

Mar. 27, 2024

Dear Suppliers

FDK Corporation

**Request to Our Suppliers : Reporting Scope of PFAS (Organofluorine compounds)**

Thank you for your ongoing support for FDK Group Green procurement activities.

We would like to respond to the recent PFAS regulation with appropriate information in order to properly assess the impact on FDK Group (hereafter called “our company”) products and to ensure a replacement period for our suppliers.

PFAS is a generic name for chemical substances containing atoms of carbon and fluorine. PFAS has many characteristics such as chemical resistance, flame resistance, and impervious to electricity, and is used in various aspects of daily life and industry.

As you know, there are many types of PFAS, and each type has different properties. The scope of substances covered by each law varies, and according to the U.S. Environmental Protection Agency, there are approximately 12,000 different PFAS.

There is a concern that the PFAS listed in the list of chemical substances to be controlled by chemSHERPA, the Common Scheme for the Communication of Chemical Substance Information, is not enough information.

Therefore, we would like to indicate the scope of PFAS that we would like our business partners to report to us.

We would appreciate your cooperation in taking the following actions.

Sincerely

## Details

1. Reporting scope of “FDK Group Specified Chemical Substances List” Table 2 Reportable Substances No.203 “Per - and polyfluoroalkyl substances”

Please survey and report based on the latest versions of the following substance lists, PFAS definitions, and information tools.

Scope of Survey ① : list of chemical substances to be controlled by chemSHERPA

<https://chemsherpa.net/tool#declarable>

Scope of Survey ② : OECD (Organization for Economic Co-operation and Development)

Substances falling under the following PFAS definitions.

PFASs are defined as fluorinated substances that contain at least one fully fluorinated methyl or methylene carbon atom (without any H/Cl/Br/I atom attached to it), i.e. with a few noted exceptions, any chemical with at least a perfluorinated methyl group (–CF<sub>3</sub>) or a perfluorinated methylene group (–CF<sub>2</sub>–) is a PFAS.

<https://www.oecd.org/chemicalsafety/portal-perfluorinated->

[chemicals/terminology-per-and-polyfluoroalkyl-substances.pdf](https://www.oecd.org/chemicalsafety/portal-perfluorinated-chemicals/chemicals/terminology-per-and-polyfluoroalkyl-substances.pdf)

Reference : Comprehensive Global Database of PFASs

<https://www.oecd.org/chemicalsafety/portal-perfluorinated-chemicals/>

Substance list (xlsx) downloadable from "Comprehensive Global Database of PFASs" in "Other publications" in the URL.

Refer to sheet "3\_overview\_with\_CAS"

Scope of Survey ③ : EPA (Environmental Protection Agency)

That structurally contains at least one of the following three sub-structures

[https://www.ecfr.gov/current/title-40/part-705#p-](https://www.ecfr.gov/current/title-40/part-705#p-705.3(Per-%20and%20polyfluoroalkyl%20substances%20or%20PFAS))

[705.3\(Per-%20and%20polyfluoroalkyl%20substances%20or%20PFAS\)](https://www.ecfr.gov/current/title-40/part-705#p-705.3(Per-%20and%20polyfluoroalkyl%20substances%20or%20PFAS))

Sub-structures

- ① R-(CF<sub>2</sub>)-CF(R)R" : where both the CF<sub>2</sub> and CF moieties are saturated carbons.
- ② R-CF<sub>2</sub>OCF<sub>2</sub>-R' : where R and R' can either be F, O, or saturated carbons.
- ③ CF<sub>3</sub>C(CF<sub>3</sub>)R'R" : where R' and R" can either be F or saturated carbons.

Reference : Public List of TSCA PFAS for 8(a)(7) Rule

<https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/tsca-section-8a7-reporting-and-recordkeeping#additional-resources>

Substance list (xlsx) downloadable from "Public List of TSCA PFAS for 8(a)(7) Rule" under "Additional Resources" in the URL.

Refer to sheet "PFAS without CBI ID claims"

Reporting style : chemSHERPA

## 2. supplement and notes on surveys and reports

About Scope of Survey ①

The URL is the website of JAMP (Joint Article Management Promotion-consortium), which operates and manages chemSHERPA.

chemSHERPA is a scheme developed and promoted by the Ministry of Economy, Trade and Industry (METI) to communicate information on chemical substances contained in products. chemSHERPA list of substances to be managed covers major domestic and international laws and regulations and major industry standards. The latest version of the chemSHERPA list can be downloaded from the URL.

Please report in chemSHERPA the relevant substance information.

About Scope of Survey ②

The URL is the website of OECD (Organization for Economic Cooperation and Development). The OECD facilitating the exchange of information on PFAS and providing information to support safer alternative transitions worldwide. The OECD has published a "Reconciling

Terminology of the Universe of Per- and Polyfluoroalkyl Substances: Recommendations and Practical Guidance".

Please report in chemSHERPA the substance information that corresponds to the PFAS definition in the blue box on page 8.

The list of PFASs (xlsx) published by the OECD is shown for reference. It can be downloaded from "Comprehensive Global Database of PFASs" under "Other publications".

Please refer to sheet "3\_overview\_with\_CAS"

\*The reference list was published in 2018 and has not been updated since the PFAS definition changed in 2021. When reporting, please report substances that fall under the PFAS definition.

About Scope of Survey ③

The URL shows the PFAS definition of the PFAS Data Reporting Rule in the U.S. Code of Federal Regulations. The full text of the rule can be found in "[Part 705](#)".

Please report in chemSHERPA the substance information that corresponds to the PFAS definition in the URL.

The list of PFASs (xlsx) published by the EPA (U.S. Environmental Protection Agency) is shown for reference.

Please refer to sheet "PFAS without CBI ID claims".

\* The reference list includes PFASs that are generally identified in the TSCA inventory, but not all substances that fall under the PFAS definitions are listed. Therefore, please report substances that fall under the PFAS definition.

### 3. Examples of Deliverables

PFAS has properties such as durability, stability, water and oil repellency, electrical insulation, and non-adhesiveness. As examples of delivered products, PFAS has been confirmed to be contained in various materials, insulating plates, tubes, ink, and electric wire coatings.

We request that our suppliers pay particular attention to the above parts and investigate and report on them.

**[For inquiries regarding this matter, please contact]**

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