



Environment, Health & Safety Requirements for Packaging

EHS-710 Revision J4 10-13-15

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Questions regarding requirements contained in this standard should be directed to: ProductStandards@xerox.com

This document is available on the Internet @ www.xerox.com

LIST OF REVISIONS		
Rev	Date	Changes
OR	08/05/02	<ul style="list-style-type: none"> Original Release- Harmonized with FX
B	8/10/07	<ul style="list-style-type: none"> Major revision adding China RoHS, Japan EcoMark and Korean marking requirements.
C	10/26/07	<ul style="list-style-type: none"> Amend Requirement 5.5 to include statement: "Compliance with ISPM-15 shall be based on heat treatment (HT) only. Methyl bromide (MB) fumigation is prohibited to support Xerox applications." Remove "Green Dot" from Appendix C.
D	12/16/08	<ul style="list-style-type: none"> Section 4.0: New terms defined Requirement 5.6 added requiring conformance with formaldehyde emission limits specified in 93120-93120.12, Title 17 of the California Code of Regulations. Requirements 5.8 and 5.10 to packaging of machines, options and consumables/ supplies. Requirement 5.14 added: All non reusable packaging shall be separable. Moved from best practice to a requirement for machines, options and consumables / supplies. Remained a best practice for FRU/spares and incoming materials to Xerox manufacturing facilities. Best Practice 6.6 added to List of Best Practices Appendix A: Addition of "Polyvinyl chloride (PVC) only permitted in Parts used for ensuring the safety (i.e. Electrical cable, Tube, Tape, Sleeve and Battery, fuse breaker, Electrolytic capacitor, Switch, Terminal block)." Appendix A (Asia Pacific Prohibited Substances): Removal of substances prohibited before the date of this Standard. Appendix B -Limited requirements to packaging of machines, options, consumables / supplies and FRU / spares (i.e. excluded requirement for stretch wrap, shrink film, banding, tape, desiccant and pallets.) Appendix B- Added symbol for natural wood that had been mistakenly deleted last version. Appendix B- The symbol for corrugated fiberboard is not marked as "optional" (i.e. Mobius loop is mandatory) Appendix B (Paper) - Added "Not required for packaging with a surface area smaller than 200 mm²". Appendix B (Metal, Glass, Wood) - Added "Not required for packaging components with a surface area smaller than 5x10³ mm²". Appendix B (Marking Requirements for Korea) - revised to state: "NOTE: This requirement does not apply to the packaging of consumables, spare parts and options. It only applies to the foam cushions on products including printers, scanners, and copiers". Removed Requirements for Japan from Appendix B. Appendix D added: U.S. Environmental Protection Agency (EPA) recommended recovered fiber content for paperboard & packaging components
E	3/21/09	<ul style="list-style-type: none"> Added Appendix E, Substances of Very High Concern as listed in the European Union Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Directive Appendix A updated to include Perfluorooctane sulfonate (PFOS) and remove PBDO.
F	3/23/09	<ul style="list-style-type: none"> Removed requirement: "Composite wood products, including packaging materials made from hardwood plywood, particle board and medium density fiberboard must comply with the formaldehyde emission limits specified in 93120-93120.12, title 17, California Code of Regulations. A label, in conformance with the regulation, is to be applied to every finished good produced or to every box containing finished goods. Any additional documentation required for compliance, including exemptions for sell-through provisions, is to be provided upon request."
G	7/17/09	<ul style="list-style-type: none"> Updated Appendix A (Prohibited Substance List) to include dimethylfumarate (DMF) Updated Appendix A (Prohibited Substance List) to include cobalt dichloride
H	1/4/12	<ul style="list-style-type: none"> Changed internet link to standard (www.xerox.com). Minor changes for clarification. Revised 5.11 for clarity. Revised to comply with EPEAT as follows: <ul style="list-style-type: none"> Revised section 5.12 to be consistent with exact language in EPEAT. Added sections 5.14, 5.15, 5.16 and Appendix E. Removed section 6.6 and Appendix D. Deleted Appendix containing REACH list and replaced with link to European Chemicals Agency (ECHA) in section 5.13. Revised Appendix B to comply with latest Korean requirements.
J	10/13/15	<ul style="list-style-type: none"> Revised Appendix B to comply with revised plastic packaging HDPE and LDPE marking requirements for China Revised Appendix B to comply with latest Korean requirements



