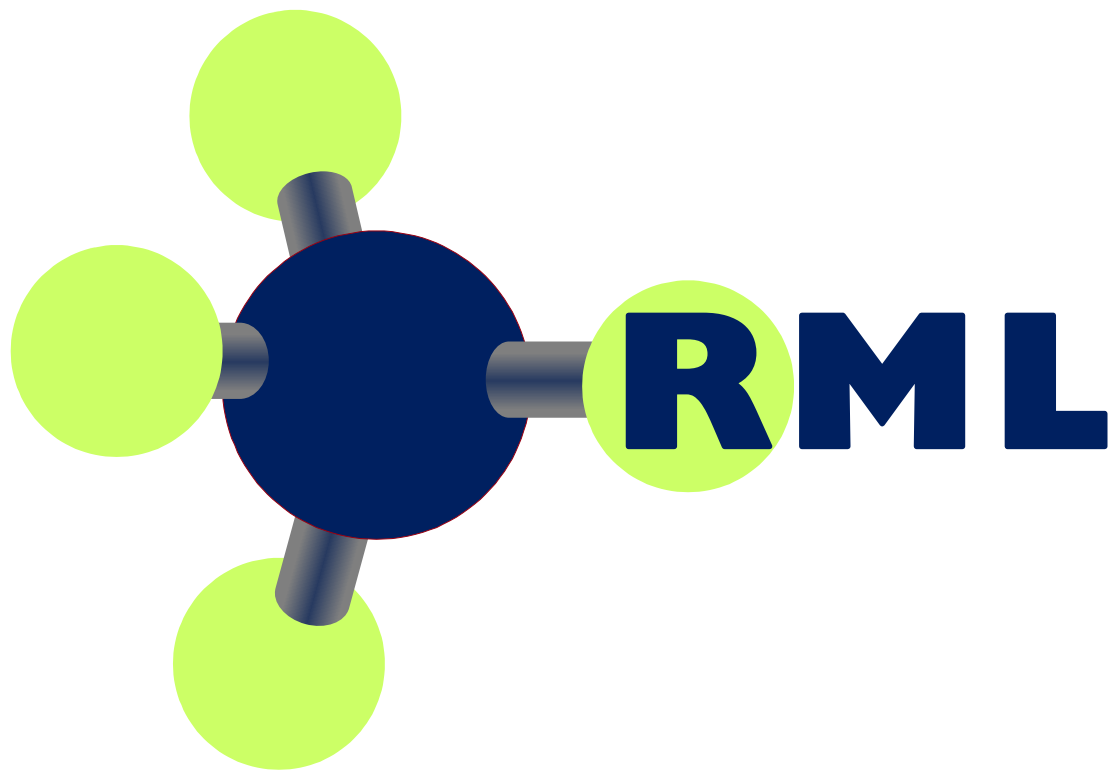


Husqvarna Group

Restricted Material List (RML)

Version 16.0

Authorized April 2025



This document applies to all suppliers who supply to any company within the Husqvarna Group.

The latest edition is available on [Husqvarna Purchase](#).

