



„Beyond compliance“: Communication along the supply chain

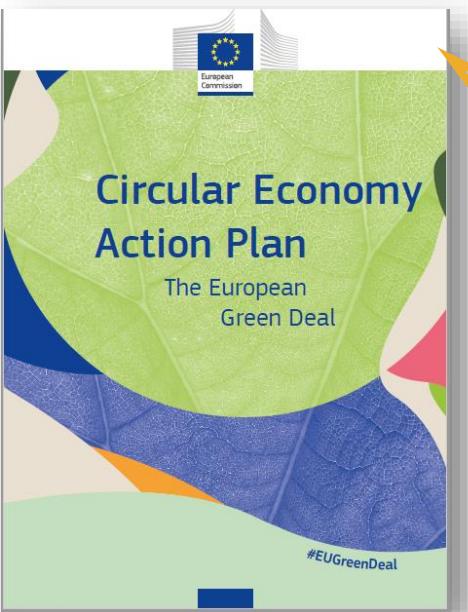
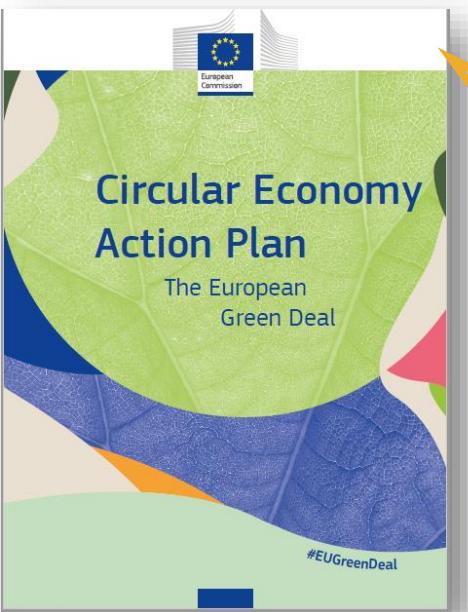
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No. LIFE16 GIE/DE/000738



Looking at the developments on European level...



“Scaling up the circular economy from frontrunners to the mainstream economic players”

“Enhancing circularity in a toxic-free environment, avoid toxic cycles”



Looking at the developments on European level...



“ensure availability of information on chemical content and safe use, by introducing information requirements”

“tracking the presence of substances of concern through the life cycle of materials and products”

- Introduction of a Digital Product Passport
- Widening the scope of the Eco-Design Framework



Looking at the developments on European level...