1.0 SUMMARY

This standard specifies the minimum environment, health, and safety requirements for packaging of products, parts, or materials shipped to any manufacturing site, distribution center or customer from suppliers or other Xerox locations.

2.0 SCOPE

This standard applies to all Xerox organizations and third party suppliers.

3.0 OBJECTIVE

Comply with all applicable regulations, satisfy customer requirements and achieve corporate waste minimization goals. Any packaging that complies with this standard will be marked indicating its material composition as reflected in Appendix B of this Standard and will be capable of being recycled.

4.0 DEFINITIONS

- Commingled Plastic: a mixture of different plastics.
- Consumable: Also called Supply. Item consumed by product during normal operation. Examples include but not limited to toner, ink, paper, drum cartridge, print cartridge, fuser, and developer and photoreceptor.
- Copolymer: a polymer consisting of two or more different monomers.
- Customer Replaceable Unit: Customer installable item that requires scheduled replacement. This is considered a consumable
- Environmental Claim: a statement, symbol, or graphic that indicates an environmental aspect of a product, component or package.
- Field Replacement Unit (FRU): Any assembly made available to support unscheduled replacement of like parts in existing equipment.
- Incoming Materials to Manufacturing: Any material and/or part coming into a manufacturing facility that becomes assembled or made into a product.
- Manufactured Wood Packaging Material: wood-based materials such as plywood, particle board, oriented strand board, veneer and wood wool that have been created using glue, heat and pressure.
- Machine: A product that performs a function on its own without the need of additional items. Examples include but not limited to printer or image output terminal (IOT), scanner or image input terminal (IIT) and multifunction product (MFP).
- Non-Manufactured Wood Packaging Material (NMWP) [also called Solid Wood Packing Material (SWPM)]: solid wood (usually softwood [coniferous]) material that is used in the construction of crates, packing blocks, load boards, pallet stringers and other material handling devices.
- Option: Items that are added to machines to provide additional capabilities. Examples include but not limited to second feeder, finisher, high capacity feeder and cart.
- Packaging: Any item that is used to protect, contain and/or transport a product, part or material. Packaging may be described as being primary, secondary or tertiary. Items that support the contents throughout their functional lifetime and remain as part of the printer are not packaging (e.g. toner cartridges).
- Pre-Consumer Waste: material, generated during a manufacturing process, which is diverted from the waste stream for another use. Excluded is reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it.
- Primary Packaging: The first wrap or containment of a product. Contains the product or material (e.g. a box holding transparencies, a carton containing toner cartridge).
- Post-Consumer Waste: material generated by consumers or businesses after using a product to the point that it is no longer usable for its intended purpose. This includes material returned through the distribution chain.
- Recycled Content: proportion, by weight, of recycled material.
- Recycled Packaging: packaging reprocessed from recovered material.
- Recyclable Packaging: packaging that can be diverted from the waste stream at end of life and returned to raw materials using available processes.
- Reusable Packaging: packaging designed for reuse.



- Rigid Plastic Packaging Container (RPPC): container that meets all of the following criteria:
 - Made entirely of plastic (except for caps, lids and labels).
 - Contain at least 8 fluid ounces (237 milliliters) but not more than 5 gallons (19 liters).
 - Capable of maintaining shape while holding a product.
 - Capable of multiple re-closures with an attached or unattached cap or lid.
 - Normally used to store a product for at least 7 days.
- Secondary Packaging: Packaging that contains the primary package (e.g. a carton containing boxes of transparencies).
- Spare: Any part made available to resolve unscheduled replacement of like parts in existing equipment.
- Supply: Also called consumable. Item consumed by product during normal operation. Examples include but not limited to toner, ink, paper, drum cartridge, print cartridge, fuser, developer and photoreceptor.
- Tertiary Packaging: Contains or holds primary and/or secondary packages primarily for transport purposes (e.g. shrink wrap, pallet).

