



KGS Procurement Standard

**Annex: Environmentally Hazardous
Substance Management Standard**

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1. Purpose

This Standard has been designed to clearly describe the management standard for the chemical substances that are related to our products as well as to promote awareness of the standard among our business partners.

2. Scope of Application

This Standard applies to all products, parts, materials, and indirect materials we purchase as well as the manufacturing processes of these items.

3. Application of the Standard

Compliance with laws and regulations is a mandatory requirement. In the event that an agreement cannot be reached regarding customer requirements under the terms of this standard, the customer's individual operational standards may be applied on a case-by-case basis. Furthermore, we request that our business partners establish a CMS (Chemical Substance Management System) to ensure appropriate and effective management in accordance with these operational standards, which includes extending this management to their subcontractors and suppliers.

For guidance on establishing a CMS, please refer to the "Guidelines for the Management of Chemicals in Products" and the "Action Item List & Check Sheet" provided by the CMP Consortium (formerly the Joint Article Management Promotion-consortium (JAMP)).

<https://cmp-consortium.com/docs/guidelines>

4. Definition of Terms

1) Supplier and Customer

"Supplier" refers to a company or a group from whom we purchase goods. "Customer" refers to a company or a group to whom we sell goods.

2) Indirect material

Indirect material refers to packaging materials (carton, plastic bag, cushioning material, tape, label, ink, adhesive, etc.) and chemicals used in a production process (mold lubricant, solvent, cleaning agent, etc.).

3) Environmentally hazardous substance

Environmentally hazardous substance refers to a substance contained in products and materials or used during manufacture which has significant adverse impact (aspect) on human body and/or global environment. In accordance with laws and regulations as well as customer requests, we specify the substance to manage it by planning its elimination or reduction.

4) Containment

Containment refers to a condition in which the substance is mixed in or added and attached to

a product, or fills the product regardless of whether it is intentional or not.

5) Impurity

Impurity refers to a chemical substance that is naturally and unintentionally contained in materials and/or formed during production and cannot be removed completely by technical means. The substances which have maximum allowable concentrations defined in this Procurement Standard shall not be contained more than the limit even if it is contained as impurities.

6) Content rate

Content rate refers to a value that is the mass of the designated substance in one component (in homogeneous material) divided by the mass of the component (the homogeneous material).

7) Intentional use

Intentional use refers to the deliberate use of a chemical substance in the manufacturing or processing of materials, parts, or products, where it is desired for the substance to remain in order to achieve specific appearance or quality characteristics.

8) Homogeneous material

Homogeneous material refers to a material that cannot be mechanically disjointed into different materials. The term “mechanically disjointed” means that the materials can be, in principle, separated by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes.

(Example: plastics, ceramics, glass, metals, alloys, paper, board, resins, ink, coat, etc.)

9) Evidence

Evidence refers to the qualitative and quantitative analysis results of a specified substance. For substances with a defined maximum allowable concentration, the evidence must consist of data obtained through a quantitative analysis method with sufficient precision to confirm compliance. Please refer to Annex Table 1-4 for details on analysis methods.

10) Safety Data Sheet (SDS) or Material Safety Data Sheet (MSDS)

These sheets are documents designed to provide information on the properties and handling of chemical substances when a product containing substances that pose potential hazards is transferred or provided to another business entity.

11) Substances of Very High Concern (SVHC)

Substances of Very High Concern (SVHC) are chemical substances designated as substances of very high concern in REACH Regulation of EU.

12) JAPIA sheet

This refers to a standard survey format for collecting information on materials and contained substances in automotive parts. It is proposed by the JAPIA Sheet Liaison Committee, which is composed of industry organizations such as the Japan Auto Parts Industries Association (JAPIA) and the Japan Construction Machinery Manufacturers Association (CEMA), and serves as the successor to the JAMA Sheet.

13) International Material Data System (IMDS)

This refers to an internet-based system for registering and reporting information to collect and analyze data on parts and materials in the automotive industry.

14) Global Automotive Declarable Substance List (GADSL)

This refers to a list of controlled chemical substances common to the automotive industry, established by the GASG (Global Automotive Stakeholders Group), which is composed of automobile, auto parts, and chemical manufacturers from Japan, the U.S., and Europe. The declarable and banned substances for the IMDS and JAPIA Sheets are determined based on this chemical substance list.

15) chemSHERPA

This refers to a common scheme developed under the initiative of the Ministry of Economy, Trade and Industry (METI) to accurately transfer and share information on chemical substances contained in products throughout the entire supply chain.

16) CMP Consortium / Chemicals and Circular Management Platform Consortium

This refers to a promotion organization established for the purpose of transferring and sharing information on chemical substances contained in products and resource circulation throughout the entire supply chain. As the successor to the former Joint Article Management Promotion-consortium (JAMP), it provides and manages the common transfer scheme, chemSHERPA.

