

# Guidelines for managing chemical substances

## Seventh Edition

OPTEX Co., Ltd.  
OPTEX FA Co., Ltd.  
OPTEX MFG Co., Ltd.

## Revision History

No.	date	Reasons for revision	Main changes
1	2011.07.01	Create new	-
2	2012.03.01	① Conducting a site survey on specific hazardous substances (6 RoHS substances) ② Changes in thresholds for restricted substances ③ Addition of 20 substances in the 6th PR ④ Change the survey report version	① Addition of the Survey Report on the Content of Specified Hazardous Substances (6 RoHS Substances) (Form 3) and the associated changes to the text ② Changes in threshold values for restricted substances (Form 1/Appendix 1) <ul style="list-style-type: none"> <li>Nickel: Intentionally added → Monitor only</li> <li>Dibutyltin compounds (DBT): Intentionally added and 1000ppm → 1000ppm</li> <li>Diocetyl tin compounds (DOT): Intentionally added and 1000ppm → 1000ppm</li> </ul> ③ Addition of 20 substances in the 6th Public Relations (Form 2/Appendix 2) ④ Investigation report version change: Ver.8.11 → Ver.9.0
3	2013.11.25	Periodic review	① Related legislation changes: 2002/95/EC → 2011/65/EC ② Changed the basic survey response format to AIS format ③ Addition of substances in the 7th and 8th PR ④ Changes to the original report format based on the above Version change: Ver.9.0 to Ver.10.0
4	2017.1.27	Periodic review	Complete Review - Standardize to AIS format (abolish unique format) • RoHS directive: 6 → 10 substances changed
5	2018.10.25		• Expanded scope of application to FA and MFG • Reply to chemSHERPA or AIS
6	2019.11.28	Periodic review	• Unify response formats to chemSHERPA-AI format (abolish AIS format) - Added the last time of purchasing parts to the survey frequency - Fixed broken URL links Classify controlled substances into REACH regulations and Proposition 65 and create Schedules 2 and 3
7	2024.9.26	Periodic review	• Related information update

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Appendix 3: "Restricted Substances Level 2 (Controlled Substances 2) Substances derived from Proposition 65 "

## **1. Purpose of operation**

The purpose of these guidelines is to clarify the actual usage of environmentally hazardous substances contained in parts and materials used in the products of Optex Co., Ltd., Optex FA Co., Ltd., and Optex MFG Co., Ltd. (hereinafter referred to as "our company") , to thoroughly inform our company and our suppliers of parts, materials, etc., and to maintain and improve the environmental quality of our products .

## **2. Scope of application**

This guideline applies to the parts, materials and products procured by our company and its affiliates. The specific scope of application is as follows:

### 1) Scope of application to parts and materials

- Parts and materials necessary to manufacture our products, including packaging/wrapping materials

\*However, packaging materials used by parts suppliers for transportation or protection (transport boxes, inner boxes, decorative boxes, cases, plastic bags, etc.) are generally not included.

### 2) Product application range

- Products designed, manufactured and sold by our company
- Products that we outsource the design and manufacture to a third party and sell
- Products that we purchase and sell that are designed by third parties

## **3. Survey subjects**

The survey covers Level 1 restricted substances (prohibited substances) and Level 2 restricted substances (controlled substances).

if a substance is listed in both the Level 1 Restricted Substances ( Prohibited Substances) List (Appendix 1 ) and the Level 2 Restricted Substances ( Managed Substances) List (Appendix 2 and 3 ) , that substance will be considered a Level 1 Restricted Substance ( Prohibited Substance).

### 1) Restricted Substances Level 1 (prohibited substances)

Restricted substances Level 1 (prohibited substances) are as shown in Appendix 1

\*Please note that thresholds vary depending on the reporting subject.

- The target is chemical substances that we have determined to be applicable based on the RoHS Directive, REACH Regulation AnnexXVII, the Chemical Substances Control Law, etc.
- The targets include prohibited inclusion and use in the production process .
- The target includes some conditions (thresholds, excluded uses, etc. )

Note: Even if a substance is not on this list, if it is regulated by law, treaty, ordinance, industry guideline, etc., please comply with them.

### 2) Restricted Substances Level 2 (Controlled Substances 1; Substances from REACH Regulations)

Restricted substances Level 2 (Controlled substances 1 ; substances derived from the REACH regulation) are as shown in Attachment 2. All substances specified in the scope of application of Section 2 are subject to reporting.

- The target is SVHC that is included in the Candidate List of substances to be authorized under the REACH Regulation ( EC No. 1907/2006 ) .