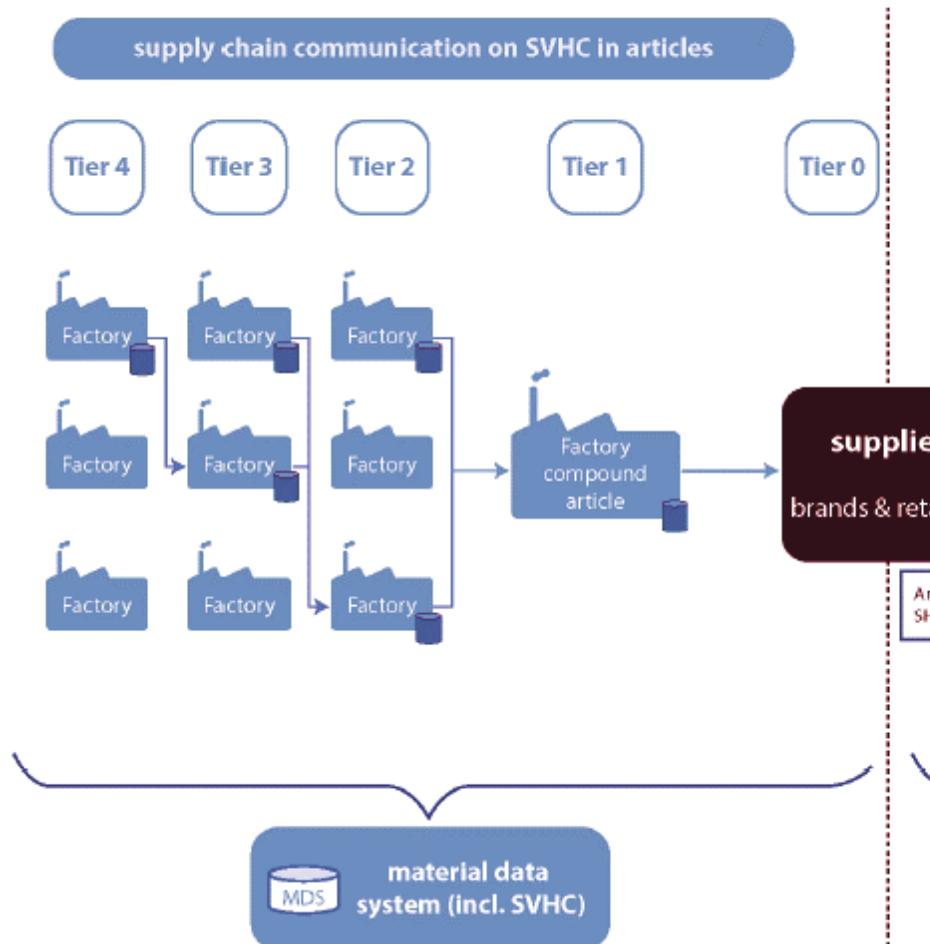


➤ **Transparency as a foundation for the transformation towards a "zero pollution" circular economy**

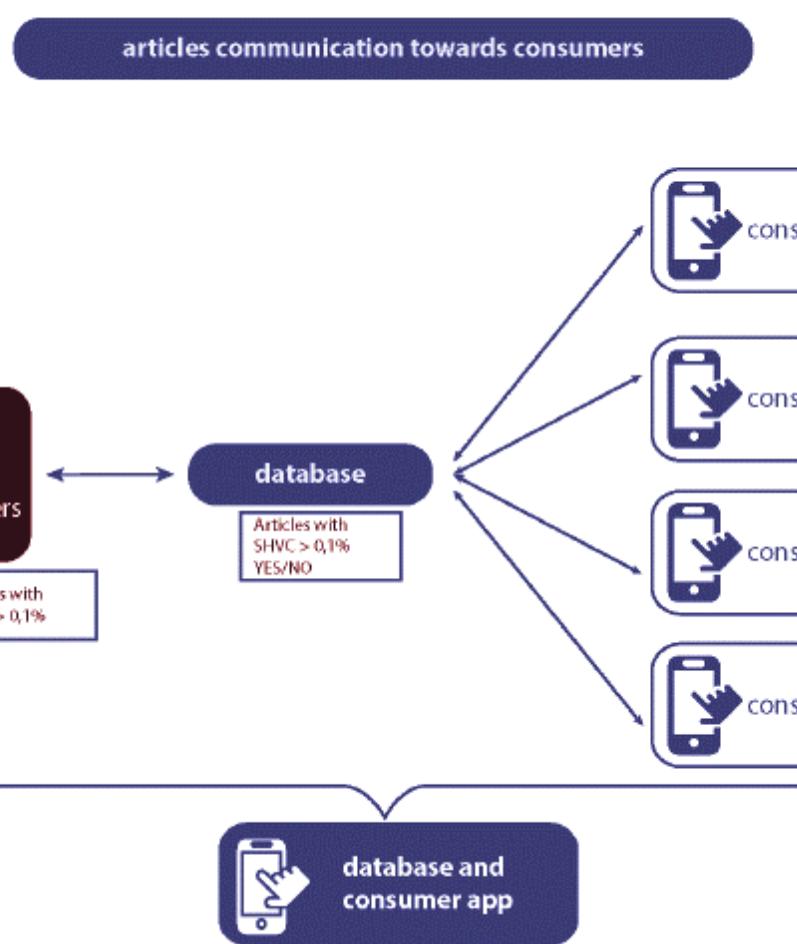


EU Policy context...REACH

Art. 33 (1) REACH



Art. 33 (2) REACH



Source: AskREACH Project Proposal in 2016

Challenge



Brussels, 14.10.2020
SWD(2020) 247 final

COMMISSION STAFF WORKING DOCUMENT

Review of certain provisions of Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restrictions of Chemicals (REACH), as laid down in its Article 138

A screenshot of a website with a green header. The header includes the text "LIFE + ASK REACH", "NEWS", "PROJECT REACH", and "COMPANIES". Below the header is a news article with a thumbnail image of a woman working at a table, the date "30/11/2018", and the text "Many companies not informed about SVHCs in their articles".

