
LIST OF PROHIBITED SUBSTANCES RONAL GROUP

WORK, HEALTH AND ENVIRONMENTAL SAFETY

State: February 2020

INDEX

1.	GENERAL	3
1.1	Definitions, hints and links	3
1.1.1	Global List of Declarable Substances in the automotive sector (GADSL)	3
1.1.2	International Material Data System (IMDS)	3
1.1.3	Conflict minerals	3
1.1.4	Recycled contents	3
1.1.5	Registration, evaluation, authorization and restriction of chemicals (REACH).....	3
1.1.6	REACH Annex XIV substances	4
1.1.7	Substances of very high concern (SVHC)	4
1.1.8	Registration of substances.....	4
2.	SUBSTANCE MANAGEMENT	4
2.1	Applicable laws, regulations and standards	4
2.2	Declarable and prohibited substances.....	4
3.	DECLARATION OF SUBSTANCES	5
3.1	Information obligations of the suppliers	5
3.2	Reporting of restricted substances and recycled contents	5
3.3	Reporting timing and deadlines	5
3.4	Electronic reporting using the international material data system (IMDS)	5
3.4.1	Substance disclosure in IMDS	6
3.4.2	Reporting of recycled contents.....	6
3.4.3	Requirements for IMDS reporting, including spare parts & accessories	6
4.	SUBSTANCE RESTRICTIONS	7
5.	ANNEX	8

1. GENERAL

Our strategic goals with regard to environmental protection, occupational health and safety includes the reduction of pollutants and the protection of the natural environment. To this end, we constantly review and improve our processes and products.

In the relevant regulations of the hazardous substances act, there are substance bans, restrictions, limit values and declaration obligations that must be complied with by all suppliers, without any restrictions. All deliveries and services must be provided in compliance with these requirements.

1.1 Definitions, hints and links

1.1.1 Global List of Declarable Substances in the automotive sector (GADSL)

The GADSL (*Global Automotive Declarable Substance List*) is a globally harmonized declarable substance list. It is a result of the efforts of a global team from the automotive, automotive parts supplier and chemical/plastics industries. The GADSL covers substances that are expected to be present in a material or part, which remains in a vehicle at the point of sale.

Further information are available at: www.gadsl.org

1.1.2 International Material Data System (IMDS)

IMDS is the automobile industry's material data system, which collects, maintains, analyses and archives all materials and substances used for automobile manufacturing.

Further information are available at: www.mdssystem.com

1.1.3 Conflict minerals

Conflict minerals currently include cassiterite, columbite/tantalite and wolframite (the most common derivatives are tin, tantalum and tungsten) as well as gold, regardless of where these minerals are mined, processed or sold.

The definition of conflict mineral can be found in the following legislation:

[Dodd-Frank Wall Street Reform and Consumer Protection Act Section 1502 Conflict Minerals](#)

1.1.4 Recycled contents

The portion of a material's or product's weight that is composed of materials, that have been recovered from or otherwise diverted from the scrap stream, either from the production process or after consumer use. Recycled content consists not from home scrap.

Post-Industrial Recyclates (PIR): Scrap which is a by-product of the production process (excluding home scrap) and reused in the production of the part.

Home scrap: Material commonly reused by the industry within the original production process. Examples include materials, which are re-granulated and re-fed within a facility. Home scrap is not considered recycled content.

1.1.5 Registration, evaluation, authorization and restriction of chemicals (REACH)

REACH is a regulation of the European Union: EU Regulation 1907/2006/EC.

Further information are available at: [REACH Legislation](#)

1.1.6 REACH Annex XIV substances

Substances listed in REACH Annex XIV shall be phased out of all products in time to comply with the relevant sunset date. These phase-outs shall be handled and notified in the same manner as any other part changes.

The current list of Annex XIV substances you will find under: [Authorisation List List of substances included in Annex XIV of REACH](#)

1.1.7 Substances of very high concern (SVHC)

A substance of very high concern (SVHC) is a chemical substance (or part of a group of chemical substances) for which it has been proposed that its use within the European Union be made subject to authorization under the REACH Regulation.

Further information are available at: [Candidate List of substances of very high concern](#)

1.1.8 Registration of substances

Registration of substances (regarding Table 1, Page 7) are identified in GADSL and/or Table 1 by substance name, type of restriction, threshold limit (where applicable), applications affected/exempted and effective dates. All substances listed in GADSL and/or Table 1 must be reported in IMDS.

