



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*

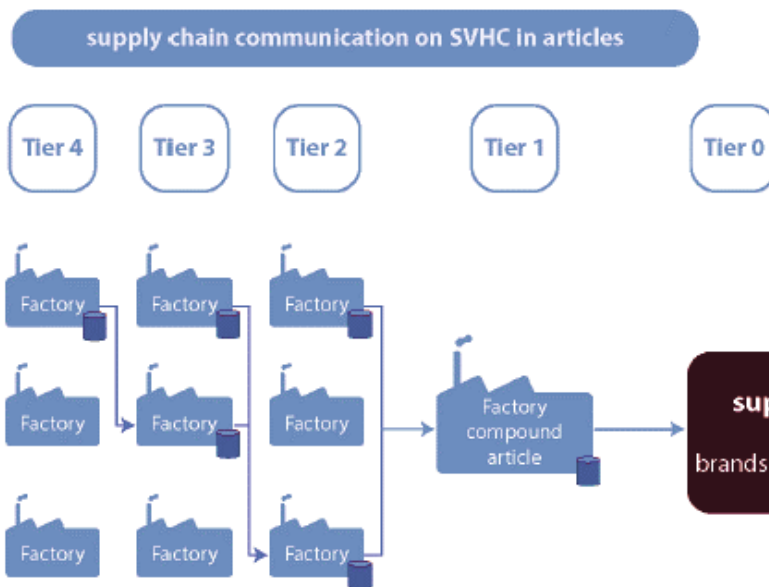
2021-01-21

No. LIFE16 GIE/DE/000738

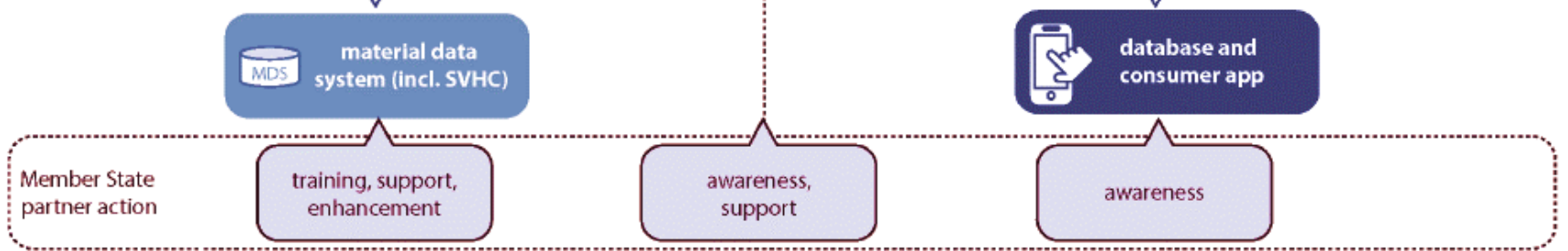
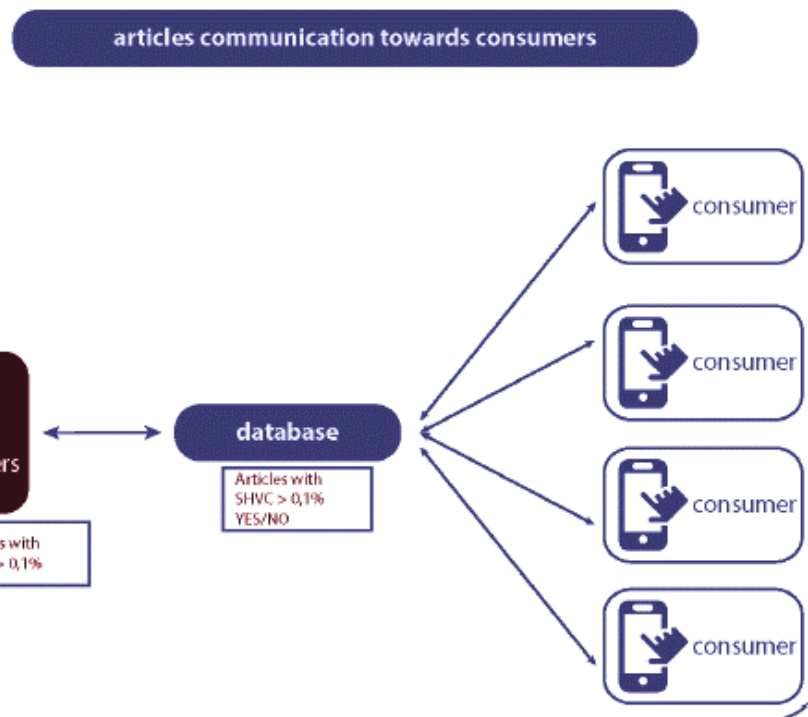


