

Keywords: Material Compliance, guideline, safety data sheet, prohibited substances, regulation

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## Amendments

Date	Version	Amended chapter	Description of amendment	Author	Status
17.10.16			First edition	Rohleder	Adopted

## Foreword – purpose

With SN 780, Heidelberger Druckmaschinen AG bundles all material and substance-related requirements from national and international laws, guidelines, standards and customer requirements, etc., in their current form.

SN 780 supports Heidelberger Druckmaschinen AG and its suppliers in the responsible and environmentally friendly handling of substances and articles under development, manufacturing, usage and waste disposal of intermediate and end products.

It contributes toward delivering a high level of protection for human health and the environment with the aim of ensuring sustainable development and stipulates the replacement of substances of very high concern with less dangerous substances or technologies.

## 1 Scope

With SN 780 as the company standard, Heidelberger Druckmaschinen AG regulates prohibited and declarable contents in products (→ *Chapter 3.1*) and information requirements associated with these. This regulation includes auxiliary and operating supplies, provided that these remain on the product or are classified as a hazardous substance, as well as packaging and transport materials, if these are delivered to the customer with the product. Heidelberger Druckmaschinen AG markets its products worldwide. As such, this standard also incorporates market-specific legal regulations as a requirement.

Heidelberger Druckmaschinen AG requires that all products comply with the stipulations laid down in this standard and that information obligations are adhered to in order to guarantee that its products are placed on the market in line with regulations.

The material- and substance-related product requirements (Material Compliance requirements) of this standard are given equal status to the other product requirements.

Adherence to SN 780 is the responsibility of the supplier.

The supplier's obligation to comply with legal provisions (national and international legislation) is not affected by this standard.

The necessity of obtaining the applicable guidelines, laws and standards is unaffected by this and remains an obligation of the suppliers of Heidelberger Druckmaschinen AG.

Note regarding sources and means of assistance:

- Platform for European regulations, guidelines and resolutions, in all existing versions and official European languages (the publication year and number must be entered in the search mask (→ *Chapter 4* and *Chapter 5*):  
<http://eur-lex.europa.eu/>
- Support site of the European Chemicals Agency (ECHA):  
<https://echa.europa.eu/support/guidance>
- REACH CLP biocide helpdesk – national helpdesk of the German federal government:  
<http://www.reach-clp-biozid-helpdesk.de/en/Homepage.html>
- REACH helpdesk – German Federal Environment Agency:  
<http://www.reach-info.de>

In individual cases, the technical data sheets for all raw materials and auxiliary materials used are to be disclosed to Heidelberger Druckmaschinen AG on request for initial sampling. Heidelberger Druckmaschinen AG reserves the right to conduct tests and laboratory examinations on products on a case-by-case basis.

Heidelberger Druckmaschinen AG publishes the currently valid version of SN 780 on the internet at [www.heidelberg.com](http://www.heidelberg.com):

- Company > About us > Sustainability > Environmental Management > Material Compliance Standard
- Company > Procurement > Cooperation > Appendix 14 > Material Compliance Standard

This can also be obtained on request via the Procurement department of Heidelberger Druckmaschinen AG.

The supplier is obliged to check whether SN 780 has been updated at least every six months. The updated version of the standard replaces the previous version and is applicable with immediate effect. Heidelberger Druckmaschinen AG does not notify the supplier of an update of SN 780. Although any legislative changes do not necessarily lead to an update of this standard, this does not release the supplier from the obligation to comply with these legislative changes.

The supplier is obliged to provide the requested information from the legal regulations listed in *Chapter 4* and *Chapter 5* free of charge.

In the event of new or altered legal provisions, the supplier is obliged to inform the Procurement department of Heidelberger Druckmaschinen AG of any potential consequences or product modifications resulting from these in good time. In particular, this applies when temporary exceptions to legal provisions are utilized and the corresponding periods expire. Accordingly, the supplier should observe the regulations in the "Product and process changes" chapter of the Guideline for Cooperation with Suppliers. The currently valid version can be accessed via [www.heidelberg.com](http://www.heidelberg.com):

- Company > Procurement > Cooperation > Guideline for Cooperation with Suppliers

This can also be obtained on request via the Procurement department of Heidelberger Druckmaschinen AG.

## 2 Normative references

None

## 3 Definitions

This section explains terms that require a definition within the scope of their use in this standard in the view of Heidelberger Druckmaschinen AG. Regulation-specific definitions are to be looked up in the respective regulation and are only listed here in exceptional cases to aid understanding of the contents of the standard, with a reference to the respective regulation.

