

# Material approval with Chemwatch

## 1 Purpose

This procedure describes the implementation of new materials in addition to the “Material Qualification Process” (CEN-QA01-PS-0002-EN)

## 2 Scope

This procedure is applicable for all AMBE sites.

According to this procedure all sites have to use ChemWatch as tool for managing new incoming and already used substances which enter the production and social areas as well as areas where we are legally obliged to keep the MSDS (see table for examples):

| <u>Concerned Material</u>  | <u>Not concerned</u>  |
|--|---|
| <ul style="list-style-type: none"> <li>• Inks &amp; coatings</li> <li>• Oils, lubricants &amp; grease</li> <li>• Washer chemicals</li> <li>• Waste water treatment chemicals</li> <li>• Cleaners, soap, lotions</li> <li>• Lab chemicals</li> <li>• Fuel (e.g. propane, LPG, diesel etc.)</li> <li>• Glues (end plants)</li> <li>• Maintenance supplies</li> <li>• Etc.</li> </ul> | <ul style="list-style-type: none"> <li>• Raw Material<br/>(Aluminium, Steel, Plastics/Widgets)</li> <li>• Office supplies<br/>(e.g. printer toner, pencils etc.)</li> <li>• Equipment &amp; machinery<br/>(e.g. Computer, BM etc.)</li> <li>• Building materials</li> </ul> |

### 2.1 Concerned Departments/Functions

This document is valid for all departments and functions which introduce new substances in AMBE sites.

## 3 Terms and Abbreviations

|           |   |
|-----------|---|
| AMBE      | Ardagh Metal Beverage Europe  |
| Sites     | All locations of AMBE incl. production facilities and laboratories                  |
| MSDS      | Material Safety Data Sheet (alternatively called SDS = Safety Data Sheet)           |
| TDS       | Technical Data Sheet  |
| ChemWatch | Cloud based chemical management database for storage and approval chemicals         |
| Substance | Is used as term for all materials, chemicals and pure substances which have an MSDS |
| GHS       | Global Harmonized System  |
| GMO       | Genetically modified organism   |
| LPG       | Liquefied Petroleum Gas   |
| PVC       | Polyvinylchlorid  |
| VOC       | Volatile Organic Compounds  |

|           |   |
|-----------|---|
| PWIS      | Paint Wetting Impairment Substances   |
| SPD       | Supply, Purchasing & Delivery   |
| Stage     | Defined part of the approval process in ChemWatch   |
| Role      | Naming of ChemWatch responsibilities incl. associated functionalities in the database                                   |
| Requestor | Employee responsible for data entries and approval process start in Chemwatch either on function or on behalf of others |
| Leader    | For AMBE leader stands for the plant manager + principal  |

## 4 Responsibilities

According to the assigned role of the individual user the following actions and responsibilities are assigned:

| Stage     | Responsibility   |
|-----------|--|
| Stage 1   | Central (e.g. Research & Development - Inks + Coatings Team, Operational Support Group - Frontend Team) and Plant (to nominate internally) |
| Stage 2   | ENV Compliance Manager, Metal - Europe<br>(deputy ENV Data & Systems Manager, Metal - Europe)  |
| Stage 3.1 | Food Compliance Manager, Metal Beverage - Europe<br>(deputy Laboratory Manager, Metal Beverage - Europe)                                   |
| Stage 3.2 | Team Manager, Chemical Analysis, Metal Beverage - Europe<br>(deputy Laboratory Manager, Metal Beverage - Europe)                           |
| Stage 3.3 | ENV Data & Systems Manager, Metal - Europe<br>(deputy ENV Engineering & Systems Manager, Metal - Europe)                                   |
| Stage 3.4 | Health, Safety and Loss Prevention Manager, Metal – Beverage - Europe<br>(deputy ENV Engineering & Systems Manager, Metal - Europe)        |
| Stage 3.5 | Plant specific (e.g. SPD function or other plant functions)  |
| Stage 4   | Plant specific (e.g. Quality, EH&S or other plant functions)   |
| Stage 5   | Plant manager + Principal  |

For further details see following chapters.

ChemWatch company will be responsible to update the MSDS independently via web search, contacting suppliers or with information directly provided by Ardagh Group or its suppliers.

Ardagh Group and local procurement teams have to ensure MSDS updates by providing the instruction letter (see Appendix 1) to the supplier contacts.

The requestor is responsible to communicate with all interested parties e.g. Headquarter, procurement, etc..

## 5 Details of procedure

The system will be used to archive different MSDS versions which are provided by suppliers.

The following flow diagram shows the activities which need to be performed to get a new substance into the ChemWatch database.

The request of a new substance has to be done for each location separately.