5. Management Standard for Environmentally Hazardous Substances

Our company manages environmentally hazardous substances by categorizing into two ranks.

A	Banned substance	- Must not be contained in products, packaging materials, etc. - Must not be used in manufacturing processes	See Table 1-1 Banned Substance
B	Controlled substance	- It is preferable that containing the substances in products or packaging materials and using them in manufacturing processes are avoided. - Presence of such substances in products (and its content if there is any) must be confirmed.	See Table 2-1 Controlled Substance

Exempt uses of the banned substances are specified in Table 1-2 Exemption to Use.

In case a substance is listed under both categories, the substance shall be regarded as a banned substance.

6. Survey on Environmentally Hazardous Substances

1) Suppliers are requested to provide us with the following information on chemical substances used in products, parts, materials, and packaging materials that are delivered to us as well as those used in manufacturing processes.

Goods delivered to KGS		Document to be submitted
1. Raw material		(1) MSDS or SDS (2) chemSHERPA (3) Chemical Substance Content Survey (4) Evidence of RoHS compliance (10 substances analysis data)
2. Parts		(1) MSDS (MSDS for raw material) or SDS (2) chemSHERPA (3) Chemical Substance Content Survey (4) Survey of Chemical Substance Used in Manufacturing Process (5) Evidence of RoHS compliance (10 substances analysis data of parts or raw material used)
3. Indirect material	Packaging material	(1) MSDS (MSDS for raw material) or SDS (2) Confirmation of Non-Use of Banned Substances for Packaging Material
	Medial agent (mold release, solvent, adhesive etc.)	(1) MSDS or SDS (2) Chemical Substance Content Survey
4. Product by contract manufacturers	Product for which KGS supplies with materials	(1) Survey of Chemical Substance Used in Manufacturing Process
	Product for which our supplier purchases materials	(1) MSDS or SDS for raw material (2) chemSHERPA for raw materials (3) chemSHERPA for parts, plating, etc. (4) Chemical Substance Content Survey (5) Survey of Chemical Substance Used in Manufacturing Process (6) Confirmation of Non-Use of Banned Substances for Packing Material (7) Evidence of RoHS compliance (10 substances analysis data of parts or raw material used)

2) If there is any information you cannot disclose due to its confidentiality, please inform us first, then provide us with a non-inclusion certificate for banned substances.

3) By our customers' request, KGS may ask you to conduct a separate survey. (IMDS, JAPIA sheet or other customer specific formats)

Note: The component table annexed to Chemical Substance Content Survey can be replaced with the JAPIA sheet or IMDS.

Revision History

Version	Revision date	Revision details
1	November 01, 2008	(1) Reviewed the second edition of KGS Procurement Standard for making the following revisions. Then, issued Environmental Hazardous Substance Management Standard as the first annex to the third edition. (2) Reviewed the substances of (A) and (B) and replaced assigned symbols with sequential number.
2	October 01, 2010	Fully reviewed controlled substances and its investigation methods along with responding to REACH regulation, revision of Japanese Chemical Substances Control Law, and change of requirements from customers etc.
3	March 20, 2012	(1) Reviewed the Exemption to Use a Banned Substance of Polyvinyl chloride (PVC) Table1-1, No.58 (2) Updated the REACH SVHC candidate list to contain 73 substances.
4	July 31, 2012	(1) Updated the REACH SVHC candidate list to contain 86 substances.
5.0	January 11, 2013	(1) Changed the number assignment rule. (2) Transferred SVHC substances under REACH Regulation to Controlled substances. However, some SVHC substances still remain as Banned substances. (3) Fully reviewed banned and controlled substances along with responses to REACH Regulation, revision of Japanese Chemical Substances Control Law, and changes of customer requirements. (4) Changed the analysis method for 6 RoHS substances to IEC62321. (5) Changed the wording of “MSDS” to “MSDS or SDS”.
5.1	July 31, 2013	(1) Updated the REACH SVHC candidate list to contain 146 substances.
5.2	January 31, 2014	(1) Added 2 substances to substance list under PAH (polycyclic aromatic hydrocarbon). (2) Added 1 substance to substance list under specific phthalate esters. (3) Added endosulfan and benzoepin as banned substances. (4) Updated the REACH SVHC candidate list to contain 153 substances.
5.3	July 31, 2014	(1) Updated the REACH SVHC candidate list to contain 157 substances. (2) Added N – Phenyl – benzenamine reaction products with styrene and 2, 4, 4 – trimethylpentene (BNST) as controlled substances. (3) Changed the wording of “JGP format” to “Green Procurement Survey Response Tool”. (4) Updated the list of banned substances and of exemptions for prohibited substances.
5.4	January 31, 2015	(1) Added the text concerning CMS establishment. (2) Added object substance to Table. (3) Updated the REACH SVHC candidate list to contain 161 substances.
5.5	July 31, 2015	(1) Newly designate PFOA control product, BNST as a prohibited substance. (2) Updated the REACH SVHC candidate list to contain 163 substances.
5.6	January 31, 2016	(1) Updated the REACH SVHC candidate list to contain 168 substances.

