h_da

HOCHSCHULE DARMSTADT UNIVERSITY OF APPLIED SCIENCE

sofia

LIFE • ASK **REACH**

PROACTIVE APPROACHES OF SUPPLY CHAIN COMMUNICATION AND AMBITIONS OF INTERSECTORAL COMMUNICATION STANDARDS (PROACTIVE ALLIANCE)

Martin Führ, Leonie Lennartz, Julian Schenten Sonderforschungsgruppe Institutionenanalyse (sofia), Hochschule Darmstadt

No. LIFE16 GIE/DE/000738







Art. 33 (1) REACH Art. 33 (2) REACH supply chain communication on SVHC in articles articles communication towards consumers Tier 0 Tier 4 Tier 3 Tier 2 Tier 1 consumer Factory Factory, consumer supplier database brands & retailers Articles with SHVC > 0,1% consumer YES/NO Articles with SHVC > 0,1% consumer database and material data MDS consumer app system (incl. SVHC) -----...... Member State training, support, awareness, awareness partner action enhancement support





Source: 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



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)



REACH

sofia

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



REACH

Benchmarking of tools and industry needs

Material Data System (MDS)

- Database: Suppliers report (<u>all</u>) 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...)
- Compliance
 Declaration

Interoperability & Security

- FMD 10% "Joker"
- Interoperability (e.g. IPC 175x, IEC 62474)
- Access control
- Data protection nnd integrity

Governance

- "Steering Committee"
- Contractual obligations
- Trust

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

h da

EU Policy context: Green Deal





REACH

Harmonised information systems for the presence of substances of concern 2021

proactive alliance

Automotive, aerospace & defence, chemicals, electrical and electronics, furniture, home textiles, insulation, medical devices, metalworking and metal articles textiles and sporting goods

towards a global material reporting standard





Ambition of inter-sectoral communication standards

so**fia**

REACH

Recommendations

proactive alliance towards a global material reporting standard

Discussion Paper with Technical Recommendations See <u>https://www.proactive-alliance.info/our-progress</u>

- 1. Harmonisation of criteria for Substance Reporting Lists (SRL)
- 2. Harmonisation of Material Reporting Standards "Ensure any standard is compatible with Full Material Declaration (FMD) reporting and supports the Regulatory Compliance Declaration (RCD)"

3. Cooperation at a global level



AskREACH goals



- Support proactive communication on SVHCs in articles
- Mid-time perspective: Full traceability



Practical test of "state-of-the-art" IT-tool by iPoint



• Feasibility studies in different supply chain contexts



Set up of Feasibility Studies

- Pilots and their suppliers benefit from free of charge access to test the tool
- Participation of pilots in tool specifications (regulations, declaration types, tolerances)
- Flexible starting point for tool test, according to company preferences



REACH



Initial Set Up and MasterData

E Dashboard				Administration	Administration					lasterdata
				*						
Hello L	eonie Lennartz, welco	me to the iPoint S	ustainHub					Tweets by @if	PointWorld	
		-		ta throughout the supply chain:	answer requests from cus	tomers, collect data from supp	liers, and check risks	iPoint-svs	tems	14
concerni	ng Material Compliance, Confl	SustainHu	ıb							Leonie Lennartz LAR
Му Ар	DS		ashboard		Administration		Account Manager	ment		🔳 Masterdata
		📻 Suppliers	🛔 Contacts	😭 Purchase Parts	Products	Classifications				ی
CM	Conflict Minerals	Search arguments	i	PRODUCT NAME	PRODUCT NUMBER	STATUS	ORGANIZATION	ТҮРЕ	WEIGHT	CLASSIFICATIONS
MC 500	Material Compliance Supply Chain Question	Life AskREACH <lar> With Sub-organization Product Name: Test Product 1 Product Number: 12345</lar>	IS	Test Product 1	12345	Draft	Life AskREACH <lar></lar>	Article	500.000000 g	
		Status: Classification:	•							





