



Hazardous Materials Corporate Guideline

Company Standard ☒

Instruction ☐

Aim and purpose

As a responsible manufacturer, the Nordex Group aims to use substances responsibly, in a way that does not endanger our employees or other stakeholders, including the environment in which we work.

This document outlines an approach designed to

- ensure legal compliance within all the international and national legislative frameworks which apply to our operations
- minimize the risk to our employees and contractors
- minimize risk to the environment in which our activities are conducted
- ensure accurate information is available for statutory disclosures.

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Validity

Global ☒	Europe ☐	International ☐
Countries	All	
Valid from	20 Jan 2025	
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Owner (name / function)	David Goodfellow / HSE	
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1. Abbreviations and Terms

Abbreviation/Term	Description
DNSH	Do No Serious Harm (criteria in EU Taxonomy regulations)
ECHA	European Chemicals Agency
GLF	Global Lead Function
PEP	Product Evolution Process (Nordex new product development process)
REACH	Registration, evaluation, authorisation and restriction of chemicals (EU Regulation)
RoHS	Restriction of Hazardous Substances (EU Regulation)
SCIP	SCIP is the database for information on S ubstances of C oncern I n articles as such or in complex objects (P roducts) established under the Waste Framework Directive (WFD).
SDS or MSDS	Material Safety Data Sheet
SoC	Substance of Concern
SVHC	Substance of Very High Concern (REACH classification)
TSC	Technical Screening Criteria (within REACH) https://ec.europa.eu/finance/docs/level-2-measures/taxonomy-regulation-delegated-act-2021-2800-annex-1_en.pdf page 193
WFD	Waste Framework Directive (EU Regulation)

2. In Scope

All activities within the Nordex Group which include the specification, purchase, use, storage, handling, transport or disposal of hazardous materials.

3. Out of Scope

Nothing



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4. Introduction

The transport, handling, use and disposal of certain materials can create hazards for persons and/or for the environment. Responsible selection and use of materials can greatly reduce these hazards.

This standard aims to combine the legal and other requirements which affect which hazardous materials must not be used within the Nordex Group, and which may be used but only if specific conditions are met or controls are deployed.

5. Requirements Framework

As a company with headquarters situated within the EU, the Nordex Group has a legal responsibility to report on its worldwide usage of chemicals under the EU Taxonomy Regulations (Reg (EU) 2020/852). This requires us to demonstrate whether our global operations meet the Do No Serious Harm (DNSH) criteria by not using specified chemicals. The restricted chemicals are listed in the Technical Screening Criteria (Appendix 4) as those defined within the following regulations:

a) Annexes I or II to Regulation (EU) 2019/1021	[Persistent organic pollutants]
b) Article 2 of Regulation (EU) 2017/852	[Mercury]
c) Annexes I or II to Regulation (EC) No 1005/2009	[Ozone depleting]
d) Annex II to Directive 2011/65/EU	[RoHS]
e) Annex XVII to Regulation (EC) 1907/2006	[REACH restrictions]
f) Article 57 and 59(1) of Regulation (EC) 1907/2006	[REACH SVHC / Candidate list]
g) Article 57 of Regulation (EC) 1907/2006	[REACH proposed SVHC]

Notes:

1. Reach Annex 17 identifies substances which have restrictions regarding their use. These restrictions are identified within the SDS for each substance.
2. REACH Article 59 identifies Substances of Very High Concern (SVHC) within the Candidate List.
3. SDS section 15.1 identifies relevance of substance to a, c, e, f, g above.

The Nordex Group has created an internal guideline "Black and Grey list" based on the above criteria. In addition, Substances of Concern (SOC) are identified by the Nordex Group due to their potentially harmful properties. See Appendix 3.

Adaptation of these guidelines to ensure compliance with National regulations (e.g. the inclusion of hazardous materials prohibited under local regulations, by providing risk assessments on the handling, storage, use and disposal of substances in a specific format or language, and implementing additional control procedures such as health monitoring/examinations) is the responsibility of the local Nordex organization.

