

TOTO GROUP  
CHEMICAL SUBSTANCE MANAGEMENT  
STANDARD (Product Edition)

Ver.6.2

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TOTO LTD.

Purchasing Headquarters

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## 1. Purpose

The purpose of this Standard is to clarify the implementation items and the management levels for the management of chemical substances in the parts and materials configuring the products sold by the TOTO Group (hereinafter referred to as “TOTO Group products”) in order to not only provide safe and secure products for customers but also contribute to compliance and global environment conservation for TOTO Group products.

## 2. Scope of Application

This Standard shall apply to the management of chemical substances contained in the parts and materials configuring TOTO Group products (hereinafter referred to as the “parts and other components stated in (1), (2), and (3) below”). However, subsidiary materials or others that are used in the manufacturing process and are not contained in products shall be excluded.

### (1) Products

- 1) Products that are designed, manufactured, and sold by the TOTO Group
- 2) Products for which the design and manufacturing are outsourced to a third party, products sold with the TOTO Group trademark, and products for which the manufacturing is outsourced to other companies and that is sold with the TOTO Group trademark (so-called OEM products).
- 3) Products for which the design and manufacturing are outsourced to the TOTO Group from a third party (excluding parts and materials designated by the third party).

### (2) Parts and materials

The parts, materials, and other items used for the products stated in 1.2. (1) *Products* shall be subject to these rules.

- 1) Parts, functional units (including those for repair), and materials
- 2) Raw materials
- 3) Printed materials included in instruction manuals, warranty cards, labels, and the like.
- 4) Subsidiary materials

### (3) Packaging materials

Packaging materials shall include the packaging materials of the products and parts shipped from the TOTO Group (packaging boxes, vinyl bags, adhesive tape, and the like) and those used for transportation (pallets, shrink films, and the like). However, this shall exclude the packaging materials, such as boxes, under the control of a cargo transporter that are collected and reused without being discharged in the TOTO Group or by real users.

### 3. Definition of Terms

The definitions of terms in this standard are as follows.

(1) Prohibited substances

The substances that are prohibited to be intentionally added to parts or others or contained beyond the regulation value according to treaties and regulations and that are prohibited for use as parts or others by the TOTO Group.

(2) Restricted substances

The substances for which the content volume or concentration is restricted or for which the content or concentration for special use is restricted by laws and regulations and that are restricted for use as parts and other components by the TOTO Group.

(3) Substances to be monitored

The substances that are required to be displayed or disclosed by laws and regulations when contained in parts and other components.

(4) Compatible materials

Formaldehyde F☆☆☆☆ equivalent materials and the four VOC standards (four volatile chemical substances; toluene, xylene, ethylbenzene, and styrene) compatible materials.

(5) Contained

All the conditions where substances are contained in parts and materials, such as products and packaging materials, as shown in the following examples:

- 1) The condition where the target substances are intentionally added.
- 2) The condition where substances are contained as impurities.
- 3) The condition where the target substances are used in manufacturing processes and remain in or adhere to final products, parts, or materials.

(6) Intentionally added

The condition where the target substances are intentionally added to parts and materials for the purpose of improvement of performance, functions, appearance, or quality. Furthermore, this includes the condition where the target substances are used in manufacturing processes or others and obviously contained in final products.

(7) Impurities

The substances that are contained in natural materials and cannot be technically removed during the purification process as industrial materials. Or, substances that are generated in the process of synthetic reactions and cannot be technically removed.

(8) Regulation value

The concentration to be guaranteed in parts or others when prohibited substances are contained as impurities instead of being added intentionally.

(9) Content concentration

The concentration in which the mass of the homogeneous material is considered a

denominator.

(10) Homogeneous materials

The materials that cannot be mechanically decomposed into different materials.

Examples of homogeneous materials are shown in [Reference Data 1](#)

(11) Packaging material unit

The unit that can be easily decomposed when discarded.

For example, although adhesive tape does not need to be separated into a base material and an adhesive layer, when it is adhered to a corrugated cardboard, the corrugated cardboard and tape are handled as a packaging material unit. In addition, although packaging materials include ink, in the case of the marker pen ink printed on the corrugated cardboard or various types of ink, the cardboard is handled as a packaging material unit.

Examples of the packaging material unit are shown in [Reference Data 2](#)

(12) Subsidiary materials

The materials such as grease, soldering materials, and adhesives used for products, and those such as adhesive tape, sealing materials, and adhesives included in products and used as construction materials.

## 4. Management of Chemical Substance in Products Standards

Management shall be conducted based on the following four management levels and exclusion.

### 4.1 Prohibited substances

Prohibited substances shall be specified based on the following representative treaties and regulations.

In the parts and other components configuring the TOTO Group products, the intentional addition of these substances shall be prohibited, and the substance shall not be contained as impurities beyond the regulation value. The regulation values for prohibited substances contained as impurities are shown in Appendix Table 1: Prohibited Substance List, the details of the target substances in Appendix Table 1-2: List of Examples of Prohibited Substances and the list of excluded prohibited substances in Appendix Table 1-3: List of Excluded Prohibited Substances.

For the parts and materials delivered to the TOTO Group, it shall be requested to submit the List of Materials Configuring Products. The form is defined in Form1・Type A: Guarantee of Non-Use of Prohibited Substances.

(Target international treaties, Japanese laws and regulations, and overseas laws and regulations are shown below.)

(1) International treaties

- Stockholm Convention on Persistent Organic Pollutants

- Montreal Protocol on substances that Deplete the Ozone Layer
- (2) Japanese and overseas laws and regulations
  - 1) Japan
    - Class 1 specified chemical substances (manufacturing and import prohibited substances) stipulated in the Act on the Evaluation of Chemical Substances and Regulation of Their Manufacture, etc. (hereinafter referred to as the Chemical Substances Control Law)
    - Specific substances stipulated in the Act on the Protection of the Ozone Layer through the Control of Specified Substances (hereinafter referred to as the Ozone Layer Protection Law)
    - Prohibited hazardous substances stipulated in Article 55 of the Industrial Safety and Health Act (hereinafter referred to as the Safety and Health Act)
    - Prohibited substances stipulated in the Construction Standard Act
  - 2) EU
    - POPs Rules
    - Rules of Ozone-Depleting Substances
    - Annex XVII (Restricted Substances) of the Regulations of Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH)
  - 3) The United States
    - Environmental tax on ozone-depleting substances
    - Title VI of the Clean Air Act: Stratospheric Ozone Protection
    - Toxic Substances Control Act

#### 4.2 Restricted substances

Restricted substances shall be specified based on the following representative laws and regulations.

