Proactive Alliance

Towards globally harmonized Communication in the Supply Chain on Substances in Articles

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About "Proactive Alliance"

- Formation at *Chemical Watch's Global Business Summit in Amsterdam in March 2018*

- **Representatives**: Global players - without having a formal mandate - from different sectors

Represented in the group:

- Automotive
- Chemicals
- Electrical and electronic
- Furniture
- Home textiles
- Metalworking and metal articles
- Textiles and sporting goods

Not yet represented in the group (e.g):

- childcare products
- mechanical
- medical devices

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About "Proactive Alliance" - Motivation

- be compliant, today and tomorrow, concerning future legal requirements

- existing supply chain and consumer information requirements under Art. 33 (1)/(2) REACH,

- cost savings from effective communication systems,

- inter-sector cooperation based on common agreement will reduce burden on supply chain actors

  →**enhance manageability**

> The motivation and goal,
> the outcomes and the outlook of
> the Proactive Alliance group are
> laid down in the commonly agreed
> *Mission Charter*

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Proactive Alliance goals

Cross sectoral **harmonization on how** to report on Substances in Articles along the supply chain on a global level

- Policy document with **recommendations**

- Criteria and technical details in terms of data generation, data collection and the development and maintenance of *Substance Reporting Lists* (SRL)
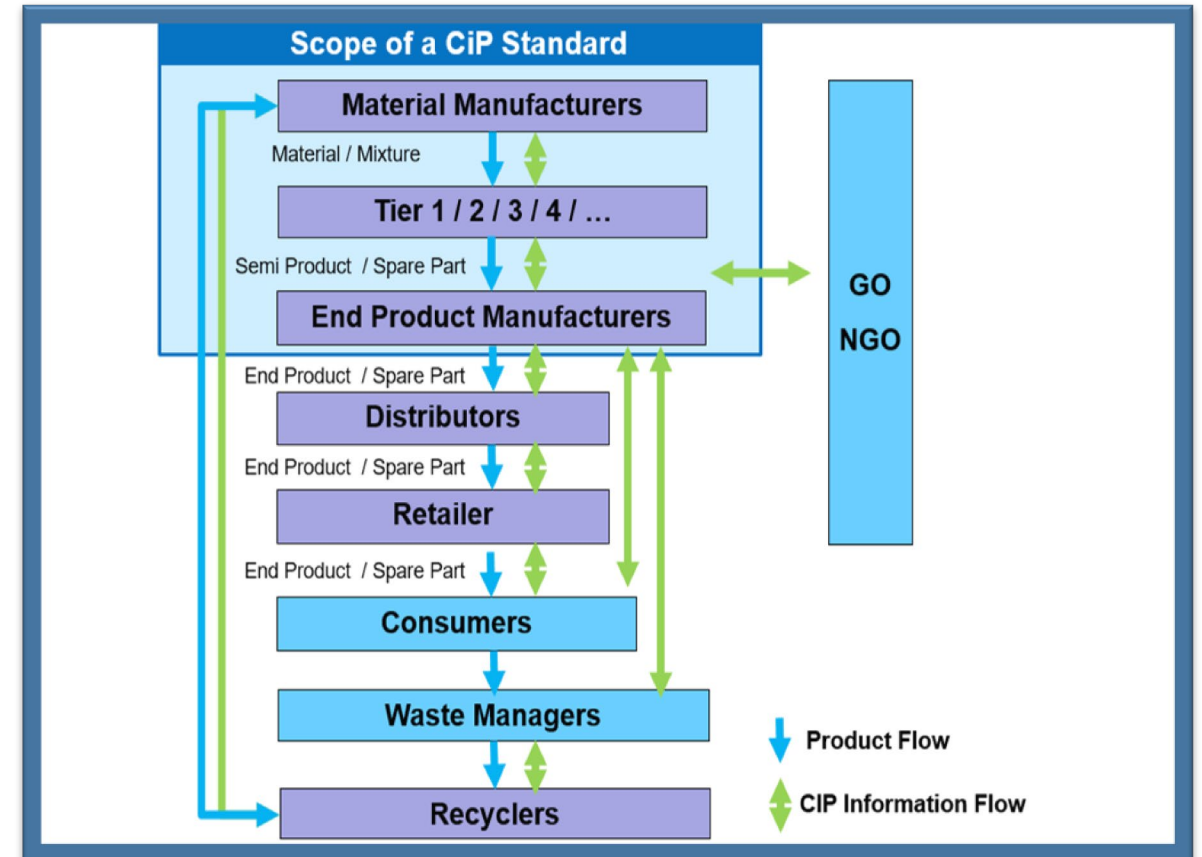
Scope of the Policy Document (1)