sofia

REACH

Send out requests to suppliers

Request to Supplier Bath Request Bath Request Bath Request Requests to Supplier 	Dashboard		M Requests	Statistics + Reports	Product Declarations	🗳 Settings	
						•	
Beck the regulations you need a complance statement for: Image: Im		· <u>M</u>				_	_
Constraints of the second		mpliance statement for.					
Prepresention 66 Prepresention 65 Prep	NAME					RELEASE DATE	
REACH Annex XW Briship REACH Annex XW 72819 SWHC material 7120 SWHC material 700	CMR 1A&1B					4/26/19	
RACH Annex XII 72819 Halognated Flam Retardants - Selected 12519 SWC material 12519 SWC material 71/20 SWC material 71/20 GOSS 71/20 GOSS 71/20 Ack for product declarations instead of compliance statements. 71/20 Supplement and mough? 0 Full Accuration 71/20 Supplement and mough? 0 Full Accuration 71/20 Supplement active statement is not enough? 0 Full Accuration Active statement is not enough? Supplement active statement is not enough? Active statement is not enough? Full Accuration Active statement is not enough? Supplement active statement is not enough? Active statement is not enough? Supplement active statement is not enough? Active statement is not enough?						9/15/19	
I was prime and a fame Retardants - Selected I was prime 125 18 I was prime 71/20 I was prime 48/20 I was prime 125 18 I was prime 48/20 I was prime 125 18 I was prime I was prime I was prime I was prime <td< td=""><td>. REACH Annex XIV</td><td></td><td></td><td></td><td></td><td>8/15/19</td><td></td></td<>	. REACH Annex XIV					8/15/19	
SVHC material 71/20 SVHC material 71/20 SVHC material 71/20 SVHC material 71/20 GASL 48/20 Accounting from the request for one mough? 31/219 A set is (2011/85/EU) A set is request. To ensure a high answer rate, please choose the surveys carefully. Partial-Declaration I have checked the data and confirm their accuracy. I am aware that an information email about the request. will be set to the primary contact of the suspeir as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the contacts of the cont	REACH Annex XVII					7/26/19	
SVHC each level 7/120 SVHC mixtures 7/120 GADSL 4/820 RetS (2011/65/EU) 4/820 Compliance statement is not enough? Ask for product declarations instead of compliance statements. Perturb Declaration Suppliers may change the product type from the requested to or from Africe, Semicomponent or Midure. Suppliers may change the product type from the requested to or from Africe, Semicomponent or Midure. Perturb Declaration Suppliers to this request. To ensure a high answer rate, please choose the surveys carefully. One the checked the data and confirm there accuracy 1 am aware that an information email about the request wile be sent to the primary contact of the suppler as well as a copy to all other contacts	. Halogenated Flame Retar	fants - Selected				12/5/18	
SWAC matures 71/20 GADSL 71/20 RodWS (2011/65/EU) 71/20 Compliance statement is not enough? Partial-Declaration Scope needs to be selected Partial-Declaration Coope - Partial-Declaration Scope needs to be selected Suppliers may change the product type from the requested to or from Article, Semicomponent or Multure RodWS surveys for your suppliers to this request. To ensure a high answer rate, please choose the surveys carefully. Please confirm before senting the Please confirm before senting the I have checked the data and confirm their accuracy. I am aware that an information email about the request will be sent to the primary contact of the supplier as well as a copy to all other contacts of the Please confirm before senting t	SVHC material					7/1/20	
GADSL 4820 AB20 AB20 ADSL 91219 compliance statement is not enough? Ask for product declarations instead of compliance statements. exampliance statement is not enough? Abs for product declarations instead of compliance statements. exampliance statement is not enough? Abs for product declarations instead of compliance statements. exampliance statement is not enough? Abs for product declarations instead of compliance statements. exampliance statement is not enough? Abs for product declarations instead of compliance statements. exampliance statement is not enough? Abs for product declarations instead of compliance statements. exampliance statement is not enough? Abs for product declaration Scope needs to be selected. Exampliance statement is not enough? Abs for product type from the requested to or from Atticle, Semicomponent or tofuture. Exampliance statement is not enough? Abs for your suppliers to this request. To ensure a high answer rate, please choose the surveys carefully. Please confirm before sending the I have checked the data and confirm their accuracy I am aware that an information email about the request will be sent to the primary contact of the supplier as well as a copy to al other contacts of the	SVHC each level					7/1/20	
