



CEAT MANAGEMENT SYSTEM

Process Title: CEAT Substance of Concern (SOC)
Management System

Document No:
CMS/R&D-MD/D/56/07
Original Issue Date: 13.01.2020
Revision No:07
Revision date: 11.04.2023
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1) Objective:

To identify substances whose use in products & packaging, in the interest of personal safety and environmental protection, are either restricted, regulated or prohibited. These restrictions are based on existing legislation, customer specific requirements, or self-imposed requirements.

2) Scope:

This guideline covers direct raw materials, indirect raw materials, packaging and any other materials which can become part of a product going to customer directly or indirectly. Here product means Tyre, Tube, Flap or any combination of these manufactured or outsourced by CEAT Ltd.

3) Abbreviation:

- 3.1) CAS: Chemical Abstract Services
- 3.2) SOC: Substance of concern
- 3.3) REACH: Registration, Evaluation, Authorization and Restriction of Chemicals
- 3.4) ELV: End of Life Vehicles
- 3.5) GADSL: Global Automotive Declarable Substance List
- 3.6) IMDS: International Material Data System
- 3.7) SVHC: Substance of very high concern
- 3.8) RoHS: Restriction of Hazardous Substances
- 3.9) PAH: Polycyclic aromatic hydrocarbons
- 3.10) 3TG: Tantalum, Tin, Tungsten & Gold
- 3.11) CSR: Customer specific requirement
- 3.12) CMRT: Conflict Minerals Reporting Template
- 3.13) CRT: Cobalt Reporting Templet
- 3.14) Material Safety Data Sheet
- 3.15) OEM: Original Equipment Manufacturer
- 3.16) EHS: Environment, Health & Safety
- 3.17) RM: Raw Material
- 3.18) IB: International Business
- 3.19) PDM: Product Development Manager
- 3.20) PFOA: Perfluorooctanoic acid

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4) Definition:

4.1) CAS: A CAS Registry Number, also referred to as CASRN or CAS Number, is a unique numerical identifier assigned by the Chemical Abstracts Service to every chemical substance described in the open scientific literature, including organic and inorganic compounds, minerals, isotopes, alloys and non-structural materials.

4.2) SOC: Substances of Concern (SoC) are the active substance, which can pose a potential risk for humans and the environment. It can be defined by existing legislation, customer specific requirements, or self-imposed requirements.

4.3) REACH: Registration, Evaluation, Authorization and Restriction of Chemicals is a European Union regulation dating from 18 December 2006. REACH addresses the production and use of chemical substances, and their potential impacts on both human health and the environment (website: <https://echa.europa.eu/regulations/reach/understanding-reach>).

4.4) GADSL: Global Automotive Declarable Substance List (website: <http://www.gadsl.org/>). Substances are designated "Declarable" (D) when present in a part in a product and are legally regulated, projected to be regulated or required to be tracked for information gathering purpose. Any SOC in homogeneous part or product need not to be reported if used in less than specified limit by regulation. Thresholds for heavy metals are to be calculated on the basis of the elemental form of metal.

4.5) ELV: The End of Life Vehicles Directive is a Directive of the European Union, addressing the end of life for automotive products. Every year, motor vehicles which have reached the end of their useful lives create between 8 and 9 million tonnes of waste in the European Union. In 1997, the European Commission adopted a Proposal for a Directive to tackle this problem (website: https://environment.ec.europa.eu/topics/waste-and-recycling/end-life-vehicles_en).

4.6) IMDS: The International Material Data System (IMDS) is a global data repository that contains information on materials used by the automotive industry. Several leading auto manufacturers use the IMDS to maintain data for various reporting requirements. International Material Data System (website: <http://www.mdssystem.com>).

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4.7) SVHC: A substance of very high concern (SVHC) is a chemical substance (or part of a group of chemical substances) for which it has been proposed that the use within the European Union be subject to authorization under the REACH regulation (website: <https://echa.europa.eu/candidate-list-table>).

4.8) RoHS: The Restriction of Hazardous Substances Directive 2002/95/EC, short for Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment, was adopted in February 2003 by the European Union (website: <https://www.rohsguide.com/rohs3.htm>).

4.9) PAH: Polycyclic aromatic hydrocarbons (PAHs, also polyaromatic hydrocarbons or polynuclear aromatic hydrocarbons are hydrocarbons or organic compounds containing only carbon and hydrogen that are composed of multiple aromatic rings (organic rings in which the electrons are delocalized). (website: <http://www.epa.gov>).