2. SUBSTANCE MANAGEMENT

2.1 Applicable laws, regulations and standards

- **Regulation (EC) No 1907/2006 (REACH)** - Candidate list SVHC (actual issue)
- **Regulation (EC) No 1907/2006 Article 56** - Annex XIV - List of substances subject to authorization (2017-12-18)
- **Regulation (EC) No 1907/2006 (REACH) Article 67** - Annex XVII Restriction list (2018-12-18)
- **Regulation (EC) No 2019/1021 Article 3** - Annex I+IV Persistent organic pollutants (2019-06-20)
- **Directive (EU) 2011/65 RoHS Article 4** - Annex II (2019-07-22)
- **Regulation (EC) No 1272/2008** - "Regulation on classification, labelling and packaging of substances and mixtures"
- **Directive 1999/45/EC** - "Directive on the classification, packaging and labelling of dangerous preparations"
- **Directive 67/548/EEC** - "Directive on the classification, packaging and labelling of dangerous preparations"
- **Chemicals Prohibition Ordinance (DE)** – Annex 1 (2017-07-18)
- **GADSL** - Global Automotive Declarable Substance List (www.gadsl.org)

2.2 Declarable and prohibited substances

In general, the GADSL and the laws listed therein are to be applied.

After each update or change to the GADSL, all data sheets that contain confidential or joker-hidden declared pure substances must be checked. If data sheets contain substances that have been included in the GADSL as new or prohibited substances, these data sheets must be updated immediately after the GADSL has been changed, the substances must be explicitly named in them and the data sheets must be sent to the RONAL GROUP again.

All substances marked with *P = Prohibited* in the GADSL must not exceed the respective limit values in the specified fields of application.

Suppliers, whose substances remain on or in the product, are obliged to enter the ingredients in the IMDS.

Material bans must also be observed for *carry-over parts* (COP) and the usability of the parts must be checked.

Products and mixtures may only contain or be released from substances that are registered and approved for the intended uses within the time limits specified in regulation (EC) No. 1907/2006 ("REACH").

Particular attention should be paid to the capture 2.1 applicable laws, regulations and standards as well as to national laws and regulations. The requirements must be met by the supplier.

3 DECLARATION OF SUBSTANCES

3.1 Information obligations of the suppliers

The supplier is obliged to inform the RONAL GROUP immediately and to jointly clarify the further procedure of the responsible procurement department, if a substance contained in a component

- may no longer be used due to a new marking in the GADSL with "P",
- is newly regulated by Annex II to Directive 2000/53/EC,
- to the list of substances subject to authorization (Annex XIV to Regulation (EC) No 1907/2006),
- is included in the register of restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and products (Annex XVII to Regulation (EC) No 1907/2006) and is used in accordance with the procedure laid down in entry in Annex XVII is prohibited.

Suppliers of operating materials are obliged to supply a safety data sheet and the exact chemical composition as supplied to the person/department authorized to receive the goods. The confidential data will only be used for industrial hygiene purposes for safety chemical labelling, evaluation and release. Access is restricted to a defined group of persons. The supplier has the option of receiving a confidentiality agreement in advance.

3.2 Reporting of restricted substances and recycled contents

The RONAL GROUP is requested by its customers to comply with the requirements and regulations of GADSL for reporting on the substances contained in products, both in production and in spare parts. Additional or changed GADSL requirements are included in Table 1.

3.3 Reporting timing and deadlines

Suppliers are required, to meet the reporting deadlines for production and spare parts.

Product data submissions:

- Current materials, substances and products should already have been reported in IMDS. If they are not, or if an update is required (see below), they shall be reported immediately.
- All materials, substances and products shall have a final material datasheet reported in IMDS in time.
- All materials, substances and products shall have a final accepted material datasheet in IMDS.

3.4 Electronic reporting using the international material data system (IMDS)

All parts and materials that remain on a wheel at the point of sale, and all spare parts and accessories, as well as all packaging shall be reported using IMDS.

RONAL GROUP requires that all datasheets be sent to RONAL GROUP (*IMDS company ID 356*).

Suppliers are required to:

- **Report substances** - All substances covered by the GADSL and/or Table 1 (identity and percent by weight).
- **Report materials** - 100 % of materials, including classification and weight of all materials.
- **Report components** - All sub-components in an assembly must appear as such, i.e. as elements in IMDS datasheet's tree structure, as detailed in IMDS Recommendation 001. The assembly component's stated mass at the top node of the component ("Measured weight per item") must represent the real mass. Real masses are either derived from statistical product control cards or are determined by weighing a statistically relevant number of items and calculating the statistical average (arithmetic mean).
- **Recycled contents** - Report the percentage of recycled content in all materials.