5.0 REQUIREMENTS (Mandatory)

- 5.1 REDUCE: Reduce packaging weight and volume to the minimal levels necessary to achieve the purpose of the package (e.g. European Union's Essential Requirements).
- 5.2 REUSE: Where technically and economically feasible, utilize reusable packaging.
- 5.3 RECYCLE: Utilize materials that are recyclable. Where technically and economically feasible, use recycled material instead of virgin material. Recycled material from post-consumer waste is preferred over recycled material from pre-consumer waste.
- 5.4 Packaging used to transport hazardous materials must comply with all applicable international, federal, state and local regulations through which the package will travel. Contact regulatory agencies directly for detailed requirements. It is beyond the scope of this document to include these requirements. Questions regarding shipping hazardous materials in North America and Europe can be directed to ProductStandards@xerox.com
- 5.5 Non-Manufactured Wood Packing (NMWP), also called Solid Wood Packaging Material (SWPM), must meet International Standard for Phytosanitary Measures Publication No. 15 (ISPM-15) and be properly identified on at least 2 sides. NMWP must also be bark free when shipped into Australia. Compliance with ISPM-15 shall be based on heat treatment (HT) only. Methyl bromide (MB) fumigation is prohibited.
- 5.6 Do not use materials that contain prohibited substances listed in Appendix A.
- 5.7 Identify packaging materials according to Appendix B.
- 5.8 Weights and dimensions of packages and weights of packaging components for machines, options and consumables / supplies must be reported to Xerox. FRU/Spare parts are exempted from this requirement. This information is required for compliance with packaging regulations, such as those implementing the EU Packaging Directive. Information to record includes the following:
 - Outside dimensions and total weight of packaged product (cm, g)
 - Total weight of primary packaging by material type (g)
 - Total weight of secondary packaging by material type (g)
 - Total weight of tertiary packaging by material type (g)
 - Material type classifications: Paper, Plastic, Wood, Aluminum, Tin Plate, Glass, Steel and Other
 - % Recycled Content (all packaging)
- 5.9 Suppliers shall provide Xerox with the approximate recycled content (by weight or volume) for packaging of machines, options and consumables/supplies. Exempted from this requirement are FRUs and spare parts
- 5.10 EH&S Labeling Guidelines for Xerox Products, Parts & Materials, including Primary Packaging must be identified per Appendix C.

5.11 Plastic bags or sheets that meet the following criteria must be marked with the suffocation warning symbol shown below. This requirement does not apply to stretch or shrink wrap. Desired size of symbol is 76 x 127 mm (3 x 5 inches). Reduce appropriately to fit a smaller item. Contact Xerox at ProductStandards@xerox.com for an electronic file of this symbol.

- Bags: 1 mil thick or less (0.025 mm, 0.001 inches) AND 305 mm (12 inches) or greater circumference opening.
- Sheets: 1 mil thick or less (0.025 mm, 0.001 inches) AND 232 cm² (36 in²).



5.12 Dissimilar packaging materials shall be separable without the use of tools (e.g. foam shall not be permanently adhered to any other type of packaging material). Exceptions include:

- 1) Plastic bags (or wrap) affixed with paper labels that meet either of the following criteria:
 - a) Combined weight of single bag (or wrap) and label is less than 25 grams.
 - b) Surface area of label is less than 50 cm².
- 2) Pallets or pallet assemblies that are part of the primary package.
- 3) Tape, glue, or staples used to construct or close a fiber-based container.
- 4) Multi-layer bags (e.g. metalized or static shielding bags).

NOTE: This is a requirement for Machines, Options and Consumables/ Supplies and best practice for FRU/Spares and incoming Materials to Xerox Manufacturing Facilities.

