

Slides to support BOMcheck response to ECHA Call for Input on Candidate List Database

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IPC-1752A Data Exchange Standard

- **Key to success:** capability for different IT tools & systems to exchange data in XML format
- Launched in 2006, IPC-1752A standard is the oldest and most widely used XML data exchange standard for substances in articles and was designed specifically to enable data exchange between different IT tools and systems
- IPC-1752A committee includes over 300 leading experts from across industry representing manufacturers, suppliers, IT system providers, IT tool providers, consultants and service providers
- Face-to-face committee meetings are held in the spring and autumn each year, supplemented by additional web meetings / conference calls as required
- Membership of the IPC-1752A committee and attendance at meetings is open to all – companies do not need to be members of IPC to participate

IPC-1752A supports modular Regulated Substances Lists

- A modular Regulated Substances List (RSL) which contains separate sections for different regulations provides benefits to Manufacturers and Suppliers:
 - Manufacturers (particularly smaller companies) can start by ask their suppliers to provide materials declarations for selected regulations, for example REACH Candidate List and REACH Annex XVII substance restrictions
 - Listing the substances which are included in each regulation enables the supplier to re-use the modular RSL to respond to different requirements from different customers. For example, some Manufacturers don't have an RSL and instead include clauses in their purchasing contracts such as 'supplier must comply with REACH Candidate List and REACH Annex XVII substance restrictions '.
 - Different regulations have different legal obligations and require different actions. For example, the REACH Candidate List is a disclosure requirement – the substances can still be used provided that the supplier reports if they are present > 0.1% by weight of any article. REACH Annex XVII is a restriction – suppliers are not allowed to use substances above certain thresholds.

IPC-1752A provides maintained legislation modules

- IPC-1752A provides maintained lists of substance categories for horizontal legislation modules and vertical legislation modules, which are updated every 6 months alongside ECHA's updates to the REACH Candidate List.

Horizontal legislation modules

- REACH Candidate List
- REACH Annex XVII substance restrictions

Vertical legislation modules

- RoHS (current six substances)
- Upcoming RoHS (new four substances)
- IEC 62474 declarable substances list
- JIG-101

IPC-1752A REACH Candidate List module enables article supplier to specify which version of REACH Candidate List is being reported

- Unique ID == EUREACH-0618 includes the 191 substance category names that were included in the REACH Candidate List as at 27 June 2018.
- Unique ID == EUREACH-0118 includes the 181 substance category names that were included in the REACH Candidate List as at 15 January 2018.

June 2018 Update		IPC-1752A with Amendment 3	
Identity	Substance Category Name	CAS number(s) published by ECHA	Threshold
<i>Included in REACH Candidate List on 7 July 2017: Unique ID == EUREACH-0717</i>			
00174	Perfluorohexane-1-sulphonic acid and its salts [PFHxS]	No CAS number(s) provided	0.1% by weight (1 000 ppm) of any article
<i>Included in REACH Candidate List on 15 January 2018: Unique ID == EUREACH-0118</i>			
00175	Benz[a]anthracene	56-55-3, 1718-53-2	0.1% by weight (1 000 ppm) of any article
00176	Cadmium carbonate	513-78-0	0.1% by weight (1 000 ppm) of any article
00177	Cadmium hydroxide	21041-95-2	0.1% by weight (1 000 ppm) of any article
00178	Cadmium nitrate	10022-68-1, 10325-94-7	0.1% by weight (1 000 ppm) of any article
00179	Chrysene	218-01-9, 1719-03-5	0.1% by weight (1 000 ppm) of any article
00180	1,6,7,8,9,14,15,16,17,17,18,18-Dodecachloropentacyclo[12.2.1.16,9.02,13.05,10]octadeca-7,15-diene ("Dechlorane Plus"™) [covering any of its individual anti- and syn-isomers or any combination thereof]	No CAS number(s) provided	0.1% by weight (1 000 ppm) of any article
00181	Reaction products of 1,3,4-thiadiazolidine-2,5-dithione, formaldehyde and 4-heptylphenol, branched and linear (RP-HP)[with greater than or equal to 0.1% w/w 4-heptylphenol, branched and linear (4-HPbl)]	No CAS number(s) provided	0.1% by weight (1 000 ppm) of any article
<i>Included in REACH Candidate List on 27 June 2018: Unique ID == EUREACH-0618</i>			
00182	Benzo[ghi]perylene	191-24-2	0.1% by weight (1 000 ppm) of any article
00183	Octamethylcyclotetrasiloxane [D4]	556-67-2	0.1% by weight (1 000 ppm) of any article
00184	Decamethylcyclopentasiloxane [D5]	541-02-6	0.1% by weight (1 000 ppm) of any article
00185	Dodecamethylcyclohexasiloxane [D6]	540-97-6	0.1% by weight (1 000 ppm) of any article
00186	Terphenyl, hydrogenated	61788-32-7	0.1% by weight (1 000 ppm) of any article
00187	Disodium octaborate	12008-41-2	0.1% by weight (1 000 ppm) of any article
00188	Lead	7439-92-1	0.1% by weight (1 000 ppm) of any article
00189	Dicyclohexyl phthalate [DCHP]	84-61-7	0.1% by weight (1 000 ppm) of any article
00190	Ethylenediamine [EDA]	107-15-3	0.1% by weight (1 000 ppm) of any article
00191	Benzene-1,2,4-tricarboxylic acid 1,2 anhydride [trimellitic anhydride; TMA]	552-30-7	0.1% by weight (1 000 ppm) of any article

IPC allocates a unique 5-digit identity code to each entry in the REACH Candidate List

