

Environmental compliance requirements for suppliers

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1 General requirements

1.1 Marel Environmental Policy

As Marel is a producer of food processing equipment, product safety is deemed of utmost importance and referred to [Marel's supplier code of conduct](#) (Environmental compliance requirements for suppliers). Additionally, Marel's ambition is to be in line with all legally binding regulations and to constantly improve their commitment to the environment. Marel follows the IEC 63 000 guidance for evaluation of products with respect to the restriction of hazardous substances.

Marel is committed to becoming net zero by 2040. Marel's medium-term sustainability program launched in 2022 complements Marel's long-term climate ambitions as we set a science-based target in 2022 in line with the Paris Agreement.

1.2 Purpose of Document

This document aims to outline the specifications for suppliers required by Marel to ensure compliance of products and activities to environmental regulations. The information described in this document is aimed to help our suppliers answer our requirements but does not supersede laws and regulations. In any case, suppliers must refer to official laws, directives, regulations and other standards applicable to their products and activities. This document does not create any legal rights for any customer, business partner, competitor, shareholder or any other third party. Texts of respective directives and regulations are available on the EUR-LEX portal.

In the rare circumstances where it appears that this document is in conflict with local law, contact the Compliance Officer: compliance.officer@marel.com for guidance. In case of conflict between this specification and any Marel part drawing requirement, suppliers shall immediately notify their Marel procurement representative. Any deviation from the requirements of this specification must have prior written approval by Marel's procurement representative.

1.3 Application

This specification applies to all suppliers of materials, parts, components, assemblies, and products supplied for Marel brand products. Compliance with the requirements in this specification alone may not satisfy the supplier's responsibilities to Marel since this specification does not necessarily encompass all applicable environmental requirements for materials, parts, components, assemblies, and products. Therefore, the supplier must comply with all environmental compliance regulation applicable to its location and activity. Therefore, all suppliers are expected to use only materials, which, in addition to the contractual requirements, are compliant to all demands of applicable European environmental laws, in particular, those concerning hazardous substances and all applicable valid technical standards.

It is important to note, that in addition to Marel's environmental compliance requirements for suppliers, Marel maintains environmental and other related requirements via other specifications, contracts or procurement documents.

This environmental compliance requirements document also applies to spare parts. This document is not applicable for materials, parts, components, assemblies and products, including spare parts for repair, or reuse, put on the market before the applicability date defined by respective regulations.

1.4 Documentation from suppliers

Marel requires suppliers to provide declarations confirming that all materials, parts, components, assemblies and products meet the requirements of Marel's environmental compliance requirements for suppliers. The supplier provides Marel with evidence of compliance, any available document about environmental performances of the product and manufacturing process. In addition, Marel also requires suppliers to disclose information about the content of certain substances in their products. The respective compliance evidence must be sent to Marel before mass production.

Depending on your category of supply, the relevant compliance documentation must be sent via email with the relevant Marel purchaser in copy. In case of use of an exemption, it must be clearly identified. Additionally, an authorized person must sign the Marel environmental supplier declaration form.

Examples of requested documentation

- Signed general Marel environmental supplier declaration form
- Full Material Declaration (FMD)
- Test reports
- Further compliance evidence

Please note that Marel will not be able to purchase your articles without requested documentation. The proof of compliance and respective documentation must be transmitted to Marel within 14 calendardays upon request.

Specifically for subassemblies, complex accessories and third party equipment, we expect to receive the following documentation:

- Signed general Marel Environmental Supplier declaration form
- An Excel bill of material, identifying high risk components and third party analysis references

1.5 Scope of environmental requirements

#	Subject	Concerned regulation	Marel document to be filled by the supplier
1	REACH	EU REACH Regulation 1907/2006, as amended	Marel Environmental Supplier declaration form Full Material Declaration
2	RoHS	EU Directive 2011/65, as amended	Marel Environmental Supplier declaration form Full Material Declaration

2 Environmental compliance requirements

2.1 Regulation (EC) No. 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), as amended.

2.1.1 Article 33 obligation

Substances that may have serious and often irreversible effects on human health and the environment are identified as Substances of Very High Concern (SVHCs). According to Article 33, producers, importers and other suppliers are obliged to provide sufficient information if articles contain SVHCs in a concentration above 0.1% weight by weight (w/w), and include safe use instruction related to these articles if necessary.

To comply with the Article 33 EU REACH Regulation, Marel requires all suppliers to identify if any of SVHC is present in an Article (within the meaning of REACH) at or above the 0.1% weight by weight (w/w) concentration. Additionally, the name of the SVHC and its CAS number is to be reported in form of FMD or Marel Environmental supplier declaration form.

