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Guidelines for management of chemical substances in product

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MITSUBISHI NICHIYU FORKLIFT CO., LTD

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1. Introduction

At the Earth Summit (the United Nations Conference on Environment and Development) in 1992, the Rio declaration on Environment and Development and its comprehensive plan of action Agenda 21 were adopted. Various means are proposed to reduce bad effects of new and existing chemicals considered toxic on the environment in the chapter 19 of Agenda 21: Environmentally Management of Toxic Chemicals.

Then in 2002, at the Johannesburg Summit (World Summit on Sustainable Development), leaders reconfirmed the agreement to Rio declaration and Agenda 21 and agreed with the aim; minimize the bad effects of producing and using chemical substances including existing chemicals on human health and the environment by 2020.

Moreover, at the International Conference on Chemicals Management in 2006, the Strategic Approach to International Chemicals Management (SAICM) was adopted.

Meanwhile, Council of the European Union implemented REACH regulation in 2007, which requires every chemical manufacturer and importer to register their products without regard to new or existing chemical substances. In addition, chemicals contained in articles for cars, electric and electronic equipment and others are required to be registered, and therefore people's information need of the situation of chemical substances is increasing not only in Europe but other countries around the world.

Also in Japan, every chemical registration of its quantity and other data is required since **the Act on the Evaluation of Chemical Substances and Regulation of Their Manufacture, etc.(CSCL)** was revised in April 2011, so that we are going to be faced with need for comprehensive chemical substances management throughout the supply chain.

Under these circumstances, the needs in our company are increasing such as:

- to collect data regarding chemical substances from suppliers;
- to accumulate the data we collected;
- to offer our customers the data;

Therefore, we issue these guidelines; Guidelines for Management of Chemical Substances in **Products**. We really appreciate your understanding and cooperation to offer our customer safe products as well as the data of chemical substances on demand.

MITSUBISHI NICHIYU FORKLIFT CO., LTD.

Quality Assurance Department

General Manager

Yasuyuki "Mike" Yamaguchi

2. Policy

These guidelines indicates the regulation to comply with besides prohibited and controlled substances to control chemicals in products of our company.

We require all our suppliers to control prohibited substances properly and to submit a declaration of non-inclusion of prohibited substances to us. We also ask our suppliers to submit an inspection report of prohibited substances in some cases.

We use a certain format when we require an investigation of contained chemical substances. In that case, please be sure to fill in the document and submit it to us.

3. Scope

3.1 Regulations

The regulations we comply with are indicated in Table 1. Since the table will be updated as necessary, please confirm that the information is the latest.

3.2 Prohibited substances

The regulations we comply with are indicated in Table 2. Since the table will be updated as necessary, please confirm that the information is the latest.

3.3 Controlled substances

The regulations we comply with are indicated in Table 3. Since the table will be updated as necessary, please confirm that the information is the latest.

4. Requirements

Suppliers shall meet the following requirements:

- 1) Fill out and submit the contact information form on substances control. (Appendix 1)
- 2) Build a chemical management system.
- Submit the declaration of non-use / non-inclusion of prohibited substances.
 (Appendix 2)
- 4) Cooperate with the investigation of chemical substances in products.

4.1 Registration of contact information

We require our suppliers to register contact person information for investigation and other contacts. Please fill out the contact information form on substances control (see Appendix 1) and send it to us <u>by e-mail</u>. If any contents of the registration changed, please let us know as soon as possible.

Our contact information about Chemical Substances in Product is below.

reach_info@nmf.co.jp

4.2 Establishing management system

We require our suppliers to build a management system for avoiding substances as well as a substances investigation system covering your supply chain in your company. In some cases, we also require your cooperation for auditing to check the management condition.

4.3 Declaration of non-use / non-inclusion of prohibited substances

Please submit a declaration of non-use / non-inclusion of prohibited substances which we specify. The format is attached to these guidelines (Appendix2; Declaration of Non-use / Non-inclusion of Prohibited Substances) and the address for submission is below.

reach_info@nmf.co.jp

More substances could be prohibited according to the revision of the regulations. If any newly prohibited substance is contained in the supplies to our company, please inform us immediately. After consultation between us please complete the replacement of the substances with alternatives before the regulation starts to take effect. Please submit the inspection reports if needed.

