

Updates of the Chemical Substance Management Rank Guidelines (for Products) Ver.14 and Requests

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i-PRO Co., Ltd.

Product Chemical Substance Management Committee

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Rank Guidelines Main Revised Contents

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- PFHxS: Changed the category to the Level 1 from the Level 2. (Refer to Page 4.)
- PIP(3:1): Changed the category to the Level 1 from the Level 2. (Refer to Page 4.)
- Dechlorane Plus TM: Changed the category to the Level 1 from the Level 3.(Refer to Page 5.)
- UV-328: Changed the category to the Level 1 from the Level
 3.(Refer to Page 5.)
- Updated the descriptions for Hydrofluorocarbon (HFC). (Refer to Page 6.)
- MCCP(C14-17): Changed the category to the Level 2 from the Level 3. (Refer to Page 8.)
- PFCA(C15-21): Changed the category to the Level 2 from the Level 3. (Refer to Page 8.)
- Added BPA to Level 2 from the Level 3. (Refer to Page 8.)
- Updated the latest information.



Way of thinking to add substances to the Level 1 in the Rank Guidelines [Reference]

Add a substance to the Level 1 Prohibited Substances judging from contents of the Elimination Recommendation under the convention on Persistent Organic Pollutants (POPs) (Addition of Annex A) deeming them equivalent to the one in the official journal (OJ).

■ Deliberation steps in Persistent Organic Pollutants Review Committee(POPRC) and publication of the OJ

Persistent Organic Pollutants Review Committee (POPRC)

Conference of the Parties (COP)

The timing implementation changes in EU in response to REACH regulation.

Proposal by COP countries

(Provide info. Specified in Annex D.)

Screening

(Judge using the screening criteria specified in Annex D.)

Preparation of risk profile

(Examine details with the info. Specified in Annex E.)

Preparation of risk management evaluation

(Examine considering the info. Specified in Annex F.)

Final determination

(Add to Annex A, B, and C.)

on Timing for adding substances to the Level 1.

Notification from U.N. general to member countries

Publication of the EU official journal e.g. EU POPs regulations

Implementation of the regulation

- ◆External environment
- > Frequent publication of candidate substances
- ➤ The regulation may be implemented within 1 year from the publication date of OJ, as the timing of the publication of OJ is unpredictable,
- ◆Internal environment
- ➤ More frequent update of the Rank Guidelines is difficult as workload such as renewal of Non-use warranty is high.

Add a substance to the Level 1 by the Elimination Recommendation (Addition of Annex A.).



Revised Contents of the Level 1 Prohibited Substances (PS) (1/3)

■ PFHxS, its salts, and PFHxS-related substances, and PIP(3:1): Changed the category to the Level 1
Prohibited Substances from the Level 2 Prohibited Substances.

Table 1

Substance/Substance Group Name	Regulations by the i-PRO	Major Referenced Laws/ Regulations
Perfluorohexane-1-sulphonic acid (PFHxS) , its salts, and PFHxS- related substances	Intentional use prohibited, and - In the case of PFHxS (including its salts), the concentration must be less than 25ppb (0.025ppm)*3 In the case of combination of one or multiple PFHxS-related substances, the concentration must be less than 1000ppb (1ppm)*3. in total of the PFHxS- related substances.	POPs Convention
Tris phosphate (Phenol isopropylated phosphate)(3:1) (PIP(3:1	Intentional use prohibited*3 (There are exemptions.)	TSCA

^{*3:} If compliance with the Regulations by the i-PRO is verified by tracing back the supply chain, the analysis for checking non-use of the subject substance is not required.

Added



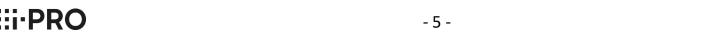
Revised Contents of the Level 1 Prohibited Substances (PS) (2/3)

Dechlorane Plus M and UV-328: Changed the category to the Level 1 Prohibited Substances from the Level 2 Prohibited Substances.

Table 1

Substance/Substance Group Name	Regulations by the i-PRO	Major Referenced Laws/ Regulations
Dechlorane Plus [™] (1,6,7,8,9,14,15,16,17,17,18,18- dodecachloropentacyclo[12.2.1.16,9. 02,13.05,10]octadeca-7,15-diene)	Intentional use prohibited*3 (There are exemptions.)	POPs Convention
UV-328 (2-(2H-benzotriazole-2-yl) -4,6-di- tert-pentylphenol)	Intentional use prohibited*3 (There are exemptions.)	POPs Convention

*3: If compliance with the Regulations by the i-PRO is verified by tracing back the supply chain, the analysis for checking non-use of the subject substance is not required.





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Revised Contents of the Level 1 Prohibited Substances (PS) (3/3)

■ Updated the descriptions for Hydrofluorocarbon (HFC).