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6. Assessment of Hazardous Materials:

Detailed process contained in BIC: [Evaluation of Hazardous Materials](#)

6.1. HSE Risk Reduction:

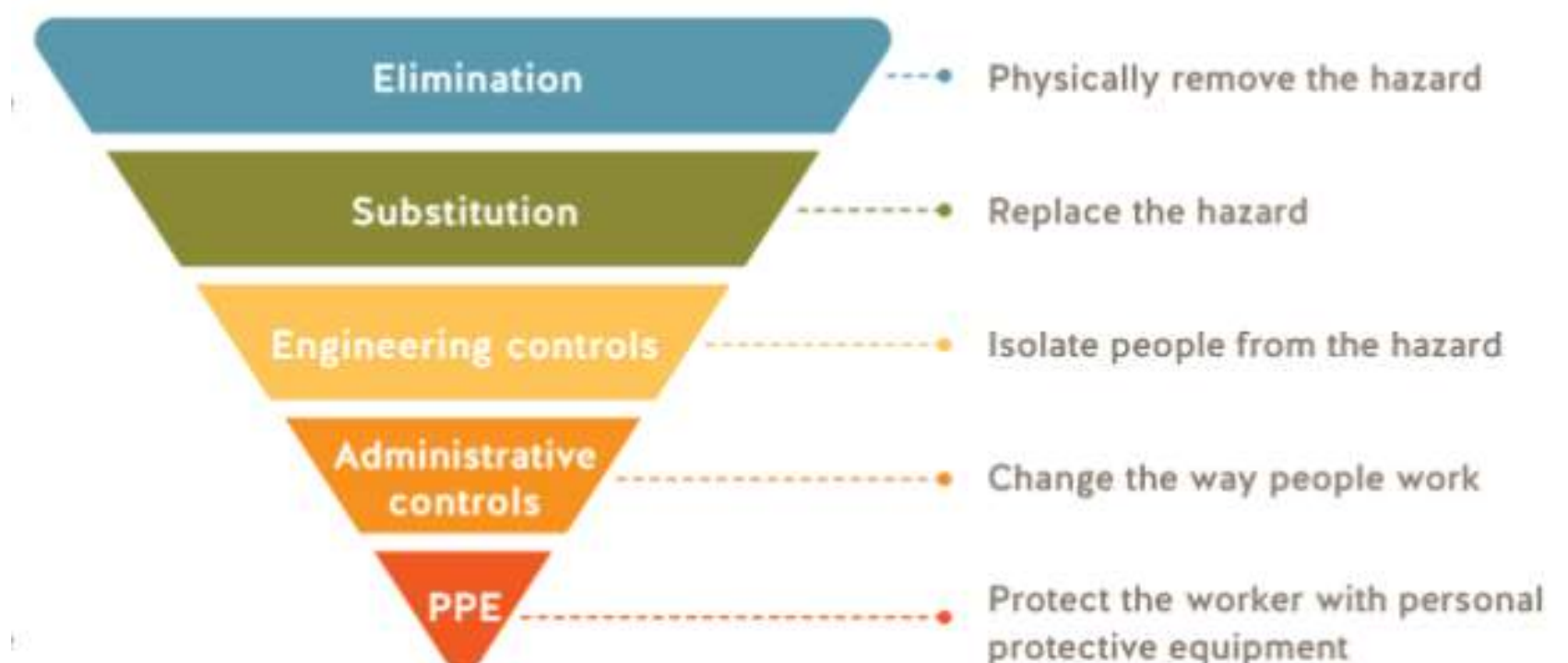
Nordex Group assesses each chemical in use, using information in the Safety Data Sheets (SDS) to analyze the:

Mixture H Phrases: to identify if the H Phrase for the mixture is contained within the Nordex black and grey list (SDS Section 2 para 1)

Water Hazard Class: to identify if the mixture is classified as Hazard Class 3 which is prohibited and contained within the Nordex Black list. (SDS Sections 12, 15)

Status under other categories within the Black and Grey list

Any hazardous materials which appear on the Black and Grey list are identified and action plans put into place based on the following hierarchy.



