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# „Beyond compliance“: Communication along the supply chain

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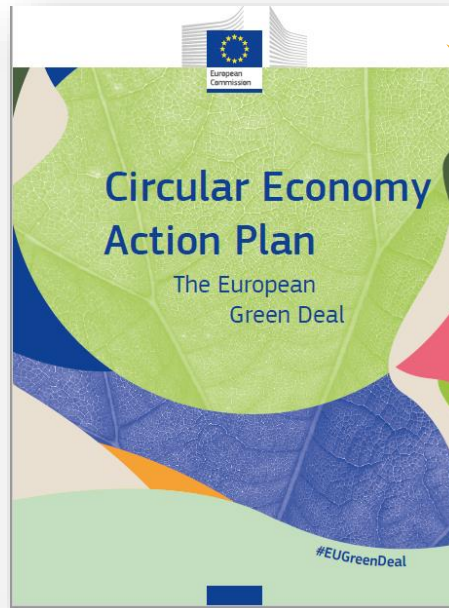
2019/04/11

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"

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# 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**

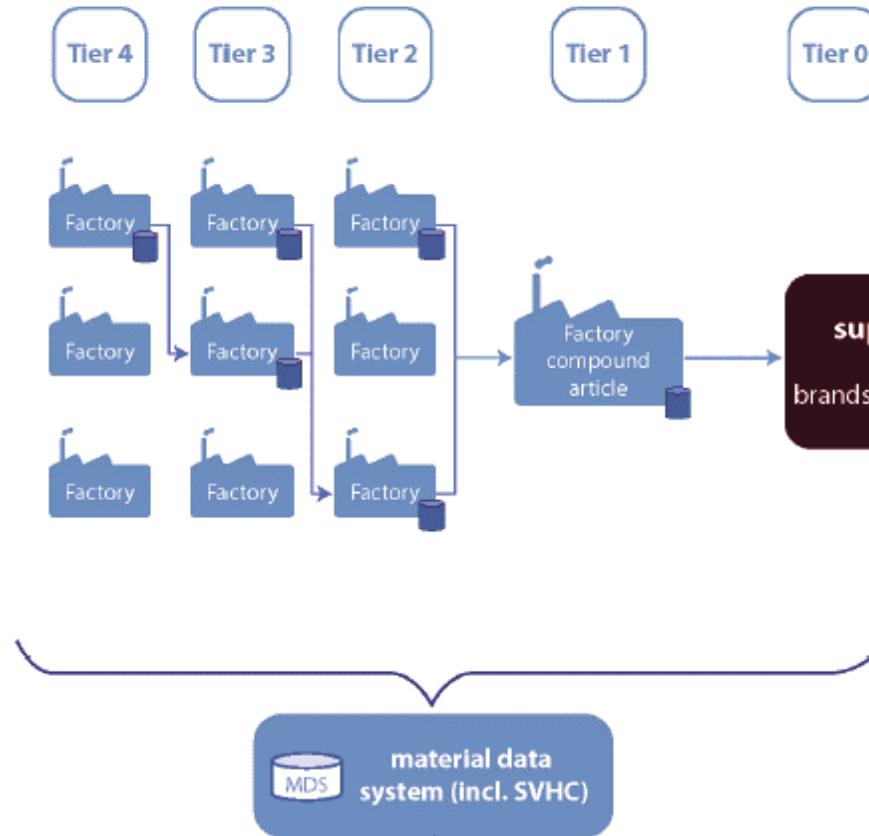
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# EU Policy context...REACH

