

EHS-701

Summary of

Requirements

EHS Standard C11-701 –
Environmental, Health & Safety
Requirements for Consumables

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Preface

This document is created as a high level overview of Xerox and regulatory requirements for Xerox branded consumable materials and can be used when referencing the full text of EHS-701 Standard – Environmental, Health & Safety Requirements for Consumables when providing suppliers, vendors or other interested parties with an overview of the EHS requirements for materials sourced for use in Xerox branded products. Detailed information may be obtained by contacting the Standard owner.

Disclaimer: This is meant as a high level overview only and further discussion and information exchange may be required between the supplier and EHS&S personnel to satisfy all requirements of the Standard.

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1. Standard Overview

Objective

To ensure that Xerox branded consumable products and the materials used in them are compliant with the following:

- Regulatory requirements at the local, national and international level
- Xerox requirements for human and environmental health
- Prohibited or restricted use of listed materials

Definitions

Consumables / Consumable Products: Any chemical substance or mixture consumed in the process of using, inspecting or repairing the equipment. Included products may be, but are not limited to, printing supplies (e.g., toners, inks), fuser lubricants and service consumables (e.g., cleaners)

Scope

Xerox EHS-701 Standard applies to all chemical substances or mixtures used as ingredients or constituents in Xerox branded consumable products worldwide.

Non Xerox branded consumable products: The minimum requirements listed in Section 2 of this document apply to all consumable products including those not branded by Xerox. EHS&S review and approval may apply.

Manufacturing process or intermediate chemicals: While EHS-701 Standard does not apply to chemical substances or mixtures used solely in the manufacturing process and not included in the final product formulation, minimum requirements as listed in Section 2 of this document do apply.

EHS&S Review and Approval of Materials

Under EHS-701, a qualified Xerox EHS&S individual will approve materials after they have completed a comprehensive evaluation of all materials (at the ingredient and product level) used in the composition of Xerox branded consumable products using a weight-of-evidence approach and considering the life cycle of the product. The result of this evaluation ensures:

- Compliance with jurisdiction-specific regulatory requirements (e.g., TSCA [US], REACH [EU, Korea]);
- Accurate classification under the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) for each jurisdiction;
- Compliant documents (Safety Data Sheets and labels) for each of the Xerox branded consumable products; and
- Compliance with Xerox internal standards regarding health, safety and environmental impacts

2. Requirements for suppliers

Minimum Requirements

At a minimum a supplier must provide Xerox Corporation with:

- A GHS compliance Safety Data Sheet (SDS) for the chemical substance or mixture; and
- Information regarding regulatory registration status in various jurisdictions (e.g., TSCA, REACH, K-REACH).

A supplier should review the attached list of prohibited substances (See Table 1). If any of the constituents of the chemical substance or mixture is listed in Table 1, Global Procurement should obtain written approval for an exception from EHS&S before the chemical substance or mixture is procured.

Note: Approval will be dependent on the results of a full product assessment with consideration of potential exposure routes to humans and the environment under normal use or disposal of the material and final product.

Additional requirements

After initial review, EHS&S may request additional information before final approval of a chemical substance or mixture for use in Xerox consumable products.

Full Formulation – Confidential Business Information

Xerox EHS&S may require full disclosure of material composition (and impurities) including those constituents present below 0.1% to fully evaluate the safety and health implications of the material before approval.

In that instance, a Confidential Disclosure Agreement (CDA) outlining limited access to the information will be negotiated and executed by EHS&S.

Hazardous Materials

Any substance or mixture that is considered a hazardous material or contains a hazardous material under the GHS classification system or other authoritative body will be reviewed for acceptance / approval by a qualified Xerox EHS&S individual.

Approval of any hazardous material for use in Xerox consumable products will be dependent on the intended use and may be expressly limited. Any substance or mixture classified in any of the following categories will require full EHS&S review and may require further testing of the material before approval:

- Acute Toxicity (Oral, Dermal or Inhalation)
- Eye or Respiratory Corrosive
- Carcinogen
- Mutagen
- Reproductive toxin

- Sensitizer (Respiratory or Skin)
- Neurotoxin
- Aquatic Toxin (Acute or Chronic)
- Hazardous Waste

Acceptance Criteria

Some constituents may have predetermined acceptance criteria. Any deviation from the criteria would require express written approval from EHS&S personnel and may require additional testing of the material.