RoHS (201165/EU) 31219 compliance statement is not enough? O Ask for product declarations instead of compliance statements. celeration Scope * Full-Declaration A Declaration Scope needs to be selected. Suppliers may change the product type from the requested to or from Article, Semicomponent or Moture. curveys dd surveys for your suppliers to this request. To ensure a high answer rate, please choose the surveys carefully. Please confirm before sending the I have checked the data and confirm their accuracy 1 am aware that an information email about the request will be sent to the primary contact of the supplier as well as a corp to all other contacts of the contacts of the supplier as well as a corp to all other contacts of the contacts of	SVHC mixtures					7/1/20	
Incompliance statement is not enough? ① Ack for product declarations instead of compliance statements. Celaration Scope* Partial-Declaration A Declaration Scope needs to be selected. Suppliers may change the product type from the requested to or from Article, Semicomponent or Moture. Surveys did surveys for your suppliers to this request. To ensure a high answer rate, please choose the surveys carefully. Please confirm before sending the I have checked the data and confirm ther accuracy 1 am aware that an information email about the request will be sent to the primary contact of the supplier as well as a copy to all other contacts of the surveys of the primary contact of the supplier as well as a copy to all other contacts of the surveys of the primary contact of the supplier as well as a copy to all other contacts of the primary contact of the supplier as well as a copy to all other contacts of the primary contact of the supplier as well as a copy to all other contacts of the primary contact of the supplier as well as a copy to all other contacts of the primary contact of the supplier as well as a copy to all other contacts of the primary contact of the supplier as well as a copy to all other contacts of the primary contact of the supplier as well as a copy to all other contacts of the primary contact of the supplier as well as a copy to all other contacts of the primary contact of the supplier as well as a copy to all other contacts of the primary contact of the supplier as well as a copy to all other contacts of the primary contact of the supplier as well as a copy to all other contacts of the primary contact of the supplier as well as a copy to all other contacts of the primary contact of the supplier as well as a copy to all other contacts of the primary contact of the supplice as well as a copy to all other contacts of the primary contact of the supplie	GADSL					4/8/20	
Ask for product declarations instead of compliance statements.	RoHS (2011/65/EU)					3/12/19	
Suppliers may change the product type from the requested to or from Article, Semicomponent or Modure.	eclaration Scope " Full-Declaration	and of compliance statements.		aration Scope needs to be selected.			
Add surveys for your suppliers to this request. To ensure a high answer rate, please choose the surveys carefully. Please confirm before sending the I have checked the data and confirm their accuracy. I am aware that an information email about the request will be sent to the primary contact of the supplier as well as a copy to all other contacts of the	Suppliers may change the product	ct type from the requested to or from					
Please confirm before sending the I have checked the data and confirm their accuracy I am aware that an information email about the request will be sent to the primary contact of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplier as well as a copy to all other contacts of the supplicit as the supplicit as well as a copy to all other contacts of the supplicit as the supplicit							
I have checked the data and confirm their accuracy I am aware that an information email about the request will be sent to the primary contact of the supplier as well as a copy to all other contacts of the supplicit as a copy to all other contacts of the supplicit as a copy to all other contacts of the supplicit as a copy to all other contacts of the supplicit as a copy to all other contacts of the supplicit as a copy to all other contacts of the supplicit as a copy to all other contacts of the supplicit as a copy to all other contacts of the supplicit as a copy to all other contacts of the supplicit as a copy to all other contacts of the supplicit as a copy to all other contacts of the supplicit as a copy to all other contacts of the supplicit as a copy to all other contacts of the supplicit as a copy to all other contacts of the supplicit as a copy to al	kdd surveys for your suppliers to thi	s request. To ensure a high answer r	rate, please choose the surveys careful	ly.			
	6						
			I have checked the data and confirm t	their accuracy. I am aware that an information email about I	the request will be sent to the primary contact of the supplie	r as well as a copy to all other contacts of	
							ч

