

GROUP POLICY

# Fiskars Group Environmental Policy

Version history

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## TABLE OF CONTENTS

1. Purpose and scope.....	3
2. Ownership, review and approval .....	3
3. Communication.....	3
4. Document's location in the policies and instructions framework .....	3
5. Definitions .....	3
6. Compliance, Laws and Regulations .....	4
7. Design for Circularity .....	4
8. Product and packaging design .....	4
9. Materials .....	5
Packaging materials.....	5
Glass and Ceramics.....	5
Plastics and Metals .....	6
Wood and other organic materials .....	6
Textiles.....	6
Food.....	6
10. Substances of concern .....	6
Compliance on Hazardous substances .....	6
Voluntary Activities on Substances of Concern .....	7
11. Chemical management and safety.....	7
12. Waste management .....	9
13. Energy and Emissions.....	9
14. Water management .....	11
15. Transportation.....	11
Appendix - Definitions.....	12

## FISKARS GROUP POLICIES

### 1. Purpose and scope

At Fiskars Group we are aware that sustainability has an increasingly high importance in our operating environment. Sustainability has been embedded into our renewed strategic priorities which are inspiring people, exciting customers, growing our business and improving performance.

Purpose of this policy is to

- Support Fiskars Group business targets and strategy
- Provide a framework into Fiskars Group sustainability commitments regarding environment
- Increase environmental awareness in the organization

It is also a commitment to meet statutory or regulatory needs as well as to continually improve our environmental performance. This policy provides guidance on our environmental direction, including design, manufacturing, materials and substances and distribution.

Fiskars Group has set three long-term sustainability commitments which are positive impact, circular product and services and carbon neutral business. This policy will focus on circular products and services and carbon neutral business.

The policy applies to all Fiskars Group's employees and operations globally.

### 2. Ownership, review and approval

Fiskars Group Global QEHS Director is accountable for this Environmental Policy.

The FGLT has approved this Policy on 11<sup>th</sup> of February 2020 and its applicable as of that date.

This Policy is regularly evaluated to ensure that it is up to date.

### 3. Communication

Fiskars Group Global QEHS Director is responsible for the communication, training and interpretation of this Policy as well as giving advice on the implementation of it. The Environmental Policy is available on Fiskars intranet and updated by Global QEHS Director as necessary.

### 4. Document's location in the policies and instructions framework

The Policy's location in the Fiskars Group policies framework is General Strategy (1A).

### 5. Definitions

Definitions can be found in the Appendix.

## 6. Compliance, Laws and Regulations

As a global company operating in consumer goods sector, we comply with the strictest legal and regulatory obligations where we operate. We follow all relevant chemical related laws, including EU REACH in Europe, Proposition 65 in the U.S. and corresponding legislation in other countries. We follow also regulations that set country-specific strict limitations for certain substances in articles.

Our electrical products, such as lamps, sold in the EU are compliant with EU RoHS requirements. Restriction of Hazardous Substances (RoHS) is a product level compliance based on the European Union's Directive 2002/95/EC which restricts the use of certain hazardous substances in electrical and electronic equipment. We comply with similar country-specific requirements and local certifications.

RoHS is closely linked with the Waste Electrical and Electronic Equipment Directive (WEEE) 2012/19/EU which sets collection, recycling and recovery targets for electrical goods and is part of a legislative initiative to solve the problem of huge amounts of toxic electronic waste. At Fiskars Group sales units in European countries are responsible to follow country specific requirements of WEEE directive.

Each country organization is responsible to report their packaging waste and recycling according to the country requirements. We comply with the EU Directive on Packaging and Packaging Waste which provides measures aimed at limiting the production of packaging waste and promoting recycling, re-use and other forms of waste recovery.

Fiskars Group requires our own manufacturing units and DCs and key suppliers to have documented and implemented environmental management system based on ISO 14001 standard which is a primary means to advance continuous improvement in processes and environmental performance. Third-party certified environmental management system supports us to identify, control and mitigate adverse environmental impacts. All units and suppliers ensure that they obtain, keep current, and follow the reporting guidelines of all the required environmental permits and registrations.

