

# Environmental Management System Environmental Form

Form: F-09-15

Rev Date: June 12, 2023

Issued By: Brandon Eckert

Subject: FWM Regulated Substance & Material of Concern  
Specification

Approved By: Kimberly Sayers

Environmental compliance is a growing concern for many companies and will continue to be a focus as new regulations continue to emerge creating significant challenges. Fort Wayne Metals Research Products, LLC (FWMRP, LLC) has implemented a Product Stewardship initiative, Responsible Sourcing Program, to meet these emerging challenges and address current and future regulatory requirements while supporting procurement of greener products.

This specification provides general requirements for suppliers of raw material, components, conversion services, processing aids and packaging regarding FWMRP, LLC standards of substance restrictions in products. This specification has been developed to fulfill the following requirements:

- To align with FWMRP, LLC Product Stewardship Program goals
- To ensure supplier products comply with regulatory requirements.
- To prevent specific substances and material of concern from being used in FWMRP, LLC products.
- To provide FWMRP, LLC the necessary information to fully identify and declare the materials make-up of all FWMRP, LLC products and meet customer requirements.
- To provide guidance to suppliers regarding substances to consider for future phase-out.
- To reduce adverse impacts to the environment

FWMRP, LLC expects all substances of supplied products to be properly registered as required in country of manufacture and/or import. Includes but not limited to United States Toxic Substances Control Act and European Union REACH Regulation (EC) NO 1907/2006.

[REACH Legislation - ECHA \(europa.eu\)](#)[TSCA Chemical Substance Inventory](#) | [US EPA](#)

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## Substance Restrictions in Products

Materials restricted in products can be found in the tables below. These lists identify substances that FWMRP, LLC prohibits the presence at or above the referenced threshold values. Please review regulation for exemptions.

### SECTION A: Raw Material & Components – Restricted Substances

Substance / Category	Reportable Application	Reportable Threshold Level	Regulation
EU REACH SVHC, REACH Annex XIV Authorization List, REACH Annex XVII Restricted Substances (as applicable)	All	>1,000 ppm by weight of the product	REACH 1907/2006 and amendments <a href="https://echa.europa.eu/regulations/reach/legislation">https://echa.europa.eu/regulations/reach/legislation</a>
RoHS	All	0.1 mass% of total Pb, Hg, Cr+6, PBB, PBDE and 0.01 mass% of total Cd in homogenous material	EU 2015/863 (EU RoHS Directive) <a href="https://environment.ec.europa.eu/topics/waste-and-recycling/rohs-directive_en">https://environment.ec.europa.eu/topics/waste-and-recycling/rohs-directive_en</a>
CA Prop 65	All	See regulation for exposure limits	Safe Drinking Water and toxic Enforcement Act of 1986 <a href="http://www.oehha.ca.gov/prop65.html">http://www.oehha.ca.gov/prop65.html</a>
Bisphenol A	All	No intentionally added content	Material of Concern
Animal Derived Products	All	No intentionally added content	Material of Concern

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## SECTION B: Processing Aids – Restricted Substances

Substance / Category	Reportable Application	Threshold Level	Regulation
EU REACH SVHC, REACH Annex XIV Authorization List, REACH Annex XVII Restricted Substances (as applicable)	All	>1,000 ppm by weight of the product	REACH 1907/2006 and amendments <a href="https://echa.europa.eu/regulations/reach/legislation">https://echa.europa.eu/regulations/reach/legislation</a>
Ozone Depleting Substances (Class I & Class II CFCs and HCFCs)	All	No intentionally added content	Montreal Protocol, Clean Air Act 40 CFR 82.106, 2037/2000/EC <a href="https://www.epa.gov/ods-phaseout">https://www.epa.gov/ods-phaseout</a>
CA Prop 65	All	See regulation for exposure limits	Safe Drinking Water and toxic Enforcement Act of 1986 <a href="http://www.oehha.ca.gov/prop65.html">http://www.oehha.ca.gov/prop65.html</a>
Bisphenol A	All	No intentionally added content	Material of Concern
Silicone	All	No intentionally added content	Material of Concern
Natural Rubber Latex	All	No intentionally added content	Material of Concern
Biocides	All	No intentionally added content	Material of Concern, (EU) 528/2012
Animal Derived Substances	All	Report all levels	Material of Concern, ISO 22442-1, (EU) 722/2012