4.10) 3TG: "Conflict minerals," as defined by the US legislation, currently include the metals tantalum, tin, tungsten and gold, which are the derivatives of the minerals cassiterite, columbite-tantalite and wolframite, respectively (website: <http://www.responsiblemineralsinitiative.org/>). Downstream companies often refer to the derivatives of these minerals as 3TG, determined by the Secretary of State to be financing conflict in the Democratic Republic of Congo or an adjoining country. Need declaration in CMRT format by the concern supplier.

4.11) PROP 65: Proposition 65 requires businesses to provide warnings to Californians about significant exposures to chemicals that cause cancer, birth defects or other reproductive harm. ... Proposition 65 became law in November 1986, when California voters approved it by a 63-37 percent margin (<https://www.oehha.ca.gov/proposition-65/about-proposition-65>).

4.12) Auxiliary materials: Materials which are utilized for tyre and tube logistics & fitment like O-ring, Valve, Separator, Flap protector (metal, plastic, fabric), Paints, Lubes, Stickers etc.

4.13) CSR: Customer specific requirements like PFOA, POP compliance declaration, Asbestos free declaration, SCCS, HCSMS declaration etc. (Annexure-IV). need to update the customer as per the frequency described by individual customers.

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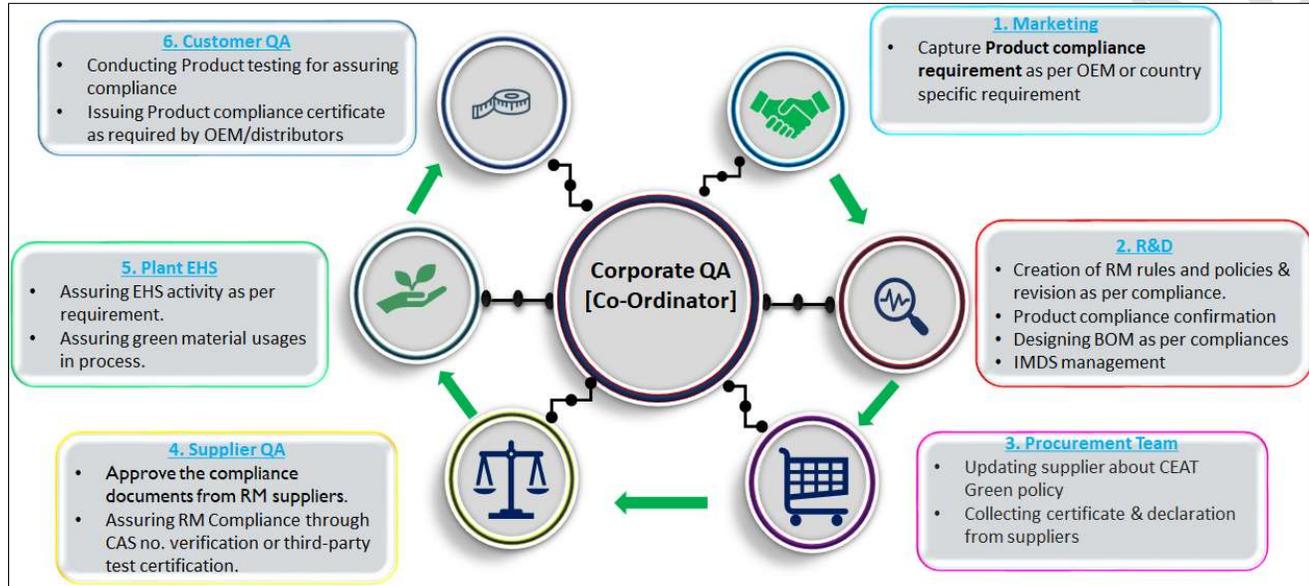
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5) SOC Management Work-flow Diagram:

Supplier Quality Assurance Dept. Head will be act as Head for SOC and all plant Lab in charges will be respective plant SOC in charges.



6) Roles & Responsibilities:

6.1) Marketing:

- 6.1.1) Primary customer contact point.
- 6.1.2) Gather compliance requirements from customer & communicate to R&D PDM & CQA through Product compliance sheet.
- 6.1.3) Submission product compliance report on time to customer as per requirement.

Documents to be maintained: Customer specific requirement on SOC. Country specific homologation requirements.

6.2) R&D (PDM, Compounding, RM Development):

- 6.2.1) Raw material rules and policies creation & revision as per compliance.
- 6.2.2) Designing BOM as per compliances.
- 6.2.3) Provide input in IMDS as per requirement.
- 6.2.4) Training on SOC materials.