## 7. Design for Circularity

To maximise the value of natural capital, we design for circularity and develop our processes to support circular economy. We target to have a financially viable business model for recycling and reselling our products. We encourage the development of use of circular services, such as renting, leasing and reselling. We also assess opportunities for reverse logistics and explore recycling partners.

## 8. Product and packaging design

Lasting design is at the core of our sustainability thinking. We strive to offer products that promote a sustainable lifestyle. We offer products that can be enjoyed for decades and can be re-sold, reused or repaired at the end of life.

We have opportunities to realize circular economy through our lasting design, material development, reduced waste streams and new service models throughout our value chain. We consider environmental impacts of new products and packaging by using 'Sustainability Evaluation Guideline' which includes

checklists and material evaluations. Guideline is to be used in all SBUs and it shall be reviewed regularly. We develop global practices in sustainable design including both product design and packaging design.

## 9. Materials

Global resource scarcity, consumer awareness of sustainability and changing legislation are driving our customers to use more sustainable products.

We consider sustainability of materials in product design and actively explore new materials. When introducing new materials, we consider environmental impacts including our impacts on biodiversity. We continuously co-operate with major raw material suppliers to identify, pilot and implement new more competitive and sustainable raw materials as well as investigate new potential material suppliers. All raw-material, component and packaging suppliers need to show their commitment by signing supplier code of conduct that states the social and environmental requirements for their operations.

SBUs are responsible to define and develop materials used in products and packaging in line with the 'Sustainability guideline' in close co-operation with supply chain.

### **Packaging materials**

We aim to increase the use of packaging materials which are recycled, recyclable and made from sustainable renewable sources. We have significantly reduced the use of plastic packaging materials, and we are implementing further reductions.

We co-operate with packaging material suppliers to reduce the environmental impact of packaging (e.g. printing inks, structure) as well we need to follow the development of appropriate recycling technologies.

To help consumers and customers be more sustainable, we communicate on how to recycle packaging, especially if containing several materials.

We support the recycling of pallets within the supply chain.

### **Glass and Ceramics**

Melting of glass and ceramics batch materials is energy intensive and require raw materials, such as clay, silica sand, from natural sources. However, tableware items may be in use for over a lifetime.

We continuously develop our glass and ceramic recipes to introduce more sustainable ingredients, observe new advanced technologies, and investigate opportunities to utilize recycled material.

We plan to eliminate lead and cadmium in our glassware products. This means that we will launch glass products that do not include intentionally added lead or cadmium.

For ceramics, we are working towards zero added lead in products. We intensify recycling of ceramics at own manufacturing and at suppliers. Alternative uses for scrap materials are actively investigated: e.g. to use scrap as foamed glass, brick production and other insulation materials in case it is not possible to reprocess in the production.

### **Plastics and Metals**

Steel and aluminum are the most common metals in Fiskars Group products. By their nature, these metals typically have a high recycled content. We aim to further increase recycled content to have a positive environmental impact on the mining & processing operation.

We substitute fossil-based raw materials with sustainable alternatives and use recycled plastics where possible. We verify that the sources of our bio-based plastics are sustainable. We comply with different country of sale recycling requirements and communicate recycling instructions to the consumer accordingly.

### **Wood and other organic materials**

Fiskars Group is committed to using wood from certified sustainable forests in new wood products and components. Fiskars Group will not use restricted and endangered wood species.

Certain products within Fiskars Group range containing wood are authorized to use the Forest Stewardship Council (FSC™ C108780) certification.

### **Textiles**

Fiskars Group prefers natural fibres in textiles and is investigating appropriate globally known and trusted certifications.

### **Food**

Fiskars Group sources food from responsible sources. For tea and coffee, our aspiration is to scope most appropriate sustainability certifications.

## **10. Substances of concern**

Increasing global concerns over human health and environmental risks associated with the use of certain environmentally sensitive materials and substances is driving Fiskars Group towards the reduction of substances of concern in our products. Our customers are more and more interested in the sustainability of our business and products.

### **Compliance on Hazardous substances**

At Fiskars Group we aim to avoid the use of substances in our products and manufacturing process that could potentially harm the environment or human health. Therefore, we have identified materials and substances in our supply chain that could possibly cause concern.

With a list of priority materials and substances we proactively work to reduce or eliminate substances of concern. The list of relevant substance of concern must be reviewed and updated in collaboration between the supply chain and SBUs on yearly basis.