1 Change log

Table 1. Change log for the document

Change	Implemented
Position on using Lead exemptions is now more strict	March 2025
Changes to table 3: Updated legal reference to reflect EU Packaging Regulation repealing the Packaging Directive	March 2025
Packaging definition updated	March 2025
SVHC definition updated	March 2025
Additions and changes to Table 3: Battery regulation, Ozone depleting substances and Global Warming Substances all have new legal references	April 2024
Additions and changes to Table 2: Definition of a battery, clarification on definition of an article	April 2024
Source Intelligence (formerly known as TPP): Referring to that TPP is now part of Source Intelligence	April 2024
Clarification on Reportable substances requirement	April 2024
Made clarifications to the Reportable Substances	April 2023
5.1 added clarifying no documentation testing	April 2023
Added "France ban on MOAH and MOSH" to Table 3, List of Regulations and Directives	April 2023
Removed "Internal Substance requirements" from the requirements	March 2022
Added Toxic Substances Control Act (TSCA) to Table 3, List of Regulations and Directives	May 2021
Specified demands for Full Material Declarations (paragraph 7.1.3)	May 2021
Clarification on declaration format for Reportable Substances (paragraph 7.2.3)	May 2021
SCIP requirement included in this document (was an attachment to RML 2020)	May 2021
Additional requirement for substances and mixtures included (paragraph 9.6)	May 2021
Minor corrections to grammar and vocabulary used in the document.	February 2020
Added Model Toxics in Packaging Legislation (US) to Table 3, List of Regulations and Directives (paragraph 7.1.5)	February 2020
Updated to refer to the new POPs regulation in Table 3, List of Regulations and Directives (paragraph 7.1.5)	February 2020
A prohibition of oxo-degradable plastics is added (paragraph 8.5)	February 2020
Format Change	January 2019
Separated requirements for Banned or Restricted substances, Reportable substances and Internal substance requirements	January 2019
Moved substance reference tables to separate document	January 2019
Updated reporting information	January 2019
Updated Supplier Process Requirements	January 2019
New additional requirements	January 2019
Format Change	September 2017
New requirements on material declarations and the collection of declarations	September 2017
Supplier process requirements	September 2017

2 Definitions

Table 2. Definitions used in this document

Definition	Explanation
Article	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, once an article, always an article.
Battery	'battery' means any device delivering electrical energy generated by direct conversion of chemical energy, having internal or external storage, and consisting of one or more non-rechargeable or rechargeable battery cells, modules or of packs of them.
Homogeneous material	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	Deliberate use of a substance to achieve certain functions. If intentionally added anywhere in the supply chain, the substance shall be treated as intentionally added.
Oxo-degradable plastic	Plastic materials that include additives which, through oxidation, lead to the fragmentation of the plastic material into micro-fragments or to chemical decomposition.
Packaging	Packaging means an item, irrespective of the materials from which it is made, that is intended to be used by an economic operator for the containment, protection, handling, delivery or presentation of products to another economic operator or to an end user, and that can be differentiated by packaging format based on its function, material and design.
SCIP database	Database for information on Substances of Concern In articles as such or in complex objects (Products) established under the Waste Framework Directive (WFD).
Substances and mixtures	A substance is a chemical element and its compounds in the natural state or the result of a manufacturing process. A mixture is a mix or solution of two or more substances. Compare with definition of 'Article'.
Substances of Very High Concern (SVHC)	Substances that may have serious and often irreversible effects on human health and the environment can be identified as substances of very high concern (SVHCs). If a substance is identified as an SVHC, it will be added to the Candidate List for eventual inclusion in the Authorisation List. 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) from January 2021, see Chapter 8 in this document. The SVHC information shall be on smallest article level (once an article, always an article).

3 Introduction

Husqvarna Group intends to minimize the amount of hazardous chemical substances in products and processes. The Restricted Material List (RML) is the main chemical compliance requirement for Husqvarna Group products.

The document provides:

- Information to suppliers, producers, importers and traders on how to fulfill the contractual terms of chemical content in articles and products purchased by Husqvarna.
- Links to lists of *Banned or Restricted substances* and *Reportable substances* in Husqvarna Group's products

4 Scope

This document specifies the requirements of chemical substances in components built into the products (including semi-finished and sourced products, parts, materials and packaging) and is valid for all suppliers of materials, preparations, additives, color-batches and others, which are used by Husqvarna Group.

Chemical substances on the Restricted Material List can be present in the maximum noted threshold level in articles or homogenous material. Where a local law is more restrictive than the RML, it takes precedence.

Products containing a chemical substance listed on the RML as Banned or Restricted above stated threshold shall not be supplied to, and can be rejected by Husqvarna Group.