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6.2.5) Product compliance feasibility sign-off for NPD / OEM / IB [Product compliance sheet] and communication - PDM.

Documents to be maintained: SOC management rules, Status update in IMDS, Data of each regulations update (SVHC, pAH, RoHS,3tg etc), CAS Number data of all RM.

6.3) Procurement:

6.3.1) Update suppliers about CEAT SOC requirement.

6.3.2) Collection of CAS number of all raw material components from the suppliers (Annexure-I).

6.3.3) Collection of test certificate/ Declaration from suppliers as per prescribed frequency.

Documents to be maintained: MSDS of all raw materials, SOC declaration

6.4) Supplier QA:

6.4.1) Assuring Raw materials compliance including Direct, Indirect or Auxiliary materials through periodic supplier declaration (Annexure-II), third-party test certification as per the requirement (Annexure-III) or confirmation provided by R&D (QA head will provide approval on the document prepared & filled by the material development engineer from R&D).

6.4.2) Cross check Raw material compliance with GADSL guideline (as applicable).

Documents to be maintained: SOC declaration/ test report of all Raw materials, SOC compliance report of Tyre. MSDS of all raw materials.

6.5) Plant EHS:

6.5.1) Assuring EHS activity as per ISO / IATF or other CSR required guideline.

6.5.2) Plant EHS certification and compliances incorporating SOC policies for all processes and plant usage.

Documents to be maintained: MSDS of all raw materials, RM storage and safety regulations.

6.6) Customer QA:

6.6.1) Conducting Product testing for assuring compliance as per required product compliance & CSR as per R&D test plan.

6.6.2) Issuing Product compliance certificate as required by OEM/distributors.

Documents to be maintained: Product compliance declaration as per customer requirements.

7) Control & Compliance Activities:

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7.1) CAS number disclosure: Required duly filled format (Annexure-I) one time for each raw material from all the suppliers. Supplier needs to provide composition percentage of major components either in exact figure or in range. If supplier not willing to disclose CAS number of any proprietary minor component, then he/she need to mention as “proprietary” and submit declaration of their conformance status.

7.2) SOC compliance declaration by supplier: Required compliance declaration either on-line (in vendor portal) or off-line for SVHC, RoHS, PAH, 3TG & CSR as and when the regulation revised and CEAT notified for submission. If suppliers not updating this document within 3 months from the declaration start date, then it will be treated as non-conforming material.

7.3) SOC test certificate by supplier: Required as per frequency defined in Annexure – III.

Additionally, test certificate to be furnished under the following circumstances:

7.3.1) New regulation added on CAS no. in the material supplied.

7.3.2) Any change in process, production line, catalysts, material composition or change of source.

7.4) Product testing by CQA: Product testing should be conducted as per customer specific requirement / guidelines or during development / change of any design (recipe) related to intentional usage of SOC enlisted materials.

8) Training:

8.1) General requirements: Training requirements contained in this section shall apply to employees with responsibility for substance of concern (SOC) management work practices. Such employees shall be trained in SOC-related management work practices and requirements, as necessary, to ensure products supplied to and/or manufactured by CEAT and intended for use in CEAT products comply with this standard. The training required by this section shall be classroom or on-the-job type or a combination of the two.

8.2) Basic training elements: The basic training elements employees are trained in include the following:

8.2.1) The requirements and responsibilities outlined in this standard.

8.2.2) SOC requirement of GADSL and customers.

8.2.3) Basic IMDS concepts and application training for individuals responsible for coordinating supplier IMDS requests, receiving and validating IMDS submissions, and coordinating customer IMDS submissions.

9) Non-conformance:

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Any material / supplier not conforming to above guideline will not be eligible for regular supply, unless deviation is approved by the respective customer and authorized by the departmental heads of Procurement, QA and R&D based on business case [like single source, proprietary materials etc.]. Also need to inform respective customers about non-compliance on any substance(s) (as applicable) found during periodic investigation / testing. Supplier needs to submit CAPA in case of intentional / non-intentional supply of non-SOC compliance materials. Non-conformance materials can be sent back to the supplier or can be disposed of as per the guideline provided by the material manufacturer (mentioned in respective MSDS) or by following Hazardous work management SOP.

