

## **To whom it may concern**

### **Subject: Request to submit in Certificate of Regulation Conformation**

“Harmony with the global environment” is one of the top-priority management policies within SEIKO EPSON Group. As a part of Epson’s commitment to the environment we continuously work on improving the environmental performance of our products. Over the last years the focus of our environmental program has, amongst others, been focused on the safe use of chemicals substances within our products. The continuous efforts of our engineers will ensure that all our products meet the requirements of the European REACH (EC) No 1907/2006 Regulation.

SEIKO EPSON printers and consumables, e.g.: inks and toners, fall under the various chemical regulation scope. Your cooperation, or your upstream suppliers’ cooperation, with our company is essential to comply with our requirements under them.

Please find attached a questionnaire on regulation conformation. The questionnaire can be filled directly on the attached Microsoft® Excel.

Regarding your product form, please note to fill-in Sheet “Certificate”;

- Single substance: please fill-in the name of substance to second line on Sheet “Certificate”;  
Please check the all items, except for dangerous preparation directive in EU.
- Mixture (Preparation): please fill-in your product name to second line on Sheet “Certificate”;  
Please check the all items for whole ingredients of your product.  
(Please fill in the name and the content of all chemicals for the mixture on “Survey\_Sheet7”. If you have the trade secret information, please contact our requester.)
- Ribbon cartridge and toner cartridge: Except case, shell, textile or film for checking; If ribbon cartridge, please check the ink on the ribbon. If toner cartridge, please check the toner in the cartridge.

Please fill-in the S code and name of ink or toner to the second line on page 1.

e.g. Toner xxxxx in Cartridge S000000

Regarding status of substance registration or notification, on; Section1 (1)

- If the product contains new chemical substance(s), please fill-in the name of new substance (may fill-in generic name) to “Survey\_Sheet7”.
- If cooperating notification with us, please fill-in “Carrying out SEC” to “Ingredients Certificate” on “Survey\_Sheet7”.
- Regarding REACH registration, if you or your upstream of supply chain carried out, please fill-in (pre-)registration numbers and due date of registration to “Ingredients Certificate” on “Survey\_Sheet7”. If pre-registration has not been carried out yet, please fill-in “yet” to the column.
- In Australia, if the chemical is new, please check whether it is nanomaterial or not. If it is not nanomaterial, we may request any reason for.

Regarding status against other regulations, on; Section1(2)

- If subject to TSCA regulation, please fill-in section number of CFR to “Regulation” on “Survey\_Sheet7”.
- Please check Export Administration Regulation. If subject, please fill-in ECCN number or EAR99 to “Regulation” on “Survey\_Sheet7”.

- Former check item “Specific Azo-colorants” implies point 43 in Annex XVII of REACH.
- Please check Biocidal Products Regulation. If application has not been carried out yet, please fill-in due date of application to the column. If the chemical is biocidal product, please fill-in “Biocidal Products” to “Ingredients Certificate” on “Survey\_Sheet7”. If it is not regulated, we may request any reason for.

[Biocidal Products Regulation: Definitions]

- "Biocidal product" means any substance or mixture, in the form in which it is supplied to the user, consisting of, containing or generating one or more active substances, with the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism by any means other than mere physical or mechanical action.
- "Treated article" means any substance, mixture or article which has been treated with, or intentionally incorporates, one or more biocidal products;
- "Active substance" means a substance or a micro-organism that has an action on or against harmful organisms;

Regarding status of expected regulations in near future, on; Section 2 (1)

- Please check SEC’s original specified substances.

Please send an e-mail to [Chemical\\_surveys@exc.epson.co.jp](mailto:Chemical_surveys@exc.epson.co.jp) with subject: “Request the substances list”. We will send the substances list to the sender automatically. Please refer to the latest version.

Regarding containing,

- Please select from six choices as below. Please decide about “containing” rather than “regulated”. If you selected No.4 to 6, please fill-in chemical name and the concentration on “Survey\_Sheet7”. As Best Available Technology rule under Chemical Substance Control Law in Japan, if the authorities allowed the trace cottoning the substance in the practical use, please mention the information into section 5. Appendix.

No.	Choices	in detail
1.	Not contain, evidently	Confirmed “not contain” and shows the evidence
2.	Not contain, logically	Argued “not contain” and shows the argument
3.	Not contain	Not intend containing, without evidence
4.	Contains, unintentional logically	Though not intend containing, confirmed “contains” and shows the evidence
5.	Contains, unintentional evidently	Though not intend containing, argued “contains” and shows the argument
6.	Contains, intentional	Intends containing

If the evidence or the argument are able to be provided to us, please attach to this Certificate of Regulation Confirmation.

Please note the choice No.3 was deleted on Class I or II Specified Chemical Substance according to Chemical Substance Control Law in Japan.

<for example>

#1. Not contain, evidently or #5. Contains, unintentional evidently:

e.g. Analysis report will be shown, method, facilities or accuracies are not required.

e.g. Information is provided by supplier or indirectly

#2. Not contain, logically or #4. Contains, unintentional logically:

e.g. Explains by chemical structure or reaction process

e.g. Estimates from similar substance.

#6. Contains, intentional:

e.g. Effectiveness by containing, i.e. a stabilizer etc.

e.g. Adds at own production process

“Unintentional” means

e.g. any impurities.

e.g. containing is not used for commercial purposes, i.e. hoping not contain.

• In case you find any changes of the contents of this Report, please mention the information of changes into section 5.Appendix.

**Addressee:** in charge of this investigation at Seiko Epson Group  
Please send the original certificate and the Excel file data.