Note: Please keep the latest version of the Candidate List for Authorized Substances of the REACH Regulation ( EC No. 1907/2006 ) as new substances are being added one after another. For the latest information, please refer to the following website of the European Chemicals Agency (ECHA).

<https://echa.europa.eu/candidate-list-table>

Note: Substances not on this list may also be included if they are regulated by law, treaty, ordinance, industry guideline, etc.

Note: For details, please refer to the following documents and lists.

"chemSHERPA Certificate of Controlled Substances" and "chemSHERPA Reference List of Controlled Substances" (latest versions of each)

Reference URL: <https://chemsherpa.net/tool/>

### 3) Restricted substances Level 2 (Controlled substances 2 ; substances derived from Proposition 65 )

Level 2 restricted substances (controlled substances 2; substances derived from Proposition 65 ) are as shown in Attachment 3. All substances specified in the scope of application of Section 2 are subject to reporting.

The list of target substances is updated periodically, so please keep the latest version. For the latest information, please refer to the following website of the California OEHHA :  
<http://oehha.ca.gov/proposition-65/proposition-65-list>

#### **4. How to answer the survey**

Suppliers are requested to provide information according to the following survey frequencies:

- 1) Survey frequency
  - ① When starting a transaction for a new part
  - ② If there is a change in the substances contained due to a change in the materials used, etc., or if new substances are found to be contained (please report this promptly each time).
  - ③ When necessary for our company (such as when domestic or overseas laws are revised)
  - ④ At the time of final purchase of parts (excluding cases where the latest version of the chemSHERPA-AI format has already been used to respond).
- 2) Survey response form

Please prepare and submit the survey response form in chemSHERPA-AI format (with the file extension shai).  
In addition, please submit your report using the most recent version of the form whenever possible.  
chemSHERPA-AI data creation support tool: <https://chemsherpa.net/> tool

#### **5. Related laws and regulations**

- 1) 2011/65/EU " RoHS Directive"  
(including amendments to Annex II by Commission Delegated Directive (EU) 2015/863 )
  - European Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment
  - Target substances: Lead, mercury, cadmium, hexavalent chromium, PBB, PBDE, DEHP, BBP, DBP, and DIBP
  - Threshold: 100 ppm for cadmium, 1,000 ppm for the other nine substances (weight ratio per homogeneous material)
  - Exemptions comply with Annex III of the RoHS Directive .
- 2) Regulation (EC) No. 1907/2006 EU "REACH Regulation"
  - European regulations regarding the registration, evaluation, authorization and restriction of chemical substances
  - Substances on the Candidate List: Threshold value 1,000 ppm
  - AnnexXVII: Restricted substances

### 3) 94/62/EC "Packaging and Waste Directive"

- European Council Directive on packaging and packaging waste
- Target substances: lead, mercury, cadmium, hexavalent chromium
- Threshold: Total content of 4 substances is 100 ppm or less

### 4) U.S. Packaging Material Heavy Metal Regulations

- Restrictions on the content of heavy metals in packaging to be 100 ppm or less in the fourth year after the start of the regulation
- Introduced in 18 states in the US

### 5) Chemical Substances Control Law

- Establish a system to examine whether the manufactured or imported new substances have properties such as persistent decomposition, and regulate their manufacture, import, use, etc.
- Type 1 specified chemical substances: Restrictions and notifications on manufacturing, import and use, obligation to comply with standards, obligation to label
- Type 2 specified chemical substances: Notification and reporting obligations for manufacture, import and use

### 6) Montreal Protocol

- Restrictions on the production and consumption of certain substances that destroy the ozone layer

### 7) Nuclear Reactor Regulation Act

- Ensuring the peaceful and planned use of nuclear raw materials and fuel materials, as well as preventing disasters and ensuring public safety
- Notification of use of each raw material

### 8) Law concerning the Protection of the Ozone Layer through the Control of Specified Substances, etc.

- Implement measures to regulate the manufacture of specific substances, as well as to reduce emissions and streamline their use.

### 9) California, USA Proposition 65

- California Safe Drinking Water and Toxic Enforcement Act of 1986 ( Proposition 65)
- Unique state laws regulating warning labels and emissions of carcinogens and reproductive toxicants

### 10) Battery Regulation EU2023/1542

- Parts that contain batteries or other devices

### 11) United States/Toxic Substances Control Act (TSCA)

- Preventing undue risks to human health or the environment from harmful chemicals.

### 12) POPs Convention (Stockholm Convention)

- A treaty that sets out clear rules regarding the elimination and restriction of the manufacture and use of persistent organic pollutants that have adverse effects on the human body and the environment, the reduction of their emissions, and the proper disposal of waste.