Fiskars Group requires suppliers to sign a Supplier Code of Conduct to comply with material restrictions and product safety requirements set by applicable laws and regulations (e.g. EU REACH) and to comply with the possible additional requirements set by Fiskars Group.

## **Voluntary Activities on Substances of Concern**

### *Lead*

Lead and lead oxides have the potential to be harmful to human health and the environment. Fiskars Group is committed to eliminating the intentional use of lead in our ceramic & glass product ranges. These are priority development projects in the business.

### *PVC*

Polyvinyl Chloride (PVC) is a very durable and long-lasting material which can be used in a variety of applications, either rigid or flexible. However, its negative reputation, mainly related to human health effects and limited recycling possibilities are a cause for concern.

Virgin and recycled PVC is used in various components and packaging in our products. We have gradually started to replace PVC in packaging, and we will create an elimination plan to phase out virgin PVC in our products and packaging.

However, a post-industrially recycled PVC is used in the watering hose manufacturing, which supports the circular economy as we utilize the waste material from other local industries.

### *Conflict-free metals*

The term “Conflict minerals” refers to gold, tin, tantalum, tungsten and diamonds mined in the Democratic Republic of the Congo or adjoining countries. Fiskars Group uses only responsible suppliers that comply with appropriate standards, including LBMA (London Bullion Market Association) Responsible Gold Guidance and the EU and US conflict mineral regulations regarding precious metals. The stipulation for ‘Conflict Free’ minerals is a requirement in the Fiskars Supplier Code of Conduct.

From 1 January 2021, EU importers of tin, tantalum, tungsten and gold will have to carry out due diligence on their supply chain.

## **11. Chemical management and safety**

Fiskars Group is committed to protect and promote the environment and the health of customers, employees and those who work in our supply chain.

- *Labelling:*  
 We follow Globally Harmonized System (GHS), including Chemicals Labelling of Products (CLP), classification and labelling of chemicals that sets requirements for EU legislation and in the United States, the Occupational Safety and Health Administration (OSHA) standards.
- *Legislation, registration & authorization:*
  - Fiskars Group’s restricted chemicals and substances are based on REACH or based on a change of chemical to a less hazardous category. We restrict the use of certain substances throughout our organization and supply chain beyond regulatory requirements.
  - Our products in the European market are obliged to comply with EU REACH legislation which covers the registration, evaluation, authorization and restriction of chemicals. In non-European countries, similar chemicals legislation is regulating our business. The sites supplying products to EU market are responsible to follow EU REACH legislation and monitor the Candidate List (of substances of very high

concern) which is updated every 6 months. The Candidate List is available on ECHA's webpage: <https://echa.europa.eu/candidate-list-table>

- Fiskars products comply with Proposition 65 requirements, which defines warning criteria within the State of California to specific exposure levels of designated substances. Link to California Office of health Hazard assessment: <https://oehha.ca.gov/proposition-65/proposition-65-list>

- *Supplier compliance:*

To ensure our suppliers comply with material restrictions and product safety requirements, suppliers must sign Fiskars Group Supplier code of conduct and they are regularly audited. Suppliers must comply with applicable laws and regulations (e.g. REACH) and any Fiskars Group's specific requirements. Suppliers are required to provide details of chemicals used in products for us.

- *Manufacturing site controls:*

- Sites assess risk of chemical as part of EHS risk assessment and implement controls and practices accordingly.
- Sites using chemicals must comply with Occupational Exposure Limits (OELs) which is an upper limit on the acceptable concentration of hazardous substance in workplace air for a particular material or class of materials. Sites control and document their exposure measurements fulfilling occupational exposure limits and if necessary, personal protective equipment must be worn. They shall also re-measure the air quality if any chemicals in use or in process is changed.
- There is a chemicals responsible colleague at all our production sites and suppliers. All the employees who may need to handle or are exposed to chemicals at their work, are educated with safe handling of chemicals during job orientation or through a (safety card) training. When purchasing new chemicals or substances for the company premises, the site chemicals responsible should be aware of the introduction.
- There are regularly internal and external audits to ensure safe use of chemicals. Also, we develop the monitoring of the hazardous chemicals from site-level to global level.
- Employees handling chemicals must be aware of the safety and environmental risks of the chemicals they are using. This includes chemicals' safe handling, movement, storage, recycling, reuse and disposal.
- Operational Safety Data Sheet (SDS) or Material Safety Data Sheet (MSDS), include information about the properties of substance, its hazards and instructions for handling, disposal and transport and first-aid, fire-fighting and exposure control measures. All Fiskars Group sites handling chemicals must have up-to-date and specific MSDS in place and introduced to employees.
- Proper storage of chemicals – in marked area, labelled, in approved containers and MSDS in place – according to storing conditions defined in MSDS.
- We ensure the hazardous waste is safely processed at suitable facilities, and report on hazardous waste disposal according to the relevant regulations.