### 3.1 Product

The "product" is everything that Heidelberger Druckmaschinen AG provides as a delivery item as well as everything produced by Heidelberger Druckmaschinen AG itself and that remains on a product placed on the market by Heidelberger Druckmaschinen AG.

*Examples of products:*

- Complete product, including trading goods
- Component, part
- Article
- Replacement part
- Semi-finished part
- Material
- Preparation or mixture
- Pure substance
- Soldering agent
- Glue
- Lubricant
- Cooling lubricant
- Surface degreasing agent
- Anticorrosive agent
- Sandblasting material
- Hardening material
- Forming material
- Packaging including conditioning, such as drying agent or anticorrosive agent
- Transport materials

### 3.2 Prohibited substances

Prohibited substances are all substances which are generally banned by currently applicable legal regulations or Heidelberg's internal provisions, or which are prohibited on the basis of other provisions (use restriction, authorization requirement, etc.).

### 3.3 Declarable substances

Declarable substances are all substances for which currently applicable legal regulations or Heidelberg's internal guidelines stipulate a declaration requirement.

### 3.4 Restriction

Requirements for the manufacturing, usage or placing on the market (of a substance) or the prohibition of these activities. Restriction is possible if the manufacturing, distribution or use of substances represents an unacceptable risk to human health or the environment (REACH regulation).

### 3.5 Placing on the market

Transfer of goods to a third party or making them available to a third party, whether for a payment or free of charge. Import shall be deemed to be placing on the market.

### 3.6 Authorization requirement

Unlike conventional bans on chemicals, an authorization requirement is a ban subject to permission being granted. This means that it is forbidden to use a substance listed in Annex XIV of REACH (→ *Chapter 4.1.1*) unless authorization has been granted.

### 3.7 Substances of very high concern (SVHCs)

Substances of very high concern (SVHCs) are substances that fulfill the criteria of Article 57 of the REACH regulation:

- Substances with carcinogenic or mutagenic properties or that are toxic for reproduction (CMR category 1 and 2)
- Substances that are rated as persistent, bioaccumulative and toxic according to the criteria of Annex XIII (PBT substances)
- Substances that are rated as very persistent and very bioaccumulative according to the criteria of Annex XIII (vPvB substances)
- Substances with properties giving rise to an equivalent level of concern, e.g. substances with endocrine disrupting properties or substances that do not meet PBT/vPvB criteria but are persistent, bioaccumulative and toxic and display severe and irreversible effects on people or the environment

### 3.8 Homogeneous material

A homogeneous material (→ RoHS Article 3, Paragraph 20) is a material of uniform composition throughout or a material consisting of a combination of materials that cannot be disjointed or separated into different materials by mechanical actions such as unscrewing, cutting, crushing, grinding or abrasive processes.

Example: A screw consists of a metal body, a zinc coating, a passivation layer and a final coating. The screw therefore contains four homogeneous materials.

### 3.9 Packaging / packaging components

Packaging describes products manufactured from any substances for containing, protecting, handling, delivering or presenting goods that can range from raw materials to the processed article and which are transferred from the manufacturer to the user or consumer. All "disposable products" used for the same purpose are also to be viewed as packaging (→ EU directive on packaging and packaging waste Article 3, Paragraph 1).

Packaging components are parts of the packaging that can be removed by hand or through simple mechanical procedures. Additional elements that are directly hung on or attached to a product and fulfill a packaging function are considered to be packaging unless they are an integral part of the product.

### 3.10 Battery and accumulator

A source of electrical energy consisting of one or more (non-rechargeable) primary cells or one or more (rechargeable) secondary cells. The energy is derived from the direct conversion of chemical energy.

## 4 Prohibited substances

This chapter lists the legal regulations that impose prohibitions on substances, as well as prohibitions on substances laid down by Heidelberger Druckmaschinen AG and its customers. **These prohibitions on substances must be strictly observed** for all product deliveries to Heidelberger Druckmaschinen AG as well as for all relevant Heidelberg products.

Where these are known, links have been provided on the respective source of the current version of the regulation, insofar as these deviate from <http://eur-lex.europa.eu/> (→ *Chapter 1*).

### 4.1 Regulation (EU) no. 1907/2006 (REACH)

This so-called REACH regulation aims to ensure a high level of protection for people and the environment. According to REACH, manufacturers, importers and downstream users have to register their chemicals and they are responsible for the safe use of said chemicals (→ European Chemicals Agency – <https://echa.europa.eu/de>).

