Updates of the Chemical Substance Management Rank Guidelines (for Products) Ver.15 and Requests

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Product Chemical Substance Management Committee

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Main Change Points in the Rank Guidelines

■ Rank Guidelines

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4. Establishment, Revision, and Abolition
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- No.1 : Updated the regulated contents for Polychlorinated terphenyls (PCTs) (refer to P.4)
- No.6 : Updated the regulated contents for Short-chain chlorinated paraffin (SCCPs) (refer to P.10)
- No.8 : Updated the regulated contents for Polybrominated Biphenyl Ether (PBDE) (refer to P.5)
  Specified brominated flame retardants are listed separately for PBB and PBDE
- No.17 : Updated the regulated contents for Formaldehyde (refer to P.6)
- No.18 : Updated the regulated contents for Perfluorooctane sulfonate (PFOS) (refer to P.7)
- No.22 : Updated the regulated contents for Hexabromocyclododecane (HBCD) (refer to P.7)
- No.27 : Updated the regulated contents for Perfluorocarboxylic acids containing 9 to 14 carbon atoms in the chain (C9-C14 PFCA) (refer to P.9)
  Classified Perfluorocarboxylic acids containing 15 to 21 carbon atoms in the chain (C15-C21 PFCA) into the Level 1, higher level (refer to P.9)
- No.30 : Updated the regulated contents for Dechlorane Plus ™ (refer to P.7)
- No.31 : Updated the regulated contents for UV-328 (refer to P.8)
- No.32 : Classified Medium chain chlorinated paraffin (MCCP, C14-17) into the Level 1, higher level (refer to P.10)

Appendix 1. List of Level 1 Prohibited Substances/Substance Groups

Appendix 2. List of Level 2 Prohibited Substances/Substance Groups

Appendix 3. List of Level 3 Prohibited Substances/Substance Groups

Appendix 4. Exempted Item List under the EU RoHS Directive

Appendix 5. Exempted Items List under the EU ELV Directive

Appendix 6. Controlled Values for Prohibited Substances

- Classified Per-and polyfluoroalkyl substance (PFAS) into the Level 2A, higher level from the Level 3 (refer to P.11)
- Classified Perfluorohexanoic acid (PFHxA) into the Level 2A, higher level from the Level 3 (refer to P.11)
- Added Organohalgen flame retardant (OFR) to the Level 2B (refer to P.11)
- Classified Decabromodiphenyl Ethane (DPDPE) into the Level 2B, higher level from the Level 3 (refer to P.11)

Update with the latest information.

Revised Contents for the Level 1 Prohibited Substances (1/7)

- **Updated the regulatory contents as an Australian regulation including requirements that may affect shipments of i-PRO products is updated. Australian regulations have not been referred in the Rank Guidelines.**

No	Substance/Substance Group Name	Regulations by the i-PRO	Regulated items	Major Referenced Laws/ Regulations
1	Polychlorinated terphenyls (PCTs)	Intentional use prohibited and less than 50ppm	All applications	EU REACH Annex XVII

The main changes are in blue

Revised Contents for the Level 1 Prohibited Substances (2/7)

- **Updated regulated contents because of the revised draft of EU POPs regulation.**
  In addition, while PBBs and PBDEs were listed together as Specified brominated flame-retardants, PBBs and PBDEs are now listed separately because regulated contents and reference laws/regulations are different.

No	Substance/Substance Group Name	Regulations by the i-PRO	Regulated items	Major Referenced Laws/ Regulations
8	Polybrominated Biphenyl Ether (PBDE)	Intentional use prohibited and less than 1000ppm	Equipment covered under the EU RoHS	CSCL EU RoHS EU POPs Annex I TSCA POPs Convention
		Intentional use prohibited and less than 10ppm	Items other than the above: all applications (e.g., application as materials for batteries, automotive components, packaging materials, and toys and nursery items)	
			<Exemptions> - PBDE at concentration of less than 350ppm in homogeneous material of toys and childcare products containing recovered material where PBDE is present (until October 20, 2026) - PBDE at concentration of less than 350ppm in homogeneous material of articles (other than toys and childcare products) containing recovered material where PBDE is present (until June 30, 2027) - PBDE at concentration of less than 200ppm in homogeneous material of articles (other than toys and childcare products) containing recovered material where PBDE is present (from July 1, 2027)	

Note: the expiry date of the exemption in the Rank Guidelines is basically set 6 months before the expiry date as stated in the regulation.