6.2. Product Design Process:

HSE specialists embedded in Engineering projects ensure any new hazardous materials being proposed are fully evaluated and approved according to the process defined in NS.05.10.10 before they can be incorporated into the product design process (PEP).

6.3. Global sourcing:

Nordex Group must report on its global operations under the EU Taxonomy regulations. This means that all hazardous materials must be assessed under the EU legal framework.

Whilst most hazardous materials are specified from within the EU, some are still sourced locally. Therefore, Nordex Group requests that suppliers of hazardous materials who are based outside of the EU provide information consistent with the EU Safety Data Sheets in relation to details of components of mixtures and the risk phrases relevant to the mixture itself. These can then be evaluated in the manner described in section 6.1.



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6.4. Transport of goods:

Nordex Group operates globally. Local Divisions and GLFs refer to the central database and local regulations to develop transport plans and relevant documentation.

6.5. Use of hazardous materials:

Nordex Group operates globally. Local Divisions and GLFs refer to the central database and local regulations to develop operational guidance for the use of hazardous materials.

6.6. Information:

Information and documentation (SDS, operational instructions) relating to each hazardous material, and in relevant languages, are held on a central database.

A cross-business team of HSE specialists meets regularly to review topics and actions relating to management of hazardous materials.

KPIs are established which focus on the elimination of risk from items which appear on the Nordex hazardous material black and grey lists.

Information on hazardous materials used by Nordex is reported under EU Taxonomy rules and in the annual sustainability report.

7. Change Management:

Where regulations change (e.g. the REACH regulations are scheduled to be updated annually), the Nordex Group reviews any changes (and any proposed additions to restrictions on specific chemicals) and implements any actions necessary to ensure continued alignment with the regulations.

From time to time, the Nordex Group takes responsibility for activities which were previously managed by third parties, and which may introduce new hazardous materials. These are evaluated in the same manner as for new materials and consequent actions taken.

A cross-business working group oversees the close out of actions to reduce the risks from hazardous materials.



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8. Associated documents

Code	Document	Location
NS05.01.10	Evaluation of Hazardous Materials	BIC software



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Appendix 1 – Example of central database - QUENTIC

Quentic

Filter menu ...

My Quentic

Administration

Organisation

Environment

Risks & Audits

Legal Compliance

Control of Work

Hazardous Substances

Hazardous Substance Overview

Hazardous Substances

Statements

Chemical Substances

Prohibited Substances

Application/Storage Areas

Risk Assessments

Safety Instructions

Exposure to hazardous substances

Dangerous Goods

Health & Safety

New data recordExportVideo tutorials

Statements (Processes)