The reports and reviews summarised in the previous section can help explain why there has been little improvement in the implementation during the last decade. These include lack of awareness of duty holders, absence of adequate information management systems in certain companies, technical difficulties derived from the complexity of articles and their chemical content and scarce information on imported articles. (S. 34)

Substances in articles lack of transparency
... in a dynamic regulatory environment



Supply Chain Communication status quo

- Restricted Substance List (RSL) and Manufacturing Restricted Substance Lists (MRSL) most common practice
- Suppliers provide general statements of conformity against the (M)RSL rather than information on actual substances

Problem:

- Data quality and reliability, information provided in compliance declarations is too scarce to check even plausibility
- Declarations report to product properties upon the date of delivery, refer to the substances listed on (M)RSL/SVHC list by this date



Supplier impediments



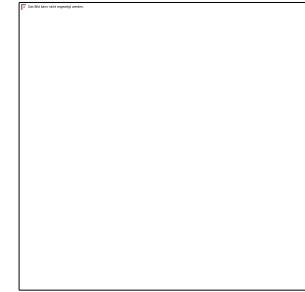
- lack the data they should supply themselves
- are not aware of (all) legal obligations on Substances in Articles
- lack resources to collect data and provide it
- hesitate to provide information because they perceive it confidential

➤ Request overload: Apart from few available sector standards, companies tend to create their own (M)RSLs, thus contributing to the proliferation of SiA requests to suppliers



Supply Chain Action Goals

- Support proactive communication on SVHCs in articles
- Practical test of „state-of-the-art“ IT-tool by iPoint
(free of charge access for pilot companies and suppliers for testing until Aug. 2022)
- Feasibility studies of the Full Material Declaration approach in different supply chain contexts



Benchmarking of tools and industry needs

| Material Data System (MDS) | „Full“ Material Declaration (FMD) | Interoperability & Security | Governance |
|---|--|--|--|
| <ul style="list-style-type: none">Database: Suppliers report <u>all</u> substances in materials and (part-) articlesBill of Materials (BOM) (Structure tree) | <ul style="list-style-type: none">Full declaration → „beyond compliance“Restricted Substance List (RSL; REACH, RoHS...) | <ul style="list-style-type: none">FMD – 10% „Joker“Interoperability (e.g. IPC 175x, IEC 62474)Access controlData protection and integrity | <ul style="list-style-type: none">„Steering Committee“Contractual obligationsTrust |

From reporting of SVHCs to ...
traceability of substances in articles

AskREACH Supply Chain Tool



A composite image showing the AskREACH Supply Chain Tool interface on three different devices: a large monitor, a tablet, and a smartphone. The monitor displays the main dashboard with sections for "My Apps" (Conflict Minerals, Material Compliance, Product Chem Risk), "Preview" (Upgrade: PCR Premium, Free Trial: CM Premium, Free Trial: eSankey), and "Tweets" from the iPoint Twitter account. The tablet shows a detailed view of the "Material Compliance" app, including a "Declared Product" table and a "Substances" section. The smartphone shows a similar view of the "Material Compliance" app. To the right of the devices is a red circular logo with the letters "SH" in white, followed by the text "SustainHub" in a large, bold, black sans-serif font.

sofia

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HOCHSCHULE DARMSTADT
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Dashboard Requests Statistics + Reports Product Declarations Settings

Requests to Suppliers Batch Requests Requests from Customers

Help

Request Configuration

Full Material Declaration Range: 90 - 110 %

Maximum Range Deviation: 20 %

Allow already released responses to be updated
 Allow supplier to see score of completed surveys
 Request SCIP Number/ECHA Article

Attachments (0)
Attach documents to send along with your request.

Regulations and Declaration
How much and which information do you need about the parts you purchase?

Regulations i
Select the regulations you need a compliance statement for.