Table 1

Substance/Substance Group Name	Regulations by the i-PRO	Major Referenced Laws/ Regulations
HVGrotillorocarpon (HFC)	Intentional use prohibited.*3	- CFPA 1999
	(The regulation scope is limited)	- EU F gasses Regulation Added

Table 2-26

Substance/Substance Group Name: Hydrofluorocarbon (HFC)

Regulated items

Products include HFC indicated in Attached table 1 6 1 3

Each product is restricted for the limited period set by HFC global warming potential (GWP) per use.

Revised

[Applications and use examples]

-Stand-alone refrigerator and Centralized refrigeration equipment.

-...



Revised Contents of the Level 1 Prohibited Substances (PS) (3/3)

* Note: To each Supplier, please check details on the above for HFC, as the period for the restriction is set per individual usage of HFC by the HFC's Global Warming Potential (GWP) value under "The CANADIAN ENVIRONMENTAL PROTECTION ACT, 1999" and/or "The EU Regulation on F gasses".

"The EU Regulation on F gasses" (Refer to ANNEX XIII)

URL for the EU Official Journal URL(English): https://eur-lex.europa.eu/legal-cotent/EN/TXT/?uri=celex%3A32014R0517

PDF file for Japanese translation for reference ⇒

◆"The CANADIAN ENVIRONMENTAL PROTECTION ACT, 1999" (Refer to Schedule 1.1)

URL for the Canadian Official Journal URL(English): https://gazette.gc.ca/rp-pr/p2/2017/2017-10-18/html/sor-dors216-eng.html

PDF file for Japanese translation for reference ⇒



Revised Contents of the Level 2 Prohibited Substances (PS)

Added the description for MCCP, C14-17, C15-C21 PFCA, its salts, and C15-C21 PFCA-related substances, and Bisphenol A to the Level 2 Prohibited Substances.

Substance/Substance Group	Date of Delivery Prohibition of components, materials, etc. to the i-PRO	Major Laws Referenced Added
Medium chain chlorinated paraffins (MCCP, C14-17)	Details will be set in response to the regulation to be promulgated hereafter.	- EU RoHS directive, - EU REACH Regulation - POPs Convention
Perfluorocarboxylic acids containing 15 to 21 carbon atoms in the chain (C15-C21 PFCAs), their salts and C15-C21 PFCA related substances.	Details will be set in response to the regulation to be promulgated hereafter.	- POPs Convention - CEPA 1999
Bisphenol A (2,2-Bis(4- hydroxyphenyl)propane) and bisphenols of similar concern	Details will be set in response to the regulation to be promulgated hereafter.	- EU REACH Regulation



Contents

1. Points of revisions to the Rank Guidelines

 Requests should be asked to suppliers (including important notes for internal responses required for the revision of the Rank Guidelines)



Request for resubmission of a Non-use Warranty

- Because of revised contents of the Level 1 Prohibited Substances (PSs), relevant suppliers are requested to resubmit a Non-use Warranty.
- For resubmission of a Non-use Warranty, relevant suppliers including those in your supply chain are requested to check whether any of the Level 1 PSs is contained and a possibility of inclusion of the PSs in your products or components.

■ How to resubmit

- Fill in requirements in the latest 'Non-use Warranty (Level 1 PSs)'.
- Submit the Non-use Warranty by the deadline respectively.
- [Change points]
- ♦ Level 1 PSs
 - Addition of substance groups:
 - 1) Perfluorohexane-1-sulphonic acid (PFHxS), its salts, and PFHxS-related substances
 - 2) Phenol isopropylated phosphate (3:1) 3) Dechlorane Plus ™ 4) UV-328

■ Important notes

The components/materials containing the foregoing newly included substances in the Level 1 PSs that exceed the restricted limit are deemed <u>non-compliant to the Rank Guidelines Ver.14</u>. In such case, <u>please immediately contact the i-PRO who requested this, in order to replace the components/materials with substitutes.</u>



Important notes for revision of the Rank Guidelines Ver.14

- Level 2 Prohibited Substances
- Please prepare for their substitution, as those substances are highly likely to classified into the Level 1 in the near feature.
- Exemption of the prohibited substances under the RoHS regulation
- As for other exempted items for which extending the exemption period was requested, the EU Commission is still under discussion. However, please pay due attention to the trend hereafter, because there is a possibility that its exemption period may be newly set, or the scope of the exemption may be limited.



Relevant Documents

Download documents available at the following URLs.

Rank Guidelines Ver.14

Japanese https://i-pro.com/corp/jp/who-

we-are/#environment

English https://i-pro.com/corp/en/who-we-

are/#environment

Green Procurement Standards
Ver.1

Japanese https://i-pro.com/corp/jp/who-we-are/#environment

Product chemical substances management system (GM Pro)
Manuals (Members only)

Japanese, English, and Chinese http://10.75.46.178/gmmanual

chemSHERPA website

Japanese https://chemsherpa.net/

English https://chemsherpa.net/english



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