**Inquiry of the form:** e-mail to [green-purchasing-TP@exc.epson.co.jp](mailto:green-purchasing-TP@exc.epson.co.jp)  
CS/Quality Assurance Environment Department  
SEIKO EPSON CORPORATION  
Hirooka Office: 80 Harashinden, Hirooka, Shiojiri-shi,  
Nagano-ken, 399-0785 JAPAN

**Due date to return:** two weeks after you receive basically. If you need more time to complete, please return with the following priority. By a due date, please confirm in a column with color without a front page and send it back.

**For your reference:** Some URLs with the numbers which corresponded with superscript of each regulations are listed as below. Please note “Disclaimer” of each web site. And please recognize your company’s own responsibility to fill this Certificate of Regulation Confirmation.

## Regarding URLs

### Japan (in Japanese)

- CHRIP: <http://www.safe.nite.go.jp/japan/db.html>.....1,2,15,16,17,19,20,21,22  
CSCL: [http://www.meti.go.jp/policy/chemical\\_management/kasinhou/about/about\\_index.html](http://www.meti.go.jp/policy/chemical_management/kasinhou/about/about_index.html)  
CSCL (J-CHECK): [http://www.safe.nite.go.jp/jcheck/top.action?request\\_locale=ja](http://www.safe.nite.go.jp/jcheck/top.action?request_locale=ja).....1,15,16,17  
ISHL: [http://anzeninfo.mhlw.go.jp/anzen\\_pg/KAG\\_FND.aspx](http://anzeninfo.mhlw.go.jp/anzen_pg/KAG_FND.aspx) .....2  
PRTR: <http://www.prtr.nite.go.jp/msds/msmate.html> .....19  
[http://www.meti.go.jp/policy/chemical\\_management/law/index.html](http://www.meti.go.jp/policy/chemical_management/law/index.html)

### USA

- TSCA: <http://www.epa.gov/oppt/existingchemicals/pubs/tscainventory/howto.html> .....3,29  
Test substances: <http://www.epa.gov/oppt/chemtest/>  
CERCLA/EPCRA/CAA:  
<http://www2.epa.gov/epcra-tier-i-and-tier-ii-reporting/epcracerclacaa-ss112r-consolidated-list-lists-october-2012>  
EAR: [http://www.access.gpo.gov/bis/ear/ear\\_data.html](http://www.access.gpo.gov/bis/ear/ear_data.html) .....30  
Proposition 65: <http://oehha.ca.gov/prop65.html> .....31

### EU

- REACH regulation: [http://echa.europa.eu/legislation/reach\\_legislation\\_en.asp](http://echa.europa.eu/legislation/reach_legislation_en.asp) .....12,32,33,34,35  
ESIS: <http://esis.jrc.ec.europa.eu/> .....13  
CLP regulation: [http://echa.europa.eu/legislation/classification\\_legislation\\_en.asp](http://echa.europa.eu/legislation/classification_legislation_en.asp).....32  
Biocidal Products regulation: <http://echa.europa.eu/regulations/biocidal-products-regulation> ..... 45

### Australia

- AICS: <http://www.nicnas.gov.au/regulation-and-compliance/aics/aics-search-page> .....4  
Nanomaterial: <http://www.nicnas.gov.au/communications/issues/nanomaterials-nanotechnology>

### Korea NciS: <http://ncis.nier.go.kr/main/Main.jsp>.....5

English Page: <http://jns.miit.gov.cn/n11293472/n11293877/n14505342/n14506927/14527926.html>

### China

- IECSC: [http://www.mep.gov.cn/gkml/hbb/bgg/201301/t20130131\\_245810.htm](http://www.mep.gov.cn/gkml/hbb/bgg/201301/t20130131_245810.htm) .....7  
Severely Restricted Toxic Chemicals:  
[http://www.crc-mep.org.cn/news/NEWS\\_DPW.aspx?TitID=387&T3=10&LanguageType=CH&Sub=1](http://www.crc-mep.org.cn/news/NEWS_DPW.aspx?TitID=387&T3=10&LanguageType=CH&Sub=1)  
.....36  
Hazardous Chemicals:  
<http://jns.miit.gov.cn/n11293472/n11293877/n14505342/n14506927/14527926.html> .....37  
Highly Toxic Chemicals:  
<http://jns.miit.gov.cn/n11293472/n11293877/n14505342/n14506927/14528037.html>.....39

### Canada

- DSL/NDSL: <http://www.ec.gc.ca/lcpe-cepa/default.asp?lang=En&n=EE479482-1>.....8  
Ontario: [http://www.e-laws.gov.on.ca/html/regs/english/elaws\\_regs\\_900852\\_e.htm](http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_900852_e.htm) .....9

New Zealand

NZIoC:

<http://www.epa.govt.nz/hazardous-substances/approvals/group-standards/Pages/NZIoC.aspx>.....10

Taiwan

CSNN: [http://csnn.cla.gov.tw/content/Substance\\_home.aspx](http://csnn.cla.gov.tw/content/Substance_home.aspx) .....11

GHS: <http://ghs.cla.gov.tw> .....41

<http://ghs.cla.gov.tw/CHT/intro/AnnounceData3.aspx?cssid=4> .....41

UN GHS

METI (Japanese): [http://www.meti.go.jp/policy/chemical\\_management/int/ghs.html](http://www.meti.go.jp/policy/chemical_management/int/ghs.html) .....14

[http://www.meti.go.jp/policy/chemical\\_management/int/ghs\\_text.html](http://www.meti.go.jp/policy/chemical_management/int/ghs_text.html) .....14

UNECE: [http://www.unece.org/trans/danger/publi/ghs/ghs\\_welcome\\_e.html](http://www.unece.org/trans/danger/publi/ghs/ghs_welcome_e.html) .....14