Carbon Black shall not contain

- Specific condensed ring hydrocarbons: < 1 ppm
- Non-specific condensed ring hydrocarbons: < 10 ppm
- Nitropyrenes: < 0.15 ppm

Note: Additional specific information regarding the lists of hydrocarbons and nitropyrenes may be obtained by contacting the Standard Owner.

Fluorinated compounds shall not contain

- Perfluorooctanoic acid and its salts

Further information

Further information can be obtained by contacting the Standard owner

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Table 1 – Prohibited Substances

Chemical Name	CAS Registry No.	Comments
Asbestos	1332-21-4	Contact Standard owner for complete list
Benzene	71-43-2	
Ozone Depleting Substances (ODSs)		Contact Standard owner for complete list
Polybrominated biphenyls (PBBs)		Contact Standard owner for complete list
Polybromodiphenyl ethers (PBDEs)		Contact Standard owner for complete list
Polychlorinated biphenyls (PCBs)		Contact Standard owner for complete list
Polychlorinated terphenyl (PCT)		Contact Standard owner for complete list
1,1,2-Trichloroethane	79-00-5	
Cadmium & Cadmium compounds	7440-43-9	Includes all inorganic and organic compounds whose molecular formula includes the chemical symbol "Cd"
Mercury & Mercury compounds	7439-97-6	Includes all inorganic and organic compounds whose molecular formula includes the chemical symbol "Hg"
Lead & Lead compounds	7439-92-1	Includes all inorganic and organic compounds whose molecular formula includes the chemical symbol "Pb"
Hexavalent chromium compounds		Contact Standard owner for complete list
Tri-substituted organostannic compounds		Applies to Tri-substituted organostannic compounds such as tributyltin and triphenyltin compounds Contact Standard owner for complete list
Short chained chlorinated paraffins (SCCPs)		Contact Standard owner for complete list
Azo colorants		Contact Standard owner for complete list Applies to colorants whose chemical formula includes azo group (-N=N-)
Cyanide compounds		Contact Standard owner for complete list
Pentachlorophenol	87-86-5	

Polyvinyl chloride	9002-86-2	
Hexachlorobenzene	118-74-1	
Specified brominated flame retardants (SBTRs)		Contact Standard owner for complete list
Arsenic & Arsenic compounds	7440-38-2	Includes all inorganic and organic compounds whose molecular formula includes the chemical symbol "As"
Beryllium & Beryllium compounds	7440-41-7	Includes all inorganic and organic compounds whose molecular formula includes the chemical symbol "Be"
Benzidine Benzidine salts and Colorants metabolized to generate benzidine	92-87-5	Contact Standard owner for complete list
2-Naphthylamine & 2-Naphthylamine salts	91-59-8	Contact Standard owner for complete list
Nickel compounds		Includes all inorganic and organic compounds whose molecular formula includes the chemical symbol "Ni" Not including compounds that have no evidence of carcinogenesis
Dibutyltin (DBT) & Dioctyltin (DOT) compounds		Contact Standard owner for complete list
Dimethyl fumarate	624-49-7	
Phthalate ester		Contact Standard owner for complete list
2-(2H-1,2,3-benzotriazole-2-yl)-4,6-di-tert-butylphenol	3846-71-7	
Radioactive materials		Not including natural radioactive materials
Perfluorooctane sulfonate (PFOs) & Perfluorooctane sulfonate salts	1763-23-1	Contact Standard owner for complete list
IARC Group 1 carcinogens		Not including compounds that have no evidence of carcinogenesis
Restricted substances specified by Annex XVII of REACH Regulations		Applies to the usage specified by Annex XVII of REACH Regulation Contact Standard owner for information
Substances requiring authorisation listed in Annex XIV of REACH Regulations		Contact Standard owner for information
REACH candidates for substances of very high concern (SVHC)		Contact Standard owner for information