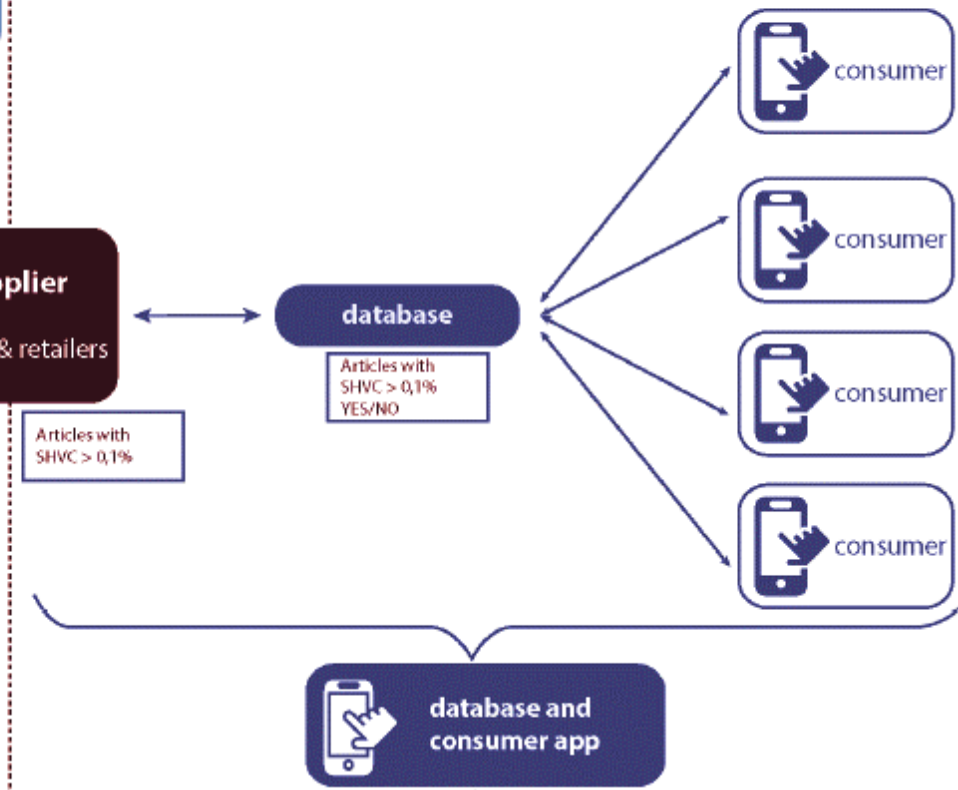
## Art. 33 (1) REACH

supply chain communication on SVHC in articles



## Art. 33 (2) REACH

articles communication towards consumers



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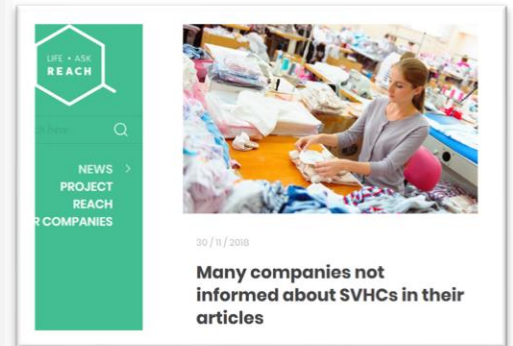
# Challenge



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



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

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# 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

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# 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

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# 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



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# Benchmarking of tools and industry needs

## Material Data System (MDS)

- Database: Suppliers report (all) substances in materials and (part-) articles
- Bill of Materials (BOM) (Structure tree)

## „Full“ Material Declaration (FMD)

- Full declaration → „beyond compliance“
- Restricted Substance List (RSL; REACH, RoHS...)

## Interoperability & Security

- FMD – 10% „Joker“
- Interoperability (e.g. IPC 175x, IEC 62474)
- Access control
- Data protection and integrity

## Governance

- „Steering Committee“
- Contractual obligations
- Trust

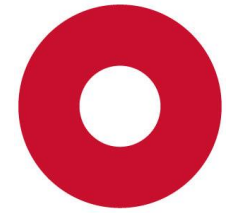


From reporting of SVHCs to ...  
**traceability of substances in articles**

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# AskREACH Supply Chain Tool



iPoint



SustainHub



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Dashboard

Requests

Statistics + Reports

Product Declarations

Settings

Requests to Suppliers

Batch Requests

Requests from Customers

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Request Name: \*

Due Date: \*

October 2021

SUN	MON	TUE	WED	THU	FRI	SAT
26	27	28	29	30	1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31	1	2	3	4	5	6

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 ⓘ

Select the regulations you need a compliance statement for.

<input type="checkbox"/>	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? ⓘ

☐ Noncompliance requires substance declaration.

A compliance statement is not enough? ⓘ



☒ Ask for product declarations instead of compliance statements.

Declaration Scope \*

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# Supply chain tool – Beyond Compliance

**MC Material Compliance**   LIFE16 GIE/DE/000738  
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Dashboard Requests Statistics + Reports Product Declarations Settings

Requests to Suppliers Batch Requests Requests from Customers

Unchecked this substance is under substance review consultation 1 • 2016

### REACH Annex XIV

Product Fails to Meet Regulation Requirements

REACH Annex XIV acc. EU Regulation amended by EC 2017/999. [http://eur-lex.europa.eu/Result.do?T1=V1&T2=2013&T3=348&RechType=RECH\\_naturel&Submit=search](http://eur-lex.europa.eu/Result.do?T1=V1&T2=2013&T3=348&RechType=RECH_naturel&Submit=search)




Product Meets Regulation Requirements Product Meets Regulation Requirements with Exemptions Product Fails to Meet Regulation Requirements Regulation does not apply No information is Available

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

### Product Declaration

#### Declared Product

NAME	INFO	WEIGHT	CONCENTRATION	CAS-NO
▼ SURFACE MOUNT TRANSORB 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 Formaldehyc		5.82mg	12%	
▲ Formaldehyde, polymer with (chloromethyl)ox		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: 231-846-0

EU-Index: 082-004-00-2

Weight: 92.647059 %

☐ Confidential Substance ☒ SVHC

Regulated by: RoHS (2011/65/EU) (v.14)

1 2 3

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# Supply chain tool – Beyond Compliance

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1 2 3

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# 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

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# 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](mailto:askreach@sofia-research.com)

