

Chemicals Management

Management System and Regulations

Mitsubishi Chemical (MCC) maintains a system that ensures the rigorous management of chemicals in all its business domains.

To effectively utilize the favorable properties of its chemical raw materials, MCC collects and shares within the company information on all substances related to its products, including that on chemical hazards, applicable domestic and international regulations, and the results of risk assessments. In addition, we have built a support structure to better enable the business domains to implement proper chemicals management.

Because chemical regulations vary by country and region, MCC has appointed persons responsible for overseeing chemicals management at the regional headquarters¹ to reinforce the global management system.

We have laid out the essentials of chemicals management in our Chemicals Management Regulations, Standards for the Safe Management of Chemicals and Standards for Product Safety Management. Furthermore, we have formulated guidelines and manuals that provide concrete methods for working within regulations, authoring and issuing SDSs,² and implementing voluntary chemicals management. These efforts help ensure proper management.

1 Regional headquarters: Companies established to accelerate Mitsubishi Chemical's overseas business development by supporting business and revenue growth in key regions.

2 Safety data sheet (SDS): A document for providing information on the properties, hazards and toxicity, safety measures and emergency responses concerning chemical substances when transferring or providing chemicals to other business entities.

Compliance with Chemical Regulations

1. Japanese Laws and Regulations

MCC complies with wide-ranging laws concerning chemicals, including the Chemical Substances Control Law (CSCL), the Industrial Safety and Health Act's requirements concerning filing new chemical substance notifications, and the Poisonous and Deleterious Substances Control Law's requirements concerning the registration and management of manufacturing, importing and sale businesses as well as record maintenance. To ensure that such compliance is thorough and comprehensive, MCC has established internal guidelines and rules related to compliance with domestic laws and carries out centralized management using a database of notifications filed. In fiscal 2017, we launched guidelines for our chemicals management that will enable each business domain to verify the name and inventory status (new or existing chemical) for each substance in accordance with the CSCL. In fiscal 2018, we are reinforcing measures to promote awareness within the Company and related training.

2. Overseas Laws and Regulations

In the run-up to 2020, the target deadline for achieving the goals of SAICM,³ countries around the world (including China, South Korea, Taiwan, Thailand, the United States and Turkey) are enacting and amending legal regulations on chemicals. In particular, the mandatory registration of all existing chemicals, begun under REACH⁴ in Europe, will soon be adopted in South Korea and Taiwan. To respond to these changes, we are working with the regional headquarters and local Group companies to collect the latest information on legal requirements in each region or location and develop a system to ensure a more accurate response to regulations. In fiscal 2017, we systematically implemented and completed the registration of chemical substances produced or imported in quantities of less than 100 tons annually under REACH in Europe and measures to comply with the inventory reset rule under the U.S. TSCA.⁵ In fiscal 2018, we are focusing efforts on preparations for the full-fledged enforcement of new standards expected going forward, namely registration under K-REACH⁶ in South Korea and TCSCA⁷ in Taiwan.

3 Strategic Approach to International Chemicals Management (SAICM):

A strategic approach to international chemicals management adopted by the Governing Council of the United Nations Environment Programme in 2002.

4 Registration, Evaluation, Authorization and Restriction of Chemicals (REACH):

European Union regulations regarding the registration, evaluation, approval and restriction of chemical substances.

5 TSCA: Toxic Substance Control Act

6 Korea REACH (K-REACH): A law concerning the registration and evaluation of chemical substances.

7 TCSCA: Toxic Chemical Substance Control Act

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Voluntary Chemicals Management Initiatives

1. Participation in Initiatives in and outside Japan

MCC contributes to the Global Product Strategy (GPS)⁸ activities advanced by the International Council of Chemical Association (ICCA) on an ongoing basis. MCC actively works with the ICCA as a CP&H LG⁹ member to plan and hold educational programs and workshops aimed at advancing capabilities in developing countries in order to achieve the goals of SAICM. We actively participate in the Japan Chemical Industry Association (JCIA) as an activity-promoting member of JIPS.¹⁰

2. Mitsubishi Chemical's Voluntary Initiatives

As part of its GPS activities, the MCC Group evaluates the risks of its chemical products, compiles the results as GPS Safety Summaries,¹¹ and publishes these summaries via a portal page (available in Japanese only) on the MCC website as well as on the ICCA website.

Furthermore, to prevent the theft and/or abuse of chemicals, MCC has established its own list of MCC specified chemicals, which includes voluntarily designated substances in addition to legally designated or restricted substances. We have established safety management guidelines for managing these substances at plants and laboratories, during logistics operations and during transfer to customers. In this way, we are working to reinforce the management of such substances.

These voluntary activities, launched in 2015, were recognized in May 2018 with MCC being granted the 12th annual JCIA Responsible Care Outstanding Award, receiving particular praise for its focus on supply chain management.



8 Global Product Strategy (GPS):

A voluntary initiative wherein companies appropriately manage and conduct risk assessments of their chemical products in order to minimize risks posed by chemical substances throughout the supply chain.

9 Chemical Policy and Health Leadership Group

10 Japan Initiative of Product Stewardship (JIPS):

A voluntary initiative promoted by the Japan Chemical Industry Association aimed at reinforcing risk-based chemicals management at companies.

11 GPS Safety Summary (sometimes abbreviated as GSS):

Documents that clearly explain methods for handling chemical substances and other information in detail that cannot be fully included on SDSs. These summaries are used in risk management-based chemicals management.

Providing Reliable Chemical Substance Information: SDS Management

We use comprehensive chemicals management systems (for example, K-Mates¹²), to support our expert staff in the proper provision of information to customers and supply chain operators as well as reliable chemicals management within the company.

The systems comprise databases of the chemical substances and components of products handled by MCC, their hazardous properties, relevant domestic and international laws and regulations, and other information. The system is capable of performing the GHS¹³ classification of chemical substances, determining the applicability of laws and regulations, and producing SDSs and labels in line with the laws and standards of a wide range of countries and regions, including Japan, Europe, the United States, and East Asian and ASEAN countries for review by expert staff. The system uses highly reliable data that is carefully reviewed by experts at Mitsubishi Chemical Research, an MCC Group company, to generate GHS classifications. Furthermore, we are implementing proactive management using a function of the system that enables users to search chemical substances and products in the MCC database that may be subject to anticipated legal or regulatory amendments.

12 KAITEKI-integrated System of Risk Management & Technical Information Supports on Chemicals

13 Globally Harmonized System of Classification and Labelling of Chemicals (GHS):

A system for classifying chemicals by the type and degree of their hazardous properties based on globally harmonized rules and communicating this information using labeling and the provision of SDSs.

In-House Chemicals Management Training

In addition to basic chemicals management education, MCC hosts the Chemicals Management Seminar on a monthly basis at MCC Group headquarters. This seminar serves to teach Group company employees about increasingly stringent regulations in and outside Japan and how to address them. In fiscal 2017, a total of 708 employees participated. Furthermore, plants and R&D centers provided education on relevant laws and regulations as well as 21 practical training sessions on GHS classification and labeling methods, and reading and preparing SDSs.



In-house chemicals management training