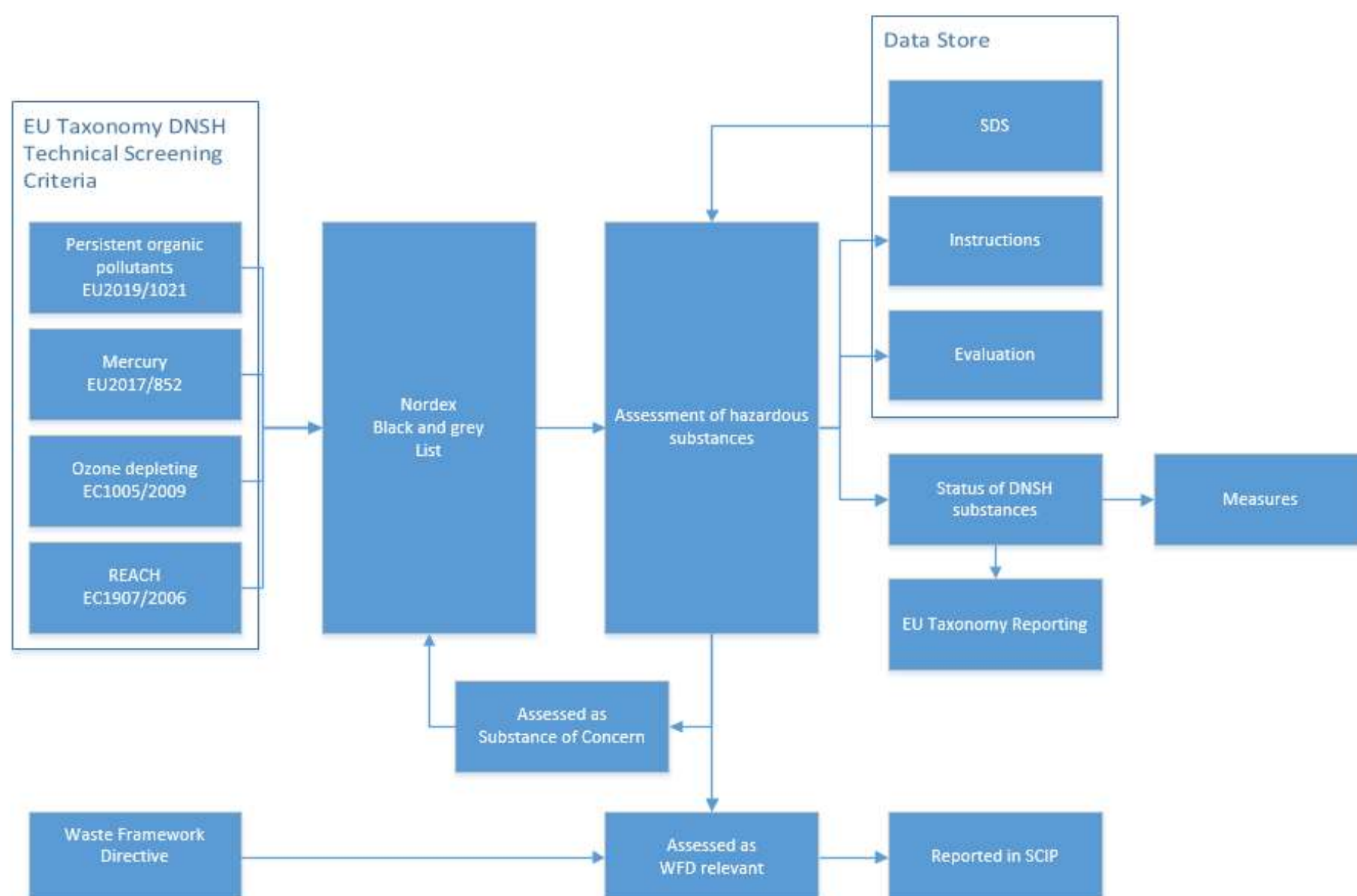
My filtersFilterColumns

St...	Hazardous/Non-hazardous subst...	Scopes	Start date	End date	Person in charge	Position in charge	Purpose at the application area	Objecti...	
	1K Streichlack Aqua Seidengl...	Nacelle Germany Rostock (D...	Oct 07, 2021	Nov 04, 2...	Fitzner, Michael		Lack für Ausbesserungs bzw. Instandhaltung...		
	3M Dry Layup Adhesive [Stk.]...	Halle 1 - Produktionshalle (D...	Aug 28, 20...	Sep 25, 20...	Heidner, Steve		Zur Applikation der Gelege im Dry-Layup-V...		
	3M Haftvermittler 4298 UV [l.]...	Bereich Parts Logistics (DE R...	Feb 16, 2021	Mar 16, 2...	Schmidt, Christoph		Automobilbau: industrielle / gewerbliche Ve...	Yes	
	3M Scotch-Weld™ Acrylic Ad...	DE Rostock - DMR (Germany)	Jul 20, 2020	Aug 17, 2...	Brauch, Tobias		Kleber für Bereich Triebstrang + Alternative ...	Yes	
	3M Scotch-Weld™ Acrylic Ad...	DE Rostock - DMR (Germany)	Jul 28, 2020	Aug 25, 2...	Brauch, Tobias		Kleber für Bereich Triebstrang Verwendung ...	Yes	
	3M™ Novec™ 1230 Fire Prot...	NXT 10 = 4x NXT 10.2 = 5x	Oct 30, 2020	Nov 27, 2...	Kräkel, Alexander		Löschmittel		
	3M™ Scotch-Weld™ Epoxy A...	GVZ_H001_NR74.5/1 Hauptf...	Feb 15, 2021	Mar 15, 2...	Kriedemann, Uwe		Konstruktionsklebstoff	Yes	
	3M™ Scotch-Weld™ Epoxy A...	GVZ_H001_NR74.5/1 Hauptf...	Feb 15, 2021	Mar 15, 2...	Kriedemann, Uwe		Konstruktionsklebstoff	Yes	
	4KG 321 TPC-AKD // Buntlac...	Nacelle Germany Rostock (D...	Aug 09, 20...	Dec 16, 20...	Birr, Matthes		Farbe		
	ADHESIVE HARDENER (SWA...	Blade Factory (Indien)	Sep 10, 2021	Oct 08, 20...	Rindt, Philipp		Härter für Rotorblattfertigung	Yes	
	Adhesive Hardener 2535-BL [...]	Halle 1 - Produktionshalle (D...	Sep 10, 2021	Oct 08, 20...	Rindt, Philipp		Hardener for blade production	Yes	
	ADHESIVE RESIN (SWANCOR...	Blade Factory (Indien)	Sep 10, 2021	Oct 08, 20...	Rindt, Philipp		Harz-Härter-System zur Blattherstellung	Yes	
	Aerofix 3 Red [kg] (Cytac Ind...	GVZ_CE (DE Rostock NBG (G...	Feb 02, 2021	Mar 02, 2...	Pospischil, Lars		Kleber	Yes	