The latest candidate list of SVHCs for authorization can be found under the following link: <https://echa.europa.eu/web/guest/candidate-list-table>. This list is updated twice a year. We require suppliers to update the information in case any new SVHC is present in the supplied products as soon as possible, at the latest within 2 months after modification of the SVHC list. The EU also provides guidance documents, e.g. guidance on requirements for substances in articles available on ECHA website: https://echa.europa.eu/documents/10162/2324906/articles_en.pdf.

SCIP - Database for information on Substances of Concern In Products. *SCIP legal obligation established under the Waste Framework Directive, 2008/98/EC targets at making recycling of products safer and improve information regarding dangerous chemical content. SCIP notification applies to any EU supplier of an article as such or in a complex object containing substances of very high concern (SVHC) above 0.1% w/w, irrespectively of the position of that supplier in the supply chain.*

The following paragraph applies only for article producers who are subject to authorization and restriction requirements:

2.1.2 Article 56, Substance for Authorization, Annex XIV

The authorization process aims to ensure that Substances of Very High Concern (SVHCs) are progressively replaced by less dangerous substances or technologies where technically and economically feasible alternatives are available. The substances of REACH Appendix XIV must not be used within the European market without authorization after the so called 'sunset date'. The latest Authorization List can be found under the following link: <https://echa.europa.eu/authorisation-list>.

2.1.3 Article 67, Restricted Substances, Annex XVII

Restrictions on substances, mixtures and/or articles are used when the risks to environmental and human health are unacceptable. According to Annex XVII, the use of selected substances for a certain applications with a specific threshold is defined. The latest List of Restricted Substances can be found under the following link: <https://echa.europa.eu/substances-restricted-under-reach>.

2.2 Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the Restriction of the use of certain Hazardous Substances in electrical and electronic equipment (RoHS), as amended.

2.2.1 Substance restriction

For the purpose of environment and human health protection, according to Annex II of RoHS Directive 2011/65/EU our electrical or electronic equipment, products, sub-assemblies or components and the products of our suppliers respectively, have to meet the following substance restrictions:

Substance	Maximum concentration value in the homogeneous material	
	% by weight	ppm by weight
Lead (Pb) and its compounds	0.1	1000
Mercury (Hg) and its compounds	0.1	1000
Cadmium (Cd) and its compounds	0.01	100
Hexavalent chromium (CrVI+) and its compounds	0.1	1000
Polybrominated Biphenyl (PBB)	0.1	1000
Polybrominated diphenyl ether (PBDE)	0.1	1000
Di (2-ethylhexyl) phthalate (DEHP)	0.1	1000
Butyl benzyl phthalate (BBP)	0.1	1000
Dibutyl phthalate (DBP)	0.1	1000
Isobutyl phthalate (DIBP)	0.1	1000

If any of the RoHS restricted substances are present above the limit or any exemptions are applied, Marel must be informed. The latest RoHS substance list can be found under the following link: <https://www.echa.europa.eu/restricted-subs-referred-art-4-rohs>

Certain substances listed in RoHS are already restricted by other regulations at concentration levels that are more stringent than those associated with RoHS conformity. In such cases, it has to be ensured by the supplier, that all legal requirements regarding the concerned substances are met.

2.3 Participation in Lifecycle analysis

Marel's aim is to measure the environmental impact of its products upon its whole life cycle, including its manufacturing process. The supplier is expected to participate in these evaluations by transmitting information,

upon request, related to environmental management (e.g. energy consumption, greenhouse gas emission, water consumption, quantity of waste) in the English language.

3 Product update and supplier evaluation

3.1 Material, part, component, assembly, product change

Marel requires suppliers to submit part change notification in case of any material, part, component, assembly or product material change and submit a revised general Marel environmental supplier declaration form, and/or Full Material Declaration, and/ or other compliance evidence accordingly. Where applicable, Marel furthermore requires the supplier to submit a revised general Marel environmental supplier declaration form, and/or Full Material Declaration, and/or other compliance evidence if one or more used substances become restricted in the legislation this document refers to.

3.2 Verification & Audits

To ensure Marel complies with all applicable regulations, Marel reserves the right to inspect its suppliers regarding environmental compliance, based on documentation verification and on-site audit. Marel furthermore reserves the right to request samples on component level for third party testing or substance screening.

At Marel's request, the supplier must furthermore be able to provide an Excel bill of material identifying high-risk components, including third party analysis reference, technical documentation or analytical test reports.