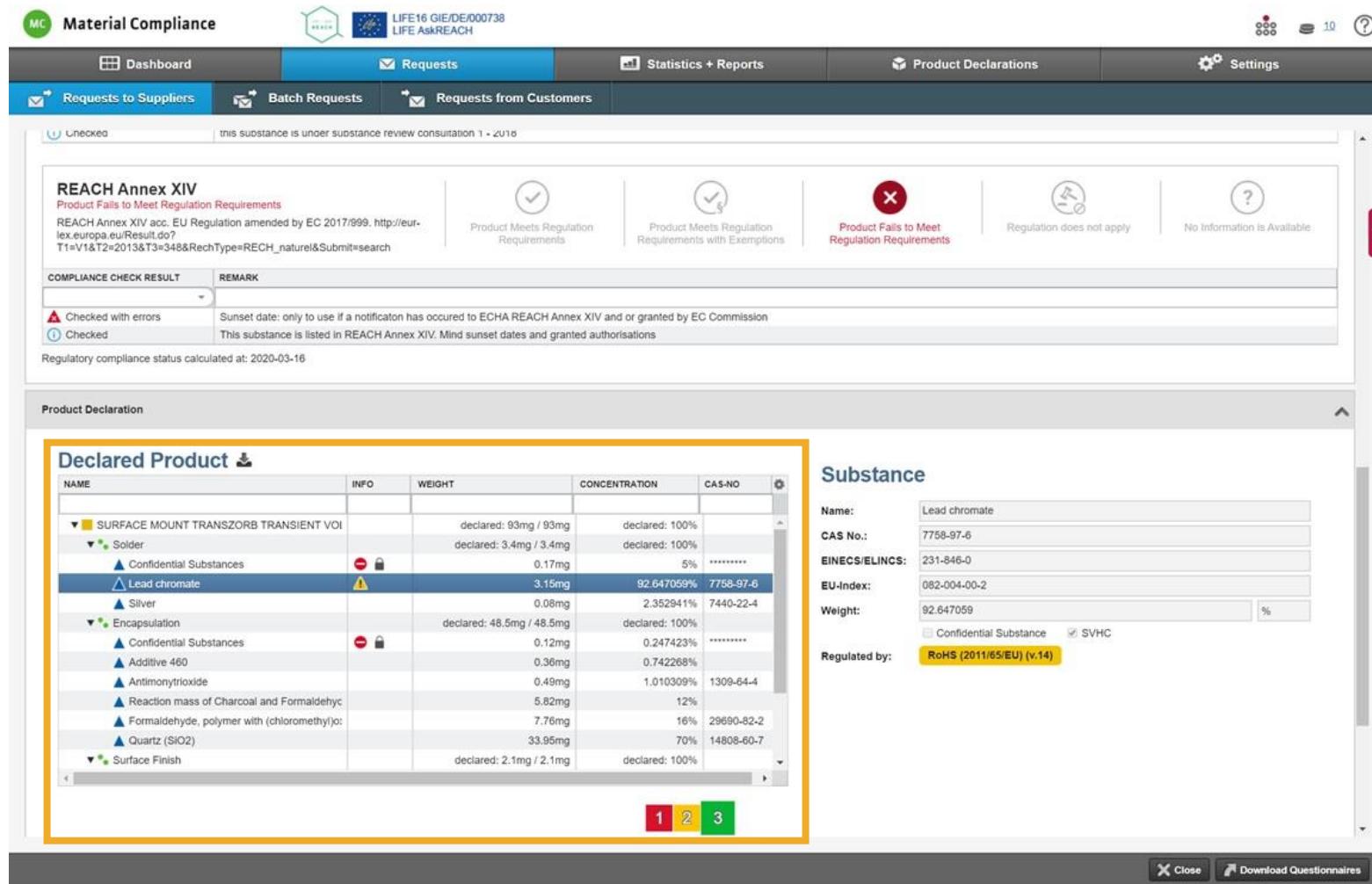
| NAME | RELEASE DATE |
|--|--------------|
| <input type="checkbox"/> Proposition 65 | 9/15/19 |
| <input checked="" type="checkbox"/> REACH Annex XVII | 7/26/19 |
| <input type="checkbox"/> TSCA 6(H) | 9/28/21 |
| <input type="checkbox"/> ECHA CoRAP | 7/12/21 |
| <input type="checkbox"/> SVHC mixtures | 7/13/21 |
| <input type="checkbox"/> RoHS (2011/65/EU) | 3/12/19 |
| <input checked="" type="checkbox"/> SVHC material | 7/13/21 |
| <input type="checkbox"/> SVHC each level | 7/13/21 |
| <input type="checkbox"/> REACH Annex XIV | 6/28/21 |
| <input type="checkbox"/> CMR 1A&1B | 6/18/21 |

Do you need information on substances above regulation thresholds? i
 Noncompliance requires substance declaration.

A compliance statement is not enough? i
 Ask for product declarations instead of compliance statements.