Requestor has to perform the approval request in ChemWatch and communicate to the plant about ongoing activities.

Requestor is responsible to ensure all required information are available before the approval starts.

The requestor is required to provide additional details if requested by the approvers or leaders if required for the approval.

Approvers are required to inform the requestor immediately in case of concerns which might lead to disapproval. Thus, clarification or, if possible, correction, can be done within the current approval process.

In stage 3 approvers can only select “recommend” or “not recommend” due to system default. This nomenclature is not valid for AMBE, for AMBE applies the following reading:

- Recommend = approved
- Not recommend = not approved

In case any result is “not recommend” in stage 3, the subsequent stage 4 is obliged to forward the process (after completion) to stage 5 (plant manager approval) for final decision making.

All attachments have to be provided in PDF file format.

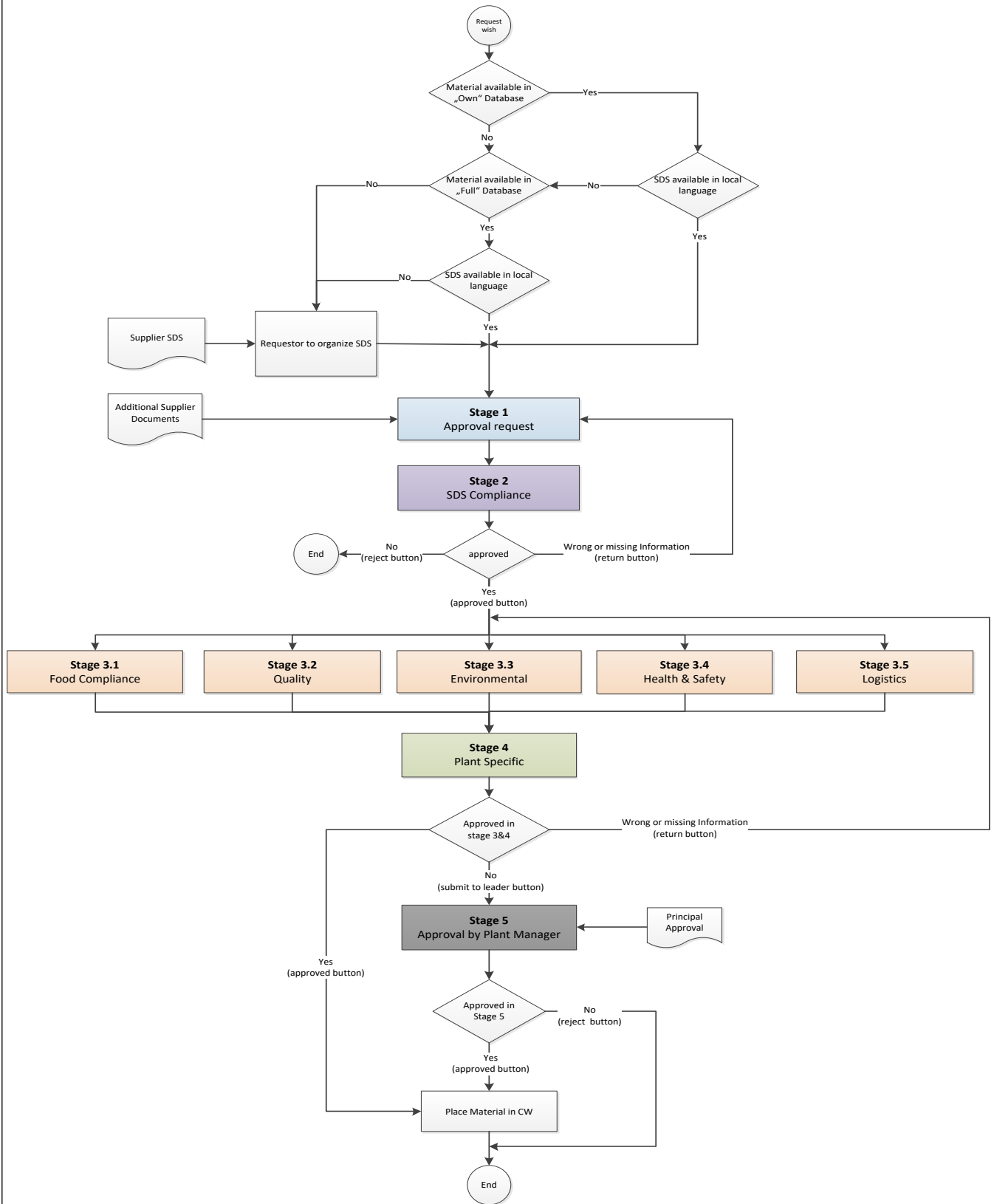
The following naming convention is valid and has to be entered in ChemWatch at the MSDS request template as material name:

**Original Product name** + **Prod Code** (if available)

*Example: Overvarnish matt - CP16-352A*

The product information needs to be taken from the MSDS.

|   |                  |                                      |
|---|------------------|--------------------------------------|
| Process: (QA) Quality Assurance<br>Sub Process: (QA01) Material Qualification |                  |                                      |
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| Stage Name                                | Responsibility           | Actions  | Form Questions   |
|---|--------------------------|--|--|
| <b>Approval Stage 1 Material Request</b>  | Role: Requestor          | Action 1: Search MSDS in ChemWatch or provide to ChemWatch (national language is required)<br>Action 2: Fill out approval request (form A)<br>Action 3: Fill out approval request (form B) and provide attachments: <ul style="list-style-type: none"> <li>MSDS in English</li> <li>PWIS Statement</li> <li>Food legal compliance statement</li> <li>TDS</li> <li>VOC Composition (if applicable)</li> <li>Any additional information</li> </ul> Action 4: Select location and provide Volume/Weight | <ul style="list-style-type: none"> <li>Requestor name + department</li> <li>Product details</li> <li>Reason for request</li> <li>Is it a replacement/substitution? If yes, what material will be replaced?</li> <li>Where is the material used?</li> <li>How is the material processed?</li> <li>Summarize the advantages compared to alternatives.</li> <li>Is this a food contact material?</li> <li>Briefly describe main storage location</li> <li>Provide additional attachments / certificates etc.</li> </ul>   |
| <b>Approval Stage 2 SDS Compliance</b>    | Role: Approver Stage 2   | Action 1: Review requestor forms<br>Action 2: Review attachments<br>Action 3: Review MSDS<br>Action 4: Fill out MSDS compliance form<br>Action 5: View regulatory check for ingredients<br>Action 6: Evaluation judgment + Comment   | <ul style="list-style-type: none"> <li>Does the vendor MSDS have the following:                             <ul style="list-style-type: none"> <li>16 sections</li> <li>Versioning</li> <li>Emergency number</li> </ul> </li> <li>Is the supplier and product name on the MSDS okay?</li> <li>Is this document GHS compliant?</li> <li>Is the issue date of the MSDS within 2 years?</li> <li>Is the MSDS language in accordance to the location?</li> <li>Is country specific information available?</li> </ul>   |
| <b>Approval Stage 3.1 Food Compliance</b> | Role: Approver Stage 3.1 | Action 1: Review requestor forms<br>Action 2: Review attachments<br>Action 3: Review MSDS<br>Action 4: Fill out food compliance form<br>Action 5: Evaluation judgment + Comment  | <ul style="list-style-type: none"> <li>Please check / confirm the food contact status of the material? (if not provide explanation)</li> <li>Did you check the compliance certificate? (comments)</li> <li>Did you check the migration certificates? (comments)</li> <li>What additional special requirements have been checked and are acceptable (optional):                             <ul style="list-style-type: none"> <li>Absence of heavy metals</li> <li>Absence of allergenic substances</li> <li>Absence of non-halal, non-kosher and non-vegan ingredients</li> <li>Absence of nanoparticles</li> <li>Free from genetically modified ingredients (GMO)</li> <li>Check phthalates statement</li> </ul> </li> <li>General comments on Food Contact</li> <li>Possibility to upload additional attachments</li> </ul> |
| <b>Approval Stage 3.2 Quality</b>         | Role: Approver Stage 3.2 | Action 1: Review requestor forms<br>Action 2: Review attachments<br>Action 3: Review MSDS<br>Action 4: Fill out quality check form<br>Action 5: Evaluation judgment + Comment  | <ul style="list-style-type: none"> <li>Did you check the PWIS statement? (comments)</li> <li>Did you check PVC statement? (comments)</li> <li>Did you check the exact VOC composition? (comments)</li> <li>Possibility to upload additional attachments</li> </ul>   |
| <b>Approval Stage 3.3 Environment</b>     | Role: Approver Stage 3.3 | Action 1: Review requestor forms<br>Action 2: Review attachments<br>Action 3: Review MSDS<br>Action 4: Fill out environmental check form<br>Action 5: Evaluation judgment + Comment  | <ul style="list-style-type: none"> <li>Specific spill measures necessary?</li> <li>Specific soil &amp; water protection measures necessary?</li> <li>Specific cleaning agents necessary?</li> <li>Self-ignition &amp; electro statics concerns?</li> <li>Vapours and air mixtures (explosives) concerns?</li> </ul>  |