Challenge

Art. 33 (1) REACH



Art. 33 (2) REACH



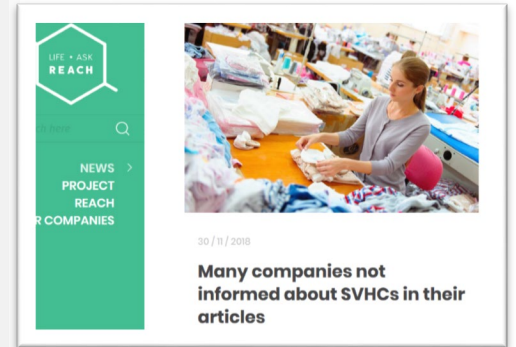
Challenge



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

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...)
- Compliance Declaration

Interoperability & Security

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

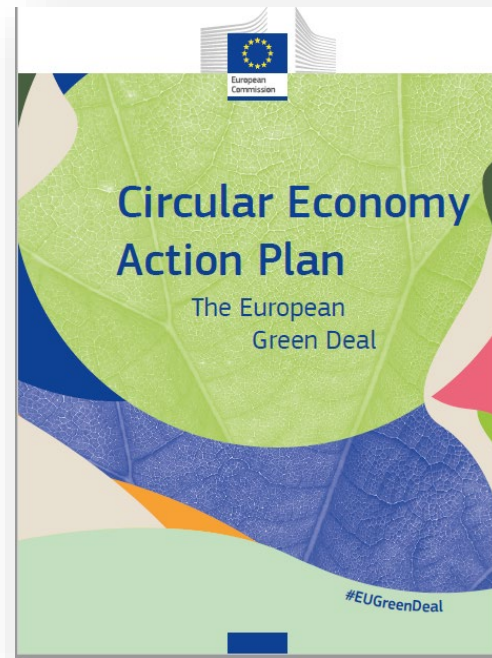
Governance

- „Steering Committee“
- Contractual obligations
- Trust



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

EU Policy context: Green Deal



Harmonised information systems for the presence of substances of concern

2021





proactive alliance

towards a global
material reporting standard

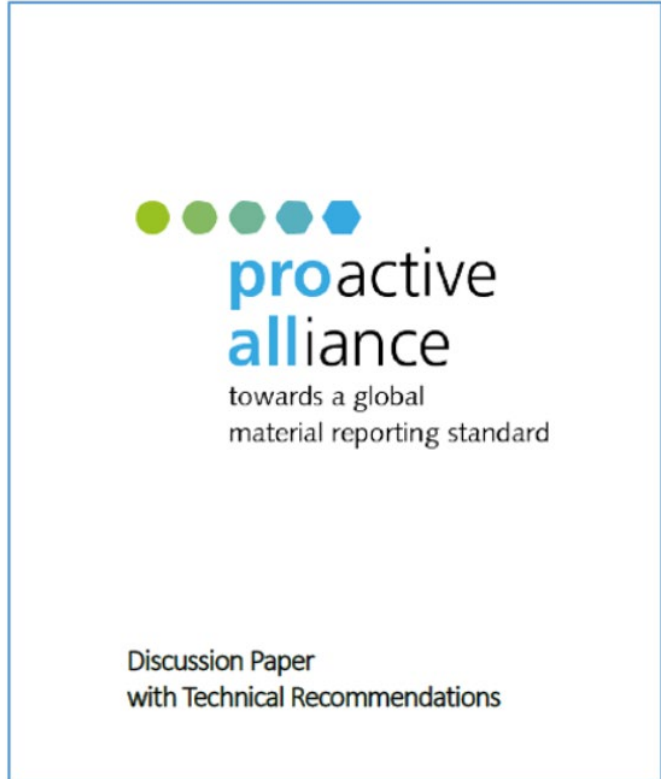
*Automotive, aerospace & defence,
chemicals, electrical and electronics,
furniture, home textiles, insulation,
medical devices, metalworking and
metal articles textiles and sporting
goods*

Ambition of inter-sectoral communication standards

LIFE • ASK
REACH



Recommendations



See <https://www.proactive-alliance.info/our-progress>

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

Initial Set Up and MasterData

The screenshot displays two overlapping views of the SustainHub application. The top view shows the main dashboard with navigation tabs for Dashboard, Administration, Preferences, and Masterdata. A welcome message for Leonie Lennartz is visible, along with a tweet from @iPointWorld. The bottom view shows the 'Products' section under 'Masterdata', featuring a search form and a table of product entries.