10) Revision History:

Rev no	Date	Revision details
01	03.03.2020	Updated for packing and indirect materials.
02	29.05.2020	Inclusion CSR & revision of Annexure documents
03	17.12.2020	Addition of new chemicals as per QCO issued by Govt. of India
04	10.02.2021	Revision in Annex-III (CRT & Indirect RM exceptions)
05	08.10.2021	Inclusion - Inform to customer on non-compliances
06	14.11.2022	Revision of Annex-III (Exception of carbon black & earthen RM)
07	11.04.2023	Revision as per customer SOC audit

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CEAT RAW MATERIAL CAS NUMBER DECLARATION SHEET

(Annexure-I)

(To be filled by the Material Supplier / Manufacturer)

Rev No: and Date: 01 / 15.04.23

Date of declaration:	
Material:	
Grade name:	
CEAT RM Code:	
Name of Supplier / Manufacturer:	
Basis of compliance declaration	
Material CAS number (mentioned in MSDS)	
Is material uploaded in IMDS	

Material composition (Chemical substances used intentionally during manufacturing process / generated unintentionally during manufacturing process)				Compliance Status as on date of declaration						GADSL Status
Material component No.	Chemical name	Component CAS No.	Percentage contribution to the material (%)	SVHC (Annex-XIV & XVII)	RoHS-3 (Directive 2015/863/EU)	PAH	CMRT (3TG) / CRT	PROP 65	CSR (Annex-IV)	
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										

Note:

- Supplier need to declare all kind of packaging materials.
- Supplier need to submit test report as evidence on compliances as per applicability / requirements.
- GADS status declaration compulsory for proprietary chemicals / components
- Link for the relevant regulations given below

SVHC	(website: https://echa.europa.eu/candidate-list-table)
RoHS	(website: https://www.rohsguide.com/rohs3.htm).
PAH	(website: http://www.epa.gov)
PROP65	https://www.oehha.ca.gov/proposition-65/about-proposition-65
CSR(Annex IV)	

Place:

Company Seal

Name

Designation

(Sign.)

Date:

List of relevant websites:

- SVHC: <http://www.echa.europa.eu/candidate-list-table/>
 RoHS: <http://www.rohsguide.com/>
 PAH: <http://www.epa.gov/>
 PROP 65: www.oehha.ca.gov/proposition-65/about-proposition-65/

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GADSL: <http://www.gadsl.org/>

IMDS: <http://www.mdssystem.com/>

PFOA: <http://www.pic.int/>

CEAT CONFIDENTIAL

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RAW MATERIAL SOC COMPLIANCE TEST FREQUENCY GUIDELINE (Annexure - III)

Sl. No.	Raw Materials Category	Test Certificate Frequency				Exceptions
		SVHC	PAH	RoHS	CMRT (3TG) / CRT	
1	Natural rubber	NA	NA	NA	NA	-
2	Synthetic rubber (Dry)	3 yrs	NA	NA	NA	-
3	Synthetic rubber (Oil extended)	3 yrs	5 yrs	NA	NA	R1712, R1721
4	Reclaim / Crumb rubber	3 yrs	5 yrs	5 yrs	NA	-
5	Carbon black	3 yrs	NA	NA	NA	-
6	Silica	3 yrs	NA	5 yrs	NA	-
7	Silane (all types)	3 yrs	5 yrs	5 yrs	NA	-
8	Clay / Non black filler	NA	NA	NA	NA	-
9	Pigments	3 yrs	5 yrs	5 yrs	NA	-
10	Process Oil	3 yrs	5 yrs	NA	NA	R547
11	Resin (all types)	3 yrs	5 yrs	5 yrs	NA	Natural Wood rosin
12	Wax	3 yrs	5 yrs	NA	NA	-
13	ZnO and other metal oxides	3 yrs	NA	5 yrs	NA	R228, R272
14	Stearic acid and other fatty acids	3 yrs	5 yrs	NA	NA	-
15	Rubber chemicals (Antioxidants, Accelerators & Process aids)	3 yrs	5 yrs	5 yrs	NA	-
16	Cobalt adhesion promoters	3 yrs	5 yrs	5 yrs	1 yr (CRT)	-
17	Sulphur	3 yrs	5 yrs	NA	NA	-
18	Fabric (PET/Nylon/Rayon/Aramid dipped cord)	3 yrs	NA	NA	NA	-
19	Steel cord	3 yrs	NA	5 yrs	1 yr (CMRT)	-
20	Bead Wire	3 yrs	NA	5 yrs	1 yr (CMRT)	-
21	Indirect materials	5 yrs	5 yrs	5 yrs	NA	Liners, Semi-embossed film

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LIST OF COMPLIANCES AS PER CUSTOMER SPECIFIC REQUIREMENT (CSR) (Annexure - IV)