## 12. Waste management

Our target for 2030 is to create no waste to landfill. We strive to achieve this by following waste hierarchy, improving material efficiency and identifying and introducing new recycling opportunities.

First and foremost, we prevent waste and reuse waste wherever possible. In all our operations, including manufacturing, own retail, offices and DCs we shall identify waste, have sorting instructions in place and sort all waste types appropriately. Each employee is responsible for sorting and recycling. We increase awareness of recycling in the company, including offices and own retail.

At manufacturing we shall increase reprocessing of scrap internally without compromising on product quality. We will actively seek and utilize external partners in recycling.

Landfilling is the least preferred waste management option.



Source: [European Commission](#).

*Waste hierarchy. The hierarchy establishes preferred program priorities based on sustainability.*

## 13. Energy and Emissions

We at Fiskars Group are committed to strive to minimize our emissions by being more energy efficient and investing in renewable energy. We measure our impact throughout the value chain and work with our partners to reduce the impact.

- *Emissions from the value chain:*
  - Fiskars Group is committed to promoting energy efficiency and identifying new solutions throughout our value chain. Our environment and energy approach is guided by two principles: supporting long-term competitiveness and mitigating negative impacts.
  - We have set emission reduction targets for our supply chain. To follow development in right direction, we report, monitor and reduce the direct emissions from own sites (Scope 1) and indirect emissions from the generation of purchased energy (Scope 2).
  - The emissions generated by our sites are regulated by the relevant authorities with limits set through environmental impact assessments and permitting processes that take

account of local conditions and legislation. Our sites monitor their emissions and their compliance with environmental permits and requirements, like do the relevant environmental authorities. In the European Union, the Member States are required to control and reduce the impact of industrial emissions on the environment under the Industrial Emissions Directive (IED).

- *Target setting:*
  - We aim to align our short-term and long-term emission reduction targets with Paris Climate Agreement. To approach that we will develop our emission reporting and assess indirect emissions from our value chain (Scope 3). To make sure we will meet the emission reduction targets, we need to identify more opportunities and we may need to make investment plans to reach our goals. Alongside, we need to follow legislation on emissions and possible related restrictions.
  
- *Energy efficiency and initiatives:*
  - We strive for increasing energy efficiency in production processes and our facilities. Key ways to improve energy efficiency are identifying energy saving opportunities in both processes and facilities and improving process capability and efficiency. Continuous energy saving actions, such as heat recovery, installation of LED lights and efficient air-conditioning continue.
  - To conserve energy, we turn off non-essential equipment, turn on non-essential equipment later and turn off earlier, and aim to use existing equipment in a smarter way. When investing for a new equipment or machinery, we investigate the optimum environmental solution.
  - We develop energy consumption monitoring to observe potential 'waste energy', and so decrease our CO2 emissions.
  - All Fiskars Group employees are responsible for economical use of energy. We increase awareness and training of employees and suppliers on economical use of energy.
  
- *Supplier engagement:*
  - Also, we support our key suppliers to significantly reducing their emissions. We engage key suppliers through trainings, workshops, supplier days and sustainability development programs.
  
- *Renewable energy sources:*
  - We commit to investigate and increase the use of renewable energy sources with investments in place.
  - By installing solar panels, we can reduce the external electricity use and produce CO2 neutral electricity in-house. We should consider using solar energy wherever it's feasible and economically reasonable within the frames of country-specific legislation. We also follow changing legislation in the countries.
  - Natural gas is a fossil fuel and essential to produce a high enough heat value for glass and ceramics processing as well as some metal processing. We look for opportunities to replace fossil fuels, including natural gas and propane, with the renewable options like biogas.

