in the verification	Results
Verification of presence of substances identified as SVHC (candidate list)	A99951-3824A; A99951F	No substances exceeding the concentration limits of 0,1% in weight/weight
Verification of presence of substances listed in the annex XIV	A99951-3824A; A99951F	No substances exceeding the concentration limits of 0,1% in weight/weight

*Products under Reach can be considered *articles* or *complex* and *very complex objects*

Compliance "POP" n. 1021/2019/CE

We declare the compliance of FANTON products to the requirements of above-mentioned regulation, as these products are free from persistent organic pollutants as indicated by EC Regulation No. 1021/2019 Annex I & Annex II and subsequent amendments and additions.

- **Compliance "PFAS" "PFCA- Regulation UE 2021/1297"**

We declare that all our products are free from the following chemical substances:

- **PFAS-PFCA**

We declare that the following chemicals are not intentionally added to all our products:

- ◆ PFOA (perfluorooctanoic acid, CAS No 335-67-1)
- ◆ PFNA (perfluorononanoic acid, CAS No 375-95-1)
- ◆ PFOS (perfluorooctanesulfonic acid, CAS No 1763-23-1)
- ◆ PFHxS (perfluorohexanesulfonic acid, CAS No 355-46-4)

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However, we cannot exclude the presence of such substances as traces or impurities in the packaging, due to the presence of recycled material.

Declaration USA EPA - TSCA

In accordance to US TSCA directive, we declare that all our products are free from the following chemical substances:

- ◆ Decabromodiphenyl ether (decaBDE), (CASRN 1163-19-5)
- ◆ Phenol, isopropylate, phosphate (3:1), (PIP (3:1), (CASRN 68937-41-7)
- ◆ 2,4,6-Tris(tert-butyl)phenol (2,4,6 TTBP)(CASRN 732-26-3)
- ◆ Hexachlorobutadiene (HCBd) (CASRN 87-68-3)
- ◆ Pentachlorothiophenol (PCTP) (CASRN 133-49-3)

This statement is based on datasheets or other statements provided by our suppliers; however, we cannot exclude the presence of these and/or other unwanted substances whose concentration is lower than the maximum allowed value.

For further questions or information about REACH please contact: v.ceccolin@fanton.com, Tel. +39 049/9597911

Kind regards

Conselve, 15th April, 2025


FANTON®
FABBRICA MATERIALE ELETTRICO
Quality Assurance Office

FANTON S.p.A.