

May 19, 2023

Panasonic Corporation
Operational Excellence Company (PEX)
Quality & Environment Division
Global Procurement Division

Dear Suppliers

Request for cooperation for investigation on PFAS (Organofluorine compounds)

Thank you for your ongoing support for Product Group Green procurement activities.

Panasonic group (hereafter called “our company”) would like to collect and understand information on components and products containing PFAS as much as details as possible at the present stage in response to movements in the U.S. and Europe to restrict use of PFAS (Organofluorine compounds; Per- and polyfluoroalkyl substances), in order to evaluate possible impact of PFAS to our products with the information, to utilize the information for lobbying to administrative bodies to prevent authorities from imposing excessive regulations and enforcing regulations in too much haste, and also when the regulations come into force, to secure enough grace period for suppliers to change to alternatives without too much burden.

[Background and purpose]

Formations of laws and regulations to restrict use of PFAS have been in progress in the U.S. and Europe in recent years. PFAS is not a single substance name but a substance group name for all organofluorine compounds whose number is said to be a few thousand to tens of thousands.

PFAS are used for many components and products including electrical and electronic products as a substance to provide functions beneficial to them such as water repellency, oil repellency, chemical resistance, non-adhesiveness, electrical insulation, and low refractive index. On the other hands, use of PFOS (Perfluorooctane sulfonate) , PFOA (Perfluorooctanoic acid), and the like that are part of PFAS group have already been restricted or banned under the Stockholm Convention. Movements to restrict use of whole PFAS group as such as of now are ongoing from a preventive point of view because of properties of PFAS, e.g. difficult to be chemically dissolved, and remains in the environment for a long time.

Specifically, in State of Maine in the U.S., “An Act To Stop Perfluoroalkyl and Polyfluoroalkyl Substances Pollution” was promulgated in July 2021. For the products intentionally containing PFAS, it is to be required to notify their information to authorities from fall this year. Based on the information notified, authorities will discuss their exemption first. After that from 2030, manufacture and sale of products containing PFAS are expected to be banned. Moreover, other state governments and federal government in the U.S. are discussing to restrict use of PFAS by laws and regulations.

In Europe, EU commission has already published a proposal to comprehensively restrict use of PFAS under REACH regulation as a part of Green Deal policy and discussions on the contents are ongoing. Use of PFAS may be totally banned around in 2026 at the earliest.

In response to the above movements to restrict use of PFAS, in the electrical and electronic industry JAMP (Joint Article Management Promotion-consortium) lists hundreds of PFAS group substances on the chemSHERPA ver.2.07.00 released on February 27, 2023 which is a tool to support preparation of articles data, in order to understand PFAS containing in products. Similarly, on GADSL (Global Automotive Declarable Substance List) , which is a managed substances list for automotive components and products, thousands of PFAS group substances are listed on 2022 Version 2.0 released on August 1, 2022,.

As a result, almost all of PFAS group substances expected to be used for components and products for delivery to our company are covered, and suppliers are now able to provide information containing PFAS to our company.

Accordingly, we would like to ask each of you, our suppliers to cooperate for the investigation as follows.

Requests to suppliers

When you receive a request for the investigation from our business division, please investigate PFAS in your components and/or products, and input* the investigation results on chemSHERPA ver.2.07.00.

If you have already completed the input, you do not need to input them again.

As for automotive components and products, in the case that you have already checked and reported chemical substances in components based on the latest version of GADSL (2023 Version 1.0 as of issued date of this letter) and reported the results on IMDS or JAPIA sheet, you do not need to report them again.

*PFAS is used for components and products that require water repellency, oil repellency, chemical resistance, non-adhesiveness, electrical insulation, low refractive index, and the like, e.g. cables, printed circuit boards, mechanical parts, high frequency parts, optical parts, coatings, and lubricants. Particularly paying attention to such components and products, please enter CAS RN[®] (CAS Registry Number) of a chemical substance contained in components or products on the substance input screen on the tool to support preparation of articles data; if a name of the substance is displayed on the screen, please input the information on the tool. Please kindly note that our company will not provide a substance list.

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