

05

Conformity with Increasingly Demanding Regulations about Chemical Substances Contained in Products

Building a New Management System and Providing Products Meeting Customer Needs and Relevant Regulations through the Utilization of OKI's Innovative Technology

Increasingly Demanding Regulations to Control Chemical Substances Contained in Products

Regulations to control chemical substances contained in products, such as EU's RoHS directive and REACH regulation*, have recently become increasingly demanding. As a result, more and more customers have come to ask manufacturers and suppliers to conform with such regulations even for products manufactured in or shipped to regions other than the European Union.

Put into effect in June 2007, the full-scale implementation of REACH regulation has already started since the commencement of the preregistration in June 2008. The regulation

requires manufacturers to control chemical substances contained in their products to be exported to EU nations throughout their supply chains. In addition, REACH regulation is more demanding than RoHS directive, with a larger number of substances to be controlled. It also requires manufactures to control the concentration and total quantities of such substances. Thus, it is indispensable for manufacturers to collect, manage, and communicate information necessary to meet the requirements of REACH.

* REACH (Registration, Evaluation, Authorization and Restriction of Chemicals) regulation: A new European regulation to be applied to all companies manufacturing and importing chemicals in the European Union. It requires manufacturers / importers to register and evaluate any chemicals subject thereto. In addition, they need to obtain authorization from the relevant authorities about the use of substances of very high concern. The regulation also restrains the use of substances with higher risks.

Pioneering the Management of Chemical Substances in Products

The OKI Group is a pioneer in the management of chemical substances in products. In fact, we developed and started implementing a management system for controlling chemical substances in products and a network-based system to manage information on chemical substances (called COSMOS within the group) long before the enactment of the above directive and regulation. In 2006, we launched the commercialized version of COSMOS, "COINServ-COSMOS", in the market to meet needs for users outside the group.

Rebuilding a Chemical Substance Management System to Ensure Conformity with REACH Regulation

Understanding the importance of REACH regulation, the OKI Group has rebuilt a chemical substance management system in order to meet the requirements of the regulation. The number of substances subject to the regulation has greatly increased. In order to handle such a large number of substances, we first specified the items to be managed by covering all processes including

● The OKI Group's Main Efforts

	2000-2005	2006	2007	2008	2009
Regulations			RoHS Directive	Chinese Regulations for Chemical Substances	REACH Regulation
Operational Management Systems	Issuance and Implementation of the OKI Green Procurement Standards		Issuance and Implementation of the OKI Guidelines for Managing Chemical Substances in Products		
Information Management Systems	Starting the operation of COSMOS	Developing and implementing RoHS-compliant COSMOS-E	Developing and implementing COSMOS-E for managing manufacturing processes	Developing and implementing REACH-compliant COSMOS-R/R	

Shuichi Kawano

Shuichi Kawano

Executive Officer,
General Manager
CSR Division



C o m m i t m e n t

As laws and regulations concerning chemical substances have become increasingly strict in both Japan and other countries, it is very important for any manufacture or supplier to meet their requirements appropriately and promptly in order to fulfill its corporate social responsibility. Efforts to meet regulatory requirements also help improve business competitiveness. In order to fulfill its responsibility as a manufacturer/supplier, the OKI Group has established and implemented a system for controlling chemical substances as well as a system to manage information on chemical substances, and thus met the requirements of relevant regulation in an appropriate and timely manner. We are also interested in contributing to society by offering such systems as solutions to environmental issues.

information collection, design and distribution. We also established a procedure for disclosing information in response to inquiries from customers. Moreover, we added the substances subject to REACH regulation and necessary survey procedures to the OKI Green Procurement Standards. The standards were established to inquire into the business systems and environment efforts of our business partners as well as chemical substances contained in their products.