- (1) Japan
 

In the parts and other components configuring the TOTO Group products sold in Japan, intentional addition of the six substances stipulated in the Directive on the Restriction of the Use of Certain Hazardous Substances in Electrical Equipment (hereinafter referred to as the RoHS Directive) shall be restricted, except for excluded items separately specified.

The target substances and management standards (including excluded items) shall be stipulated in [Annex 1](#): Guidelines for the Management of Restricted Substances in Japan.
- (2) EU
 

In the parts and other components configuring products sold by the TOTO Group in the EU regulated area (hereinafter referred to as the EU area) and the parts and other components incorporated into other company's products sold in the EU area, the inclusion of these substances shall be restricted.

The target substances and management standards shall be stipulated in [Annex 2](#): Guidelines for the Management of Restricted Substances in EU. The management shall be conducted in three categories; (1) products and parts subject to the RoHS Directive, (2) products and parts

not subject to the RoHS Directive, and (3) packaging materials subject to the European Parliament and Council Directive on Packaging and Packaging Waste (hereinafter referred to as the Packaging Directive).

(Target EU regulations are shown below.)

- RoHS Directive
- Packaging Material Directive
- Annex XVII (Restricted Substances) of the Regulations of Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH)

### (3) China

As for the parts and other components configuring products that are using electricity and sold by the TOTO Group in China (excluding Hong Kong, Macao, and Taiwan), the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products (China RoHS) shall be complied with.

Target substances and management methods shall be stipulated in Annex 3: Guidelines for the Management of Restricted Substances in China.

(Target Chinese regulations are shown below.)

- Restriction of the Use of Hazardous Substances in Electrical and Electronic Products

## 4.3 Substances to be monitored

Substances to be monitored shall be specified based on the following representative laws and regulations.

### (1) EU

In the parts and other components configuring products sold by the TOTO Group in the EU area and the parts and other components incorporated into other company's products sold in the EU area, when the content of candidate substances subject to REACH (SVHC) exceeds the regulation value (0.1 wt%)\*<sup>1</sup>, information on the contained substance and its safe use shall be provided to the seller.

(Target EU regulations are shown below.)

- Candidate List of Substances of Very High Concern for Authorization (SVHC) of the Regulations of Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH)

URL for SVHC information:

<https://echa.europa.eu/candidate-list-table>

\*1: The denominator for calculating the concentration shall be the part weight defined in Page 33 to Page 37 of the Guidance on requirements for substances in articles, June 2017, Version 4.0 issued by ECHA.

URL for information of the Guidance Version 4.0 issued by ECHA:

[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)

#### 4.4 Compatible materials

##### (1) Japan

Wooden building materials and others configuring the TOTO Group products sold in Japan shall be the materials equivalent to formaldehyde F☆☆☆☆ and compatible with the four VOC standards.

The management standards shall be stipulated in Annex 4: Guidelines for the Management of Compatible Materials.



## 5. Applicable TOTO Group Companies

◇日本	◇Japan
TOTO株式会社	TOTO LTD.
TOTOウォシュレットテクノ株式会社	TOTO WASHLET TECHNO LTD.
TOTOアクアテクノ株式会社	TOTO AQUATECHNO LTD.
TOTOオキツモコーティングス株式会社	TOTO OKITSUMO Coatings LTD.
TOTOサニテクノ株式会社	TOTO SANITECHNO LTD.
TOTOハイリビング株式会社	TOTO High Living LTD.
TOTOバスクリエイト株式会社	TOTO Bath Create LTD.
TOTOファインセラミックス株式会社	TOTO Fine Ceramics LTD.
TOTOプラテクノ株式会社	TOTO PLATECHNO LTD.
TOTOマテリア株式会社	TOTO MATERIA LTD.
サンアクアTOTO株式会社	SUNAQUA TOTO LTD.
◇アメリカ合衆国	◇U.S.A
TOTO U.S.A.,INC.	TOTO U.S.A.,INC.
◇メキシコ	◇Mexico
TOTO Mexico, S.A. de C.V.	TOTO Mexico, S.A. de C.V.
◇中国	◇China
北京東陶有限公司	BEIJING TOTO CO.,LTD.
東陶北京有限公司	TOTO (BEIJING) Co.,Ltd.
東陶大連有限公司	TOTO DALIAN CO.,LTD.
南京東陶有限公司	NANJING TOTO CO.,LTD.
東陶上海有限公司	TOTO (SHANGHAI) CO.,LTD.
東陶華東有限公司	TOTO EASTCHINA CO.,LTD.
東陶広州有限公司	TOTO (GUANGZHOU) CO.,LTD.
東陶(福建)有限公司	TOTO (FUJIAN) CO.,LTD.)
◇ベトナム	◇Vietnam
TOTO VIETNAM CO., LTD.	TOTO VIETNAM CO., LTD.
◇タイ	◇Thailand
TOTO THAILAND CO., LTD.	TOTO THAILAND CO.,LTD.
◇マレーシア	◇Malaysia
TOTO MALAYSIA SDN. BHD.	TOTO MALAYSIA SDN. BHD.
◇台湾	◇Taiwan
台湾東陶	TAIWAN TOTO CO.,LTD
◇ドイツ	◇Germany
TOTO Germany GmbH	TOTO Germany GmbH
◇インド	◇INDIA
TOTO INDIA INDUSTRIES PVT. LTD.	TOTO INDIA INDUSTRIES PVT. LTD.

The number of TOTO Group companies may be increased or decreased.

The latest information is released on the TOTO website, etc. Please visit TOTO's website.