Declaration Scope*

Supply chain tool – Beyond Compliance

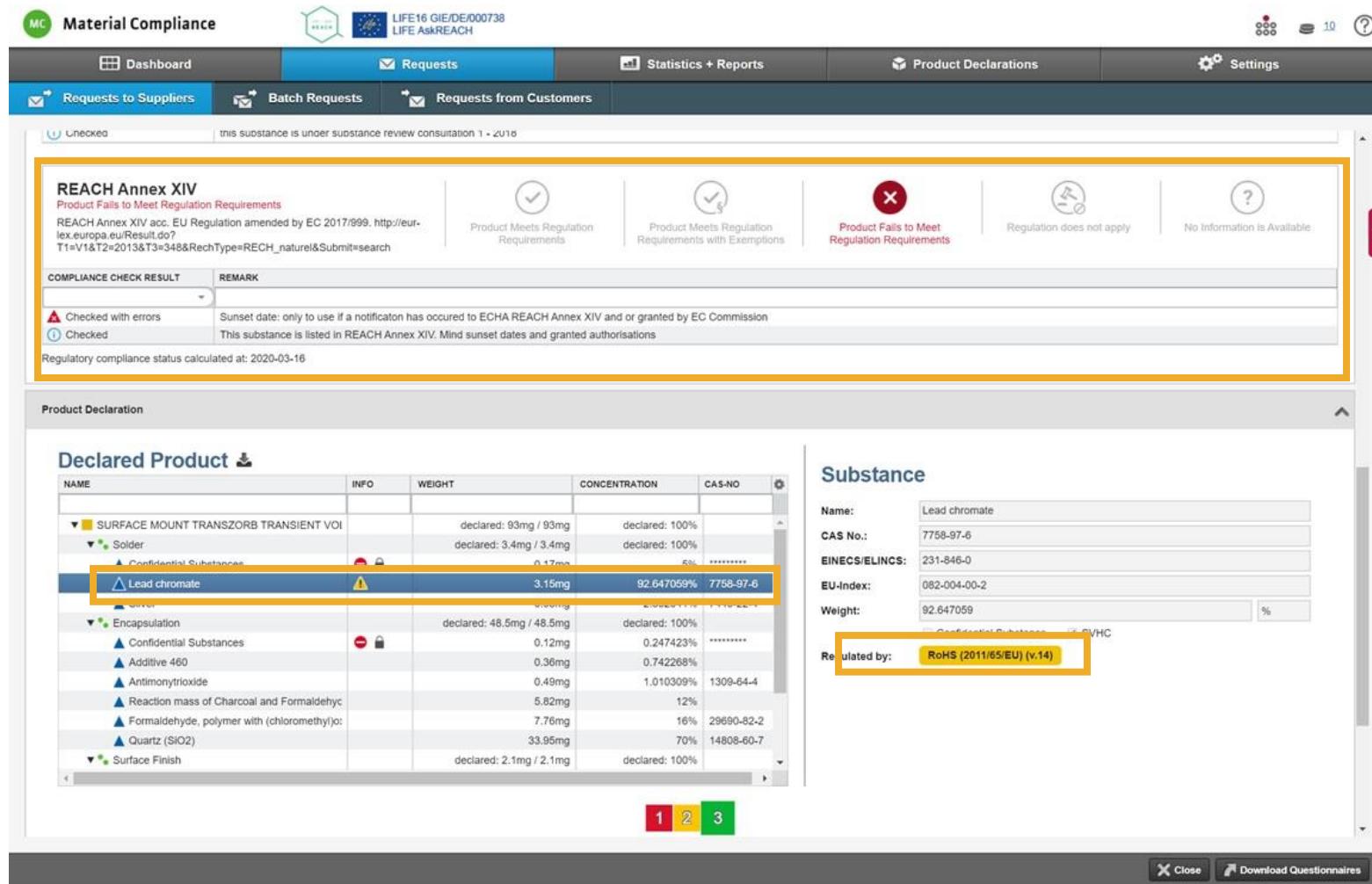


The screenshot shows the Material Compliance (MC) software interface. At the top, there are navigation tabs: Dashboard, Requests (selected), Statistics + Reports, Product Declarations, and Settings. Below the tabs, there are sub-tabs: Requests to Suppliers, Batch Requests, and Requests from Customers. The main content area displays a product declaration for a declared product. The declaration table includes columns for NAME, INFO, WEIGHT, CONCENTRATION, and CAS-NO. The substance table on the right lists details for Lead chromate, including Name, CAS No., EINECS/ELINCS, EU-Index, Weight, and Regulation. The software interface includes various status indicators and a help button.