The main changes are in blue

Revised Contents for the Level 1 Prohibited Substances (3/7)

- **Updated the regulated contents in the Rank Guidelines as Formaldehyde had been added to the Restriction list because of revised EU REACH ((EU)2023/1464). In accordance with the revision, deleted “Germany Chemicals prohibition ordinance” and “Denmark Formaldehyde Regulation” from the referenced laws/regulations.**

No	Substance/Substance Group Name	Regulations by the i-PRO	Regulated items	Major Referenced Laws/ Regulations
17	Formaldehyde	- Wood-base articles Aerial concentration: Less than 0.062mg/m^3(0.05ppm) - Articles other than the abobe Aerial concentration: Less than 0.080mg/m^3(0.06ppm)	All applications (of articles)	EU REACH Annex XVII TSCA CEPA 1999

The main changes are in blue

Revised Contents for the Level 1 Prohibited Substances (4/7)

- **Updated regulated contents because of revised EU POPs regulation. (1/2)**

No	Substance/Substance Group Name	Regulations by the i-PRO	Regulated items	Major Referenced Laws/ Regulations
18	Perfluorooctane sulfonate (PFOS), its salts and PFOS-related substances	Intentional use prohibited and - In the case of PFOS (including its salts): less than 25ppb (0.025ppm) - In the case of one or combination of multiple PFOS-related substances: less than 1000ppb (1ppm) in total	All applications	CSCL EU POPs Annex I POPs Convention
22	Hexabromocyclododecane (HBCD)	Intentional use prohibited and less than 75ppm	All applications	CSCL EU POPs Annex I POPs Convention
30	Dechlorane Plus™	Intentional use prohibited and less than 1000ppm - from Apr. 16, 2027 less than 1ppm	All applications <Exemptions> (until Aug. 26, 2029) - Aerospace plane, Defense application - Devices/equipment for medical image diagnosis or radio therapy	CSCL EU POPs Annex I POPs Convention

Note: the expiry date of the exemption in the Rank Guidelines is basically set 6 months before the expiry date as stated in the regulation.

The main changes are in blue

Revised Contents for the Level 1 Prohibited Substances (5/7)

- **Updated regulated contents because of revised EU POPs regulation. (2/2)**

No	Substance/Substance Group Name	Regulations by the i-PRO	Regulated items	Major Referenced Laws/ Regulations
31	Specific benzotriazole compounds (2) UV-328	Intentional use prohibited and less than 100ppm - from Aug. 4, 2026 less than 10ppm - from Aug. 4, 2028 less than 1ppm	All applications <Exemptions> (until Feb. 4, 2030) - Automobiles (including trucks, motorcycles, vehicles for construction, agricultural, and industrial use) - Industrial coating for engineering machines, rail transportation vehicles, and heavy-duty coatings for large steel structures, etc. - Triacetyl cellulose (TAC) film in polarizing plates - Aircrafts	CSCL EU POPs Annex I POPs Convention

Note: the expiry date of the exemption in the Rank Guidelines is basically set 6 months before the expiry date as stated in the regulation.