## 6. Table of Annexes, Submission Forms and Appendix Tables

Reference Data 1	Examples of homogenous materials
Reference Data 2	Examples of packing material units
Annex 1	Guidelines for the Management of Restricted Substances in Japan.
Annex 2	Guidelines for the Management of Restricted Substances in EU.
Annex 3	Guidelines for the Management of Restricted Substances in China.
Annex 4	Guidelines for the Management of Compatible Materials.
Form1・Type A	Guarantee of non-use of prohibited substances
Form1・Type B	Certificate for EU (Product subject to RoHS Order)
Form1・Type C	Certificate for EU (Product not subject to RoHS Order)
Form1・Type D	Certificate for EU (Product subject to Packing Material Order)
Form 3-1	(Japanese only)
Form 3-2	(Japanese only)
Form 4	(Japanese only)
Form 5	(Japanese only)

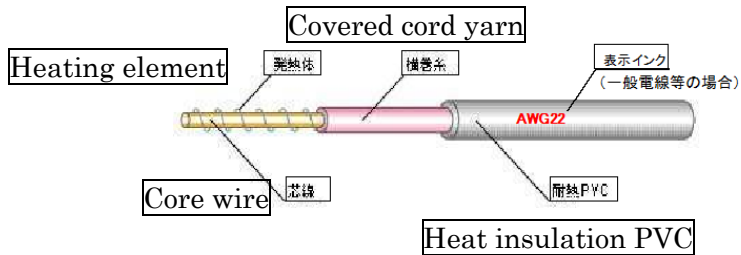
As for the following appendixes, please refer to the “List of Prohibited and Restricted Substances”.

Appendix Table 1	List of prohibited substances
Appendix Table 1-2	List of representative substances of prohibited substances
Appendix Table 1-3	List of exclusions from application of prohibited substances
Appendix Table 2	Examples of Substances Subject to EU Standards Concerning Restricted Substances
Appendix Table 2-2	Table of specific amines that should not be generated
Appendix Table 2-3	List of Specific Use Subject to Regulation of EU Standards Concerning Restricted Substances
Appendix Table 2-4	List of exclusions from application of operation standards regarding prohibited substances
Appendix Table 3	(Japanese only)
Appendix Table 4	Concepts of Measures for Formaldehyde and 4VOC Based on Spaces, Parts,

## Examples of Homogenous Materials

## 【事例その1】ヒーター線

構成部位: 芯線、発熱体、横巻糸、絶縁体、表示インク

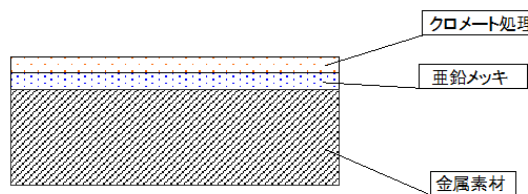


## [Case 1] Heater wire

Component parts: Core wire, heating element, covered cord yarn, insulating material and indication ink

## 【事例その2】金属素材へのメッキ

構成部位: 金属素材、亜鉛メッキ、クロメート処理

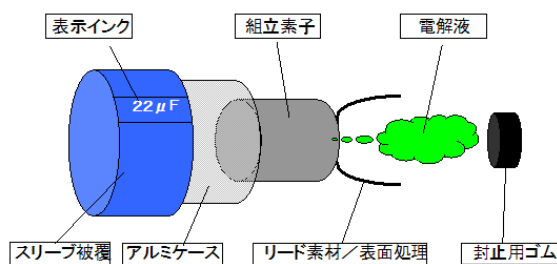


## [Case 2] Plating on metal raw material

Component parts: Metal raw material, zinc plating and chromate treatment

## 【事例その3】アルミ電解コンデンサの場合

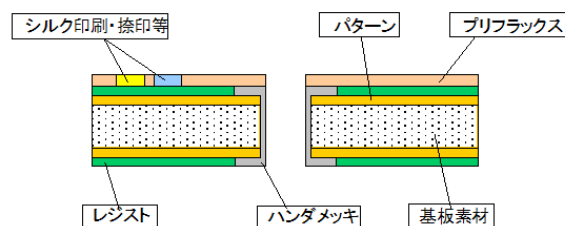
構成部位: スリーブ被覆、表示インク、アルミケース、組立素子、リード素材、リード素材への表面処理、電解液、封止用ゴム



## [Case 3] Aluminum electrolytic capacitor

Component parts: Sleeve coating, indication ink, aluminum case, assembly element, lead raw material, surface treatment on lead raw material, electrolytic solution and sealing rubber

## 【事例その4】プリント基板の場合

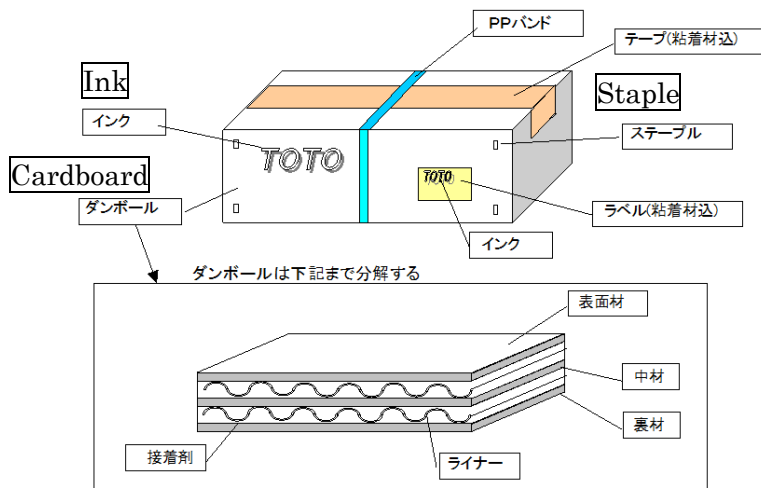


## [Case 4] PWB (Printed-wire board)

## Examples of Packing Material Units

## 【事例その1】外装箱まわり

構成部位:ダンボール、インク、テープ、ラベル、ステープル、PPバンド



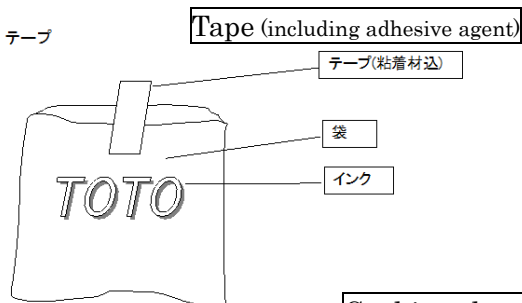
## [[Case 1] Exterior box

Component parts: Cardboard, ink, tape, label, staple and PP band

The cardboard should be broken down to the components in the following figure.