5.13 Must comply with the specific requirements of the European Union Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Directive. The latest candidate list of substances of very high concern for authorization can be found on the European Chemical Agency (ECHA) web site. Use of any of the restricted material(s) is to be disclosed to Xerox. URL for the ECHA as of this writing of EHS-710 is:

http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp

5.14 Elemental chlorine shall not be used as a bleaching agent to bleach virgin or recovered content fibers in packaging.



5.15 Paperboard, corrugated fibreboard, solid fibreboard and spiral wound tubes shall meet or exceed the minimum total recovered fiber content specified in the table below. Post-consumer recovered content is preferred over pre-consumer recovered content.

Minimum Total Recovered Fiber Content		
Category	Comments / Examples	Total Recovered Fiber Content ¹
Paperboard	Boxboard Chipboard Barrierboard Cartonboard	80 %
Corrugated Fibreboard ²	Containerboard Linerboard Corrugated Medium	25 %
Solid Fibreboard		40 %
Spiral Wound Tubes	Comprised of paper only	90 %
NOTES: 1) Calculated as percent of total packaging part weight over the course of a year using a weighted average. 2) Required content based on weighted average (by weight) of all components in packaging part (e.g. liners and mediums in corrugated).		

5.16 Suppliers shall provide Xerox with “supplier letters” to verify compliance to certain requirements. Supplier letters can be found in Appendix D and E. Note that one letter can be used to verify compliance for multiple packaging components (i.e. an entire product family) or all material sold to Xerox (i.e. all corrugated, all EPS foam, etc.).

- Elimination of intentionally added toxic constituents in packaging. Sample letter in Appendix D.
- Recovered content in select fiber-based packaging materials. Sample letter in Appendix E.

6.0 BEST PRACTICES (Preferred)

- 6.1 Use Kraft or unbleached paper materials whenever possible.
- 6.2 Do not use coatings or adhesives that prevent recycling.
- 6.3 Avoid using polyurethane foam.
- 6.4 Avoid using pre-molded polyurethane and/or foam-in-place.
- 6.5 Avoid using commingled plastics and copolymers. Only use if there is an established recycling process that can be utilized in all applicable markets. Rubberized versions of Expanded Polystyrene (EPS) are acceptable as long as they can be recycled as a monomer material (e.g. brand names RMER, NEPS).
- 6.6 Rigid Plastic Packaging Containers (RPPC) shall be composed of at least 25 percent post consumer resin.



Appendix A Harmonized Prohibited Substance List	
Asbestos	
1,1,2-Trichloroethane	
Azo colorants (only those containing more than one aromatic amine specified in 74/69/EEC)	
Benzene	
Cobalt dichloride	
Cyanide Compounds	
dimethylfumarate (DMF)	
Halogen-Containing Polymers from plastic packaging	
Heavy metals	<p>Cadmium /Cadmium Compounds, Hexavalent Chromium & its Compounds, Lead/Lead Compounds and Mercury/Mercury Compounds shall not be intentionally added to any package or packaging component. For incidental presence, the sum of the concentrations of lead, cadmium, mercury, and hexavalent chromium present in any packaging component shall not exceed 100 parts per million (ppm) by weight, with the exception of packaging components that qualify for the recycled content exemption.</p> <p>“Recycled content exemption” is specified in the Model Toxics in Packaging Legislation as the following: packaging components that would not exceed the maximum contaminant levels i.e., the sum of the concentration levels of lead, cadmium, mercury and hexavalent chromium present in any packaging component shall not exceed 100 ppm by weight but for the addition of recycled materials; and provided that none of the four regulated metals in the packaging components has been recovered and/or separated from other materials for use as a metal or metallic compound; and provided that the packaging components do not exceed a maximum concentration limit of 200 ppm by weight for the sum of the four regulated metals.</p>
Hexachlorobenzene	
Ozone Depleting Substances (ODS)	
Pentachlorophenol	
Perfluorooctane sulfonate (PFOS)	
Polybrominated Biphenyls (PBBs)	
Polybrominated Diphenylethers (PBDEs)	
Polychlorinated Biphenyls (PCBs)	
Polychlorinated Naphthalenes (PCN)- more than 3 chlorine atoms	
Polychlorinated terphenyl (PCTs)	
Polyvinyl chloride (PVC) - Permitted only in Parts used for ensuring the safety: Electrical cable, Tube, Tape, Sleeve and Battery, fuse breaker, Electrolytic capacitor, Switch, Terminal block	
Radioactive Substances	
Short Chain Chlorinated Paraffins (SCCP)	
Tributyl Tin (TBT) and Triphenyl Tin (TPT) and Tributyl Tin Oxide (TBTO)	
The following are prohibited only for products that will be distributed in Asia-Pacific market areas	
Brominated Flame Retardants (BFR) in addition to PBB and PBDE.	