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## SECTION C: Packaging – Restricted Substances

Substance / Category	Reportable Application	Threshold Level	Reference
EU REACH SVHC, REACH Annex XIV Authorization List, REACH Annex XVII Restricted Substances (as applicable)	All	>1,000 ppm by weight of the product	REACH 1907/2006 and amendments <a href="https://echa.europa.eu/regulations/reach/legislation">https://echa.europa.eu/regulations/reach/legislation</a>
Heavy Metals: Cadmium/Cadmium Compounds, Hexavalent Chromium/Hexavalent Chromium Compounds, Lead/Lead Compounds, Mercury/Mercury Compounds	Package or individual packaging components	Total concentration of these heavy metals cannot exceed 100 ppm.	European Parliament and Council Directive 94/62/EC on Packaging and Packaging Waste (Amended by Directive 2004/12/EC) <a href="http://ec.europa.eu/environment/waste/packaging/index_en.htm">http://ec.europa.eu/environment/waste/packaging/index_en.htm</a>
Methyl bromide Treatment: only Heat Treatment as outlined in IPPC ISPM 15	Fumigation of wood pallets and other wood packaging material	No intentionally added content	International Standards for Phytosanitary Measures, ISPM-15 <a href="https://www.ippc.int/en/publications/640/">https://www.ippc.int/en/publications/640/</a>
2,4,6-tribromophenol (TBP) or any other form of phenol-based fungicide treatment.	Fungicide treatment of wood pallets and other wood packaging material	No intentionally added content	Material of Concern
Dimethyl fumarate	All	No intentionally added content	2009/251/EC <a href="http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:074:0032:0034:EN:PDF">http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:074:0032:0034:EN:PDF</a>
Ozone Depleting Substances (Class I & Class II CFCs and HCFCs)	All	No intentionally added content	Montreal Protocol, Clean Air Act 40 CFR 82.106, 2037/2000/EC <a href="https://www.epa.gov/ods-phaseout">https://www.epa.gov/ods-phaseout</a>
Bisphenol A	All	No intentionally added content	Material of Concern
Poly vinyl chloride (PVC)	All	0.1% in supplied packaging	Material of Concern
Natural Rubber Latex	All	No intentionally added content	Material of Concern

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## SECTION D: Conversion Services – Restricted Substances

Substance / Category	Reportable Application	Reportable Threshold Level	Regulation
EU REACH SVHC, REACH Annex XIV Authorization List, REACH Annex XVII Restricted Substances (as applicable)	All	>1,000 ppm by weight of the product	REACH 1907/2006 and amendments <a href="https://echa.europa.eu/regulations/reach/legislation">https://echa.europa.eu/regulations/reach/legislation</a>
RoHS	All	0.1 mass% of total Pb, Hg, Cr+6, PBB, PBDE and 0.01 mass% of total Cd in homogenous material	EU 2015/863 (EU RoHS Directive) <a href="https://environment.ec.europa.eu/topics/waste-and-recycling/rohs-directive_en">https://environment.ec.europa.eu/topics/waste-and-recycling/rohs-directive_en</a>
CA Prop 65	All	See regulation for exposure limits	Safe Drinking Water and toxic Enforcement Act of 1986 <a href="http://www.oehha.ca.gov/prop65.html">http://www.oehha.ca.gov/prop65.html</a>
Bisphenol A	All	No intentionally added content	Material of Concern
Natural Rubber Latex	All	No intentionally added content	Material of Concern