## 【事例その2】袋類

構成部位:袋、インク、テープ

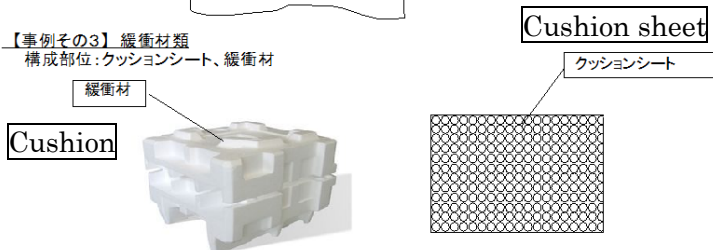


## [Case 2] Bags

Component parts: Bag, ink and tape

## 【事例その3】緩衝材類

構成部位:クッションシート、緩衝材



## [Case 3] Cushions

Component parts: Cushion sheet and cushion

## Guidelines for Management of Restricted Substances in Japan

### 1. Scope

These Guidelines shall apply to all parts and others configuring products sold by the TOTO Group in Japan.

### 2. Target Substances and Regulation Values

No.	Substance Name	CAS No.	Target Material	Regulation Value
1	Mercury and its compounds	Appendix Table 2.	Parts and others configuring products sold in Japan	Intentional addition prohibited
2	Lead and its compounds	Appendix Table 2.		
3	Cadmium and its compounds	Appendix Table 2.		
4	Hexavalent chromium compound	Appendix Table 2.		
5	PBBs (Polybromobiphenyl)	Appendix Table 2.		
6	PBDEs (Polybromodiphenyl ether)	Appendix Table 2.		

### 3. Exclusion from Application

Excluded items shall be defined in Appendix Table 3: List of Exclusions from the Guidelines for Management of Restricted Substances in Japan. These items shall be allowed in products.

### 4. Documents to be Submitted

For the products, parts, materials, and packaging materials subject to these Guidelines, we shall ask suppliers who directly supply them to agree with providing cooperation in reducing restricted substances. This agreement shall be confirmed by the CSM Development Purchasing System (the description in Measures for Reduction of Restricted Substances if the system has not been introduced yet).

The agreement shall be valid as long as there is no change request from both companies. In addition, if it is clearly identified that target substances are intentionally added in cases other than those shown in the list of excluded applications in Appendix Table 3, suppliers shall be requested to submit the Report on Contained Restricted Substances in order to contribute to our activities for reduction of restricted substances.

Form 3-1: Measures for Reduction of Restricted Substances (Japanese only)

Form 3-2: Report on Contained Restricted Substances (Japanese only)

## Guidelines for EU Operation on Restricted Substances

## 1. Scope

These Guidelines shall be applied to products that are sold in the EU region, as well as parts, materials, and packaging materials configuring those products. However, these Guidelines shall not apply to repair parts of the products sold before July 2006.

## 2. Target Substances and Regulation Values

No	Substance Name	CAS No.	Target Material	Regulation Value
1	Mercury and its compounds	Appendix Table 2.	Products, parts, and materials subject to the RoHS Directive	Less than 1000 ppm
			Packaging materials	Total values of heavy metals of 1 to 4 are less than 100 ppm.
2	Lead and its compounds	Appendix Table 2.	Products, parts, and materials subject to the RoHS Directive	Less than 1000 ppm
			Packaging materials	Total values of heavy metals of 1 to 4 are less than 100 ppm.
3	Cadmium and its compounds	Appendix Table 2.	Products, parts, and materials subject to the RoHS Directive	Less than 100 ppm
			Packaging materials	Total values of heavy metals of 1 to 4 are less than 100 ppm.
4	Hexavalent chromium compound	Appendix Table 2.	Products, parts, and materials subject to the RoHS Directive	Less than 1000 ppm
			Packaging materials	Total values of heavy metals of 1 to 4 are less than 100 ppm.
5	PBBs (polybrominated biphenyl)	Appendix Table 2.	Products, parts, and materials subject to the RoHS Directive	Less than 1000 ppm
6	PBDEs (polybromodiphenyl ether)	Appendix Table 2.	Products, parts, and materials subject to	Less than 1000 ppm

7	Bis(2-ethylhexyl)phthalate(DEHP)	117-81-7	the RoHS Directive	
8	Butyl benzyl phthalate (BBP)	85-68-7		
9	Dibutyl phthalate (DBP)	84-74-2		
10	Diisobutyl phthalate (DIBP)	84-69-5		
11	Short chain type chlorinated paraffin (C10-13)	Appendix Table 2.	Products, parts, materials, and packaging materials sold in the EU region	Less than 1500 ppm
12	Polychlorinated terphenyls (PCT)	61788-33-8		Less than 50 ppm
13	Azo dye, pigment forming specific amine, pigment *1	Appendix Table 2.		Less than 30 ppm as a specific amine
14	Monomethyl-tetrachloro-diphenylmethane (Ugilec 141)	76253-60-6		Intentional addition prohibited
15	Monomethyl-dichloro-diphenylmethane (Ugilec 121, Ugilec 21)	81161-70-8		Intentional addition prohibited
16	Monomethyl-dibromo-diphenylmethane (DBBT)	99688-47-8		Intentional addition prohibited
17	Dibutyl tin compound (DBT)	Appendix Table 2.		Less than 1000 ppm
18	Dioctyltin compound (DOT)	Appendix Table 2.		Less than 1000 ppm
19	Trisubstituted organotin compound	Appendix Table 2.		Less than 1000 ppm
20	Dimethyl fumarate (DMF)	624-49-7		Less than 0.1 ppm
21	Polycyclic aromatic hydrocarbon (PAH)	Appendix Table 2.		Less than 1 ppm
22	Phenyl mercury	Appendix Table 2.		Less than 100 ppm

\*1: Specific amines that should not be generated by reductive composition of azo dyes and pigments shown in No. 13 shall be shown in Appendix Table 2-2: List of Specific Amines That Should not be Generated.