- Global scope

- Support reporting requirements on Substances in **Articles** (in terms of REACH) provided by law, by company requirements or by sectoral associations

  - 1st module: **Globally** regulated problematic substances [like POPs]**.**

  - 2nd module: **Horizontal** legislations [like REACH or Waste Framework Directive Art. 9(1)], relevant for **all sectors**.

  - 3rd module: **Vertical** legislations [like restriction of the use of certain Hazardous Substances in electrical and electronic equipment (RoHs) or End of Life Vehicles Directive (ELV)],

- Apply and promote transparent criteria on the structure of *SRL* and for adding substances to the list of declarable or restricted substances.

Scope of the Policy Document (2)

- **B2B** reporting between

- **supply chain** actors
  (incl. material manufacturers and
  the various tiers)

- until "**end product**"

Source: Hyundai Motor Europe Tech. Center GmbH

Scope of Policy Document (3)

Reporting on
- a bill of material (BOM) structure
- as well as Full Material Declaration (FMD)

should be possible where desired, but not required

Support compliance declarations with respect to regulated substance lists and industry lists of prohibited and declarable substances.

Outline a (stepwise) FMD approach.

Standard should support CBI protection, reliability, data quality, interoperability with different IT tools.

Organization of the Proactive Alliance

Proactive Alliance will work together in the group, which will in a second phase connect with other (global) associations

Plenary Meetings
- Meeting with all members
- Took place in May and September 2018

Technical Coordination Meetings
- Web-Conference with all members
- Started in Nov. 2018 and is scheduled on monthly basis

Working Groups Meetings
- Web-Conference with members contributing to a commonly agreed workpackage
- Weekly/biweekly meetings, as appropriate

Organized by chair/coordinator (sofia)

Organized by chair/coordinator (sofia)

Organized by Working group lead (PA Member)

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Work in Progress

Established four Working groups:

WG 1	WG 2	WG 3	WG 4
Harmonisation of Criteria for Substance Reporting List (SRL)	Towards harmonization of reporting formats	Terms of Reference (rules of procedure)	Connecting the dots

Work in Progress – WG 1

Harmonisation of Criteria for Substance Reporting List (SRL)

- Background: Without a SRL,
  - no efficient substance data collection is possible
  - CBI is difficult to be protected

- The more harmonised the sector/company SRLs are,
  - the more efficient the data collection can be performed
  - the less individual work is required

- Case Study - Automotive Industry:
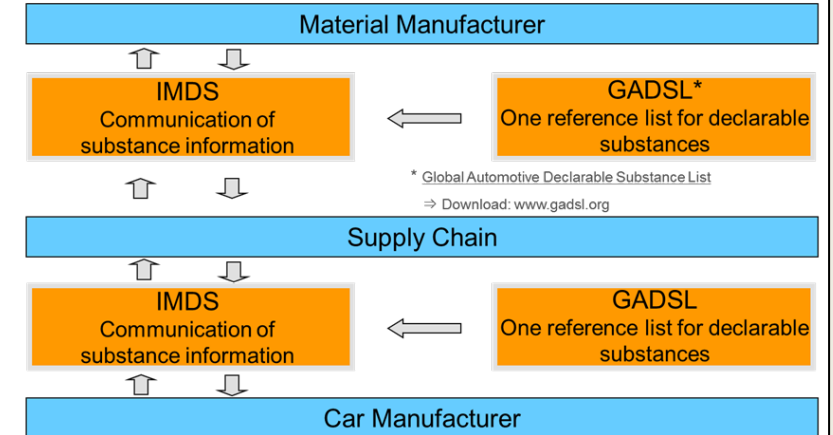
The general process of substance reporting in the AI