| Stage Name                                    | Responsibility                 | Actions  | Form Questions  |
|---|--------------------------------|--|---|
| <b>Approval Stage 3.4 Health &amp; Safety</b> | Role:<br>Approver<br>Stage 3.4 | Action 1: Review requestor forms<br>Action 2: Review attachments<br>Action 3: Review MSDS<br>Action 4: Fill out H&S check form<br>Action 5: Evaluation judgment + Comment  | <ul style="list-style-type: none"> <li>○ Workplace measurements required at trial?</li> <li>○ Workplace measurements required after operational implementation?</li> <li>○ State what specific safety measures are necessary.</li> <li>○ State if specific protective equipment is necessary.</li> <li>○ Other specific safety measure(s) necessary?</li> </ul>   |
| <b>Approval Stage 3.5 Logistics</b>           | Role:<br>Approver<br>Stage 3.5 | Action 1: Review requestor forms<br>Action 2: Review attachments<br>Action 3: Review MSDS<br>Action 4: Fill out Logistic check form<br>Action 5: Evaluation judgment + Comment   | <ul style="list-style-type: none"> <li>○ Did you check storage prohibitions / required conditions (e.g. storage class) against local possibilities? (comments)</li> <li>○ Is the requested final storage location suitable? (comments)</li> <li>○ Did you check waste disposal conditions &amp; confirm ability by contractors? (comments)</li> <li>○ Are there any transportation requirements for this material?</li> </ul> |
| <b>Approval Stage 4 Plant specifics</b>       | Role:<br>Approver<br>Stage 4   | Action 1: Review requestor forms<br>Action 2: Review previous approval stage forms and final comments (Stage 2+3)<br>Action 3: Review attachments<br>Action 4: Review MSDS<br>Action 5: Provide plant specific check (if required) (PDF preferred)<br>Action 6: Complete risk assessment in ChemWatch<br>Action 7: Decide if approval by leaders required<br><i>(Forward to leader is mandatory if stage 3 or 4 have not recommend usage)</i><br>Action 8: Evaluation judgment + Comment | <ul style="list-style-type: none"> <li>○ Please provide any plant specific documents. (as attachment if applicable)</li> <li>○ Is approval by leader required?</li> </ul>   |
| <b>Approval Stage 5 Plant Manager</b>         | Role:<br>Approver<br>Stage 5   | Action 1: Review approval decision and final comments of previous approval stage (Stage 1-4)<br>Action 2: Provide confirmation documents<br>Action 3: Evaluation judgment + Comment  | <ul style="list-style-type: none"> <li>○ Please attachment confirmation documents if applicable / required. (as attachment)</li> </ul>  |

**Input:**

All inputs are to be provided in PDF file format

- MSDS in national language of requested site
- MSDS in English language for all sites
- PWIS Statement (CEN-QA01-FO-0003-EN)
- Food legal compliance statement such as following Ardagh (IMS) documents or corresponding supplier formats:
  - Confirmation of Physiological Safety - Internal Lacquer Can (CEN-QA01-FO-0006-EN)
  - Confirmation of Physiological Safety - Coil-Coating Material for Ends and Tabs (CEN-QA01-FO-0007-EN)
  - Confirmation of Physiological Safety - Compound (CEN-QA01-FO-0008-EN)

Process: (QA) Quality Assurance  
Sub Process: (QA01) Material Qualification

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**PROCEDURE**

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- Confirmation of Physiological Safety - External Lacquer Can (CEN-QA01-FO-0009-EN)
- Confirmation of Physiological Safety - Printing Inks for Cans and Outside Printing for Ends (CEN-QA01-FO-00010-EN)
- Chemical Composition of individual VOCs (CEN-QA01-FO-00013-EN)
- Approval by leader (Principal) via E-mails, minutes or memos

## 6 Associated and applicable documents

### ChemWatch Training Documentation:

Documentation in latest available edition

- Chemwatch\_User Manual - Part 1 Everyone Login
- Chemwatch\_User Manual - Part 2 SSO Login
- Chemwatch\_User Manual - Part 3 Basic Tools
- Chemwatch\_User Manual - Part 4 Adding Material
- Chemwatch\_User Manual - Part 5 Approver
- Chemwatch\_User Manual - Part 6 EHS Tools

Click here to download ChemWatch - User Manual Package (Edition 1.1)



Chemwatch - User Manual Package (Ed

### Appendix 1:

Supplier Letter (see below)

## 7 Amendment chronology

| Changes compared to previous edition  | Made by   |
|---|-----------|
| 1 <sup>st</sup> edition: Introduction of Chemwatch replaces the "Chemical & Material Approval Form" (CEN-QA01-FO-001-EN). | G. Wagner |

|   |                  |                                      |
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