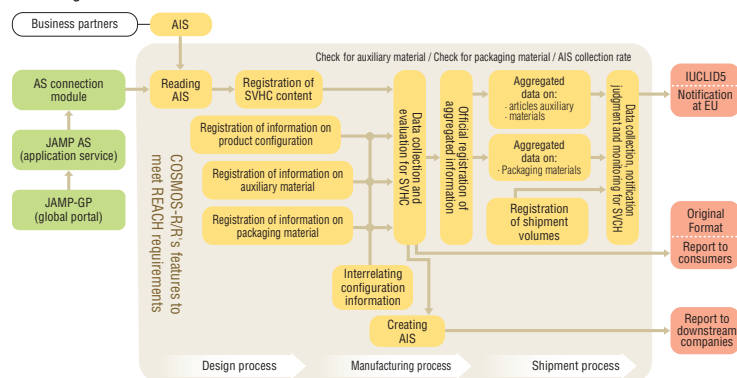
Developing "COSMOS-R/R", a New Information Management System for Chemical Substances

As part of our efforts to rebuild a chemical substance management system, we developed "COINServ-COSMOS-R/R", a new information management system for chemical substances focusing on conforming with REACH regulation in fiscal 2008.

The number of substances subject to the regulation is 15 at this moment (as of May 2009). However, it is very likely that the scope of the regulation will be expanded to include 1,500 substances at most in the future. "COSMOS-R/R" which has developed this time allows the management of information necessary to conform with both RoHS directive and REACH regulation in an integrated way. The system has the following four features.

First, the system enables the efficient management of information because it supports not only JGPSSI*1, the most widely used format in the industry, but also JAMP*2 and AIS*3 as well.

● Configuration of COSMOS-R/R



Second, it can be utilized to build a database on chemical substances used in articles to be processed internally. This database is useful to calculate the content of each substance in each article. In this way, the efficient management of chemical substances in internally-processed articles is possible.

Third, the system enables the classification of articles to be handled into three groups: "overall structural units", "intermediate units" and "packaging materials". As a result, the management of chemical substances by article configuration is possible. The article configurations (including the shipping unit of packaging materials and maintenance parts) supported by the system include those covered in REACH regulation.

Finally, it allows the integrated management of all types of information required by REACH regulation, such as "inquiries into business partners," "evaluation in the designing phase," "information management in the production phase" and "shipment information (of whether notification is necessary or not)."

We are also considering supporting JAMP-GP*4, an information distribution platform across different supply chains.

The OKI Group will further improve its conformity with relevant regulations to control chemical substances through its global business activities, and continue to create products meeting customer needs.

*1 JGPSSI: Japan Green Procurement Survey Standardization Initiative

*2 JAMP: Joint Article Management Promotion-consortium

*3 AIS (Article Information Sheet): an information communication sheet created by JAMP to be used for disclosing information on chemical substances contained in molded articles

*4 JAMP-GP: a global portal that can process requests from different companies for information exchanges in an integrated way

Voice Kazukiyo Haga



Kazukiyo Haga

Engineering Department
Business Support Center

While supporting designing and manufacturing departments, Business Support Center has also been involved in environmental measures such as the establishment and implementation of the chemical substance management system to meet the requirements of RoHS directive and REACH regulation. Such environment-related regulations have recently become increasingly demanding and strict. It is particularly important for us to promptly respond to REACH regulation since the number of substances subject thereto is larger than that of RoHS directive. COSMOS-R/R is a system to manage information on chemical substances focusing on meeting REACH requirements. Since the system was designed to be implemented across the entire OKI group, we took into consideration different operational conditions at different group companies during the development process. We also placed an importance on efficient operational management as well as conformity with industry trends and regulatory requirements. As a result, the new system is much more flexible and scalable than ever.

Column

REACH-compliant SVHC Analysis Service

OKI Engineering has launched an analysis service on 15 substances of very high concern (SVHC) designated by REACH, utilizing its accumulated technologies to analyze electronic components. The service uses cutting-edge analysis techniques (such as GC/MS technique with SVHC solvent extraction and ICP/MS technique with microwave dissolution), different preprocessing technologies, and the

latest analytical instruments. The service offers customers not only simple data obtained from analyses but also important factors involved and possible solutions to their problems. We will continue to help our customers manage chemical substances by providing highly-reliable data.