- To protect CBI, Material Manufac. are allowed to „hide" up to 10% of their recipe behind so called "Jokers", e.g. "Further Additives"

BUT:

- If a substance is listed on GADSL (= prohibited or declarable), it must not be hidden behind a Joker but has to be reported

Material Manufacturer

IMDS Communication of substance information	GADSL* One reference list for declarable substances

* Global Automotive Declarable Substance List
⇒ Download: www.gadsl.org

Supply Chain

IMDS Communication of substance information	GADSL One reference list for declarable substances

Car Manufacturer

⇒ No CBI Protection for GADSL Listed Substances

⇒ GADSL has to be absolutely correct to ensure CBI Protection

Work in Progress – WG 1

Harmonisation of Criteria for Substance Reporting List (SRL)

The WG aims at providing recommendations for the sectors / individual companies when developing own SRLs.

- 6 criteria for the development and maintenance of SLRs (next page)

- Recommendation for a governance- / administration-model

- Desired outcomes: Guidance document incl. commonly agreed criteria until mid 2019

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Work in Progress – WG 1
Step 1: Inventory of all criteria

1. Definition of the scope of substances

A: Legal Approach

B: Hazard Approach

C: Risk Approach

D: Reputation Approach

2. Definition of the scope of the legislation

A: SoC (only) Scope (= #1 A-D)

B: SoC(+) Scope

3. Definition of the scope of the jurisdiction

A: Global Scope (Best in class)

B: Regional Scope

4. Definition of the scope of the application

A: Product Scope

B: Product & Production Scope

C: Accessories

D: Pre- & Post-production

5. Definition of the threshold

A: Threshold by Law

B: Threshold by own / external data

6. Definition of the format & content of the SRL

A: Format

B: Content

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Work in Progress – WG 1
Step 2: Recommendation of criteria

1. Definition of the scope of substances

A: Legal Approach

B: Hazard Approach

C: Risk Approach

D: Reputation Approach

2. Definition of the scope of the legislation

A: SoC (only) Scope (= #1 A-D)

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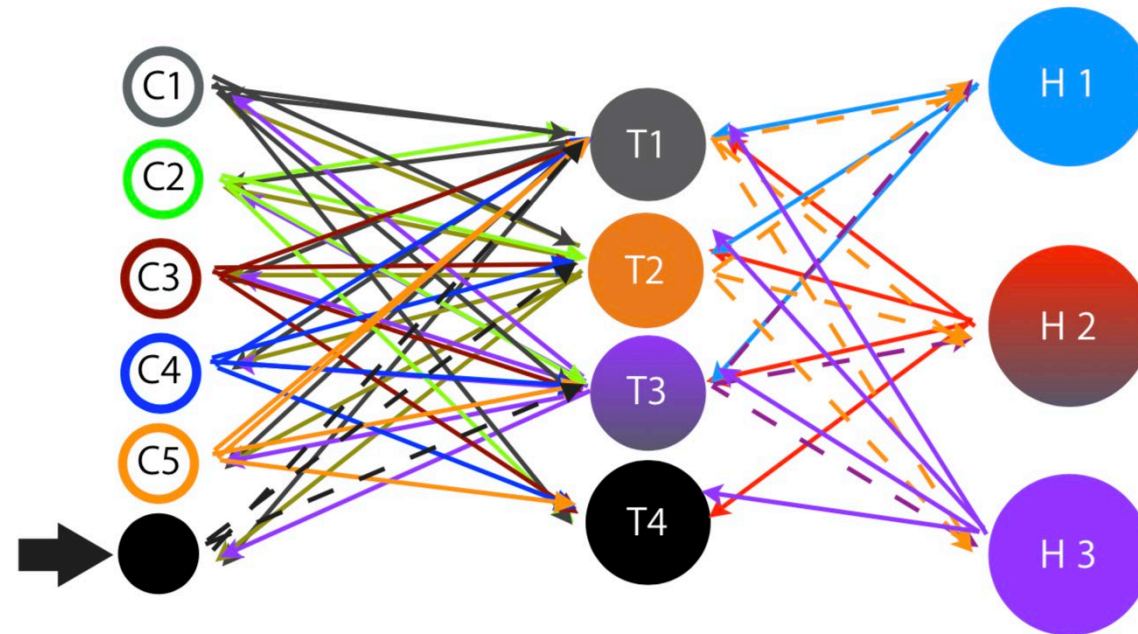
A: Format