5.7	July 31, 2016	(1) Changed the previous "Polychlorinated Naphthalenes with 3 or more chlorine atoms" to "Polychlorinated Naphthalenes with 1 or more chlorine atoms". (2) Added Hexachlorobutadiene to Banned Substances. (3) Updated the total number of substances on the REACH SVHC candidate list to 169.
5.8	February 28, 2017	(1) Updated the REACH SVHC candidate list to contain 173 substances.
5.9	August 31, 2017	(1) (Added Class 1 Designated Hazardous Substances pursuant to Soil Contamination Countermeasures Act to Banned Substances.) (2) Updated the REACH SVHC candidate list to contain 174 substances.
6.0	March 31, 2018	(1) Added a part of candidate chemicals listed under the Stockholm Convention to Banned Substances. (2) Updated the REACH SVHC candidate list to contain 181 substances.
7.0	October 1, 2018	(1) Added 3 substances to substance list under Specific organophosphorous compounds. (2) Changed the substance name of A-42 to "specific phosphorus compound". (3) Updated the REACH SVHC candidate list to contain 191 substances. (4) Added 4 phthalate substances as Confirmation of Non-Use of Banned Substances for Packing Material. (5) Added 4 phthalate substances and Asbestos as Confirmation of Non-Use of Banned Substances for Packing Material".
7.1	April 1, 2019	(1) Updated the REACH SVHC candidate list to contain 197 substances.
7.2	November 1, 2019	(1) Updated the REACH SVHC candidate list to contain 201 substances. (2) Updated the list of exemptions for prohibited substances. (3) Changed the substance name of A-67 to "Perfluorooctanoic acid (including salt) (PFOA) and perfluorooctanoic acid related substances". (4) Updated the list of substances exemplified in "A-29 Ozone depleting substance" and "A-31 Greenhouse effect gas".
7.3	May 26, 2021	(1) Added the "JAPIA sheet" in 4. Definition of Terms. (2) Updated the list of substances exemplified in "A-42 Specific phosphorus compound". (3) Added the chemical substances under TSCA and by customer request in the list of prohibited substances (No.78 ~84). (4) Updated the list of exemptions for prohibited substances. (5) Updated the REACH SVHC candidate list to contain 211 substances.
7.4	Oct 29, 2021	(1) Updated the REACH SVHC candidate list to contain 219 substances.
7.5	May 2, 2022	(1) Updated the REACH SVHC candidate list to contain 223 substances.
7.6	Dec 13, 2022	(1) Added Perfluorohexane-1-sulphonic acid (PFHxS) and its salts and Perfluorocarboxylic acids (PFCAs) and its salts and related substances to banned substances. (2) Updated the list of substances exemplified in "A-67 Perfluorooctanoic acid (including salt) (PFOA) and perfluorooctanoic acid related substances" and "B-17 Fluorine and its compounds". (3) Updated the list of exemptions for prohibited substances. (4) Added Neodymium and its compounds to controlled

		substances. (5) Updated the REACH SVHC candidate list to contain 224 substances.
7.7	May 13, 2023	(1) Added 2-(2H-benzotriazol-2-yl)-4,6-ditertpentylphenol (UV-328) to banned substances. (2) Updated the REACH SVHC candidate list to contain 233 substances.
7.8	Nov 10, 2023	(1) Added Perfluorohexanoic acid (PFHxA), its salts and PFHxA-related substances to banned substances. (2) Updated the list of exemptions for prohibited substance. (3) Updated the REACH SVHC candidate list to contain 235 substances.
7.9	Apr 30, 2024	(1) Updated the REACH SVHC candidate list to contain 240 substances.
8.0	Dec 27, 2024	(1) Added Methoxychlor to banned substances. (2) Updated the REACH SVHC candidate list to contain 242 substances. (3) Added 1,3-Dihydroxybenzene to controlled substances.
8.1	May 1, 2025	(1) Updated the REACH SVHC candidate list to contain 247 substances.
8.2	Sep. 30, 2025	(1) Added Medium-chain chlorinated paraffins (MCCP), Long-chain perfluorocarboxylic acids (LC-PFCA) its salts and related substances, and Chlorpyrifos to banned substances. (2) Updated the REACH SVHC candidate list to contain 250 substances.
8.3	May. 29, 2026	(1) Changed the wording to "CMP Consortium" and updated the URL due to the change in the operating organization. (2) Deleted the mention of "JAMA Sheet" from the main text. (3) Updated the REACH SVHC candidate list to contain 253 substances.