Chemical substances occurring solely in the form of impurities in a specific product can be tolerated by Husqvarna, provided that (i) the content is very low (i.e. trace amounts) and (ii) Husqvarna Group has approved it. Threshold levels must be withheld independently of legal requirements.

In case an exemption is listed, this is only valid for the specified application.

5 Sanctions of violations

In case a Banned or Restricted substance is found in delivery from a supplier or included in a Husqvarna Group product, the supplier agrees to indemnify and hold Husqvarna Group harmless from, against and in respect of all damage or loss incurred by Husqvarna Group resulting from or arising out of such breach. Husqvarna Group is entitled to take any suitable action until necessary measures have been carried-out and approved by Husqvarna.

5.1 Testing in case of insufficient documentation

Husqvarna reserves the right to send samples for testing at an accredited test institute at the expense of the supplier for any documentation missing according to the requirements set out in this document. The supplier will be prompted with a number of reminders and a final warning before this requirement is realized. For further information, please refer to [Supplier Administrative Fees & Charge Backs](#).

6 How RML is applied

The RML is an integral part in all supply agreements, even if it is not enclosed with every purchase order. The sourcing organization ensures relevant information to suppliers. By signing a purchase agreement with Husqvarna Group, the signatory is obliged to follow the requirements and restrictions accordingly.

7 Requirements

7.1 Banned or Restricted substances

7.1.1 Requirement

Banned or Restricted substances are substances that prohibit sales. These substances are not allowed over listed thresholds for homogenous materials/articles. Substances with a Husqvarna deadline are not allowed to be present after the listed date to be able to meet regulatory requirements at the effective date.

Follow this [link](#) for the substance reference list.

7.1.2 Exemptions

In general, exemptions will not be accepted unless allowed by a regulation/directive and justified through an investigation resulting in that no alternatives are available. Such an investigation need Husqvarna approval. For example, EU RoHS allows higher concentration of lead by applying exemptions. However, if a lead-free alternative exists, exemptions will not be accepted. All exemptions shall be reported with a substance concentration. Husqvarna Group suppliers are expected to investigate alternatives without exemptions and ensure the validity of such an exemption and to communicate any potential changes.

7.1.3 Acceptable documentation

The following types of documentation are acceptable. If any other reporting than IPC 1752A Class D format is chosen, you will be required to provide updated documentation when the regulation and/or directives are updated.

1. Full Material Declaration (FMD) according to IPC 1752A Class D.

This is the preferred data exchange format. Husqvarna Group has the following demands on the content of a Class D declaration (Full Material Declaration):

- The materials declared as homogenous materials shall be truly homogenous, e.g. a part with plating shall be declared as two materials.
- When declaring a chemical compound the unique CAS number for the chemical compound shall be used, not the CAS number for the contained chemical elements, e.g. Sodium Chloride shall not be declared as Sodium and Chloride separately. Please note following:
 - when declaring alloys, the CAS numbers of the different elemental metals shall be used
 - when declaring polymers, the CAS number for the substances used to produce the material shall be used
 - additives as fillers, pigments, flame retardants, plasticizers shall be declared
- If there is a need to not disclose the exact content of a certain material, a maximum of 5% of the product weight can be declared as trade secret. Substances which are listed on the Husqvarna Restricted Material List or known as SVHC cannot be declared as trade secret and must be declared in the Full Material Declaration.

2. Absence declaration for RML Banned or Restricted substances according to IPC 1752A Class A or C. All exemptions shall be reported according to the applicable EU RoHS product category.

Examples of documentation that may be used to create the IPC 1752A format are:

- GADSL report
- IEC 62474 report
- Absence declarations covering regulations and directives listed in Table 3
- Test reports (from a ISO 17025 certified test institute at the expense of the supplier. Please find information about chemical testing in link Best Practice Document)
- Safety data sheets according to CLP for chemical substances

7.1.4 Validation

Husqvarna Group can require a test report to validate above documentation. This will be communicated in the purchase process. Husqvarna Group performs random testing over time.