B: Content

Only examples: Not defined yet!

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WG 2 – Towards harmonization of reporting formats

Before

WG 2 – Towards harmonization of reporting formats

- Deals with the following ways of declaring substance information in products

Negative declaration based on any kind of Substance Reporting Lists (SRL)

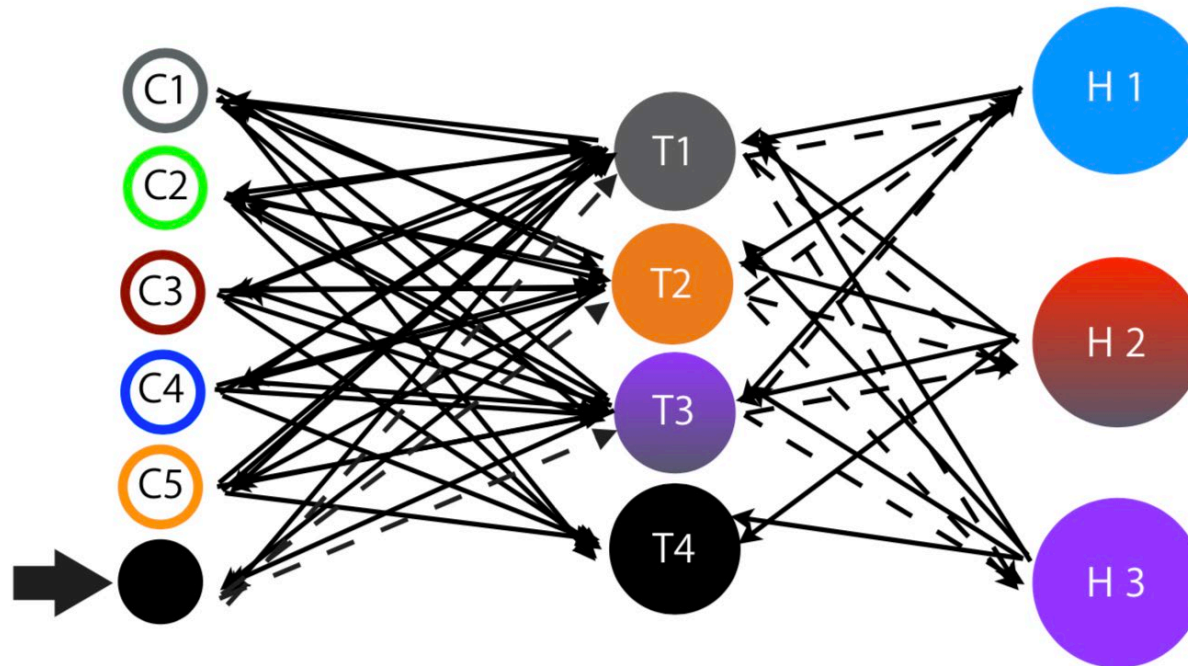Mix of positive & negative declarations (based on SRL or CAS numbers)

Full material declarations based on CAS number only

- Already created overview of different approaches, standards and definitions and will create recommendations towards a harmonized approach

- Ultimate objective is to ensure interoperability by agreeing on a common language and common elements to be used in different standards and tools

WG 2 – Towards harmonization of reporting formats

WG 3: Proactive Alliance Membership – Terms of References (ToR)

- The group is open to any industry or industry association that can contribute to the **SiA** (Substances in article) **Mission**

- The composition of the **Steering Group** includes members who created the group