Visit <u>https://www.askreach.eu/supply-chain-tool/</u> to see the video sequence (5:26–7:46)



LIFE • ASK **R E A C H**

h_da

Answer requests as a supplier

Image: Deskiboard Declare Product Contact Data Attach Documents Verify Data C1 22 C1 C1 C2 C1 C1 C1 C2 C1 C2 C1 C2 C1 C2 C1	Material Com	pliance		LIFE16 GIE/DE/000738 LIFE AskREACH									Li Nguyen -	GlobalTextileSupplie	er 000	(
View Request Declare Product Contact Data Attach Documents Verify Data 02 03 04 03 0 0 04 0 0 0 0 <th></th> <th></th> <th>🖽 Dashboar</th> <th>ď</th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th>🛛 Reque</th> <th>sts</th> <th></th> <th></th> <th></th> <th></th>			🖽 Dashboar	ď							🛛 Reque	sts				
D2 D3 D4 D5 INFO WEIGHT CONCENTRATION CAS NO CONCENTRATION CONCENTRATION CONCENTRATION <t< th=""><th>Requests from C</th><th>ustomer</th><th>S</th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th></t<>	Requests from C	ustomer	S													
IMFO WEIGHT CONCENTRATION CAS-NO Image: Concentration of the concen	view Request			uct	Cont	act Data		Atta	ch Docun	nents			Verify Data	a		
NAME INFO WEIGHT CONCENTRATION CAS.NO Image: Concentration of the concent	1		> 02		03	1		> 04				>	05			-
NAME NFO WEIGHT CONCENTRATION CAS.NO Image: Concentration of the state of t	/ - 14 4 4	• 4	🔹 🚱 Legend and Help			Edit prod	uct									
Image: Construction of the construc	NAME	INFO	WEIGHT	CONCENTRATION	CAS-NO 🏟	Tuner	Artists									
Dress SS 21 (t) declared: 400g / 400g declared: 100%						10000000										
Image: Cotton declared: 200g / 200g declared: 100% Image: Cotton Image																
▲ Poly(10g 5% 9002-92-0 ▲ Cellu 190g 95% 9004-34-6 ▼ ● Back part ((declared: 200g / 200g declared: 100% ▲ Cellu declared: 200g / 200g declared: 100% ▲ Polye 2g 1% 50-00-0 99% ● Polye 198g 99% 902-88-4 Add Remove						Product Code: *	0987-0986									
Cellu 1000 9004-34-6 Celared: 2000 / 2000 declared: 100% Celared: 2000 / 2000		0			10000100101	Defined Weight:*	1	Each +	weighs	400		g	•			
Image: Seak part (for the seak part (for			270													
Constraint Constraint <td></td> <td></td> <td></td> <td></td> <td>9004-34-6</td> <td>Exemptio</td> <td>ns</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>					9004-34-6	Exemptio	ns									
Form 2g 1% 50-00-0 REGULATION NUMBER DESCRIPTION A Polye 198g 99% 9002-88-4 Add Remove								nex XIV, REAC	H Annex XV	1						
▲ Polye 198g 99% 9002-88-4		A			50-00-0	REGULATION	NUMBER	DESCR	IPTION							ø
Add Remove																
	6															





REACH

Response from the pilot company perspective

Material Compliance	LIFE ASKREACH			Leonie Lennartz - Life AskREACH ~	0000
E Dashboard	M Requests	Statistics + Reports	SProduct Declarations	Ö ^O Settings	
🕈 Requests to Suppliers 🏻 🔭 F	Requests from Customers				
eview Response				Collapse All	xpand Al
Request Details					^
Request Name: Request Dress SS 21 Request ID: 152 Request Type: Article (full declaration) Customer: Life AskREACH Request Date: 2020-08-01 Due Date: 2020-08-15 Request Reason: Image: Comparison of the state of	Supplier Name: Supplier Number: Product Name: Product Number: Request Status:	Dress SS 21 0987-0986	Requested Regulations: R0HS (2011/65/EU) REACH Annex XIV REACH Annex XVII		
Attachments (0)					~
Regulatory Compliance 🥝 2/3 📿 0/3 😣	1/3 🛞 0/3 💿 0/3				^

Visit <u>https://www.askreach.eu/supply-chain-tool/</u> to see the video sequence (18:17–18:31)

Pilot Feedback

- "Very helpful communication tool for Substances in Articles"
- "The benefit of the tool lies in the full declaration. This saves time for me when reviewing new regulated substances and I do not need to request existing articles again, unless there are fundamental changes (e.g. change to other plastics)"
- Tool is less complex and easier to work with than expected
- Time invest for pilot participation in Supply Chain Action is less than expected (approx. 15 hours) simple case study
- Pilot considers to work with the tool beyond AskREACH





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



REACH





- Information, Flyer, Supply Chain Communication Tool Video-Tutorials (English): <u>https://www.askreach.eu/supply-chain-tool/</u>
- Email: <u>askreach@sofia-research.com</u>
- National webinars on Supply Chain Communication in 2021



REACH

sofia