	Airtac 2 LH [Stk.] (Airtech Eur...	Halle 1 - Produktionshalle (D...	Dec 02, 2021	Dec 30, 20...	Pospischil, Lars		Sprühkleber	Yes	
	Airtac 3 [Stk.] (Airtech Europ...	Halle 1 - Produktionshalle (D...	Dec 02, 2021	Dec 30, 20...	Pospischil, Lars		Sprühkleber	Yes	
	AKTIVATOR - 150 ML [ml] 08...	Service D-A-CH (Nordex Ene...	Feb 14, 2018	May 31, 2...	Heidner, Steve		Additiv	Yes	
	ALEXIT-BladeRep LEP 10 RAL...	Halle 2 - Finishhalle (DE Rost...	Feb 15, 2021	Mar 15, 2...	Heinz, Steffen		Industrial serial painting	Yes	
	ALEXIT-Härter/Hardener 495...	Halle 2 - Finishhalle (DE Rost...	Oct 28, 2021	Nov 25, 2...	Heinz, Steffen		Härter für Wuchtmasse	Yes	
	ALEXIT-Wuchtmasse 494-NX...	Halle 2 - Finishhalle (DE Rost...	Oct 21, 2021	Nov 18, 2...	Heinz, Steffen		Wuchtmasse		
	Alpa-Sil EH A [kg] (BEZEMA ...)	GVZ_CE (DE Rostock NBG (G...	Jan 28, 2021	Feb 25, 20...	Hölzel, Hannes		Formen- und Modellbau		
	ALPA-SIL EH Härter [l] (BEZE...	GVZ_CE (DE Rostock NBG (G...	Jan 28, 2021	Feb 25, 20...	Hölzel, Hannes		Industrielle Verwendung		
	ALPA-SIL EH Härter blau [l] (...)	GVZ_CE (DE Rostock NBG (G...	Jan 28, 2021	Feb 25, 20...	Hölzel, Hannes		Dentaltechnik		
	Antifrogen N [l] Material-Nr...	Nordex Energy SE & Co. KG	Jan 11, 2021	Feb 08, 20...	Heidner, Steve		Funktionsflüssigkeiten / Wassergemisch z 2...	Yes	
	Assembling paste MV3 for c...	DE Engineering-CE (DE Ham...	Feb 02, 2021	Mar 02, 2...	Bartling, Rene		cable fitting mounting paste		
	Assembly Paste [kg] (TYCO EL...	DE Engineering-CE (DE Ham...	Feb 02, 2021	Mar 02, 2...	Bartling, Rene		Industriellackierung. Sorgt für reibungslose ...		
	BAYDUR 120V2 [l] 86215624 ...	Halle 1 - Produktionshalle (D...	Jun 18, 2021	Jul 16, 2021	Haspel, Benedikt		Herstellung von Polyurethanen	Yes	
	BergoLED Speed-Repair Putt...	Nordex Blades Germany (GV...	Jan 06, 2023	Feb 03, 20...	Heinz, Steffen		Spachtelmasse	Yes	
	Bergolin 1-Component Topc...	GVZ_CE (DE Rostock NBG (G...	Jun 25, 2020	Jul 23, 2020	Heinz, Steffen		Decklack		