Appendix B – Material Identification

NOTES:

1. These requirements are based on regulations from the European Union, China, Japan and Korea. Their intent is to facilitate recycling by identifying the material of each packaging component.
2. Only one mark per component is required and the mark must be legible.
3. All packaging components for products, options and consumables must be identified as indicated in the table below. Stretch wrap, shrink film, banding, tape, desiccant and pallets do not require identification. FRUs and spares are regarded as best practice.

General Requirements

Minimum size should be 20X 20 mm. Marking can be proportionately reduced below this size to accommodate smaller packaging components (must be legible).

For products launched after 1 January 2016, if space and cost permit, use both Option A and Option B resin codes for high density polyethylene and low density polyethylene. If cost and space do not permit the use of both Option A and Option B resin codes, use only Option B.

PLASTIC			
<i>Type</i>	<i>Code</i>	<i>#</i>	
Polyester	PET	01	 PET
High density polyethylene	HDPE and PE-HD	02	
Polyvinyl chloride	PVC	03	
Low density polyethylene	LDPE and PE-LD	04	
Polypropylene	PP	05	
Polystyrene	PS	06	
Other Plastic	Other	07	
<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"> <p><u>Option A (HDPE)</u></p> HDPE </div> <div style="text-align: center;"> <p><u>Option B (PE-HD)</u></p> PE-HD </div> </div> <div style="display: flex; justify-content: space-around; align-items: center; margin-top: 10px;"> <div style="text-align: center;"> <p><u>Option A (LDPE)</u></p> LDPE </div> <div style="text-align: center;"> <p><u>Option B (PE-LD)</u></p> PE-LD </div> </div>			
PAPER			
Not required for packaging components with a surface area smaller than 200 mm ² .			
All paper material including but not limited to:	 Required - All paper material must have this symbol	 Optional - Corrugated fiberboard cartons should also have this symbol	
Paper Paperboard Corrugated Cardboard Corrugated Fiberboard Non-corrugated Fiberboard			
METAL, GLASS & WOOD			
Not required for packaging components with a surface area smaller than 5x10 ³ mm ² (5000mm ²).			
<i>Type</i>	<i>Code</i>	<i>#</i>	 FE
Steel	FE	No #	
Aluminum	ALU		
Glass	GL		
Natural Wood	NW		
COMPOSITES			
<i>Type</i>	<i>Code</i>	<i>#</i>	 90
Plastic/aluminum	No Code	90	
Plastic/tin		91	
Plastic/mixed metals		92	
Plastic/glass		95	
Glass/aluminum		96	
Glass/tin		97	
Glass/mixed metals		98	

Paper or fiberboard/mixed metals	80
Paper or fiberboard/plastic	81
Paper or fiberboard/aluminum	82
Paper or fiberboard/tin	83
Paper or fiberboard/plastic/aluminum	84
Paper or fiberboard/plastic/aluminum/tin	85

Requirements for Korea

The appropriate Korean recycle symbol shown below must be placed on all packaging components - foam cushions, plastic film, thermoform plastics, sheets and bags. The symbol can be molded into or printed directly on the packaging part or printed onto a label that is applied to the part. It is recommended that the label be of the same material as the part to which it is being applied.

