

Husqvarna Group

Best Practices for Material Compliance

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Companies are influenced by regulatory requirements, and consumer and media pressure to sell safer or “green” products. Husqvarna must understand the chemical ingredients of the products sold, and the toxicity of these ingredients. Therefore, Husqvarna must perform the due diligence to understand the chemical ingredients in each component that goes into its products.

Although some products and components do not change year over year, the regulations do. For instance, the REACH Candidate List is reviewed and amended twice annually. As regulations evolve and scopes expand, companies must constantly update their compliance data with new substance information. That requires contacting each supplier down the chain and requesting new material disclosures¹ and chemical test report evidence. Some suppliers receive many such requests each year.

When companies have the supplier’s complete substance list for the parts they supply, the companies no longer need to query their supply chains every time a new substance is added to a regulation. Thus, eliminating resource time and effort for both the supplier and the company.

Husqvarna’s preferred means to collect the supplier’s complete substance list in each part, is with a Full Material Declaration (FMD) using the IPC 1752A (Class D) Standard. For more information, see link [IPC 1752A-D guide](#).

Sometimes, when a supplier cannot provide a FMD or cannot provide evidence about substances in the part, and specific substances listed in regulations as Restricted or Banned are known to be at risk to exist in the part, they may be asked to provide a chemical test report to show that these Restricted or Banned substances do not exist in the parts they are supplying to Husqvarna.

Accredited Laboratories according to ISO 17025 perform the accepted test methods to determine whether these Restricted or Banned substances exist or are not detected in the part being tested. If you supply a part to Husqvarna that is an assembly with many components, you can ask the lab to group 4 or 5 similar components (for example, soft rubber or plastic components can be grouped together) to check a first pass for whether the test detects substances in the group. If the substances are not detected in the group, then it is high probability that the substances would not be detected in each individual component. Thus, reducing test costs. However, if banned or restricted substances are detected in the group, then a second round of testing for each individual component will be necessary to identify which specific component contains the detected substances, and whether it is above the allowed maximum amount. Once identified, work with Husqvarna to develop a plan to eliminate this substance.

Here is a list of some accredited laboratories, and there are many more:

- UL
- SGS
- Intertek
- TÜV

¹ Desrosiers, Matthew. “Why Full Material Disclosures Are the Best Way to Collect Data.” Assent Compliance BLOG, n.p., March 30, 2016

<http://corporate.husqvarna.com/purchase/en/restricted-material-list-rml>

Specific information relevant for sourced products/OEM

For a sourced product, either as a finished product or as a system to be included in a finished product, the supplier must provide Husqvarna with sufficient information so that all legal obligations can be fulfilled. Appendix I below gives an example of the level of documentation that must be available to Husqvarna Group. This example is prepared according to EN IEC 63000:2018 where the supplier shall provide a bill of material that is analyzed according to this standard for RML Banned or Restricted substances and RML Reportable substances. The detailed requirements can be found in Husqvarna Group's RML.

Explanation of the example table:

- Bill of material: The technical file is expected to be in this format showing the article relationship. This is crucial information for further reporting obligations to the ECHA waste data base (SCIP).
- Article and supplier identification: Articles must be identified with an article number and article description as well as the article supplier.
- TARIC number or material category.
- Compliance status:
 - It must be clarified in the report that each article fulfills the Husqvarna RML Banned or Restricted substances.
 - The report must contain information on Husqvarna RML Reportable substances. This information is needed to enable Husqvarna Group to inform their customers about the SVHC substances used in their products as well as to provide information to the ECHA waste data base (SCIP). If an article contains an SVHC >0,1 % (w/w), the name of that substance along with CAS-number must be available. In addition, the year/version of the REACH SVHC-list must be available.
 - EU RoHS information must be available as either compliant or compliant with exemptions. If the supplier uses an exemption it must be reported.
- Risk assessment of sub-suppliers: Sub-suppliers must be assessed according to risk to mitigate any risks for non-compliance. A risk conclusion must be available and any further actions to mitigate that risk.
- Chemical analysis/testing: If the supplier have addressed a risk of non-compliance for any sub-supplier delivering an article, a chemical analysis must be performed to validate the content of that article. It is required that testing is performed by an ISO 17025 certified laboratory.

