

Suncall

Environmentally Hazardous

Substances Control Standards

(Version 3)



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Procurement and Logistics Management Department, Business Division
Safety and Environmental Maintenance Department, Quality, Safety, and Environment Division

Table of Contents

1. Scope	- 2 -
2. Terms and Definitions	- 2 -
3. Matters to be Complied With	- 3 -
1) Compliance with the Suncall Environmentally Hazardous Substances Control Standards	- 3 -
2) Surveying and reporting of environmentally hazardous substances	- 4 -
3) Management of information at points of change	- 4 -
4) Submission timings for documents	- 5 -
4. Environmentally Hazardous Substances	- 6 -
1) Laws and regulations of major countries	- 6 -
2) In-vehicle products.....	- 6 -
(1) Scope of control.....	- 6 -
(2) Control categories.....	- 7 -
3) Electrical and electronic products	- 8 -
(1) Scope of control.....	- 8 -
(2) Control categories.....	- 8 -
(3) Applications exempted under RoHS Directive Annex III.....	- 9 -
(4) Applications exempted under RoHS Directive Annex IV	- 9 -
4) Packaging materials	- 9 -
(1) Scope of control.....	- 9 -

1. Scope

The Standards herein apply to all parts, materials, indirect materials, packaging materials, and other supplies that make up the products we procure and to the suppliers who deliver these items to us.

The Standards herein also apply to Suppliers commissioned with the assembly and processing (molding, surface treatment, etc.) of parts and materials.

[Examples of applicable parts and materials]

- Parts, units, materials, and accessories to products (such as their operating manuals).
- Indirect materials used for products (adhesive tapes, soldering materials, adhesives, inks, etc.). Indirect materials also include indirect materials that may adhere to or remain in products.

2. Terms and Definitions

1) Inclusion

This term means the addition, mixing, or adhesion of substances to parts and materials constituting our products, whether intentional or not. The term also refers to those unintentionally generated in manufacturing processes.

2) Intentional addition

This term means intentionally including substances in parts and materials for such purposes as improved performance or modified characteristics. Besides, the pertinent substances used for such purposes as manufacturing processes and undoubtedly included in final products are also deemed examples of intentional addition.

3) Impurities

This term refers either to substances included in natural raw materials and technically impossible to remove completely by a refining process or to substances generated in a reaction process and technically impossible to remove completely.

4) Threshold value (allowable concentration)

This term refers to the maximum allowable value of the content or contained concentration of a chemical substance included in a part or material. For composite parts containing more than one raw material (material) in their parts, the contained concentration of the target substance shall be its concentration in the homogeneous raw material (homogeneous materials) rather than the value determined with the whole part as the denominator.

5) Mixture

A mixture is two or more different substances that are mixed without changing their properties but can still be separated (crystallized, distilled, sublimated, filtered, or otherwise isolated) without using any other substance.

6) JAPIA Standard Material Datasheet

A component survey data sheet standardized by the Japan Auto Parts Industries Association (JAPIA).

7) IMDS (International Material Data System)

A system operated with a membership of major automotive manufacturers worldwide to collect and manage information on materials and chemical substances.

8) GADSL (Global Automotive Declarable Substance List)

A declarable substances list used in the global automotive industry. See: <http://www.gadsl.org/>

9) chemSHERPA CI

chemSHERPA-CI is the basic information communication sheet recommended by the Ministry of Economy, Trade and Industry and operated by JAMP to communicate information on chemical substances in products (substances/mixtures).

10) chemSHERPA AI

chemSHERPA AI is the basic information communication sheet recommended by the Ministry of Economy, Trade and Industry and operated by JAMP to communicate information on chemical substances in molded articles.

3. Matters to be Complied With

As a rule, we do not purchase parts and materials containing prohibited substances other than exempted substances in Table 1 and reportable substances in Tables 6 and 8.

In addition, we shall establish Environmentally Hazardous Substances Control Standards, which Suppliers shall comply with. If presented by Customers to whom we make deliveries with their own Environmentally Hazardous Substances Control Standards, Suppliers shall also comply accordingly.