#### 4.1.1 Annex XIV – Authorization List

Annex XIV of the REACH regulation lists substances that are generally prohibited and those for the further use of which there is an authorization requirement (→ *Chapter 3.6*). The publication names a substance-specific transitional period (sunset date), after which the substance may no longer be brought into circulation or may only be brought into circulation subject to authorization. The substances were previously published in the list of SVHC candidates (→ *Chapter 3.7* and *Chapter 5.1*) and remain listed there.

*Source*

<https://echa.europa.eu/de/addressing-chemicals-of-concern/authorisation/recommendation-for-inclusion-in-the-authorisation-list/authorisation-list>

#### 4.1.2 Annex XVII – list of restricted substances

Annex XVII of the REACH regulation governs restrictions placed upon putting into circulation and using hazardous substances.

*Source*

<http://echa.europa.eu/addressing-chemicals-of-concern/restrictions/substances-restricted-under-reach>

#### 4.1.3 Appendices 1 to 6, 8 and 9 – CMR substances and azodyes

Substances with carcinogenic, mutagenic and/or reproduction-toxic properties (CMR substances) and azodyes are subject to various bans and are listed in annexes 1 - 6 and 8 and 9 of the REACH regulation.

*Source*

The annexes are not provided as a separate link on the ECHA site, but are rather attached directly to the regulation.

### 4.2 Directive 2011/65/EU (RoHS)

The so-called RoHS directive restricts the use of certain hazardous substances in electrical and electronic equipment. It has been implemented in national law in all EU member states and came into force in Germany on January 2, 2013 with the Ordinance on the Restriction of Use of Hazardous Substances in Electrical and Electronic Equipment (ElektroStoffV).

The substance bans and exemptions laid down in this law refer to the maximum concentrations in the homogeneous material (→ *Chapter 3.8*) of each product and can be found in the currently valid version of the guideline.

### 4.3 Directive 94/62/EC (packaging)

Directive 94/62/EC on packaging (→ *Chapter 3.9*) and packaging waste restricts the concentrations of heavy metals in packaging (Article 11).

#### **4.4 Regulation (EU) no. 528/2012 (biocides)**

Regulation (EU) no. 528/2012 governs the approval of biocides in the European Union and thereby standardizes the provision and use of biocidal products on the European market. Approval takes place using a tiered approach.

Every supplier to Heidelberger Druckmaschinen AG is obliged to meet the specifications and obligations for biocidal products and treated goods in full if their product falls under the scope of the regulation. Furthermore, the information obligation must be complied with if a product is treated with a biocide and a corresponding identification is required according to the regulation.

Products may only be used if they

- were not treated with biocides, or
- were treated with a biocidal product approved in the EU.

#### **4.5 Ordinance on Hazardous Substances (GefStoffV)**

The Ordinance on Hazardous Substances (GefStoffV) is an ordinance from German occupational health and safety law and aims to protect people and the environment from hazardous substances at work. In particular, the requirements of appendix II (to Section 16 Paragraph 2) "Special restrictions on the manufacturing and use of certain substances, preparations and articles" are to be observed.

#### **4.6 Regulation (EC) no. 850/2004 (POP)**

Regulation (EC) no. 850/2004 aims to protect human health and the environment from persistent organic pollutants. This is implemented via a ban or by restricting the manufacturing, placing on the market and use of persistent organic substances. The listed substances can be found in the annexes of the regulation as well as in regulation (EU) no. 757/2010, which contains amendments and additions.

#### **4.7 Regulation (EU) no. 517/2014 (greenhouse gases)**

Regulation (EU) no. 517/2014 aims to protect the environment by lowering the emissions of fluorinated greenhouse gases and replaces the previously valid regulation (EC) no. 842/2006 (fluorinated greenhouse gases). This is for meeting binding requirements and goals defined in the international environmental agreements (Kyoto and Montreal Protocol). A list of the prohibitions and restrictions can be found in the corresponding annexes of the regulation.

#### **4.8 Clean Air Act (U.S.C Title 42 Chapter 85 Subchapter VI)**

The Clean Air Act (U.S.C Title 42 Chapter 85 Subchapter VI) is a US federal law for controlling air pollution with the further goal of protecting the ozone layer by reducing greenhouse gas emissions – similar to the greenhouse gas regulation (EU) no. 517/2014 (→ *Chapter 4.7*).

Source

<https://www.epa.gov/clean-air-act-overview/clean-air-act-text>

<https://www.epa.gov/clean-air-act-overview/title-vi-stratospheric-ozone-protection>

#### **4.9 Regulation (EC) no. 1005/2009 (ozone)**

Regulation (EC) no. 1005/2009 on substances that deplete the ozone layer governs the production, importing, exporting, placing on the market, use, recovery, recycling, reprocessing and destruction of ozone-depleting substances. The substances regulated here can be found in the corresponding annexes of the regulation.