Design Detail Information:

- The triangular recycling symbol (excluding the "material name" text below it) must be at least 8 mm in width and length. The triangular recycling symbol and the material composition must be at least 11 mm in length. See design detail information for further details regarding size of symbol and code.
- The material type name inside the symbol must be written in Korean. The Material composition name below the symbol should be written in English.
- The extension of each side of the symbol is a regular triangle, whose inside angle is 60° and outside angle at the bended part of the arrow's end is 120°.
- The label is to be located on the front or side flank or around the barcode of the component, unless it is impossible, in which case the mark could be located on the bottom or lid of the package.

Exemptions: The following packaging materials are exempt from the marking requirement:

- Toner containers and CRUs.
- Packaging for spares/FRUs.
- Un-printed films, sheets, and bags.
- Packaging materials whose surface is less than 50 cm² (7.75 in²).
- Plastic sheet and film with a surface area less than 100 cm² (15.5 in²). Plastic bags are included in the scope of plastic sheet and film. Example for bags: A 6 cm wide x 10 cm tall bag that uses 120 cm² plastic film, exceeding the >100 cm² limit, must be marked unless otherwise exempt.
- Plastic film or sheet packaging materials with a thickness less than 20 microns (µm).

Plastic foam cushion – plastic foam and buffer packaging must use the following marks

Type	Code	
High density polyethylene	HDPE	<p>A: Minimum size 8mm, B: Minimum size 11mm</p> <p>← Text does not change (Meaning: "Plastic foam cushion")</p> <p>← Code changes according to material type</p>
Low density polyethylene	LDPE	
Polypropylene	PP	
Polystyrene	PS	
Polyvinyl chloride	PVC	
Other Plastic	Other	

Film sheet – film sheet packaging, including aluminum bags, must use the following marks

Type	Code	
High density polyethylene	HDPE	<p>← Text does not change (Meaning: "Film sheet")</p> <p>← Code changes according to material type</p>
Low density polyethylene	LDPE	
Polypropylene	PP	
Polystyrene	PS	
Polyvinyl chloride	PVC	
Other Plastic	Other	

Polyester (PET) – PET packaging must use the following marks

Type	Code	
Polyester	PET	<p>← Text does not change (Meaning: "PET").</p>



Appendix C – EH&S Labeling Guidelines for Xerox Products, Parts & Materials, including Primary Packaging

Product marking requirements are covered in EH&S-1001.

Note to Supplier: Artwork containing these requirements is typically provided by Xerox in the form of an Adobe Illustrator file. Contact Xerox Group program manager if artwork has not been provided.

Key:

- Required
- NR Not presently required by current EH&S regulatory regulations.

Packaging Contents

	Waste Toner (waste toner sump)	Toner, Developer, Replenisher, or Cartridge & Primary Pkging	Toner, Developer or Replenisher Bottle	Solid Inks	Water-Based Liquid Inks	Solvent-Based Liquid Inks	Photoreceptor	Service Materials/Supplies (primary & secondary Packaging)	Equip Parts (printers, copiers, Kits and Options)
Chemical Composition (e.g. SPI code)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Ingredients (e.g. CAS #)	NR	NR	NR	NR	NR		NR		NR
Health Hazard Warning	NR	NR	NR	NR	NR	See comment #5	NR	See comment #5	NR
Physical Hazard Warning	NR See comment #1	NR	NR	NR	NR	See comment #5	NR	See comment #5	NR
Agency Approval	NR See comment #6	NR See comment #6	NR See comment #6	NR	NR	NR	NR	NR	See #6
Product Identifier (e.g., part #)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> See comment #4	<input checked="" type="checkbox"/> See comment #4	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> See comment #4	<input checked="" type="checkbox"/> See comment #4	<input checked="" type="checkbox"/> See comment #4	<input checked="" type="checkbox"/> See comment #4	<input checked="" type="checkbox"/> See comment #4
Green World Alliance	See comment #2	See comment #2	See comment #2	NR	See comment #2	See comment #2	See comment #2	See comment #2	See comment #2
Hazardous Material Shipping Information	NR	NR	NR	NR	NR		NR		NR
Voluntary Ecolabel	NR	See comment #3	See comment #3	NR	NR	See comment #3	NR	NR	See comment #3
<p>Comments:</p> <p>#1- For products distributed in Asia/Pacific market, include warning “DO NOT INCINERATE”</p> <p>#2 – Use if return system has been established</p> <p>#3 - Applies if eco label certification has been achieved.</p> <p>#4 – Both primary and secondary packaging shall include Xerox name, product name and part number. Refer to MN2-155.2 and Xerox Packaging Graphic Standards for details.</p> <p>#5 - Symbols, graphics, language and text may vary by country</p> <p>#6 - Consult with Xerox Product Safety Engineering for unique applications. Examples include UL, CSA, and Russia GOST. GOST symbol required for all equipment going to Russia.</p>									



