

**Updates of the Chemical Substance
Management Rank Guidelines
(for Products) Ver.13 and
Requests**

December 15, 2021

**Quality & Environment Division
Operational Excellence Company
Panasonic Corporation**

1. Points of revisions to the Rank Guidelines

2. Requests to suppliers

Rank Guidelines Main Revised Contents

■ Rank Guidelines

1. Objective of this Guidelines
2. Scope
3. Operations and Exemptions
4. Establishment, Revision, and Abolition

5. Definition of Terms

6. Specified Managed Substances

- Level 1 Prohibited Substances (PS)
- Level 2 PS
- Level 3 PS

- Added C9-C14 PFCA to the Level 1 PS. (Refer to Page 3.)
- PBB, PBDE: Changed the descriptions of the restrictions. (Refer to Page 4.)

- Added PIP(3:1) to the Level 2 PS. (Refer to Page 5.)

- Newly added 8 substances/substance groups to the Level 3. (Refer to Page 7.)

Appendix 1. Exempted Items List on the EU RoHS Directive

Appendix 2. Exempted Items on the ELV Directive

Appendix 3. Controlled Values for Prohibited Substances

- Changed the descriptions of the controlled value for hexavalent chromium. (Refer to Page 8.)

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

- Added perfluorocarboxylic acids containing 9 to 14 carbon atoms in the chain (C9-C14 PFCAs), their salts and C9-C14 PFCA-related substances.

Added

Substance/Group of Substances	Regulated by the Panasonic Group	Main Laws/Regulations referred to
Perfluorocarboxylic acids containing 9 to 14 carbon atoms in the chain (C9-C14 PFCAs), their salts and C9-C14 PFCA-related substances	In the case of C9-C14 PFCAs (including individual salts), the concentration must be less than 25ppb (0.025ppm) *3 In the case of combination of one or multiple C9-C14 PFCA-related substances, the concentration must be less than 260ppb *3 in total of the C9-C14 PFCA-related substances. (There are exemptions.)	– EU REACH Annex XVII

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

■ Updated the descriptions of the regulated contents for specific brominated flame retardants (PBB, PBDE).

Substance/Group of Substances	Regulated by the Panasonic Group Updated	Main Laws/ Regulations referred to
Specific brominated flame retardants (PBB, PBDE)	<p>Intentional use of these substances is prohibited, and the concentration must be less than 1000ppm*7.</p> <p>Items except equipment subject to the EU RoHS Directive: the concentration of PBDE must be less than 500ppm*8.</p>	<ul style="list-style-type: none"> - CSCL (Chemical Substances Control Law), - EU RoHS Directive, and - EU REACH Annex XVII - EU POPs Regulation Annex I - TSCA Added

*7: The regulated value 1000ppm indicates the concentration of each substance group of PBB and PBDE.

*8: The restricted value of 500ppm indicates concentration of the PBDE substance group.

Revised Contents of the Level 2 Prohibited Substances (PS)

- Added Phenol isopropylated phosphate (3:1) (PIP(3:1)) to the Level 2 Prohibited Substances (PSs).

Added

Substance/Group of Substances	Regulated by the Panasonic Group	Main Laws/ Regulations referred to
Phenol isopropylated phosphate (3:1) (PIP(3:1))	Details will be set according to regulatory trends hereafter.	- TSCA

Request to respond to PIP(3:1)

- A letter of 'Request for compliance with the rules to prohibit PBT substances under the U.S. TSCA (Toxic Substances Control Act)' has been on the Panasonic 'Green Procurement' site. In the letter, we have requested to suppliers regarding PIP(3:1) as follows;
 1. Inform us of information on any component/material containing PIP(3:1) if any.
 2. Submit respective information on the components/materials containing PIP(3:1) or Non-use warranty, and consult for providing substitute components/materials.
- Please bear in mind; there is a possibility that PIP(3:1) may be classified firstly into the category of the Level 1 (use of the substance must be immediately stopped) depending on the new enforcement date that EPA will publicize by March 8, 2022.

Revised Contents of the Level 3 Prohibited Substances (PS)

- Newly added 8 substances/Group of substances.