Search arguments:

- Organization: * Life AskREACH <LAR>
- With Sub-organizations
- Product Name: Test Product 1
- Product Number: 12345
- Status: [Dropdown]
- Classification: [Dropdown]

PRODUCT NAME	PRODUCT NUMBER	STATUS	ORGANIZATION	TYPE	WEIGHT	CLASSIFICATIONS
Test Product 1	12345	Draft	Life AskREACH <LAR>	Article	500.000000 g	

SustainHub © iPoint-systems gmbh



Send out requests to suppliers

MC Material Compliance LIFE16 GIE/DE/000738
LIFE AskREACH

Leonie Lennartz - LAR

Dashboard **Requests** Statistics + Reports Product Declarations Settings

Requests to Suppliers Batch Requests Requests from Customers

Regulations

Select the regulations you need a compliance statement for.

<input type="checkbox"/>	NAME	RELEASE DATE
<input type="checkbox"/>	CMR 1A&1B	4/26/19
<input type="checkbox"/>	Proposition 65	9/15/19
<input type="checkbox"/>	REACH Annex XIV	8/15/19
<input type="checkbox"/>	REACH Annex XVII	7/28/19
<input type="checkbox"/>	Halogenated Flame Retardants - Selected	12/5/18
<input type="checkbox"/>	SVHC material	7/1/20
<input type="checkbox"/>	SVHC each level	7/1/20
<input type="checkbox"/>	SVHC mixtures	7/1/20
<input type="checkbox"/>	GADSL	4/8/20
<input type="checkbox"/>	RoHS (2011/65/EU)	3/12/19

A compliance statement is not enough?

Ask for product declarations instead of compliance statements.

Declaration Scope ^{*}

Full-Declaration

Partial-Declaration

Suppliers may change the product type from the requested to or from Article, Semicomponent or Mixture.

Surveys

Add surveys for your suppliers to this request. To ensure a high answer rate, please choose the surveys carefully.

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.

Please confirm before sending the requests:

LIFE • ASK
REACH



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

Answer requests as a supplier

MC Material Compliance
LIFE16 GIE/DE/000738
LIFE AskREACH
Li Nguyen - GlobalTextileSupplier

Dashboard
Requests

Requests from Customers

Review Request
Declare Product
Contact Data
Attach Documents
Verify Data

01
02
03
> 04
> 05

Legend and Help

NAME	INFO	WEIGHT	CONCENTRATION	CAS-NO
▼ Dress SS 21 (declared: 400g / 400g	declared: 100%	
▼ Front part (declared: 200g / 200g	declared: 100%	
▼ Cotton		declared: 200g / 200g	declared: 100%	
▲ Poly(🔒	10g	5%	9002-92-0
▲ Cellu		190g	95%	9004-34-6
▼ Back part (declared: 200g / 200g	declared: 100%	
▼ Polyeste		declared: 200g / 200g	declared: 100%	
▲ Form	⚠️	2g	1%	50-00-0
▲ Polye		198g	99%	9002-88-4

Edit product

Type:

Product Name: *

Product Code: *

Defined Weight: * Each weighs

Exemptions

Requested regulations: REACH Annex XIV, REACH Annex XVII

REGULATION	NUMBER	DESCRIPTION

Save
Cancel
Back
Next
Finish



Response from the pilot company perspective

The screenshot displays the 'Material Compliance' software interface. At the top, there is a navigation bar with tabs for 'Dashboard', 'Requests', 'Statistics + Reports', 'Product Declarations', and 'Settings'. Below this, there are sub-tabs for 'Requests to Suppliers' and 'Requests from Customers'. The main content area is titled 'Review Response' and contains a 'Request Details' section. This section is divided into three columns: 'Request Details', 'Supplier Information', and 'Requested Regulations'. The 'Request Details' column includes fields for Request Name, ID, Type, Customer, Date, Due Date, and Reason. The 'Supplier Information' column includes fields for Supplier Name, Number, Product Name, Number, and Status. The 'Requested Regulations' column lists RoHS (2011/65/EU), REACH Annex XIV, and REACH Annex XVII. Below the details, there is an 'Attachments (0)' section and a 'Regulatory Compliance' summary showing progress for various regulations, including REACH Annex XIV. At the bottom, there are buttons for 'Close', 'Reject Response', 'Accept Response', and 'Download Questionnaires'.

Request Details	Supplier Information	Requested Regulations
Request Name: Request Dress SS 21	Supplier Name: Global Textile Supplier	Requested Regulations:
Request ID: 152	Supplier Number: 7689-432	RoHS (2011/65/EU)
Request Type: Article (full declaration)	Product Name: Dress SS 21	REACH Annex XIV
Customer: Life AskREACH	Product Number: 0987-0986	REACH Annex XVII
Request Date: 2020-08-01	Request Status: Response Provided	
Due Date: 2020-08-15		
Request Reason:		

Visit <https://www.askreach.eu/supply-chain-tool/> 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

LIFE • ASK
REACH



Interested „pilots“ are welcome



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