Table 3. List of Regulations and Directives

Description	Regulation or Directive
RoHS	Directive 2011/65/EU including amendment 2015/863/EU
REACH	Regulation (EC) No. 1907/2006
POPs	Regulation (EU) No. 2019/1021
Packaging Directive	Directive 94/62/EC
Packaging Regulation	Regulation (EU) 2025/40
US package legislation	Model Toxics in Packaging Legislation
Battery Regulation	Regulation EU No. 2023/1542
Ozone depleting substances	Regulation EU No. 2024/590
Global warming substances	Regulation (EU) No. 2024/573
Reduction of the impact of certain plastic products on the environment	Regulation (EU) No. 2019/904
Toxic Substances Control Act (TSCA)	15 USC 2601 et seq., 1976
France ban on MOAH and MOSH	Substances Contained in Mineral Oils Prohibited for Use on Packaging and Printing Materials Distributed to the Public, Order, April 2022

7.2 Reportable substances

7.2.1 Requirement

Reportable substances are substances required by law to be reported over certain thresholds and substances in a regulatory process that include measures affecting Husqvarna Group products. The minimum requirement is to report these substances over specified thresholds but should be avoided if possible and phased out over time. Husqvarna Group specifications may come with stricter requirements related to Reportable substances. Specific requirements might be added to individual purchase orders. The minimum requirement for reporting these substances is with an IPC 1752A class C declaration including for example substance name, CAS number and weight percent of the substance in the material or article as applicable. For certain substances you will be asked to provide additional information as needed for reporting to authorities.

7.2.2 Exemptions

No exemptions will be made to the reporting requirement.

7.2.3 Acceptable reporting

The following types of documentation are acceptable. If any other reporting than IPC 1752A Class D format is chosen you will be required to provide updated documentation when the regulation and/or directives are updated.

1. **Full Material Declaration (FMD)** according to IPC 1752A Class D.

This is the preferred data exchange format. See Husqvarna Group demands on the content of a Class D declaration in Chapter 7.1.3.

2. **Absence declaration for RML Reportable substances** according to IPC 1752A Class A or C.

Note that if the article contains a reportable substance, the only acceptable declaration format is Class C or D, not Class A.

Examples of documentation that may be used to create the IPC 1752A format are:

- GADSL report
- IEC 62474 report
- Absence declarations covering REACH Candidate List of Substances of Very High Concern (SVHC)
- Test reports (from an ISO 17025 certified test institute is required or will be performed by Husqvarna Group at the expense of the supplier. Risk based testing is acceptable. Please find information about chemical testing in link [Best Practice Document](#).)
- Safety data sheets according to CLP for chemical substances

8 SCIP requirement

8.1 What is SCIP?

SCIP is the database for information on **Substances of Concern** in articles as such or in complex objects (**Products**) established under the Waste Framework Directive (WFD) for European Union. Companies that produce, import or supply articles containing substances of very high concern (SVHCs) on the Candidate List in a concentration above 0.1% weight by weight (w/w) have to submit information on these articles to the SCIP database, as from 5 January 2021. These articles can be produced in the EU or imported from non-EU countries. The information in the database is then made available to waste operators and consumers.

8.2 Husqvarna Group requirements to the suppliers to fulfill SCIP requirements

Part of the SCIP information is reported by declaring SVHCs in the Reportable substance section 7.2 in this requirement. For the SCIP database, more information is needed to fulfill the SCIP requirements. All suppliers that have reported and will report SVHCs to Husqvarna will be required to give additional information. The type of information depends on if the supplier within European Union or not.

8.2.1 Additional information from suppliers within the European Union

Husqvarna Group requires ECHA SCIP IDs from all suppliers within EU for all articles containing SVHCs in a concentration above 0.1% (w/w). For details, see information in [ECHA link](#).