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Appendix 2 – Diagram showing legislation and activities

Note: This is not a process flow but shows the interrelationship between EU legislative articles and the Nordex Group activities, specifically to understand how the EU Taxonomy informs and also receives output from the process.



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Appendix 3 – Black and Grey List

Category	Black list Use not allowed	Grey list Controls regarding use must be evaluated and contained in working instructions.
Persistent organic pollutants	All chemicals specified within Annexes I or II to Regulation (EU) 2019/1021	
Mercury	All mercury containing products within definitions contained in Article 2 of Regulation (EU) 2017/852 . Exclusion allowed for calibration equipment	
Ozone depleting	All substances listed in Annexes I or II to Regulation (EC) No 1005/2009	
RoHS	All substances listed in Annex II to Directive 2011/65/EU	
REACH	Any chemical product with the following H Phrases: H200, H201, H202, H203, H204, H205, H230, H231, H240, H241, H271 H300, H304, H310, H330, H340, H341, H350, H350i, H351, H360, H360D, H360f, H360fd, H370, H372 H300+H310, H300+H330, H300+H310+H330, H301+H311+H331, H311+H331 EUH001, EUH203 Any hazardous material listed as prohibited in Appendix 14 or 17, or on the candidate list	Any chemical product with the following H Phrases: H280 H302, H317, H332, H334, H361, H361d, H361f, H361fd, H362, H371, H373 H420 H301+H331, H302+H312, H302+H312, H302+H332, H312+H332 EUH018, EU019, EUH032, EUH044 Any hazardous material used in line with restrictions specified in Appendix 14 or 17, or on the candidate list
Radioactive substances	All radioactive substances other than exceptions specified in grey list	Where a low-level source is included in detection equipment.
Germs / biological agents	All	
Water Framework Directive	Items in Annex 8 and 10	Items identified in SDS section 15 as Water Hazard Class 3 (restrictions on handling and storage volumes)



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Appendix 4 - EU Taxonomy DNSH screening criteria

- a) Substance, whether on their own, in mixtures or in articles, listed in Annexes I or II to Regulation (EU) 2019/1021 (Recast Regulation on Persistent Organic Pollutants), except in the case of substances present as an unintentional trace contaminant;
- b) Mercury and mercury compounds, their mixtures and mercury-added products as defined in Article 2 of Regulation (EU) 2017/852 (Regulation on Mercury);
- c) Substances, whether on their own, in mixtures or in articles, listed in Annex I or II to Regulation (EC) No 1005/2009 (Regulation on Substances that Deplete the Ozon Layer);
- d) Substances, whether on their own, in mixtures or in an articles, listed in Annex II to Directive 2011/65/EU (recast Regulation on the restriction of the use of certain hazardous substances in electrical and electronic equipment) except where there is full compliance with Article 4(1) of that Directive;
- e) Substances, whether on their own, in mixtures on in an article, listed in Annex XVII to Regulation (EC) 1907/2006 (Regulation on the registration, evaluation, authorisation and restriction of chemicals), except where there is full compliance with the conditions specified in that Annex;
- f) Substances, whether on their own, in mixtures on in an article, meeting the criteria laid down in Article 57 of Regulation (EC) 1907/2006 (Regulation on the registration, evaluation, authorisation and restriction of chemicals) and identified in accordance with Article 59(1) of that Regulation for the society; and
- g) Other substances, whether on their own, in mixtures or in an article, that meet the criteria laid down in Article 57 of Regulation (EC) 1907/2006 (Regulation on the registration, evaluation, authorisation and restriction of chemicals), except where their use has been proven to be essential for the society.