### 3. Specific Applications Subject to Regulation

Chemical substances regulated by restricting applications shall be shown in Appendix Table 2-3: List of Specific Applications Subject to EU Operation Standard Rules on Restricted Substances.

#### 4. Exclusion from Application

Excluded items shall be defined in Appendix Table 2-4: List of Exclusions from EU Operation Standard on Restricted Substances. These items shall be allowed in the product.

#### 5. Documents to be Submitted

For the products, parts, materials, and packaging materials subject to these Guidelines, the following documents shall be submitted according to each regulation.

##### (1) Products subject to the RoHS Directive and parts and materials configuring them

Submit Form 1: Guarantee of Non-Use of Prohibited Substances and Restricted substances (Type B).

Submit this document regardless of whether the target substance is contained in the product or not. In addition, as certification documents concerning the content status of substances listed in Nos. 1 to 6, submit the List of Materials Configuring Products and the Component Analysis Table (Analysis Data) where the parts configuring the product are decomposed into homogeneous materials. Note that any format can be used for the List of Materials Configuring Products and the Component Analysis Table (Analysis Data). The requirements of analysis data shall be shown in [Annex 5](#) : TOTO Group analysis guidelines regarding chemical substances.

##### (2) Products not subject to the RoHS Directive and parts and materials configuring them

Submit Form 1: Guarantee of Non-Use of Prohibited Substances and Restricted substances (Type C).

##### (3) Packaging materials subject to the Packaging Material Directive

Submit Form 1: Guarantee of Non-Use of Prohibited Substances and Restricted substances (Type D).

Submit this document regardless of whether the target substance is contained in the product or not. In addition, as certification documents concerning the content status of substances listed in Nos. 1 to 4, submit the List of Materials Configuring Products and the Component Analysis Table (Analysis Data) where the packaging materials are decomposed into homogeneous materials.

Note that any format can be used for the List of Materials Configuring Products and the Component Analysis Table (Analysis Data). The requirements of analysis data shall be shown in [Annex 5](#) : TOTO Group analysis guidelines regarding chemical substances.



## Guidelines for Management of Restricted Substances in China

Regarding the Management Methods for Controlling Pollution by Electronic Information Products (China RoHS): Phase 1, the management standard shall be defined as follows.

## 1. Target Products

These Guidelines shall apply to products sold in China that are using electricity not exceeding DC 1500 V and AC 1000 V. However, China does not include Hong Kong, Macao, and Taiwan.

## 2. Target Substances and Regulation Values

No.	Hazardous Substance Name	Regulation Value *
1	Lead and its compounds	1000 ppm
2	Mercury and its compounds	1000 ppm
3	Cadmium and its compounds	100 ppm
4	Hexavalent chromium compound	1000 ppm
5	Polybromobiphenyl (PBB)	1000 ppm
6	Polybromodiphenyl ether (PBDE)	1000 ppm

\* Regulation values are calculated by setting the homogeneous material weight as the denominator.

## 3. Displaying Hazardous Substances Contained in Products

## 3.1 Displaying hazardous substance names and contained amount

Display the components and parts beyond the limit amount in Chinese simplified letters in documents such as the instruction manual. The height of the characters shall be 1.8 mm or more. It shall be also acceptable to insert paper indicating the amount of contained hazardous substances in documents such as the instruction manual. Basically, indicate only the components where hazardous substances exist.

产品中的有害物质的名称及含有量

部件名称	有害物质					
	铅 (Pb)	汞 (Hg)	镉 (Cd)	六价铬 (Cr(VI))	多溴联苯 (PBB)	多溴二苯醚 (PBDE)

根据 SJ/T 11364 的规定，做成本表。

○：表示该有毒有害物质在该部件所含有均质材料中的含量均在 GB/T26572 标准规定的限量要求以下。

×：表示该有毒有害物质至少在该部件的某一均质材料中的含量超出 GB/T26572 标准规定的限量要求。

Table 1: Form of Displaying Hazardous Substance Name and Contained Amount

### 3.2 Hazardous substance use restriction mark

Attach Fig. 1 when hazardous substances are not contained in products and Fig. 2 when they are. The figure size should not be less than 5 mm x 5 mm. Use block copy data to create the marks because the font (impact) of the number in the circle, as well as the inside and outside diameter ratio of the circle, are specified.



Fig. 1: Target substances not contained



Fig. 2: Target substances contained

The outside arrows shown in Figs. 1 and 2 indicate that the product can be recycled. The character e in Fig. 1 means electrical, electronic, and environmental. The number in Fig. 2 means the environmental protection expiration date.

The environmental protection expiration date shall be determined by conforming numbers, such as the product's design life and the anticipated safety trial period.

Note: As of April 15, 2016, the Chinese Home Appliances Association has published the average environmental protection expiration date for each product as their instruction guidelines (Chung Sha Association [2016] Issue 36). The figure color can be either black or white according to the color tone of the brand plate.

### 4. Survey on Hazardous Substances Contained in Products

If there is no information on hazardous substances contained in parts and materials configuring the target product, conduct surveys based on Form 6.

## Guidelines for Management of Compliance Materials

Compliance materials shall be divided into formaldehyde F☆☆☆☆ and four VOCs (toluene, xylene, ethylbenzene, and styrene). The management standard for each material shall be defined as follows.

### 1. Scope of application

This standard covers products sold in Japan and installed in a living room or a space equivalent to a living room\*<sup>1</sup> (hereafter referred to as “products”).

#### 1.1. Formaldehyde F☆☆☆☆

Building material used for products and subject to notification\*<sup>2</sup>

#### 1.2. 4VOC (toluene, xylene, ethylbenzene, and styrene)

Building materials used in products and subject to indication of 4VOC\*<sup>2</sup>

\*<sup>1</sup>: An example of a living room or space equivalent to a living room is shown in “Appendix Table 4-1 How to in terms of space, location and materials compatible with formaldehyde and 4VOC.”