#### **4.10 Directive 2006/66/EC (batteries and accumulators)**

Directive 2006/66/EC on batteries and accumulators as well as used batteries and accumulators governs the placing on the market of batteries and accumulators (→ *Chapter 3.10*). In particular this prohibits placing batteries and accumulator on the market that contain hazardous substances such as mercury and cadmium.

#### **4.11 Polycyclic aromatic hydrocarbons (PAHs) – GS specification**

The information published by the Product Safety Commission (AfPS) in the GS specification contains substance limit values for testing and evaluating polycyclic aromatic hydrocarbons (PAHs) during the

course of awarding the GS mark. The substance limit values differ from those in REACH Annex XVII (→ *Chapter 4.1*) and must therefore be regarded separately.

*Source*

Federal Institute for Occupational Safety and Health (baua):  
<http://www.baua.de/de/Themen-von-A-Z/Ausschuesse/AfPS/Aktuelles.html>

## 5 Declarable substances

This chapter lists regulations and provisions that specify a declaration obligation.

Where these are known, links have been provided on the respective source of the current version of the regulation, insofar as these deviate from <http://eur-lex.europa.eu/> (→ *Chapter 1*).

### 5.1 SVHC candidate list of regulation (EC) no. 1907/2006 (REACH)

The SVHC candidate list contains substances that are considered to be of very high concern (→ *Chapter 3.6*). This list was first published in October 2008 and is updated several times a year as required by the European Chemicals Agency (ECHA). If an article contains a substance included in the candidate list in a concentration higher than 0.1 mass percent (w/w), the supplier is obliged to provide sufficient information for the safe use of this manufactured item (declaration obligation).

This information must be made available to the Procurement department of Heidelberger Druckmaschinen AG upon delivery of the article without further request, as per Article 33 of the REACH regulation. This also applies when such a substance is only included in the candidate list during an existing supply relationship.

In line with the decision of the European Court of Justice, the principle "Once an article, always an article" applies. The obligation to inform is therefore to be applied even for subassemblies.

As soon as a subassembly exceeds the concentration limit of 0.1 %, Heidelberger Druckmaschinen AG must be informed of the designation of the SVHC substance.

*Source*

Current official SVHC candidate list as per REACH:  
[http://echa.europa.eu/chem\\_data/authorisation\\_process/candidate\\_list\\_table\\_en.asp](http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp)

### 5.2 Conflict minerals – Dodd-Frank Act

The Dodd-Frank Act is a US law signed in July 2010, which obliges companies listed on the US stock exchange to renounce the use of raw materials from conflict regions. Companies that use a conflict mineral must submit a special report as to its origin. According to the act, cassiterite, coltan, wolframite and gold are classified as conflict minerals, from which the following four metals – known as 3GT – are produced:

- Gold
- Tin
- Tantalum
- Tungsten

Should Heidelberger Druckmaschinen AG receive queries from its customers regarding the origin of conflict minerals, these queries are then forwarded to its suppliers.

*Further information*

<https://www.sec.gov/News/Article/Detail/Article/1365171562058>

## 6 Auxiliary materials and operating supplies for production

The placing on the market, trade and handling of auxiliary materials and operating supplies for production always requires a classification with regard to national and international hazardous substances regulations as well as an inspection regarding product-related specifications, provided that these substances remain on the product. This chapter comprises specifications that must be complied with due to legal provisions and that Heidelberger Druckmaschinen AG demands.

### 6.1 Safety data sheet

The safety data sheet is the central communication element in the supply chain for hazardous substances and mixtures. It provides important information on their characteristics, e.g.:

- Identity of the product
- Purpose of use
- Existing risks
- Safe handling
- Measures for accident and illness prevention
- Measures in an emergency

The requirements for the contents and format of the safety data sheet are laid down in Article 31 and Annex II of the REACH regulation (EC) no. 1907/2006.

The supplier of a substance/mixture is responsible for ensuring that the safety data sheet is correctly and fully filled out.

The safety data sheet is made available to Heidelberger Druckmaschinen AG free of charge on paper, in electronic form or as a download on the day of the first delivery at the latest.

In line with Article 31 (9), suppliers update the safety data sheet immediately if

- new information becomes available that can impact risk management measures,
- an authorization has been granted or refused, or
- a restriction has been issued.

The amended version must be made available to customers who have received a delivery within the last 12 months.