4 Document Administration

4.1 Document updates

Marel will keep suppliers informed of any changes to the scope of this document. However, updates to the respective mentioned legislation are not considered as change in this document, therefore suppliers themselves are responsible for keeping up to date with the latest legislations. Suppliers must always proactively and immediately inform Marel in case of any updates and concerns about product safety and/or compliance. This document evolves with existing laws and regulations. The latest version is available on Marel's website at the following address: <http://www.marel.com>

4.2 Managing entity and key contacts

Managing department: Procurement

Marel compliance Officer: Arni Sigurjonsson Tel.: E: compliance.officer@marel.com

Marel Alternate Compliance Officer: Halla Björgvinsdóttir Tel.: E: compliance.officer@marel.com

Marel Chief Procurement Officer: Michiel Hekkens E: Michiel.hekkens@marel.com

Appendix I: Definitions

4.3 Definitions

Article	In reference to EU REACH Regulation, an article is defined as an object, which during production is given a special shape, surface or design, which determines its function to a greater degree than does its chemical composition.
Assemblies	Assemblies can be defined as a combination of parts and/or components assembled by the supplier and sold to Marel for use or re-sale in a final product, or as a final product.
Components	Components can be defined as a smaller, self-contained parts of a larger entity such as manufactured object, that is part of a larger device, supplied and sold to Marel for manufacturing or re-sale.
Deliverable(s)	Deliverable(s) means any tangible item delivered to Marel in accordance with purchase conditions and/ or any other agreements with Marel. Deliverables include, but are not limited to, materials, parts, components, assemblies and products.
Dependent	For the purposes of definition of EEE, and in reference to EU RoHS Directive, 'dependent ' means, with regard to EEE, needing electric currents or electromagnetic fields to fulfil at least one intended function.
EEE	In reference to EU RoHS Directive, an Electrical and Electronic Equipment (EEE) is defined as an equipment which is dependent on electric currents or electromagnetic fields in order to work properly and equipment for the generation, transfer and measurement of such currents and fields and designed for use with a voltage rating not exceeding 1 000 volts for alternating current and 1 500 volts for direct current.
Exemption	An exemption can be defined as an application of a specific restricted substance above the threshold that is permitted by the respective law.
Homogeneous material	In reference to EU RoHS Directive, a homogeneous material means one material of uniform composition throughout or a material, consisting of a combination of materials, that cannot be disjointed or separated into different materials by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes.
Intentionally added	Intentionally added can be defined as a substance that is deliberately utilized in the production of a material or part.
Materials	Materials can be defined as chemical substances and preparations that are supplied for the production of parts, components and products (e.g. structural plastics, metals, coatings, paints, adhesives, ..).
Not-intentionally added	Not-intentionally added can be defined as a substance that is not deliberately utilized in the production of a material or part.
Parts	Parts can be defined as raw material, chemical, packaging or individual components or other object supplied and sold to Marel for manufacturing or re-sale.
Products	Products can be defined as stand alone, final assemblies that Marel sells its own brand including complete machines supplied by an original equipment manufacturer (OEM) to Marel for sale under a Marel brand.

REACH	REACH is an acronym for the European Commission Regulation Number 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals, as amended.
RoHS	RoHS is an acronym for the European Parliament and of the Council Directive 2011/65/EU concerning Restriction of the use of certain Hazardous Substances in electrical and electronic equipment
Spare parts	In reference to EU RoHS Directive, a spare part is defined as a separate part of an EEE that can replace a part of an EEE. The EEE cannot function as intended without that part of the EEE. The functionality of EEE is restored or is upgraded when the part is replaced by a spare part.
Substance	In reference to EU REACH Regulation, a substance means a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.
SVHC	Substance of Very High Concern (SVHC) is defined by EU REACH Regulation. The SVHC concentration above 0.1% weight by weight applies to each constituent article, therefore when a product is made up of more than one constituent article, this concentration limit must apply to each individual article making up the product.
Threshold	Threshold can be defined as concentration level which defines the limit equal or to above which the presence of a substance must be reported according to respective law.

Appendix II: References

External documents

- European Union Directive 2011/65/EU on the restriction of the use of Certain Hazardous Substances in Electrical and Electronic Equipment (RoHS), as amended.
- IEC 63 000:2022 - Technical documentation for the assessment of electrical and electronic products with respect to the restriction of hazardous substances
- Module (A) - Decision No 768/2008/EC of the European Parliament and of the Council of 9 July 2008 on a common framework for the marketing of products, and repealing Council Decision 93/465/EEC, as amended.
- EU Regulation 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), as amended.

Note that these laws, are subject to regular revisions which often results in newly restricted substances being added into the scope of regulation. It is the supplier's responsibility to monitor such revisions and inform Marel immediately if any material, part, component, assembly, product no longer meets the revised regulatory requirements.