4.4 Cooperation with investigations

Our company will make an investigation to comply with the regulations of chemical substances control such as REACH and others. We adopt AIS datasheet which is standardized by Joint Article Management Promotion-consortium (JAMP) for the investigation.

4.4.1 Target

The target substances for the investigation are indicated in Table 2 (prohibited substances) and

Table 3 (controlled substances). If any of listed substances is contained in the supplies to our company, please be sure to inform us.

These lists would be revised as needed. If any of newly added substances is contained in the products, please update your datasheet and send it to us as soon as possible.

4.4.2 Corresponding format (JAMP AIS)

- (1) We will send investigation sheets to your company's contact person by e-mail.
- (2) You can get JAMP AIS application at JAMP's website (http://www.jamp-info.com/).
- (3) Please complete the sheet and send it to the address below.

Support center for chemical substances: reach_data@nmf.co.jp (RECEIVE ONLY)

If you have any other questions about chemical substances in products, feel free to ask by e-mail. Contact to the address below.

Support center for chemical substances: reach_help@nmf.co.jp

4.4.3 Precaution for using AIS

- (1) Please be sure to use AIS format though there is another format named "MSDS Plus" released by JAMP, which is designed for mixtures such as materials, chemicals and paints. We have to understand all the residual materials after removal of volatile components of mixtures, and AIS is covering it.
- (2) When you make datasheets of materials, chemicals and paints, please put the density (g/cm^3 , g/mm^3) in the form "5. その他 (Other info)".

4.4.4 Other tools (except for AIS)

We accept other kinds of datasheets temporarily only in the case that "your company has already established a chemical management system using other format and it is not easy to convert it to JAMP AIS immediately". Please adopt JAMP AIS as much as possible.

Table 1 Regulation list

Regulations	Note
REACH Regulation	EU
RoHS Directive	EU
The Law Concerning the Examination and Regulation of Manufacture, etc. of Chemical Substances (or the Chemical Substances Control Law)	JP
Industrial Safety and Health Law	JP
Poisonous and Deleterious Substances Control Law	JP

Table 2 Prohibited substances list

Regulations	Prohibited substances	Note	
REACH Regulation	List of Restrictions (ANNEX X VII)	Applied to the articles	
DE ACII De gulation	Authorization List (ANNEY VIV)	Applied to the substances	
REACH Regulation	Authorization List (ANNEX XIV)	and mixtures	
Chemical Substances	Class I Specified Chemical Substances		
Control Law	Class I Specified Cheffical Substances		
Industrial Safety and	Drahihitad substances of Manufacturing		
Health Law	Prohibited substances of Manufacturing		
Poisonous and Deleterious	Specified poisonous substances		
Substances Control Law	Specified poisonous substances		

Table 3 Controlled substances list

Regulations	Controlled substances	Note
REACH Regulation	SVHC (Substances of Very High Concern)	Need to report if the substance is contained more than 0.1wt% in the article
IMDS (International Material Data System)	GADSL (Global Automotive Declarable Substance List)	List of Controlled substances which is adopted in the automotive industry
RoHS Directive	 (1) lead (2) mercury (3) cadmium (4) hexavalent chromium (5) Polybrominated biphenyl (PBB) (6) Polybrominated diphenyl ether 	Need to report cadmium; over 0.01wt% others; over 0.1wt% (not include exemptions)
JAMP (Joint Article Management consortium)	The list of JAMP declarable substances	

Your company's Contact information for substances control

Date:

	Name	
,	Supplier code	
ıpany	Department	
Contact information of your company	Name of person in charge	
	Phone	
	FAX	
	E-mail address	

$\underline{DECLARATION\ OF\ NON-USE\ /\ NON-INCLUSION\ OF\ PROHIBITED\ SUBSTANCES}$

SCOPE OF DECLARATION

This declaration is applied to all the dealings of products, parts, materials, subsidiaries and other
supplies (hereinafter called supplies collectively) for Mitsubishi Nichiyu Forklift (hereinafter called
MN).

I as a representative of	hereby declare that the supplies we deliver to
MN are non-use / non-inclusion of prohibited substa	inces indicated in the guidelines released by MN
(except for the supplies of permitted application	and designed as those containing prohibited
substances.).	

	Name	
S	Supplier code	
	Department	
	Name of person in charge	
ıarge	Phone	
person in charge	FAX	
persc	E-mail address	
	Date	
	Signature or seal	