A) STOCKHOLM & ROTTERDAM CONVENTION		
Sl. No.	Category of Chemicals	CAS Number
1	Perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds (list is not exhaustive)	335-67-1*
		3825-26-1*
		335-95-5
		2395-00-8
		335-93-3
		335-66-0
		376-27-2
2	Perfluorooctane sulfonic acid, perfluorooctane sulfonates, perfluorooctane sulfonamides and perfluorooctane sulfonyls	3108-24-5
		1691-99-2
		1763-23-1
		24448-09-7
		251099-16-8
		2795-39-3
		29081-56-9
		29457-72-5
		307-35-7
		31506-32-8
		4151-50-2
		56773-42-3
		70225-14-8
3	Polybrominated Biphenyls (PBBs)	13654-09-6
4	Polychlorinated Biphenyls (PCBs)	27858-07-7
5	Polychlorinated Terphenyls (PCTs)	1336-36-3
6	Tetraethyl lead	61788-33-8
7	Tetramethyl lead	78-00-2*
8	Tributyltin compounds	75-74-1
		1461-22-9
		1983-10-4
		2155-70-6
		24124-25-2
		4342-36-3
9	Tris(2,3 dibromopropyl)phosphate	56-35-9*
		85409-17-2
10	Asbestos (Actinolite, Anthophyllite, Amosite, Crocidolite, Tremolite, *Chrysotile)	126-72-7
		77536-66-4
		77536-67-5
		12172-73-5
		12001-28-4
11	Dechlorane Plus	77536-68-6
		12001-29-5
		13560-89-9

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B)	POP (Persistent Organic Pollutants)	
1	Chlordecone	143-50-0
2	Hexabromobiphenyl	36355-01-8
3 & 4	Hexabromodiphenyl ether (Hexa BDE) and 4. Heptabromodiphenyl ether	
	I) 2,2',4,4',5,5'-hexabromodiphenyl ether	68631-49-2
	II) 2,2',4,4',5,6'-hexabromodiphenyl ether	207122-15-4
	III) 2,2',3,3',4,5',6-heptabromodiphenyl ether	446255-22-7
	IV) 2,2',3,4,4',5',6-heptabromodiphenyl ether	207122-16-5
5 & 6	Tetrabromodiphenyl ether and 6. Pentabromodiphenyl ether (commercial penta-BDE):	
	I) 2,2',4,4'-tetrabromodiphenyl ether	5436-43-1
	II) 2,2',4,4',5-pentabromodiphenyl ether	60348-60-9
7	Pentachlorobenzene	608-93-5
8	Hexabromocyclododecane – HBCDD:	
	I) Hexabromocyclododecane	25637-99-4*
	II) 1,2,5,6,9,10-hexabromocyclododecane	3194-55-6*
	III) alpha- hexabromocyclododecane	134237-50-6*
	IV) beta-hexabromocyclododecane	134237-51-7*
	V) gamma-hexabromocyclododecane	134237-52-8*
9	Hexachlorobutadiene - HCBd	87-68-3
10	C Deca-BDE	1163-19-5*
11	Short-chain chlorinated paraffins (Alkanes, C, chloro)+: straight-chain	
	I) Alkanes, C10-13, chloro; Short-chain chlorinated paraffins (SCCP)	85535-84-8*
	II) Chlorinated n-paraffins (C6-18)	68920-70-7
	III) Alkanes, C12-13, chloro	71011-12-6
	IV) Alkane, C12-14-, Chloro-	85536-22-7
	V) Alkane, C10-14-, Chloro-	85681-73-8
	VI) Chlorinated paraffins (Average chain length, C12; approximately 60	108171-26-2
12	Dechlorane plus	13560-89-9* and its syn-isomer (CAS No. 135821-03-3) and anti-isomer (CAS No. 135821-74-8)
13	Methoxychlor	72-43-5
C)	Quality Control Orders (QCO) by Ministry of Chemicals & Fertilizers, Govt. of India, regulation guideline	
1	Pyridine	110-86-1
2	Gamma Picoline	108-89-4
3	Beta Picoline	108-99-6
4	Morpholine	110-91-8
5	Sodium Sulphide	1313-82-2
6	Potassium Carbonate	584-08-7
7	Acetone	67-64-1
8	Phosphorous Trichloride	2125683
9	Phosphorous Pentachloride	10026-13-8
10	Phosphorous Oxychloride	10025-87-3
11	Hydrogen Peroxide	7722-84-1
12	Precipitated Barium Carbonate	513-77-9
13	Sodium Formaldehyde Sulphoxylate	149-44-0/ 6035-47-8
14	Sodium Tripolyphosphate	7758-29-4

* Included in SVHC list (for information only).

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