1) Compliance with the Suncall Environmentally Hazardous Substances Control Standards

- Raw materials, parts, products, and indirect materials (if adhesive to products) we procure, chemical substances included in packaging materials, and chemical substances used at the manufacturing stage shall be classified into “Prohibited (with exemptions),” “Scheduled for prohibition,” and “Reportable” as in Table 1 and controlled accordingly.
- Even for substances that fall into a control category other than “Prohibited,” laws or regulations effective, if any, in the delivery destination country or region (in cases of overseas delivery or the like) shall be complied with.

<<Table 1: Control categories and their definitions>>

Control category		Definition
Prohibited		• No inclusion exceeding the threshold value is allowed in the delivery items. • Substances with a designated due date and already past the due date must not be included in the delivery items by more than the threshold value. • Substances with intentional additions, even below the threshold value, shall be deemed “Prohibited.”
	Exempted	• For certain limited applications, inclusion in the delivery items is not prohibited. • Intentional additions shall be deemed and reported by exception as inclusions when equal to or more than allowable concentrations. • Any substance with a specified expiration date of the exemption period shall always be reported to us before the expiration date. A transition date shall always be determined through mutual consultation to complete the transition procedure.
Scheduled for prohibition		• For substances near the expiration date of the exemption period, the transition procedure shall be completed by the due date. • In addition, any substance with a specified expiration date of the exemption period shall always be reported to us before the expiration date. A transition date shall always be determined through mutual consultation to complete the transition procedure. • Substances with intentional additions, even below the threshold value, shall be deemed “Scheduled for prohibition.”
Reportable		• Intentional additions in delivery items shall be reported to us. • Impurities and other non-intentional inclusions equal to or more than their allowable concentrations shall be reported to us.

2) Surveying and reporting of environmentally hazardous substances

- For products, parts, materials, indirect materials, packaging materials, and other supplies delivered to us, Suppliers are asked to submit filled-out survey sheets, reports, or any other documents on environmentally hazardous substances information based on the Standards herein whenever requested to do so. Submission forms to be used shall be basically as in <<Table 2: Submission Forms for Environmentally Hazardous Substances Information>> and shall be specified at the time of survey request. Responding using a form other than those in Table 2 may be allowed in some cases.
- When finding that any prohibited substance is included in items delivered or to be delivered to us, Suppliers shall immediately report to us.
- Information submitted to us shall be shared in-house and used for our in-house chemical substances control and responses to our Customers' requests for surveys and may be disclosed to third parties as our products' information for legal compliance.

<<Table 2: Submission Forms for Environmentally Hazardous Substances Information>>

Submission form	Submission criteria		Remarks
	Substance/mixture	Molded articles	
(a) IMDS	○ (In-vehicle equipment)	○ (In-vehicle equipment)	http://www.mdssystem.com/
(b) JAPIA Standard Material Datasheet	◆ (In-vehicle equipment)	◆ (In-vehicle equipment)	https://www.japia.or.jp/work/kankyou/japiasheet/
(c) chemSHERPA AI	—	○ (Electronic equipment)	https://chemsherpa.net/chemSHERPA/tool/
(d) chemSHERPA CI	○ (Electronic equipment)	—	https://chemsherpa.net/chemSHERPA/tool/
Declaration of Non-Inclusion of Environmentally Hazardous Substances	◆	◆	Attached Sheet 2
Report of Inclusion of Environmentally Hazardous Substances	◆	◆	Attached Sheet 3
Analysis Data	◆	◆	The item(s) to be analyzed and the analysis method shall be notified separately.

○: Mandatory in principle (Use (a), (c), or (d) as applicable to respond.)

◆: Requested as necessary

—: Submission not required

3) Management of information at points of change

When any of the following changes to environmentally hazardous substances information becomes apparent, the corresponding Submission Forms shall be revised immediately to communicate the information to our contact department accordingly:

- (i) New control target substances (such as SVHC) are added to the List for a cause such as a law change.
- (ii) Any error is found in the content of communicated information (substance's content, material information, etc.).