An update of existing IMDS data is required in the following circumstances:

- A new material.
- A change in the mass of a material that exceeds $\pm 10\%$ or 50 g.
- A new substance listed in the GADSL and/or Table 1 is added to a material.
- A substance, which has not already been reported but which is included in the GADSL and/or Table 1.
- A change in the mass of a substance already reported in the GADSL and/or Table 1 that exceeds $\pm 10\%$, or if a change in the mass causes a threshold limit requirement to be exceeded.
- A change in recycled content that exceeds $\pm 10\%$ or 50 g.
- If the RONAL part number changes, a new material datasheet is required.

3.4.1 Substance disclosure in IMDS

All substances listed in the GADSL and/or Table 1 shall be disclosed in IMDS. All substances identified in the GADSL and/or Table 1 of this standard must be identified with the correct CAS number when being reported in IMDS. The use of non-CAS identified substances is acceptable for the reporting of substances in accordance with IMDS Recommendation 001. Paints, polymers, adhesives and sealants, etc., must be reported in the cured state. Substances listed in the GADSL and/or Table 1 are not allowed to be marked or reported as "confidential" when being reported in IMDS.

3.4.2 Reporting of recycled contents

Only the weight of the recyclate within the component or assembly shall be reported as recycled content. Do not report the entire weight of the component or assembly as recycled content.

3.4.3 Requirements for IMDS reporting, including spare parts & accessories

All production parts, attachments including packaging must be reported.

4. SUBSTANCE RESTRICTIONS

Following a list of prohibited and/or restricted substance as well as regulations.

Table 1 – List of restricted and/or prohibited substances

Substance category or notation	Classification	Applications affected	Threshold	Effective date
All GADSL listed substances	D/P ²	All materials are subject to the GADSL guidelines listed at http://www.gadsl.org .	See GADSL	Immediately
Asbestos forms – minerals – all members	P ³	All products and equipment (e.g. machines, buildings).	Not detectable	Immediately
Substances listed in EU REACH, Annex XIV	P ³	All products and equipment consumables and packaging.	0%	After the deadline
Regulation (EC) No 1907/2006 (REACH) – Candidate list SVHC (actual issue)	P ³	All products, materials, mixtures and auxiliary materials.	0%	
Conflict minerals including Tin, Tantalum, Tungsten, Gold	D ⁴	All products and components.	0%	Immediately, are subject to declaration and proof of origin is necessary.
Chemicals and materials marking with skull and crossbones	P ³	All materials, substances and chemicals.	Labeling	Measures to be set to replace the substance or proving the possibilities to use other products / substances.

Percent by weight of a substance contained in a homogeneous material, mixtures and chemicals

D/P² = *Prohibited in some applications and declarable in all other cases*

P³ = *Prohibited*

D⁴ = *Declarable*

5. ANNEX

5.1 Process related of environmental requirements – Paint Shop

<p>1 RONAL-Requirements</p>	<ul style="list-style-type: none"> ▪ Supplier's Handbook Annex Environment: <ul style="list-style-type: none"> ➢ Energy saving options ➢ Water saving options ➢ Resource efficiency ▪ REACH regulation and SVHC – substance prohibition and declaration ▪ No substances, chemicals and materials marking with skull and crossbones ▪ No materials including conflict minerals (declaration and explanation of origin)
<p>2 BAT – best available technique Information sheet, Best Available Techniques (BAT) Reference Document on Surface Treatment Using Organic Solvents including Preservation of Wood and Wood Products with Chemicals. Final Draft. European IPPC Bureau (EIPPCB), Seville 2019.</p>	<ul style="list-style-type: none"> ▪ VOC control at afterburner ▪ VOC material flow documentation for the necessary documentation of solvent balances
<p>3 The IE Directive 2010/75/EU /1/ - Central European legal standard for the definition of environmental requirements for industrial installations.</p>	<ul style="list-style-type: none"> ▪ Chapter V, Annex 7, Parts 1 and 2 ▪ Annex II; List of pollutants ▪ Annex III, Criteria for identifying best available techniques
<p>4 Council Directive 1999/13/EC of 11 March 1999 on the limitation of emissions of volatile organic compounds due to the use of organic solvents in certain activities and installations (EU LM Directive). OJ EU, L (1999) No L85, p. 1 (23.12.2008).</p>	