Supplier Letter to Verify Elimination of Intentionally Added Toxic Constituents in Packaging

The purpose of this letter is to verify compliance to the following requirement for the packaging components listed in this letter. Note that one letter can be used to verify compliance for multiple packaging components (i.e. an entire product family) or all material sold to Xerox (i.e. all corrugated, all EPS foam, etc.).

Product:

Packaging component (list all):

We certify that packaging components provided to Xerox comply with the following:

Cadmium /Cadmium Compounds, Hexavalent Chromium & its Compounds, Lead/Lead Compounds and Mercury/Mercury Compounds shall not be intentionally added to any package or packaging component. For incidental presence, the sum of the concentrations of lead, cadmium, mercury, and hexavalent chromium present in any packaging component shall not exceed 100 ppm by weight, with the exception of packaging components that qualify for the recycled content exemption.

“Recycled content exemption” is specified in the Model Toxics in Packaging Legislation as the following: packaging components that would not exceed the maximum contaminant levels i.e., the sum of the concentration levels of lead, cadmium, mercury and hexavalent chromium present in any packaging component shall not exceed 100 parts per million by weight but for the addition of recycled materials; and provided that none of the four regulated metals in the packaging components has been recovered and/or separated from other materials for use as a metal or metallic compound; and provided that the packaging components do not exceed a maximum concentration limit of 200 ppm by weight for the sum of the four regulated metals.

Supplier Name: _____

Authorized by: _____
(print name)

Authorized by: _____
(print title)

Authorized by: _____
(signature & date)



Appendix E

Supplier Letter to Verify Recovered Content In Select Fiber-based Packaging Materials

The purpose of this letter is to verify compliance to the following requirement for the packaging components listed in this letter. Note that one letter can be used to verify compliance for multiple packaging components (i.e. an entire product family) or all material sold to Xerox (i.e. all corrugated, all EPS foam, etc.).

Product:

Packaging component (list all):

We certify that packaging components provided to Xerox comply with the following:

Paperboard, corrugated fibreboard, solid fibreboard, and spiral wound tubes shall meet or exceed the minimum total recovered fiber content specified in the table below. Post-consumer recovered content is preferred over pre-consumer recovered content.

Minimum Total Recovered Fiber Content		
Category	Comments / Examples	Total Recovered Fiber Content ¹
Paperboard	Boxboard Chipboard Barrierboard Cartonboard	80 %
Corrugated Fibreboard ²	Containerboard Linerboard Corrugated Medium	25 %
Solid Fibreboard		40 %
Spiral Wound Tubes	Comprised of paper only	90 %
NOTES: 1) Calculated as percent of total packaging part weight over the course of a year using a weighted average. 2) Required content based on weighted average (by weight) of all components in packaging part (e.g. liners and mediums in corrugated).		

Supplier Name: _____

Authorized by: _____
(print name)

Authorized by: _____
(print title)

Authorized by: _____
(signature & date)