

## 1. INTRODUCTION

REACH deals with the Registration, Evaluation, Authorization and Restriction of Chemicals and entered into force on June 1, 2007. REACH is designed to further improve the protection of human health and the environment through a clearer and faster identification of certain chemicals. This legislation of the European Union shall apply to all suppliers (inside and outside Europe) who sell, import or manufacture “articles”, i.e. chemicals and / or products with certain chemicals within the European Union.

## 2. DEFINITIONS

### 2.1 Substances of Very High Concern

Substances that may have serious and often irreversible effects on human health and the environment can be identified as Substances of Very High Concern (SVHCs) if the criteria are fulfilled. REACH provides a Candidate list with SVHCs which is updated approximately every six months;

### 2.2 The definition of an article

With the judgement of the European Court of Justice dated September 10<sup>th</sup> 2015, the interpretation of the definition of an article: “*once an article, always an article*” has been withheld. We are currently in the process of harmonising our assessment and reporting procedures across Europe, a fuller update will be published following the publication of detailed guidance on the ECHA website (European Chemicals Agency):

[https://echa.europa.eu/documents/10162/23036412/articles\\_en.pdf/cc2e3f93-8391-4944-88e4-efed5fb5112c](https://echa.europa.eu/documents/10162/23036412/articles_en.pdf/cc2e3f93-8391-4944-88e4-efed5fb5112c). We are actively looking at the operational impacts while waiting for guidance from ECHA on the new interpretation.

Initially, there were two competing definitions of what an “article” was - affecting the threshold from which companies have to report SVHCs – and this resulted in different reporting requirements in different countries:

- 1. Belgium, Denmark, France, Germany, Norway and Sweden *consider “once an article, always an article”*, meaning that the threshold of reporting SVHCs over 0.1% applies to every article of the finished product. These countries have published a “Guidance for Suppliers of Articles” :  
[http://www.kemi.se/Documents/Forfattningar/Reach/Guidance\\_for\\_suppliers\\_of\\_articles\\_EN.pdf](http://www.kemi.se/Documents/Forfattningar/Reach/Guidance_for_suppliers_of_articles_EN.pdf)
- 2. Other European countries, including Italy, considered that components cease to be an article once they are assembled in the final product, which resulted in a more lenient reporting threshold.

## 3. OUR OBLIGATIONS

### 3.1 registration

Manufacturers and importers of substances have a general obligation to submit a registration to the European Chemicals Agency for each substance manufactured or imported in quantities of 1 tonne or more per year per company.

### 3.2 communication

According to the interpretation now withheld at EU level, we have the duty to inform customers of all products containing SVHC on the candidate list - if they are present in a concentration of >0.1% of the weight of any article of any component or product. We are required to provide recipients of the article with the name of the substance, in order to allow safe use of the article.

#### 4. OUR APPROACH

##### 4.1 Code of Conduct for Suppliers

At Toyota Material Handling Europe (TMHE) we are committed to being the first choice partner for all customers looking for materials handling solutions. We will do this by providing high-quality, innovative products, services and added-value solutions while using resources in a sustainable, socially and environmentally responsible manner. In order to build trust and confidence and to show our commitment to Corporate Social Responsibility (CSR) throughout the entire value chain of our operations, including our suppliers, we ask all our suppliers to agree with our Code of Conduct for Suppliers, which contains the following requirements regarding the management of substances of concern:

*“Suppliers shall comply with any applicable laws and regulations such as REACH<sup>1</sup> and RoHS<sup>2</sup> prohibiting or restricting the use or handling of specific substances. To ensure safe handling, movement, storage, recycling, reuse, and disposal, Suppliers shall identify, manage and list Substances of Concern as required by each TMHE entity (any presence of such substances shall be reported via prescribed reply form) and comply with applicable labelling laws and regulations for design, manufacturing, recycling and disposal.”*

##### 4.2 Informing customers

At TMHE we are committed to the EU's objective to reduce the number of substances of concern such as SVHC's in circulation, as well as to transparency towards our customers, we provide this information publicly. Through our ongoing awareness raising efforts with customers on the topic of sustainability, we will direct customers to this page.

At this point in time (13<sup>th</sup> of April 2017), SVHC on the candidate list have been identified in “articles” contained in products in the table below:

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<sup>1</sup> EU Regulation concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals

<sup>2</sup> Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment

Product Family	Article	Article Number	Substances of Very High Concern	Comments
Autoshuttle PAE150	FX3U-32BL Backup Battery 	7590719	The battery contains 1,2-dimethoxyethane (ethylene glycol dimethyl ether, EGDME)	According to the material declaration the battery contains less than 2.1% of the substance. The battery weight is 10 gram which makes the total amount of about 0.2 gram of the substance. The battery is enclosed inside the PLC inside the electrical box and will never come in contact with the user. For any support or maintenance of the electrical box, the customer should always contact the vendor.
Autoshuttle PAE150	Ultrasonic sensor 	7590751	Lead titanium zirconium oxide, CAS-nr 12626-81-2	The article contains 1,8 gram of the substance. The material is in the piezo crystal of the transducer inside the sensor. The material will never come in contact with the user, nor service personnel.
BT Reflex RRE120B/140B/160B	Relay 	7534003	The contact contains cadmium oxide	According to the material declaration from the supplier of the assembled electronic unit, the article containing the substance will be found on the contacts. It is enclosed in a plastic housing and will therefore not come in contact with the user of the truck under normal use. For any maintenance on the relay, the customer should always contact the vendor.
BT Staxio SPE200D/DN SPE120/140/160/200/120L/140L/ 160L/200L/140S SPE120XR/XRD SWE145/160/200/145L/160L/200L/ 140S/120XR SAE160, LAE250	Motorcontroller 	7539116-001, 7539116-002	Some subparts in the motor controller contains Lead-titanium-trioxide CAS-number 12060-00-3, Lead-monoxid CAS-number 1317-36-8, Diboron-trioxide CAS-number 1303-86-2, 1-Methyl-2-pyrrolidine (NMP) CAS-number 872-50-4	According to the material declaration from the supplier of the assembled electronic unit, the articles containing these substances will be found on the printed circuit board. It is enclosed in a plastic housing and will therefore not come in contact with the user of the truck under normal use. For any maintenance on the motor controller, the customer should always contact the vendor.

