



Dongguan, 16/05/2022

Comotec Optical Products (Dongguan) Ltd. Informative Report according to the provisions of European Regulation (EC) No. 1907/2006 (REACH)

Dear Customer,

Since June 1st, 2007, the **REACH European Regulation (EC) No. 1907/2006** concerning the Registration, Evaluation, Authorization and Restriction of Chemicals produced or commercialized within the European Community became effective. The aim of this Regulation is to allow the responsible use of chemicals and to this end REACH provides for the registration at the European Community both for new chemicals and for those already existing on the market.

Comotec Optical Products (Dongguan) Ltd., as "manufacturer of articles" (and therefore "downstream user", as defined by Art. 3 clause 13 of REACH Regulation) has no obligation of pre-registration or registration, because the conditions requiring these fulfillments according to Art. 7 of the Regulation (Registration and notification of substances in articles) are not present.

Moreover, Comotec Optical Products (Dongguan) Ltd., with the aim of making the REACH enforcement easier in the private sector establishing some communication standards in the supply chain and in voluntary compliance with Art. 32 and 33 of the same, has arranged for its Customers this Informative Report and the related Technical Datasheets (containing the information extracted from the Safety Data Sheets arranged by suppliers of metal alloys) identifying the chemical composition of alloys used for glasses components.

Comotec Optical Products (Dongguan) Ltd. specifies that according to REACH Regulation (EC) No. 1907/2006 and up to the date of revision of this document, the spectacles components produced and/or commercialized included in the catalogue "Comfort for the vision 2021" and "Components for frames 2021":

[\(https://www.visotticagroup.com/download/catalogue-products/\)](https://www.visotticagroup.com/download/catalogue-products/)

- do not contain chemicals present in the "**Candidate List**" of the Substances of Very High Concern (SVHC), above the threshold limit of 0.1%.
- do not contain chemicals that are subjected to authorization listed in the **Annex XIV** (List of Substances subject to Authorization);
- can contain chemicals that are subjected to restrictions present in the **Annex XVII** (Restrictions on the manufacture, placing on the market and use of certain dangerous substances, preparations and articles), and in particular:
 - Nickel (CAS No. 7440-02-0), which can be present (6÷65% w/w) in the metal alloys constituting its articles and by those could be released in case of direct and prolonged contact with skin, with standards higher than the restrictions reported at point No. 27 of Annex XVII.

To this end Comotec Optical Products (Dongguan) Ltd. reaffirms that the correct use of its components, intended for a professional user for the production of spectacle frames, requires not to put them in direct and prolonged contact with skin if they haven't been covered with appropriate Nickel-free coating guaranteeing a release not exceeding the limits imposed by Annex XVII of REACh Regulation.

Considering the dynamic nature of the Candidate List of SVHC substances, as well as of Annexes XIV and XVII of REACh Regulation No. 1907/2006, Comotec Optical Products (Dongguan) Ltd. will keep on monitoring them periodically and informing the downstream users should there be any necessity to use such substances. This Informative Report complies with Standards and Regulations in force on the date in which it has been issued. An updated copy of this Informative Report and of the mentioned Technical Datasheets are downloadable from the website visotticagroup.com.

Best regards,

Comotec Optical Products (Dongguan) Ltd.

General Manager

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