8.2.2 Additional information from suppliers from non- EU countries

For suppliers based outside European Union, Husqvarna Group requires the following information for all articles containing SVHCs in a concentration above 0.1% weight by weight (w/w):

- Article name and part number
- Other Article Identifier (if needed to identify the article in a complex object)
- TARIC number
- Safe use instruction(s)
- Candidate List Substance name and CAS number
- Concentration range
- Material category / Mixture category

If the article is a part of a complex object, a Bill Of Material (BOM) is required to show how the article is linked in the complex object and how many units of the article is present. For details, see [ECHA link](#).

9 Additional requirements

9.1 Requirements for sourced products/OEM

Additional requirements will be clarified in the product specification. This can require recurring testing performed by an ISO 17025 certified laboratory.

9.2 Requirements for textile, clothes, leather goods and shoes

OEKO-Tex certificate is preferred. It is mandatory when stated on the drawing whereby Husqvarna Group requires that the whole article shall be certified with Oeko-Tex® Standard 100. This includes, for example, any zippers, thread, buttons and prints in the article.

9.3 Requirements for radioactive substances (including scrap metal contaminants)

Husqvarna Group does not accept radiating materials. Materials must not be radiating, not contain any radiating sources, irrespective if they are encapsulated or not, and not otherwise be contaminated by radiating material.

9.4 Requirements for biocides

Intentionally added biocides shall be communicated to Husqvarna.

9.5 Oxo-degradable plastics

Articles made from oxo-degradable plastics are prohibited.

9.6 Substances and mixtures

Supplier shall make sure substances and mixtures supplied to Husqvarna Group as such follow the RML and all local requirements for the markets specified by Husqvarna Group. This includes, but is not limited to: restricted substances, labelling, packaging, notifications and registrations. Supplier shall also provide Husqvarna Group with the necessary documentation, for example Safety Data Sheets (SDS).

10 Reporting

Husqvarna Group has contracted Source Intelligence (SI) to collect material declarations via material.declarations@husqvarnagroup.com. SI will provide clarifications to Husqvarna suppliers related to providing sufficient and correct information in the IPC 1752A data exchange format.

How to report on the RML will be clarified in the purchase process and might be different depending on your location and to which brand you deliver.

11 Supplier Process Requirements

Husqvarna Group's suppliers are expected to have and follow processes to secure Husqvarna Group's Restricted Materials List (RML) is followed and to mitigate any risks for non-compliance. The ability of the supplier to follow the RML is captured by the Supplier Chemical Compliance Risk Assessment ¹.

The goal of the Supplier Chemical Compliance Risk Assessment is to identify challenges related to the suppliers' ability to supply according to Husqvarna Group's Restricted Materials List (RML) and solve these challenges through continuous improvement and corrective actions. Results of the classification may be used to contribute to business award decisions. The classification is subject to review.

Several inputs can be used to perform the supplier chemical compliance risk assessment. The supplier risk assessment will also be used to identify chemical testing needs. Examples of inputs to the supplier chemical compliance risk assessment are:

- Self-assessments/questionnaires which provide an overview of how RML requirements are managed
- Quality of the chemical compliance documentation provided to Source Intelligence
- Quality of Supplier's chemical compliance process/procedure. Examples of inputs which can be described by the supplier:
 - Roles & responsibilities to manage Husqvarna Group's RML
 - Risk assessment of sub-suppliers
 - Sub-supplier onsite audits
 - Chemical analysis/testing
 - Collection and evaluation of sub-suppliers' chemical compliance documentation

¹ **Note:** The Supplier Chemical Compliance Risk Assessment is initiated and evaluated by dedicated Husqvarna specialists either through direct email request or through the supplier onboarding self-assessment. It shall only be sent to the supplier's direct Husqvarna contact or Husqvarna requestor. Source Intelligence is contracted to collect and evaluate material declarations/material compliance documentation only.