\*<sup>2</sup>: Building materials subject to notification and building materials subject to 4VOC indication are shown in “Appendix Table 4-2 Table of building materials subject to notification and building materials subject to 4VOC indication.”

### 2. Exclusion from Application

Exclusion from the application of 4 VOC shall be defined in Appendix Table 4-3: List of exclusions from the application of 4 VOC. In addition, even for a case falling under the exclusion, it is possible to respond to a request from a customer.

### 3. Documents to be submitted

#### 3.1. Formaldehyde F☆☆☆☆

As for the products, parts and materials subject to this operation standard\*<sup>7</sup>, an “Application for Formaldehyde F☆☆☆☆conformity” should be submitted.

The form is Form 4 (attached)(Japanese only).

The “JAS certification number,” “JIS certification number” or “Minister’s authorization number” proving that the content of formaldehyde is less than the target value should be written in this “Application for Formaldehyde F☆☆☆☆conformity.” As for the items authorized by the minister, a copy of minister’s authorization should be submitted.

As for adhesive agents not subject to notifications of the Building Standard Law, the registration

number of the Japan Adhesives Industry Association and certificates (MSDS for GHS, ingredients table, etc.) should be submitted. (If it is difficult to use adhesive registered by the Japan Adhesives Industry Association in parts and otherwise imported from foreign countries, it suffices to submit only the certificates that prove they do not contain formaldehyde.)

\*7: Adhesive agents used in electric or electronic equipment and the inner parts of water faucet equipment and adhesive agents for tape, seals, labels, etc. used for all products are not subject to the items of this application.

### 3.2. 4VOC (toluene, xylene, ethylbenzene, and styrene)

As for the relevant products, parts and materials, an “Application for 4VOC standard conformity” should be submitted.

The form is Form 5 (attached) (Japanese only).

Either “Appendix Table 4-4 Kinds of certificates of conformity to 4VOC standard of parts of wooden building materials” (attached) or any background information proving that the value is less than the target value should be written in this conformity application form.

### **Guarantee of Non-Use of Prohibited Substances & Restricted Substances**

Corporate Seal

A : Group I (No need to write List of Delivered Parts)  
B : Group I + II + III + IV (Products Subject to RoHS Directive)  
C : Group I + IV (Products Not Subject to RoHS Directive)  
D : Group I + II + IV (Products Subject to Packaging Material Directive)  
E : Group I + II + III (Products Subject to RoHS in each country)

Responsible Person:

### Prohibited Substances

Group	NE	Substance Name or Substance Group Name	NE	Substance Name or Substance Group Name
I	1	CFC	25	Bis (chloromethyl) ether *
	2	Halon	26	4-Aminobiphenyl (4-aminodiphenyl) and its salt *
	3	Carbon tetrachloride	27	6-naphthylamine and its salt *
	4	1,1,1-trichloroethane	28	4-Nitrobiphenyl (4-nitrodiphenyl) and its salts *
	5	HBFC	29	Benzidine and its salt *
	6	Bromochloromethane	30	Chlorpyrifos
	7	Methyl bromide	31	Perfluorooctanesulfonic acid (PFOS) or its salt
	8	Asbestos *	32	Perfluorooctanesulfonic acid fluoride (PFOSF)
	9	PCB (Polychlorinated biphenyl)	33	Pentachlorobenzene
	10	PCN (Polychlorinated naphthalene)	34	α-hexachlorocyclohexane
	11	Hexachlorobenzene (HCB)	35	β-hexachlorocyclohexane
	12	Aldrin	36	γ-hexachlorocyclohexane
	13	Dieldrin	37	Chlordecone
	14	Endrin	38	Hexabromobiphenyl
	15	DDT	39	Tetrabromodiphenyl ether
	16	Chlordane	40	Pentabromodiphenyl ether
	17	Bis (tributyltin) oxide	41	Hexabromodiphenyl ether
	18	Phenylenediamines	42	Heptabromodiphenyl ether
	19	2,4,6-tri-tert-butylphenol	43	Endosulfan (Benzosopin)
	20	Toxaphene	44	Hexabromocyclododecane (HBCD)
	21	Mirex	45	Pentachlorophenol or a salt or ester
	22	Kelthane	46	Short chain type chlorinated paraffin (C10 to C13)
	23	Hexachlorobutadiene	47	Decabromodiphenyl ether
	24	2- (2H-1,2,3-benzotriazol-2-yl) -4,6-di-tert-butylphenol		

[illegible]

**List of Delivered Parts Subject to Certificate of Conformity**

List of Delivered Parts Subject to Certificate of Conformity			
Name	Item No.	Name	Item No.

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**TOTO Group**

Date:

**Guarantee of Non-Use of Prohibited Substances & Restricted Substances**Our company shall submit Type **B** Guarantee.

Corporate Seal

**Type**

- A : Group I (No need to write List of Delivered Parts)  
 B : Group I + II + III + IV (Products Subject to RoHS Directive)  
 C : Group I + IV (Products Not Subject to RoHS Directive)  
 D : Group I + II + IV (Products Subject to Packaging Material Directive)  
 E : Group I + II + III (Products Subject to RoHS in each country)

Company Name: \_\_\_\_\_

Address: \_\_\_\_\_

Responsible Person: \_\_\_\_\_

Our company shall guarantee that we shall not intentionally add the chemical substances listed below (for the chemical substances for which regulation values are stipulated by laws and regulations, the values shall not be exceeded regardless of intentional or unintentional addition) to the following parts and other components delivered to the TOTO Group directly or through third parties (including parts, raw materials, and subsidiary materials, such as accessory subparts).

