HORIBA Group Guidance on Reporting substances contained in products

The 1.1 edition

October 17, 2017 HORIBA Ltd.

Submission of data on controlled substances

1. Report on substances subject to Authorisation (SVHC)¹

Be sure to recognize whether a chemical substance is Contained/NOT Contained in a product and to take corresponding action according to the following.

- (1) When the concentration exceeds 0.1wt%, this shall be reported without fail.
- (2) When the concentration is less than 0.1wt%, this shall be reported as far as your knowledge allows
- (3) Where a SVHC is involved, whether the added substance is Contained/NOT Contained shall be ascertained and reported immediately according to (1) or (2) above.

2. Reporting substances other than SVHC

(1)The concentration shall be reported as far as your knowledge allows.

(2)When receiving new information on contained substances, it shall be reported immediately.

3. When no controlled substance is contained

When no controlled substance is contained or there is no relevant information, it should also be reported.

4. Format to report information on controlled substances

(Before December 2017)

- The HORIBA Group requests submission by JAMP MSDS plus format (the latest version) with regard to substances and mixtures (preparation).
- The HORIBA Group requests submission by JAMP AIS format (the latest version) with regard to articles.
- · JAMP Declarable Substances Reference List shall be the latest version.
- The HORIBA Group may request submission in formats other than the above in the case of a survey limited to particular substances for the purposes of compliance or customer requirement.

HORIBA Group Guidance on Reporting substances contained in products 1.1

¹ These are SVHC (Substances of Very High Concern) stipulated in Article 59 of the REACH regulations, and are substances that have as defined in Article 57. As of July, 2011, 53 substances had been so designated, and they have been added in stages. According to Article 33, the information necessary to use such products safely shall be provided to the users in a case where a product that contains these substances at a concentration of more than 0.1 wt% of the article is to be placed on the market.

(After January 2018)

- After January 2018, the HORIBA Group requests submission by chemSHERPA-CI format (the latest version) with regard to substances and mixtures (preparation), and by chemSHERPA-AI format (the latest version) with regard to articles.
- The HORIBA Group suggests reference on Data entry support tool provided by chemSHERPA for entry.
- The HORIBA Group suggests reference on manuals and rules provided by chemSHERPA for detail searching URL below.

https://chemsherpa.net/chemSHERPA/tool/

5. Subjects to be reported as controlled substances

We email you if we request the submission of data on controlled substances. The methods differ from your condition below.

- 1. XML format shall be used for JAMP AIS/MSDSplus.
- 2. SHAI or SHCI format shall be used for chemSHERPA.

Note: We do not receive your data in Excel and PDF format. Please check the format of your file before your submission.

Note: Please conduct error check to your file before your submission. We will ask you to revise and submit the data again if we find an error which happens to your file.

Suppliers who use the web system

If we asked you to use ProChemist/AS² and you have accepted it, you shall log in ProChemist/AS with your ID and its password and upload the file of your data.

We email your person who is registered in the system when we ask you for the data on controlled substances. You shall upload the file according to the procedure when you receive the email.

Suppliers who send the data to us by email

If we did not ask you to use ProChemist/AS, we correspond with you on this matter by email as we have done. We ask you to reply us by email with the document attached.

We email your person in charge when we ask you for the data on controlled substances. When you received the email, you shall create the document for the substances whose data is requested, and submit it by email.

6. The products which shall be reported as control substances

The products for which the HORIBA Group requests the data

If we find more than 0.1wt% of unreported SVHCs in a product, we will request to investigate the root cause.

² ProChemist/AS is a solution system which manages chemical substances in product with complying with REACH, which is provided by NEC, enabling to communicate by cloud computing.



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HORIBA Group Guidance on Reporting substances contained in products 1.1

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