Technical coordination meeting
Global inter-sector standard for SiA communication
Frankfurt, Airport Conference Center
22nd of May 2018
Protocol

Common understanding

The technical coordination meeting for an inter-sector communication standard of "Substances in Articles" (SiA) brought actors from different industries together around one table to explore the common ground for cooperation. Representatives from the following sectors (without having a formal mandate) participated: automotive, chemicals, furniture, childcare products, electrical and electronic, mechanical, metalworking and metal articles, home textiles, textiles and sporting goods, medical devices. The working title of the group is "Proactive Alliance". The participants agreed on 'Substances in Articles' (as defined by REACH) to be the main scope of the cooperation.

The industries are facing new challenges coming from customer requirements and legal frameworks like the REACH regulation, which motivates them to investigate in long-term solutions and to avoid duplications of standards. The motivation for the industries for an inter-sector communication standard of SiA comprises customer demands, comes from the right to information of the REACH Regulation, as well as the aim to be compliant, today and tomorrow concerning future legal requirements. Further, additional benefits like increased manageability providing a position of "being prepared" for future regulations and other cost saving effects, achieved by implementing effective systems for communication, create incentives for the industries to cooperate.

Concerning the common level of data details and the level of disclosure, **the Proactive Alliance is heading into the direction of**

− **Full Material Declaration (FMD) on the level of the individual article as a long-term objective.**

Besides, the future standard must support compliance declarations with respect to

− regulated substance lists as well as
− industry lists of prohibited and declarable substances.

A stepwise approach in the timeline should be considered, since it is impossible to achieve the long-term objective of FMD within a short timeframe.

Confidential business information (CBI) has to be taken into account with respect to all use cases.

Inter-sector cooperation will reduce the proliferation of multiple "negative lists" and in consequence as well the additional burdens placed on supply chain actors by different levels of ambitions, since the future standard is capable to integrate different sectoral or company demands.

The future standard should allow to integrate different modules.

− The first module covers generally problematic substances like POPs regulated 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).

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

Outcome (in brief)

The essential outcome of the meeting can be summarized as follows. The meeting participants of the "Proactive Alliance"

- agreed that the focus of the group is on substances in articles (as defined by REACH; substances that remain in products as delivered to end user, at least to start with);
- decided for "a" cross-sectoral standard on data exchange (with a focus on the data entries and article identifiers that are interoperable with different IT-tools)
  - start by exploring/ expanding existing standards in use, which
  - supports Full Material declaration as well as Compliance Declaration based on lists of declarable and regulated substances
  - decided that the standard should support CBI protection, reliability, data quality, interoperability;
- acknowledges that Full Material Declaration is already being used by some parts of industry where it is seen as the most efficient vehicle to achieve compliance (and go beyond) in the longer term as well as
- encourages all industry sectors to establish a list of declarable and regulated substances for their industry vertical and publish the underlying criteria and methodology

The future work of the group serves, i.a., the purpose

- to refine requirements based on the minutes and the feedback by associations gained in the meantime and to
- explore existing standards in order to identify their capability to serve as a cross-sectoral standard on data exchange.

Contact: proactive.alliance@sofia-darmstadt.de