## 14. Water management

Water availability is a growing concern in many parts of the world. Water plays a central role in some of our production processes, such as cleaning, heating or cooling. Our production process water is purified by waste water treatment plants before it is safely discharged in accordance with regulatory requirements. Non-process water is typically clean enough to be safely released without treatment.

We recycle water in our sites whenever possible to minimize the need for water intake. We have developed closed-loop systems reducing water consumption. Our suppliers generating effluent are audited both by Fiskars Group and environmental authorities to meet the local environmental regulations.

We are committed to minimize and optimize the use of water throughout in Fiskars Group, and thus reducing negative environmental impact.

## 15. Transportation

We aim at managing and reducing the environmental impact of the transportation related to our business, including transportation into, within and from Fiskars Group. We use global logistic service providers that have environmental management systems and actively promote their own ambitious emission reduction targets. International laws regulate transportation, which contributes to reducing emissions from transportation.

We track carbon dioxide emissions from our major global logistic service providers. Logistic service providers are regularly audited by Fiskars Group and by external auditors. We develop the emissions data tracking, as well as take the impact on the environment into consideration when making decisions on changing of transportation modes and logistics. We also consider environmental impacts when planning and arranging travel, and we make use of video and telephone meetings whenever possible.

## APPENDIX - DEFINITIONS

Term	Definition
Bio-based (of a feedstock, chemical or material)	Made wholly or to a significant part from biomass. (Does not define or limit the amount of energy or conversion steps needed to make the substance.) E.g. sugar cane is processed to produce ethylene which can be then used to manufacture polyethylene plastic.
Biodegradable	A material is biodegradable if it can, with the help of microorganisms, break down into natural elements (like water, carbon dioxide and biomass). E.g. wood, paper, food waste.
Biodiversity	Biodiversity refers to the range of genetic differences, species differences and ecosystem differences in a given area.
By-product	By-product is a substance or object, resulting from a production process, the primary aim of which is not the production of that item.
Candidate list	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.
Carbon footprint	A carbon footprint defined as the total greenhouse gas (GHG) emissions caused by an individual, organization, or product, expressed as carbon dioxide equivalent.
CDP	Carbon Disclosure project. CDP is a not-for-profit charity that runs the global disclosure system for investors, companies, cities, states and regions to manage their environmental impacts.
Circular Economy	A circular economy aims to maintain the value of products, materials and resources for as long as possible by returning them into the product cycle at the end of their use, while minimising the generation of waste. The fewer products we discard, the less materials we extract, the better for our environment. E.g. sharing, leasing, reusing, refurbishing and recycling
Conflict mineral	“Conflict minerals” refers to gold, tin, tantalum, tungsten and diamonds mined in the Democratic Republic of the Congo or adjoining countries (in politically unstable areas).
Critical Raw Materials	Critical raw materials (CRMs) are raw materials of a high importance to economy of EU and whose supply is associated with a high risk.
Disposal	Disposal means any operation which is not recovery, even where the operation has as a secondary consequence the reclamation of substances or energy.
Ecodesign	The integration of environmental aspects into product design with the aim of improving the environmental performance of the product throughout its whole life cycle.
Emission intensity	Emission intensity= GHG emissions (Ton) / Production (ton)
Energy intensity	Energy intensity= Energy consumption (MWh) / Production (ton)