- The PA Steering group is requesting sofia research group to continue to lead the Proactive Alliance group and chair the group

- There is no membership fee

- Representativeness is **limited** to European trade associations, or have been designated or mandated by such associations

- The Proactive Alliance will reach out to other activities by the WG4 "connecting the dots"
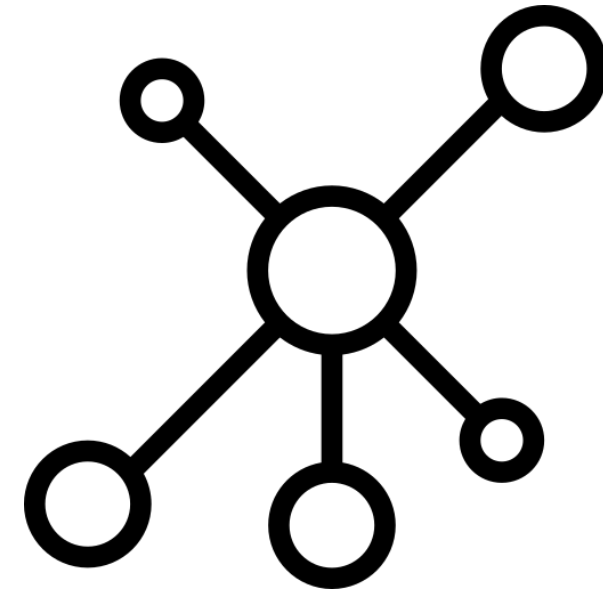
→ **PA has jointly agreed on ToR in February 2019**

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WG 4 – Connecting the dots

Connecting the dots …

- with other initiatives around the globe
- including standardization bodies

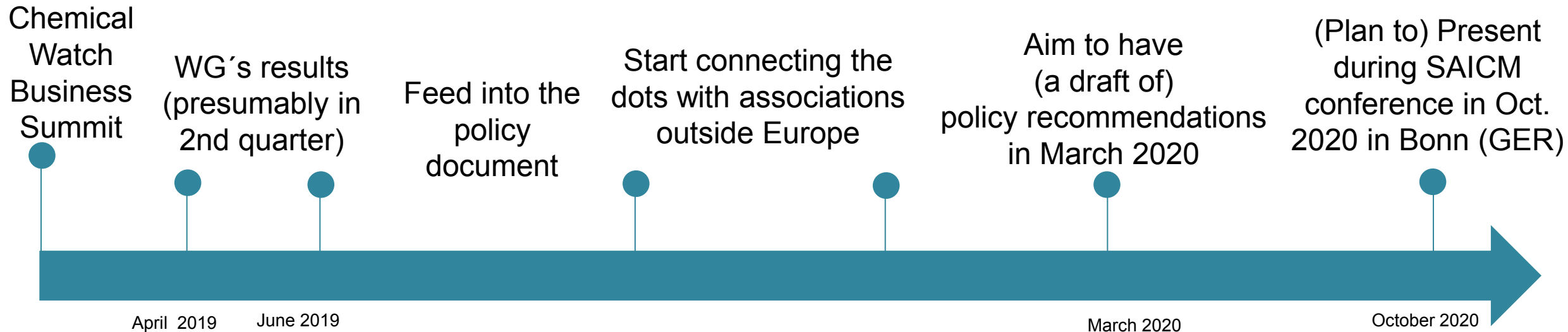*Work has not yet started*

Proactive Alliance – Outcomes to date

- Agreement on Mission charter ✓

- Agreement on ToR ✓

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Proactive Alliance – Next steps

Chemical Watch Business Summit

WG´s results (presumably in 2nd quarter)

Feed into the policy document

Start connecting the dots with associations outside Europe

Aim to have (a draft of) policy recommendations in March 2020

(Plan to) Present during SAICM conference in Oct. 2020 in Bonn (GER)

April 2019   June 2019   March 2020   October 2020

(Pro-) Active members are welcome
Mission statement: www.reach-helpdesk.info/

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Thank you for your attention!

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www.reach-helpdesk.info/