Newly added

Substance/Group of Substances	Main Laws/ Regulations referred to
Dechlorane Plus TM	POPs (Persistent organic pollutants) Convention
2-(2H-benzotriazol-2-yl)-4,6-ditertpentylphenol (UV-328)	POPs Convention
Perfluorohexanoic acid (PFHxA)	EU REACH Annex XVII
Decabromodiphenyl Ethane (DBDPE)	CEPA 1999 (Canadian Environmental Protection Act, 1999)
Triphenyl phosphate (TPP)	TSCA (The Toxic Substances Control Act)
Medium chain chlorinated paraffins (MCCP, C14-17)	EU RoHS (Restriction of Hazardous Substances) Directive
Tetrabromobisphenol A (TBBPA); additive application type	EU RoHS Directive
Per- and polyfluoroalkyl substances (PFAS)	US Specified State TIP (Toxics in Packaging Regulation)

- Changed the descriptions of the controlled value for hexavalent chromium.

Prohibited Substance	Applicable part/material	Controlled Value (Content concentration that is deemed to not exceed when the non-use control of Level 1 Prohibited Substances/Substance Groups is properly managed)
Hexavalent chromium	Surface treated materials	Must be less than $0.1\mu\text{g}/\text{cm}^2$ *1 (Method according to IEC 62321-7-1)

*1: Does not apply to packaging material.

Changed

1. Points of revisions to the Rank Guidelines

2. Requests to suppliers

- 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 set by Panasonic group’s Divisional Companies, relevant companies, and Business Divisions (BDs).

[Change points]

◇ Level 1 PSs

- Addition of substance groups: perfluorocarboxylic acids containing 9 to 14 carbon atoms in the chain (C9-C14 PFCAs), their salts and C9-C14 PFCA-related substances

■ Important notes

The components/materials containing ‘C9-C14 PFCAs, their salts and C9-C14 PFCA-related substances’ that exceed the restricted limit are deemed non-compliant to the Rank Guidelines Ver.13. In such case, please **immediately** contact the Panasonic BD who requested this, in order to replace the components/materials with substitutes.

- Once the Rank Guidelines Ver.13 is enforced, Panasonic's responsible division will request relevant suppliers to investigate subject substances via product chemical substances management system.
- Upon the request, the subject suppliers are requested to reconfirm the registered information of the subject chemical substances in the components/materials (correct the information, if necessary.), and update the data with the latest version of the tool.

■ Important notes

- 1) Please reconfirm the status of the following substances in the components/materials, that have been newly added to the Level 1 Prohibited Substances.
 - Perfluorocarboxylic acids containing 9 to 14 carbon atoms in the chain (C9-C14 PFCAs), their salts and C9-C14 PFCA-related substances
- 2) The components/materials containing 'C9-C14 PFCAs, their salts and C9-C14 PFCA-related substances' that exceed the restricted limit are deemed non-compliant to the Rank Guidelines Ver.13. In such case, please **immediately** contact the Panasonic BD who requested this, in order to replace the components/materials with substitutes.

■ Level 2 Prohibited Substances

- Please prepare for their substitution, as those substances are highly likely to be classified into the Level 1 in the near future.
- Particularly for PIP(3:1), please continue to support for the response as we requested in the letter on Panasonic Green Procurement site.

■ 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.

Green
Procurement
Standards
Ver.6.4

Rank
Guidelines
Ver.13

- Regulated value
- List of Exempted Items
- List of the Controlled Values

Japanese

<https://www.panasonic.com/jp/corporate/management/procurement/green.html>

English

<https://www.panasonic.com/global/corporate/management/procurement/green.html>

Chinese

<https://panasonic.cn/about/csr/supply/procurement/>

Product chemical substances
management system
Manuals
(Members only)

Japanese, English, and Chinese

<https://eww.gpscmmn.panasonic.co.jp/prtl>

Website introducing e-learning
programs for Product Chemical
Substance Management, and the like
(Document and videos on chemSHERPA)

Japanese, English, and Chinese

http://www.panasonic.com/jp/corporate/eco/chem_info.html

chemSHERPA website

Japanese <https://chemsherpa.net/>

English <https://chemsherpa.net/english>