The main changes are in blue

Revised Contents for the Level 1 Prohibited Substances (6/7)

- **At the twelfth meeting of the Conference of the Parties to the Stockholm Convention (SC COP-12), "C9-C21 PFCAs" was added to the list of substances for elimination (Annex A).**
  - **Classified Perfluorocarboxylic acids (PFCA) containing 15 to 21 carbon atoms in the chain into the Level 1, higher level.**
  - **Updated the regulated contents for Perfluorocarboxylic acids (PFCA) containing 9 to 14 carbon atoms in the chain.**

No	Substance/Substance Group Name	Regulations by the i-PRO	Regulated items	Major Referenced Laws/ Regulations
27	Perfluorocarboxylic acids containing 9 to 21 carbon atoms in the chain (C9-C21 PFCAs), their salts and C9-C21 PFCA-related substances	[C9-C14 PFCA] Intentional use prohibited, and - In the case of C9-C14 PFCAs (including individual salts): less than 25ppb (0.025ppm) - In the case of one or combination of multple C9-C14 PFCA-related substances: less than 260ppb (0.26ppm) in total concentration	All applications	EU REACH Annex XVII POPs Convention
			<Exemptions> - C9-C14 PFCAs as impurity at concentration of 1ppm or less in polytetrafluoroethylene (PTFE) micropowder by ionizing radiation or by thermal degradation	
		[C15-C21 PFCA] Intentional use prohibited	All applications	POPs Convention

The main changes are in blue

Newly added

Revised Contents for the Level 1 Prohibited Substances (7/7)

- **At the twelfth meeting of the Conference of the Parties to the Stockholm Convention (SC COP-12), "Medium chain chlorinated paraffin (MCCP, C14-17)" was added to the list of substances for elimination (Annex A).**
  - **Classified Medium chain chlorinated paraffin (MCCP, C14-17) into the Level 1, higher level from the Level 2.**
  - **Updated the SCCP contents because of classification of MCCP into Level 1, higher level.**

No	Substance/Substance Group Name	Regulations by the i-PRO	Regulated items	Major Referenced Laws/ Regulations
32	Medium chain chlorinated paraffin (MCCP, C14-17) (limited to whose chlorinated content is 45wt% or more)	Intentional use prohibited	All applications <Exemptions> - Flexible PVC used for; ・Construction sector, including maintenance of buildings and other structures, for uses other than flooring in indoor spaces that are not used for commercial purposes ・Wires and cables in the construction sector ・Wires and cables in medical devices and in-vitro diagnostic devices ・Calendered films in the packaging field - Flexible elastomeric foam for thermal insulation (FEF) - Adhesives or sealants used for; ・Polysulfide sealant and one-component polyurethane foam used in sealing for doors and windows ・Waterproof coatings and anticorrosion coatings ・Aerospace and defence applications - Tape used for non-structural bonding in aerospace and defence products - Fatliquoring component in leather, except in children's products	POPs Convention
6	Short-chain chlorinated paraffin (SCCPs, C10-13)	Intentional use prohibited and ~~concentration must be~~ less than 1500ppm ~~if contained as an impurity of medium-chain chlorinated paraffin (MCCP, C14-17)~~		

Newly added

The main changes are in blue

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Revised Contents for the Level 2 Prohibited Substances

- **Classified the following substances into the level 2, higher level from the Level 3: Per- and polyfluoralky substance (PFAS), Perfluorohexanoic acid (PFHxA), Decabromodiphenyl Ethane (DBDPE).**
- **Added Organohalogen flame retardant (OFR) to the Level 2. (Refer to the next page for details of subject substances and components.)**

◆List of Level 2A Prohibited Substances/Substance Groups

No	Substance/Substance Group Name	Date of Delivery Prohibition	Regulated items	Major Referenced Laws/ Regulations
1	Per- and polyfluoroalkyl substance (PFAS)	Jan. 1, 2031 The date may be changed depending on the regulatory trend in the future.	All applications	US Law
2	Perfluorohexanoic acid (PFHxA) and its salts, and PFHxA related substances	Oct. 10, 2026	In the use of textiles, leather, furs and hides; - In the case of PFHxA (including its salts): less than 25ppb (0.025ppm) - In the case of one or combination of multiple PFHxA-related substances: less than 1000ppb (1ppm) in total concentration	EU REACH

