Proactive Alliance

Mission Statement (charter)

The Proactive Alliance brings together representatives seeing themselves as global players from the different sectors (without having a formal mandate), including – for the time being – automotive, chemicals, childcare products, electrical and electronic, furniture, home textiles, mechanical, medical devices, metalworking and metal articles, textiles and sporting goods.

The Proactive Alliance

observing that industries are facing new challenges in terms of "Substances in Articles" (SiA) communication coming from customer demands, coming from information requirements under the REACH Regulation and other legislation, as well as the aim to be compliant, today and tomorrow concerning future legal requirements;

acknowledging that the more common data demands are the stronger is the voice of the different sectors to obtain a sufficient level of information by their suppliers;

expecting an inter-sector cooperation based on an common agreement will reduce burdens placed on supply chain actors;

pursuing the overall aim of an agreed set of criteria for (a) the exchange and collection of data and (b) for the development lists of declarable or restricted substances in order to facilitate the implementation of such criteria within the different sectors;

aiming thereby to build on existing standards as well as criteria and consider, where required, to enhance existing ones towards a harmonized approach;

seeking for long-term solutions avoiding duplications of diverging standards

therefore agrees

to draft a policy document with recommendations regarding the development of a global cross-sector standard for the communication on SiA (as defined by REACH);

not to create a new standard but to build on existing standards and consider, where required, to enhance existing ones, where these, e.g., show gaps, towards a harmonized global cross-sector approach;

that with a view to successful supply chain communication the standard will provide criteria for (a) data generation and collection (i.e. data quality, reliability, comprehensiveness and exchange formats as well

as basic rules governing data protection and security) and for the development of (b) lists of declarable or restricted substances (RSL) where appropriate;

that the standard needs to reflect the short term need of compliance with legal requirements (e.g. under REACH or California Prop 65) and company requirements and should support the users to fulfil related obligations;

on the long term ambition to gain benefits in terms of efficiency and effectiveness, e.g. from the **Full Material Declaration** (FMD) within the professional supply chain; whereas FMD shall not be mandatory but a desired capability of all several sectors;

that the standard should thus - concerning the common level of data details and the level of declaration - support FMD on the level of the individual article as this would yield additional benefits like increased manageability providing a position of "being prepared" for future regulations and other cost saving effects,

that the standard should be compatible with the long term ambition,

that the standard does not define which data are to be disclosed to third parties as this needs to be defined by the individual companies or sectors;

that justified confidential business information (CBI) has to be taken into account with respect to all use cases;

that for the RSL developments, the standard should allow to integrate different content modules.
– The first module covers generally problematic substances like POPs regulated at global level.
– The second module includes horizontal legislations like REACH or Waste Framework Directive Article 9.1 (WFD), which is relevant for all sectors.
– The third module covers vertical legislations like Restriction of the use of certain Hazardous Substances in electrical and electronic equipment (RoHs) or End of Life Vehicles Directive (ELV);

that the standard design should also allow for including requirements beyond SiA, if Proactive Alliance members require so;

that the system has to be based on governance mechanisms assuring a most harmonized approach, which is reliable and interoperable between the different sectors, guarantees security and supports an accurate identification (with regard to substances [CAS number] and a precise article identifier) as well as data quality and timely data updates plus corresponding indicators.

Outcome of the Proactive Alliance

Outcome of the Proactive Alliance (PA) will be a policy document with recommendations from several industries for a global standard to report on Substances in Articles along the supply chains. The PA intends

to propose criteria and technical details for such a standard, in particular in terms of data generation and collection (i.e. data quality, reliability, comprehensiveness and exchange formats as well as basic rules governing data protection and security) and in terms of the development and maintenance of Restricted Substance Lists. In contrast, the recommendations will not address disclosure of data to third parties.

Items, which need further discussions, will be identified, where appropriate. Standard Development Organisations are welcome to pick up the recommendations and take further initiatives.

The work of the PA is heading towards a global standard that will rely on existing standards and, where required, enhance those towards a harmonized approach as outlined above.

As a starting point, companies and EU trade associations will work together in the group, which will in a second phase connect with other (global) associations.

Scope of the policy document

Geography:
The recommendations for a standard have a global scope.

Regulations and additional sector requirements:
The scope of the recommendations should support reporting requirements on Substances in Articles provided by law, by company requirements and by (sector) associations.
The policy document will apply and promote transparent criteria on the development and maintenance of RSLs such as on the structure of the list and on criteria to be applied when adding substances to the list of declarable or restricted substances.

Outline of SiA reporting approach:
Reporting on a bill of material (BOM) structure as well as a FMD should be possible where desired, but not required. The standard hence also supports compliance declarations with respect to regulated substance lists as well as industry lists of prohibited and declarable substances.
The recommendations will outline a (stepwise) FMD approach.

Stakeholders:
Concerning the scope of supply chain stakeholders, supply chain reporting shall apply until an article is finished, including material manufacturers and the various tiers down to the manufacturer of the final article. Public (full material) disclosure is therefore not covered by the scope.

Time perspective
The policy document will propose a roadmap for mid and long term development of standards for SiA communication.