**Prohibited Substances**

Group	№	Substance Name or Substance Group Name	№	Substance Name or Substance Group Name
I	1	CFC	25	Bis (chloromethyl) ether *
	2	Halon	26	4-Aminobiphenyl (4-aminodiphenyl) and its salt *
	3	Carbon tetrachloride	27	8-naphthylamine and its salt *
	4	1,1,1-trichloroethane	28	4-Nitrobiphenyl (4-nitrodiphenyl) and its salts *
	5	HBFC	29	Benzidine and its salt *
	6	Bromochloromethane	30	Chlorpyrifos
	7	Methyl bromide	31	Perfluorooctanesulfonic acid (PFOS) or its salt
	8	Asbestos *	32	Perfluorooctanesulfonic acid fluoride (PFOSF)
	9	PCB (Polychlorinated biphenyl)	33	Pentachlorobenzene
	10	PCN (Polychlorinated naphthalene)	34	α-hexachlorocyclohexane
	11	Hexachlorobenzene (HCB)	35	β-hexachlorocyclohexane
	12	Aldrin	36	γ-hexachlorocyclohexane
	13	Dieldrin	37	Chlordecone
	14	Endrin	38	Hexabromobiphenyl
	15	DDT	39	Tetrabromodiphenyl ether
	16	Chlordane	40	Pentabromodiphenyl ether
	17	Bis (tributyltin) oxide	41	Hexabromodiphenyl ether
	18	Phenylenediamines	42	Heptabromodiphenyl ether
	19	2,4,6-tri-tert-butylphenol	43	Endosulfan (Benzoepin)
	20	Toxaphene	44	Hexabromocyclododecane (HBCD)
	21	Mirex	45	Pentachlorophenol or a salt or ester
	22	Keithane	46	Short chain type chlorinated paraffin (C10 to C13)
	23	Hexachlorobutadiene	47	Decabromodiphenyl ether
	24	2- (2H-1,2,3-benzotriazol-2-yl) -4,6-di-tert-butylphenol		

**Restricted substances**

Group	№	Substance Name or Substance Group Name	Laws and regulations	Regulation Value
II	1	Mercury and its compounds *	RoHS	RoHS:<1000ppm
	2	Lead and its compounds *		RoHS:<1000ppm
	3	Cadmium and its compounds *		RoHS:<100ppm
	4	Hexavalent chromium compounds *		RoHS:<1000ppm
III	5	PBBs (polybrominated biphenyl) *	RoHS	RoHS:<1000ppm
	6	PBDEs (polybromodiphenyl ether) *		RoHS:<1000ppm
	7	Bis (2-ethylhexyl) phthalate (DEHP) *		RoHS:<1000ppm
	8	Butyl benzyl phthalate (BBP) *		RoHS:<1000ppm
	9	Dibutyl phthalate (DBP) *		RoHS:<1000ppm
	10	Diallylbutyl phthalate (DIBP) *		RoHS:<1000ppm
IV	11	Short chain type chlorinated paraffin (C10 to C13) *	REACH ANNEX 17	<1500ppm
	12	Polychlorinated terphenyls (PCTs) *		<50ppm
	13	Azo dye that generates some aromatic amines *		<30ppm as a specific amine
	14	Monomethyl-tetrachloro-diphenylmethane		Intentional addition prohibited
	15	Monomethyl-dichloro-diphenylmethane		Intentional addition prohibited
	16	Monomethyl-dibromo-diphenylmethane (DBBT)		Intentional addition prohibited
	17	Dibutyl tin compound (DBT) *		<1000ppm
	18	Dioctyltin compound (DOT) *		<1000ppm
	19	Trisubstituted organotin compound *		<1000ppm
	20	Dimethyl fumarate (DMF) *		<0.1ppm
	21	Polycyclic aromatic hydrocarbon (PAH) *		<1ppm
	22	Phenyl mercury *		<100ppm

The above target substances are based on the regulations of Japan and EU, and substances with (\*) after the substance name have legal inclusion restriction values.

**List of Delivered Parts Subject to Certificate of Conformity**

Name	Item No.	Name	Item No.

This written certificate shall be valid unless we are requested to change the information in this written certificate from our company and the TOTO Group.

To TOTO Group

Date:

**Guarantee of Non-Use of Prohibited Substances & Restricted Substances**Our company shall submit Type **C** Guarantee.

Corporate Seal

**Type**

- A : Group I (No need to write List of Delivered Parts)  
 B : Group I + II + III + IV (Products Subject to RoHS Directive)  
 C : Group I + IV (Products Not Subject to RoHS Directive)  
 D : Group I + II + IV (Products Subject to Packaging Material Directive)  
 E : Group I + II + III (Products Subject to RoHS in each country)

Company Name: \_\_\_\_\_

Address: \_\_\_\_\_

Responsible Person: \_\_\_\_\_

Our company shall guarantee that we shall not intentionally add the chemical substances listed below (for the chemical substances for which regulation values are stipulated by laws and regulations, the values shall not be exceeded regardless of intentional or unintentional addition) to the following parts and other components delivered to the TOTO Group directly or through third parties (including parts, raw materials, and subsidiary materials, such as accessory subparts).

**Prohibited Substances**

Group	№	Substance Name or Substance Group Name	№	Substance Name or Substance Group Name
I	1	CFC	25	Bis (chloromethyl) ether *
	2	Halon	26	4-Aminobiphenyl (4-aminodiphenyl) and its salt *
	3	Carbon tetrachloride	27	0-naphthylamine and its salt *
	4	1,1,1-trichloroethane	28	4-Nitrobiphenyl (4-nitrodiphenyl) and its salts *
	5	HBFC	29	Benzidine and its salt *
	6	Bromochloromethane	30	Chlorpyrifos
	7	Methyl bromide	31	Perfluorooctanesulfonic acid (PFOS) or its salt
	8	Asbestos *	32	Perfluorooctanesulfonic acid fluoride (PFOSF)
	9	PCB (Polychlorinated biphenyl)	33	Pentachlorobenzene
	10	PCN (Polychlorinated naphthalene)	34	α-hexachlorocyclohexane
	11	Hexachlorobenzene (HCB)	35	0-hexachlorocyclohexane
	12	Aldrin	36	γ-hexachlorocyclohexane
	13	Dieldrin	37	Chlordecone
	14	Endrin	38	Hexabromobiphenyl
	15	ODT	39	Tetrabromodiphenyl ether
	16	Chlordane	40	Pentabromodiphenyl ether
	17	Bis (tributyltin) oxide	41	Hexabromodiphenyl ether
	18	Phenylenediamines	42	Heptabromodiphenyl ether
	19	2,4,6-tri-tert-butylphenol	43	Endosulfan (Benzoquin)
	20	Toxaphene	44	Hexabromocyclododecane (HBCD)
	21	Mirex	45	Pentachlorophenol or a salt or ester
	22	Keithane	46	Short chain type chlorinated paraffin (C10 to C13)
	23	Hexachlorobutadiene	47	Decabromodiphenyl ether
	24	2- (2H-1,2,3-benzotriazol-2-yl) -4,6-di-tert-butylphenol		