Newly added

◆List of Level 2B Prohibited Substances/Substance Groups

3	Organohalogen flame retardant (OFR)	Details will be set in response to the regulatory trend hereafter.	Use in the following applications; (1) Plastic cases and stands for displays (2) Other than the above: plastic cases of EEE for indoor use <Exemptions> - Cases of components that do not contact human skins - Codes, cables, switches, connectors	US Law
4	Decabromodiphenyl Ethane (DBDPE)	Details will be set in response to the regulatory trend hereafter.	All applications	CEPA 1999

Newly added

The main changes are in blue

Revised Contents for the Level 2 Prohibited Substances: Organohalogen flame retardant (OFR) subject to the regulation

- **For the regulatory contents and interpretation for your work, make sure to check with the original text of the regulation, always referring to the updated information**

Organohalogen retardant	Chemicals to be used for retarding fire spread with following chemical bonds: **Carbon (C) － Halogen (Fluorine (F), Chlorine (Cl), Bromine (Br) or Iodine (I))** ***Mainly the substances subject to the chemSHERPA management Substance Groups code SG058(halogen flame retardant). Pay due attention to the subject substances since the substances that are not subject to the chemSHERPA management are sometimes included.**
Covered components	Components of electric and electronic products (EE)[*2] with plastic external enclosure[*1] in which organohalogen flame retardant is used. *1 External enclosure: components that fulfill the requirement for an enclosure* and that the user of the EE products can touch. *2 EE products: products with standard 120V, outlet max. 20A circuit, or battery-powered products.
Exempted components	・Components that general consumers can not access (e.g., printed circuit boards, internal fans.) ・Internal components that can be removed or replaced by the user; however, in the state that the product is fully assembled and functions, the user can not touch the components. ・A component whose weight is less than 0.5 g. ・Wires, codes, cables, switches, electric light bulbs, connectors ・Components enclosed around the external enclosure for decoration. (PVC sheets, etc.)

Requests should be asked to suppliers

Request for resubmission of a Non-use Warranty

- Because of revised contents of the Level 1 Prohibited Substances (PSs), relevant suppliers are requested to resubmit a Non-use Warranty.
- For resubmission of a Non-use Warranty, relevant suppliers including those in your supply chain are requested to check whether any of the Level 1 PSs is contained and a possibility of inclusion of the PSs in your products or components.

■How to resubmit

– Fill in requirements in the latest 'Non-use Warranty (Level 1 PSs)'.

– Submit the Non-use Warranty by the deadline respectively.

■Important notes

The components/materials containing the Level 1 PSs that exceed the restricted limit are deemed non-compliant to the Rank Guidelines Ver.15. In such case, please **immediately** contact the i-PRO who requested this in order to replace the components/materials with substitutes.

Requests for suppliers

Important notes for revision of the Rank Guidelines

■ Level 2 Prohibited Substances

Please prepare for their substitution, as those substances are highly likely to classified into the Level 1 in the near feature.

■ Exemption of the prohibited substances under the RoHS regulation

As for other exempted items for which extending the exemption period was requested, the EU Commission is still under discussion. However, please pay due attention to the trend hereafter, because there is a possibility that its exemption period may be newly set, or the scope of the exemption may be limited.

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Relevant Documents

Relevant Documents

Download documents available at the following URLs.

Rank Guidelines Ver.15

Japanese, English
https://i-pro.com/ja-JP/sustainability/environment/resource_circulation.html
English
https://i-pro.com/en/sustainability/environment/resource_circulation.html

Sustainable Procurement Guidelines Ver.1.0

Japanese, English
https://i-pro.com/ja-JP/sustainability/social/supply_chain.html#sustainable_procurement_guidelines
English
https://i-pro.com/en/sustainability/social/supply_chain.html#sustainable_procurement_guidelines

Product chemical substances management system (GM Pro) Manuals (Members only)

Japanese, English, and Chinese http://10.75.46.178/gmmanual

chemSHERPA website

Japanese https://cmp-consortium.com
English, Chinese https://cmp-consortium.com/english

Website for Explanatory Documents

Japanese
https://cmp-consortium.com/chemsherpa/aboutchemsherpa
English, Chinese
https://cmp-consortium.com/english/chemsherpa/aboutchemsherpa

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