



Environmental Management System Environmental Form

Form: F-09-15 Rev. Date: September 28, 2015

Issued By: Jaimie Vogelsong

Subject: FWM Regulated Substance & Material of Concern Specification

Approved By: Kay Haggard

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 (FWM) 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 FWM standards of substance restrictions in products. This specification has been developed to fulfill the following requirements:

- To align with FWM Product Stewardship Program goals
- To ensure supplier products comply with regulatory requirements
- To prevent specific substances and material of concern from being used in FWM products
- To provide FWM the necessary information to fully identify and declare the materials make-up of all FWM 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

FWM 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.

<http://echa.europa.eu/regulations/reach/registration>

<http://www2.epa.gov/tsca-inventory>

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Substance Restrictions in Products

Materials restricted in products can be found in the tables below. These lists identify substances that FWM 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 http://echa.europa.eu/web/guest/regulations/reach
RoHS	All	0.1 mass% of total Pb, Hg, Cr+6, and 0.01 mass% of total Cd in homogenous material	2002/95/EC (EU RoHS Directive) http://ec.europa.eu/environment/waste/rohs_eee/
CA Prop 65	All	See regulation for exposure limits	Safe Drinking Water and toxic Enforcement Act of 1986 http://www.oehha.ca.gov/prop65.html
Conflict Minerals (Tin, Tantalum, Tungsten, Gold)	All	Conflict Mineral	Sec. 1502 Dodd-Frank Wall Street Reform and Consumer Protection Act
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 http://echa.europa.eu/web/guest/regulations/reach
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 http://www.epa.gov/Ozone/title6/phaseout/index.html
CA Prop 65	All	See regulation for exposure limits	Safe Drinking Water and toxic Enforcement Act of 1986 http://www.oehha.ca.gov/prop65.html
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	Report all levels	Material of Concern
Animal Derived Substances	All	Report all levels	Material of Concern, ISO 22442-1



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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 http://echa.europa.eu/web/guest/regulations/reach
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 96/62/EC on Packaging and Packaging Waste (Amended by Directive 2004/12/EC) http://ec.europa.eu/environment/waste/packaging/index_en.htm
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 https://www.ippc.int/en/publications/640/
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 http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:074:0032:0034:EN:PDF
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 http://www.epa.gov/Ozone/title6/paseout/index.html
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 http://echa.europa.eu/web/guest/regulations/reach
RoHS	All	0.1 mass% of total Pb, Hg, Cr+6, and 0.01 mass% of total Cd in homogenous material	2002/95/EC (EU RoHS Directive) http://ec.europa.eu/environment/waste/rohs_eee/
CA Prop 65	All	See regulation for exposure limits	Safe Drinking Water and toxic Enforcement Act of 1986 http://www.oehha.ca.gov/prop65.html
Conflict Minerals (Tin, Tantalum, Tungsten, Gold)	All	Conflict Mineral	Sec. 1502 Dodd-Frank Wall Street Reform and Consumer Protection Act
Bisphenol A	All	No intentionally added content	Material of Concern
Natural Rubber Latex	All	No intentionally added content	Material of Concern