BT Reflex RRE140H-250H RRE160HR	Motorcontroller	7577098-001, 7577099-001	Some subparts in the motor controller contains Lead-titanium-trioxid CAS-nr 12060-00-3, Lead-monoxide CAS-nr 1317-36-8, Diboron-trioxide CAS-nr 1303-86-2, Boric acid 10043-35-3	According to the material declaration from the supplier of the assembled electronic unit, the articles containing these substances will be found on the printed circuit board. It is enclosed in a plastic housing and will therefore not come in contact with the user of the truck under normal use. For any maintenance on the motor controller, the customer should always contact the vendor.
Fleet management	Data Handling Unit (DHU2) 	7556555 -xxx	Some LEDs contain, 3,5-Tris(oxiranylmetyl)-1,3,5-triazin-2,4,6(1H,3H,5H)-trion (TGIC) with CAS-number 2451-62-9 Some Resistors and Capacitors contain Diboron trioxide with CAS-number 1303-86-2	According to the material declaration from the supplier of the assembled electronic unit, the articles containing these substances will be found on the printed circuit board. It is enclosed in a plastic housing and will therefore not come in contact with the user of the truck under normal use. For any maintenance on the DHU2, the customer should always contact the vendor.
Hand Pallet Trucks BT Lifter HHL100	Ultrasonic sensor 	7590073	Lead titanium zirconium oxide, CAS-nr 12626-81-2	The article contains 1,8 gram of the substance. The material is in the piezo crystal of the transducer inside the sensor. The material will normally not come in contact with the user, nor service personnel. Unless the transducer is damaged.
RRE,OME, OSE, LPE, SPE, LWE, SWE	Lithium battery 	7577595-001	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME) CAS: 110-71-4	A control assembly contains a lithium battery. The substance is used as a solvent in the sealed batteries. There is no intended release of the substance. Batteries are collected according to the battery directive (2006/66/EC).
All trucks	Adhesive labels	several	Organotin compound: 8-Oxa-3,5-dithia-4-stannatetradecanoic acid, 10-ethyl-4,4-dioctyl-7-oxo-, 2-ethylhexyl ester CAS: 15571-58-1  8-Oxa-3,5-dithia-4-stannatetradecanoic acid, 10-ethyl-4-[[2-[(2-ethylhexyl)oxy]-2-	The substances are UV-stabilizers of the carrier material (PVC-film). The substance will be substituted by the manufacturer of all labels during 2017.

			oxoethyl]thio]-4-octyl-7-oxo-, 2-ethylhexyl ester CAS: 27107-89-7	
OM, OS, LPE	Seal of bearing 	29882	Di(2-ethylhexyl) phthalate DEHP CAS: 117-81-7	The seal is an enclosed part of the steering arm and will not come in contact with the user of the truck under normal use.

Product Family	Article	Article Number	Substances of Very High Concern	Comments
Hand Pallet Trucks BT Lifter HHL100	Contactora 	7537283	One subpart contains N,N-dimethylacetamide (DMAC) with CAS-number 127-19-5	According to the material declaration from the supplier of the Contactora, a subpart contains an isolation washer out of Nomex® that contains a substance listed on the Candidate List. For more information about the NOMEX® material see DuPont REACH web site: <a href="http://reach.dupont.com">http://reach.dupont.com</a> For any maintenance on the contactora, the customer should always contact the vendor.
BT Staxio SSE160D BT Staxio SSE135/160/135L/160L BT Levio LSE200 BT Optio OME100M/MW7W	Contactora	226710		
BT Staxio SSE160D BT Staxio SSE135/160/135L/160L BT Levio LSE200 BT Optio OME100M/MW7W	Contactora	226712		
BT Reflex RRE120M/140M/160M	Contactora	226716		
BT Staxio RWE120	Contactora	226717		
BT Staxio SWE080L	Contactora	226720		
BT Levio LRE300/300T	Contactora	227741		
BT Levio LSE200 BT Staxio SSE160D	Contactora	230888		
BT Reflex FRE270 BT Vector VCE125/150	Contactora	236414		
BT Levio LWE130/ BT Staxio HWE100/100S	Contactora	238759		

Product Family	Article	Article Number	Substances of Very High Concern	Comments
BT Staxio SWE080L/100/120/140/120S/120L/140L SWE200D BTLevio LWE140/160/180/200/250	Contactora	248310		
BT Levio LWE140/160/180/200/250 BT Staxio SWE080L/100/120/140 BT Levio LPE200/220/250	Contactora	248311		
BT Reflex RRE140-250B/E BT Reflex RRE160R BT Vector VRE125/150 BT Optio OME100H/100HC BT Optio OME120HW/120HWC	Contactora	249354		
BT Levio LRE200/ BT Staxio SRE135/SRE160/SRE135L/SRE160L	Contactora	257832		
BT Reflex RRE120B/RRE140B/RRE160B	Contactora	7540648		
BT Reflex RRE140H-250H	Contactora	7580320		
BT Staxio HWE100/100S, BT Levio LWE130	Contactora	7571938		