FSC	The Forest Stewardship Council (FSC) is an international non-profit organization that claims to promote responsible management of the world's forests. FSC Chain of custody certification provides credible assurance for products with environmentally and socially responsible sources to access the market.
GHG emissions	Greenhouse Gas emissions
Hazardous waste	Hazardous wastes pose a greater risk to the environment and human health than non-hazardous waste and thus require a stricter control regime. Defined by national legislation.
IED	The Industrial Emissions Directive (IED) and Directive 2010/75/EU of the European Parliament is one of the main EU instrument regulating pollutant emissions from industrial installations.
Industrial scrap	See 'Pre-Consumer Waste'
Life-cycle of materials	Includes all activities related to materials such as extraction, transportation, production, consumption, material/product reuse, recovery, and disposal.
LCA	Life Cycle Assessment. Compilation and evaluation of the inputs (material or energy which enters a unit process), outputs (material or energy which leaves a unit process) and the potential environmental impacts of a product system throughout its life cycle.
Materials	Include all those extracted or derived from natural resources, which may be either inorganic or organic substances, at all points throughout their life-cycles.
Micro plastics	Microplastics are small fragments or granules of plastic less than 5mm in diameter. They are largely formed as plastic products gradually break up, though some plastic products such as the granules in certain personal care products are deliberately manufactured to this size. Other well-known sources of microplastics include fibres from synthetic textiles, and plastic fragments generated by road traffic.
Non-renewable	Natural resources are exhaustible natural resources whose natural stocks cannot be regenerated after exploitation or that can only be regenerated or replenished by natural cycles that are relatively slow at human scale. E.g. metals, minerals, oil.
Non-hazardous waste	Non-Hazardous wastes include all other wastes that do not fit the definition of hazardous wastes.
Non-renewable energy source	Energy source that cannot be replenished, reproduced, grown or generated in a short time period through ecological cycles or agricultural processes. E.g. gasoline, diesel fuel, natural gas
Post-Consumer Waste	It is a material discarded after someone uses it. Post-consumer waste has served its intended purpose, passed through the hands of a final consumer, and has been discarded for disposal or recovery.
Pre-Consumer Waste	It is a material that was discarded before it was ready for consumer use. Pre-consumer waste is the reintroduction of manufacturing scrap (such as trimmings from paper production, defective aluminium cans, etc.) back into the manufacturing process. Scrap is reprocessed without leaving the facility.

Primary raw materials	Primary raw materials are virgin materials, natural or organic substance, such as metallic ores, industrial minerals, construction materials or energy fuels, used for the first time.
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) is a European Union regulation which addresses the production and use of chemical substances, and their potential impacts on both human health and the environment.
Recycling	Recycling means any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes.
Recyclable material	Products or materials that can be collected, separated and processed to be used as raw materials in the manufacture of new products.
Renewable natural resource	Renewable natural resources are natural resources that, after exploitation, can return to their previous stock levels by natural processes of growth or replenishment. Conditionally renewable resources are those whose exploitation eventually reaches a level beyond which regeneration will become impossible at human scale (e.g. clear-cutting of tropical forests) E.g. timber, freshwater, fish, land.
Renewable energy source	Energy source that is capable of being replenished in a short time through ecological cycles or agricultural processes. E.g. geothermal, wind, solar, hydro, and biomass.
Reuse	Reuse is the use of materials or products more than once. E.g. refilling of bottles. Context: The re-introduction of a residual material into a production (or consumption) process so that it is used as an input in its original form.
RoHS	Restriction of Hazardous Substances is a product level compliance based on the European Union's Directive 2002/95/EC, the Restriction of the Use of certain Hazardous Substances in Electrical and Electronic Equipment.
Safety Data Sheet	Materials Safety Data Sheet (MSDS) or Safety Data Sheet (SDS) include information about the properties of the substance, its hazards and instructions for handling, disposal and transport and also first-aid, fire-fighting and exposure control measures.
SCOC	Fiskars Supplier Code of Conduct
Scope 1	Direct GHG emissions from sources that are owned or controlled by an organization.
Scope 2	Scope 2 emissions are indirect emissions from the generation of purchased energy. E.g. purchased or acquired electricity, heating, cooling, and steam consumed by an organization
Scope 3	Scope 3 emissions are all indirect emissions (not included in scope 2) that occur in the value chain of the reporting company, including both upstream and downstream emissions. E.g. purchased goods and services, business travel
SDG	Sustainability Development Goals set by the United Nations

Secondary raw materials	Secondary raw materials are defined as materials produced from other sources than primary. Secondary raw materials can also be obtained from the recycling of raw (i.e primary) materials. E.g. steel or aluminium scrap.
Substances of concern	A chemical that is proven or suspected to be harmful to human health or the environment.
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). See 'Candidate List'.
Virgin material	See 'Primary raw materials'
WEEE	The Waste Electrical and Electronic Equipment Directive (WEEE Directive) is the European Community Directive 2012/19/EU on waste electrical and electronic equipment.