**Restricted substances**

Group	№	Substance Name or Substance Group Name	Laws and regulations	Regulation Value
IV	11	Short chain type chlorinated paraffin (C10 to C13) *	* REACH ANNEX17	<1500ppm
	12	Polychlorinated biphenyls (PCBs) *		<50ppm
	13	Azo dye that generates some aromatic amines *		<30ppm as a specific amine
	14	Monomethyl-tetrachloro-diphenylmethane		Intentional addition prohibited
	15	Monomethyl-dichloro-diphenylmethane		Intentional addition prohibited
	16	Monomethyl-dibromo-diphenylmethane (DBBT)		Intentional addition prohibited
	17	Dibutyl tin compound (DBT) *		<1000ppm
	18	Dioctyltin compound (DOT) *		<1000ppm
	19	Trisubstituted organotin compound *		<1000ppm
	20	Dimethyl fumarate (DMF) *		<0.1ppm
	21	Polycyclic aromatic hydrocarbon (PAH) *		<1ppm
	22	Phenyl mercury *		<100ppm

The above target substances are based on the regulations of Japan and EU, and substances with (\*) after the substance name have legal inclusion restriction values.

**List of Delivered Parts Subject to Certificate of Conformity**

Name	Item No.	Name	Item No.

This written certificate shall be valid unless we are requested to change the information in this written certificate from our company and the TOTO Group.



<Form1 TYPE D>

To TOTO Group

Date:

## Guarantee of Non-Use of Prohibited Substances & Restricted Substances

Our company shall submit Type **D** Guarantee.

Corporate Seal

### Type

- A : Group I (No need to write List of Delivered Parts)  
 B : Group I + II + III + IV (Products Subject to RoHS Directive)  
 C : Group I + IV (Products Not Subject to RoHS Directive)  
 D : Group I + II + IV (Products Subject to Packaging Material Directive)  
 E : Group I + II + III (Products Subject to RoHS in each country)

Company Name:

Address:

Responsible Person:

Our company shall guarantee that we shall not intentionally add the chemical substances listed below (for the chemical substances for which regulation values are stipulated by laws and regulations, the values shall not be exceeded regardless of intentional or unintentional addition) to the following parts and other components delivered to the TOTO Group directly or through third parties (including parts, raw materials, and subsidiary materials, such as accessory subparts).

### Prohibited Substances

Group	№	Substance Name or Substance Group Name	№	Substance Name or Substance Group Name
I	1	CFC	25	Bis (chloromethyl) ether *
	2	Halon	26	4-Aminobiphenyl (4-aminodiphenyl) and its salt *
	3	Carbon tetrachloride	27	0-naphthylamine and its salt *
	4	1,1,1-trichloroethane	28	4-Nitrobiphenyl (4-nitrodiphenyl) and its salts *
	5	HBFC	29	Benzidine and its salt *
	6	Bromochloromethane	30	Chlorpyrifos
	7	Methyl bromide	31	Perfluorooctanesulfonic acid (PFOS) or its salt
	8	Asbestos *	32	Perfluorooctanesulfonic acid fluoride (PFOSF)
	9	PCB (Polychlorinated biphenyl)	33	Pentachlorobenzene
	10	PCN (Polychlorinated naphthalene)	34	α-hexachlorocyclohexane
	11	Hexachlorobenzene (HCB)	35	β-hexachlorocyclohexane
	12	Aldrin	36	γ-hexachlorocyclohexane
	13	Dieldrin	37	Chlordecone
	14	Endrin	38	Hexabromobiphenyl
	15	DDT	39	Tetrabromodiphenyl ether
	16	Chlordane	40	Pentabromodiphenyl ether
	17	Bis (tributyltin) oxide	41	Hexabromodiphenyl ether
	18	Phenylenediamines	42	Heptabromodiphenyl ether
	19	2,4,6-tri-tert-butylphenol	43	Endosulfan (Benzoepin)
	20	Touaphene	44	Hexabromocyclododecane (HBCD)
	21	Mirex	45	Pentachlorophenol or a salt or ester
	22	Keithane	46	Short chain type chlorinated paraffin (C10 to C13)
	23	Hexachlorobutadiene	47	Decabromodiphenyl ether
	24	2-(2H-1,2,3-benzotriazol-2-yl)-4,6-di-tert-butylphenol		

### Restricted substances

Group	№	Substance Name or Substance Group Name	laws and regulations	Regulation Value
II	1	Mercury and its compounds *		Total values of heavy metals of 1 to 4 are less than 100 ppm.
	2	Lead and its compounds *		
	3	Cadmium and its compounds *		
	4	Hexavalent chromium compounds *	* Packaging materials	
IV	11	Short chain type chlorinated paraffin (C10 to C13) *		<1500ppm
	12	Polychlorinated terphenyls (PCTs) *		<50ppm
	13	Azo dye that generates some aromatic amines *		<30ppm as a specific amine
	14	Monomethyl-tetrachloro-diphenylmethane		Intentional addition prohibited
	15	Monomethyl-dichloro-diphenylmethane		Intentional addition prohibited
	16	Monomethyl-dibromo-diphenylmethane (DBBT)		Intentional addition prohibited
	17	Dibutyl tin compound (DBT) *		<1000ppm
	18	Dioctyltin compound (DOT) *		<1000ppm
	19	Trisubstituted organotin compound *		<1000ppm
	20	Dimethyl fumarate (DMF) *		<0.1ppm
	21	Polycyclic aromatic hydrocarbon (PAH) *		<1ppm
	22	Phenyl mercury *		<100ppm

The above target substances are based on the regulations of Japan and EU, and substances with (\*) after the substance name have legal inclusion restriction values.

### List of Delivered Parts Subject to Certificate of Conformity

Name	Item No.	Name	Item No.

This written certificate shall be valid unless we are requested to change the information in this written certificate from our company and the TOTO Group.