| NAME | INFO | WEIGHT | CONCENTRATION | CAS-NO |
|--|------|---------------------------|----------------|------------|
| SURFACE MOUNT TRANZORB TRANSIENT VOI | | declared: 93mg / 93mg | declared: 100% | |
| Solder | | declared: 3.4mg / 3.4mg | declared: 100% | |
| Confidential Substances | 🚫 | 0.17mg | 5% | ***** |
| Lead chromate | ⚠ | 3.15mg | 92.647059% | 7758-97-6 |
| Silver | | 0.08mg | 2.352941% | 7440-22-4 |
| Encapsulation | | declared: 48.5mg / 48.5mg | declared: 100% | |
| Confidential Substances | 🚫 | 0.12mg | 0.247423% | ***** |
| Additive 460 | | 0.36mg | 0.742268% | |
| Antimonytrioxide | | 0.49mg | 1.010309% | 1309-64-4 |
| Reaction mass of Charcoal and Formaldehyd | | 5.82mg | 12% | |
| Formaldehyde, polymer with (chloromethyl): | | 7.76mg | 16% | 29690-82-2 |
| Quartz (SiO2) | | 33.95mg | 70% | 14808-60-7 |
| Surface Finish | | declared: 2.1mg / 2.1mg | declared: 100% | |

| Substance | |
|----------------|--------------------------|
| Name: | Lead chromate |
| CAS No.: | 7758-97-6 |
| EINECS/ELINCS: | 231-546-0 |
| EU-Index: | 082-004-00-2 |
| Weight: | 92.647059 |
| Regulated by: | RoHS (2011/65/EU) (v.14) |

Supply chain tool – Beyond Compliance



The screenshot shows the Material Compliance (MC) software interface. The top navigation bar includes 'Material Compliance', 'LIFE16 GIE/DE/000738 LIFE AskREACH', and 'Dashboard', 'Requests', 'Statistics + Reports', 'Product Declarations', and 'Settings'.

The 'Requests' tab is active, showing a sub-tab 'Requests to Suppliers'. A message box indicates 'this substance is under substance review consultation 1 + 2018'.

A yellow box highlights the 'REACH Annex XIV' section, which displays a 'Product Fails to Meet Regulation Requirements' status. The status is also reflected in the 'Compliance Check Result' table:

| COMPLIANCE CHECK RESULT | REMARK |
|-------------------------|---|
| ⚠ Checked with errors | Sunset date: only to use if a notification has occurred to ECHA REACH Annex XIV and or granted by EC Commission |
| ⓘ Checked | This substance is listed in REACH Annex XIV. Mind sunset dates and granted authorisations |

Regulatory compliance status calculated at: 2020-03-16.

The 'Product Declaration' section shows a 'Declared Product' table:

| NAME | INFO | WEIGHT | CONCENTRATION | CAS-NO |
|--|------|---------------------------|----------------|------------|
| SURFACE MOUNT TRANZORB TRANSIENT VOI | | declared: 93mg / 93mg | declared: 100% | |
| ↳ Solder | | declared: 3.4mg / 3.4mg | declared: 100% | |
| ↳ Confidential Substances | | 0.17mg | 5% | ***** |
| ↳ Lead chromate | ⚠ | 3.16mg | 92.647059% | 7758-97-6 |
| ↳ Encapsulation | | declared: 48.5mg / 48.5mg | declared: 100% | |
| ↳ Confidential Substances | 🚫 | 0.12mg | 0.247423% | ***** |
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| ↳ Surface Finish | | declared: 2.1mg / 2.1mg | declared: 100% | |

The 'Substance' section details 'Lead chromate' with CAS No.: 7758-97-6, EINECS/ELINCS: 231-546-0, EU-Index: 082-004-00-2, and Weight: 92.647059%. It is regulated by 'RoHS (2011/65/EU) (v.14)'.

Page navigation: 1 2 3

Buttons: Close, Download Questionnaires

Why Traceability of SiA?



- Support Compliance today – and tomorrow
...also with a view to circular economy (avoid „toxic material cycles“)
- More effective and efficient (risk) management: Suppliers and processes
- Data source for product design
- Foundation for credible transparency for consumer
- ...all can contribute to: New business models



Interested „pilots“ are welcome

- Free of charge access for pilot companies and suppliers for testing until Aug. 2022



Information, Flyer, Supply Chain Communication Tool Video-Tutorials (English):
<https://www.askreach.eu/supply-chain-tool/>

Email: askreach@sofia-research.com