- (iii) Any change has occurred in the content of communicated information from an upstream company or companies (your supplier(s)).
- (iv) Occurrence of a 4M change. If the change item falls under (i) Design Change, (ii) Material Change, (iii) Production Site Change, or (iv) Process/Manufacturing Condition Change, regardless of the control category, a follow-up or review shall be conducted to re-submit the substance data.

4) Submission timings for documents

The documents to be submitted shown in Table 3 shall be submitted at the following <<submission timings>> by the date we specify:

<<Table 3: List of documents to be submitted and their submission timings>>

Effort	Document to be submitted	Submission timing				Remarks
		Law change (upon the addition of control target substances)	At 4M change	As individually requested	At the start of a new deal	
Compliance with product chemical substances control standards	(i) Product chemical substance data	○	○ (*)	○		• Available from URLs in Table 2
	(a) IMDS					
	(b) JAPIA Standard Material Datasheet					
	(c) chemSHERPA AI					
	(d) chemSHERPA CI					
	(ii) Declaration of Non-Inclusion of Environmentally Hazardous Substances			○		Attached Sheet 2
	(iii) Analysis Data			○		

*When the 4M change item falls under (i) Design Change, (ii) Material Change, (iii) Production Site Change, or (iv) Process/Manufacturing Condition Change regardless of the control category.

4. Environmentally Hazardous Substances

1) Laws and regulations of major countries

Table 4 shows the applicable laws and regulations of major countries. Prohibited substances shall be identified according to these laws, regulations, or the like within the scope of control.

<<Table 4: Laws and regulations of major countries>>

Region	Law/Reg.	Regulated/prohibited substances
Japan	CSCL	Class I Specified Chemical Substances http://www.meti.go.jp/policy/chemical_management/kasinhou/index.html
Europe	REACH Regulation	EU REACH Regulation (EC) No 1907/2006 https://echa.europa.eu/information-on-chemicals
	ELV Directive	EU ELV Directive 2011/37/EU http://ec.europa.eu/environment/waste/elv/legislation_en.htm
	RoHS Directive	EU RoHS Directive 2011/65/EU http://ec.europa.eu/environment/waste/rohs_eee/legis_en.htm

2) In-vehicle products

(1) Scope of control

Table 5 shows the scope of control we require for chemical substances in in-vehicle products.

<<Table 5: Scope of control for in-vehicle products>>

Scope of control	Regulation
GADSL	Automotive, automotive parts, chemical, and other manufacturers in Japan, the United States, and Europe shall collaborate in studies and refer to the international standard declarable substance list for substances included in automotive raw materials, and parts. The original text of the applicable laws and regulations (latest version) shall be checked. http://www.gadsl.org/

Reportable substances present in materials and parts for vehicles are labeled as “P” or “D” according to the following:

[Explanatory notes on classification]

P (Prohibited): Prohibited by laws and regulations or not to be included.

D (Declarable): Declaration is mandatory for inclusions.

D/P: Classifiable as either P or D, depending on the intended use or the Customer's requirements.

[Inclusion purpose codes and their definitions]

Category	Definition	Meaning
LR	Legally regulated	Substances legally regulated because they are extremely dangerous to human health or the environment if used as part of vehicles.
FA	For assessment	Substances proposed to be regulated by governmental agencies based on decisions by the GASG (= Global Automotive Stakeholders Group) Steering Committee.
FI	For information	Substances traced for information purposes only based on decisions by the GASG Steering Committee. Automotive manufacturers can also classify individual substances or substance groups into substances of this code, considering decisions and exceptions made by the GASG Steering Committee.

(2) Control categories

Table 6 shows the control categories of "Prohibited," "Scheduled for prohibition," and "Reportable" based on control targets.