Specific information relevant for sourced batteries – Hazardous substances

Article 74 of the EU Battery Regulation 2023/1542/EU requires information on the presence of hazardous substances. Husqvarna Group has implemented reporting obligations for substances classified as hazardous pursuant to Article 3 of Regulation (EC) No 1272/2008 (CLP regulation) at or above a concentration of 0.1% (w/w). All parts of the battery are in scope (e.g. screws, cells, housing, BMS).

Information needed:

- Substance name
- Substance CAS-no
- Substance concentration
- Harmonized substance classification (according to Article 3 of Regulation (EC) No 1272/2008)
- Location of the hazardous substance in the battery



Appendix I. Example of material compliance technical file according to IEC 63000

SOM level	Article number	Article description	Supplier name	TARIC number or Material category	Banned or Restricted substances				Reportable substances																			Supplier Risk	Chemical Risk Conclusion	Chemical test required	Test report reference	
					Husqvarna RML Banned or Restricted Status	Year/Version of RML	RoHS	RoHS exemption	SVHC/REACH status	SVHC substance	SVHC CAS-no	Year/Version of PFAS REACH	PFAS substance	PFAS CAS-no	Flame Retardants substance	Flame Retardants CAS-no	Critical Raw Materials substance	Critical Raw Materials substance CAS-no	Critical Raw Materials date	Precious metals	Precious metal's CAS-no	Hazardous substances	Hazardous substances CAS-no	TSCA substances	TSCA substances CAS-no	Registry of substances (RoHS) substances	Registry of substances (RoHS) CAS-no					
0	00000000	Walk-Behind Lawn Mower	Assembly		Compliant	2025																										
1	11111111	Warning label	Labels Ltd	XXXXXXXXXXXX	Compliant	2025		Compliant	N/a	Compliant	None	N/a	2025	None	N/a	None	N/a	None	N/a	2020	None	N/a	None	N/a	None	N/a	None	N/a	Low	Supplier risk low. No test needed	No	
1	12222222	Engine Assy	Assembly	XXXXXXXXXXXX										None	N/a	None	N/a	None	N/a	2020	None	N/a	None	N/a	None	N/a	None	N/a				
2	21111111	Cylinder	Cylinders Ltd	XXXXXXXXXXXX	Compliant	2025		Compliant	6(b) Lead as an alloying element in aluminium containing up to 0,4 % lead by weight	Contains	Lead	7439-92-1	2025	None	N/a	None	N/a	None	N/a	2020	None	N/a	None	N/a	None	N/a	None	N/a	Medium	Skin-contact not relevant. No test needed	No	
3	31111111	Spark Plug	Spark Plugs Ltd	XXXXXXXXXXXX	Compliant	2025		Compliant	N/a	Contains	Diboron Trioxide	1303-86-2	2025	None	N/a	None	N/a	None	N/a	2020	Palladium	7440-05-3	None	N/a	None	N/a	None	N/a	Low	Supplier risk low. No test needed	No	
2	22222222	Carburetor	Carburetors Ltd	XXXXXXXXXXXX	Compliant	2025		Compliant	6(c) Copper alloy containing up to 4 % lead by weight	Contains	Lead	7439-92-1	2025	None	N/a	None	N/a	None	N/a	2020	None	N/a	None	N/a	None	N/a	None	N/a	Low	Supplier risk low. No test needed	No	
2	23333333	Lubrication Nipple	Nipples Ltd.	XXXXXXXXXXXX	Compliant	2025		Compliant	6(a) Lead as an alloying element in steel for machining purposes and in galvanized steel containing up to 0,35 % lead by weight	Contains	Lead	7439-92-1	2025	None	N/a	None	N/a	None	N/a	2020	None	N/a	None	N/a	None	N/a	None	N/a	Low	Supplier risk low. No test needed	No	
2	24444444	Screw	Screws Ltd.	XXXXXXXXXXXX	Compliant	2025		Compliant	N/a	Compliant	None	N/a	2025	None	N/a	None	N/a	None	N/a	2020	None	N/a	None	N/a	None	N/a	None	N/a	Low	Supplier risk low. No test needed	No	
1	13333333	Handle bar	Handles Ltd.	XXXXXXXXXXXX	Compliant	2025		Compliant	N/a	Compliant	None	N/a	2025	None	N/a	Triphenyl phosphate (TPP)	115-86-6	None	N/a	2020	None	N/a	None	N/a	None	N/a	None	N/a	Medium	Medium supplier risk. Repeated Skin-contact. Test is needed	Yes	ABC-123