<< Table 6: Control categories>>

Control category	Target substances
Prohibited	Of the chemical substances specified in the GADSL, chemical substances falling under Category "P" or classified into "P" from "D/P" and chemical substances with a designated due date and already past the expiration date.
Scheduled for prohibition	Of the chemical substances specified in the GADSL, chemical substances falling under Category "P" or classified into "P" from "D/P" with a designated due date and near the expiration date. *For chemical substances with a designated due date, the transition procedure shall be completed by one year before the expiration date.
Reportable	Of the chemical substances specified in the GADSL, chemical substances falling under Category "D" or classified into "D" from "D/P."

<<Attachments>>

(Attached Table 1) Environmentally Hazardous Substances Control Standards (Automotive Parts)

3) Electrical and electronic products

(1) Scope of control

Table 7 shows the scope of control we require for chemical substances in electrical and electronic products.

<<Table 7: Electrical and electronic products scope of control>>

Scope of control	Regulation
chemSHERPA control target substance	Japanese CSCL Class I Specified Chemical Substances
	Prohibited or Restricted Substances under the US Toxic Substances Control Act (TSCA) (Section 6)
	EU ELV Directive
	EU RoHS Directive ANNEX II
	EU POPs Rules ANNEX I
	EU REACH Regulation Candidate List of SVHC for Authorization (Candidate Substances for Authorization) and ANNEX XIV (Authorized Substances)
	EU REACH Regulation (EC) No 1907/2006 ANNEX XVII (Restricted Substances)
	EU Medical Device Regulations (MDR) Annex I 10.4 Chemical Substances
	Revised China RoHS
	Global Automotive Declarable Substance List (GADSL)
	IEC 62474 DB Declarable Substance Groups and Declarable Substances

(2) Control categories

Table 8 shows the control categories of “Prohibited,” “Scheduled for prohibition,” and “Reportable” for chemical substances.

<< Table 8: Control categories>>

Control category	Target substance
Prohibited	Chemical substances prohibited or restricted as chemSHERPA control target substances and those with a designated due date and already past the expiration date.
	Ten chemical substances specified by RoHS (lead, mercury, hexavalent chromium, cadmium, polybrominated biphenyls, polybrominated diphenyl ethers, di-2-ethylhexyl phthalate, dibutyl phthalate, butyl benzyl phthalate, and diisobutyl phthalate) and chemical substances with exemptions and already past the expiration date.
Scheduled for prohibition	Of chemical substances prohibited or restricted as chemSHERPA control target substances, chemical substances with a designated due date and near the expiration date. *For chemical substances with a designated due date, the transition procedure shall be completed by one year before the expiration date.
	Chemical substances with the exemption for the ten chemical substances specified by RoHS and near the expiration date.

	*For chemical substances with a designated due date, the transition procedure shall be completed by one year before the expiration date.
Reportable	• Chemical substances falling under “Reportable” in the sense specified for chemSHERPA control target substances.

(3) Applications exempted under RoHS Directive Annex III

For details, see the original text of the applicable laws and regulations (latest versions) available from the following URL:

http://ec.europa.eu/environment/waste/rohs_eee/legis_en.htm

(4) Applications exempted under RoHS Directive Annex IV

For details, see the original text of the applicable laws and regulations (latest versions) available from the following URL:

http://ec.europa.eu/environment/waste/rohs_eee/legis_en.htm

4) Packaging materials

(1) Scope of control

Table 9 shows the scope of control we require for chemical substances in packaging materials.

<<Table 9: Scope of control for packaging materials>>

Scope of control	Regulation
Specific heavy metals	• EU Packaging Waste Directive 94/62/EC • US state regulations on heavy metals in packaging materials (TIP)
Phthalic acid esters	• European Commission’s Delegated Directive “2015/863/EU” for amending RoHS Directive “2011/65/EU” • EU REACH Regulation (EC) No 1907/2006 ANNEX XVII (Restricted Substances)

Revision History

Ver	Date of revision	Revision description
Version 1	April 1, 2017	Newly established
Version 2	March 1, 2023	Text fully revised
Version 3	July 10 2025	Change of Management Division Revision of <<Table 7: Electrical and electronic products scope of control>>