- Unique 5-digit identity code enables the ECHA database to more easily identify each REACH Candidate List entry in Class C XML files provided by article suppliers. This is particularly important for REACH Candidate List entries which do not have EC numbers or CAS numbers.

```
<SubstanceCategoryListID authority="IPC" identity="EUREACH-0618"/>
- <SubstanceCategory name="Ethylenediamine [EDA]">
  <Threshold overThreshold="false" threshold="0.1% by weight (1 000 ppm) of any article"/>
  <SubstanceCategoryID authority="IPC" identity="00190"/>
</SubstanceCategory>
- <SubstanceCategory name="Benzene-1,2,4-tricarboxylic acid 1,2-anhydride [trimellitic anhydride; TMA]">
  <Threshold overThreshold="false" threshold="0.1% by weight (1 000 ppm) of any article"/>
  <SubstanceCategoryID authority="IPC" identity="00191"/>
</SubstanceCategory>
- <SubstanceCategory name="Cadmium nitrate">
  <Threshold overThreshold="false" threshold="0.1% by weight (1 000 ppm) of any article"/>
  <SubstanceCategoryID authority="IPC" identity="00178"/>
</SubstanceCategory>
- <SubstanceCategory name="Cadmium carbonate">
  <Threshold overThreshold="false" threshold="0.1% by weight (1 000 ppm) of any article"/>
  <SubstanceCategoryID authority="IPC" identity="00176"/>
```

ECHA envisages submitting company will create REACH-IT account

3.1. Administrative/legal entity data (related to submission management)

Administrative data is in principle automatically generated and refers to:

- reference date (date of first submission) and submission dates (for updates),
- submission numbers,
- reference number (to allow to retrieve the history of submissions).

For the identification of the submitter(s), the following legal entity (company) data would be submitted:

Legal entity (company) identifiers

Company name*
Company's contact details*
ECHA's company identifier (e.g. company UUID)#
Contact person (details)&

*Mandatory fields

#Mandatory field, only for internal purposes

& Voluntary fields



You are connected as [aturnbull](#) | [Logout](#)

i Thank you for adding a legal entity. A default contact has been created from your user and legal entity data. You can now start using ECHA applications.

[Edit](#) [Export](#)

General details

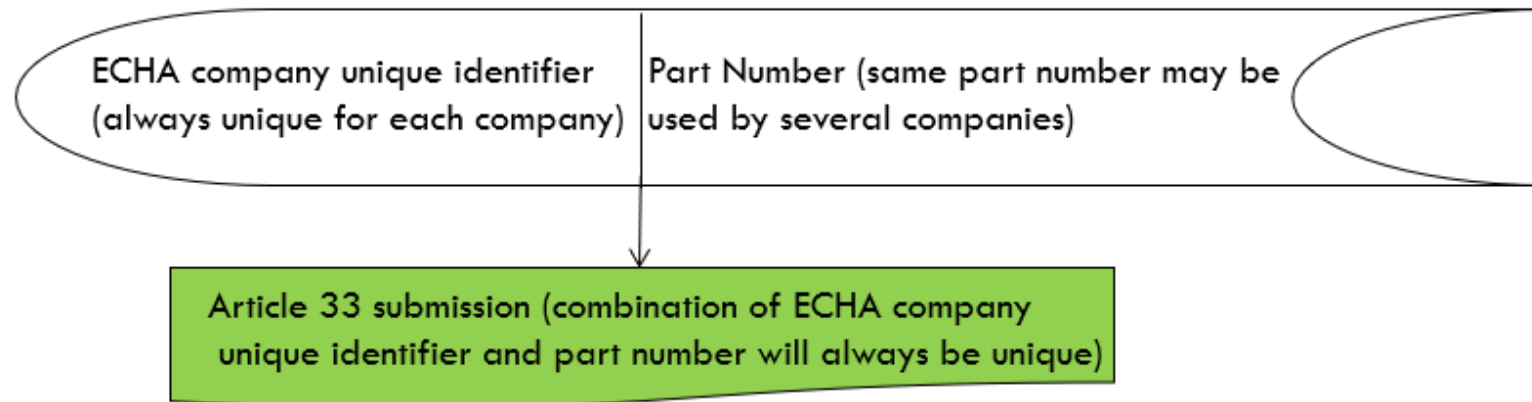
Legal Entity name	Thinkstep Compliance Ltd	History
Legal Entity UUID	ECHA-7ab4377b-ad19-414d-85c8-9d4150cae95e	
D-U-N-S		
VAT number		
Remarks		

General Contact information

Phone	+447710023461
Fax	
Email	aturnbull@bomcheck.net
Website	

ECHA should enable submitting company to participate in the algorithm to create the unique identifier for the article or complex object

- REACH-IT tool could be adapted to create a unique ECHA company identifier
 - 9 alphanumeric characters would be more than sufficient to provide an ECHA unique identifier for every submitting company (it would allow for up to 101,559,956,668,416 [one hundred trillion])
- Submitting company could be made responsible for providing an identifier which is unique at that company for the article or complex object



Reporting a REACH Article 33 information for an Article using draft IPC-1752B

Unique ECHA company identifier

Unique company identifier for article

REACH Candidate List information including enumerated list of safe use information text strings

```
<?xml version="1.0" encoding="UTF-8"?>
- <MainDeclaration xmlns="http://webstds.ipc.org/1752B/2.0" version="1752B">
  - <BusinessInfo mode="Distribute">
    - <Response comment="BOMcheck" fieldLock="false" date="2018-09-13">
      - <Authorizer name="Aidan Turnbull">
        <Email address="aturnbull@bomcheck.net"/>
        <Phone number="+441225724124"/>
      </Authorizer>
      - <SupplyCompany name="Ace Supplier">
        <CompanyID authority="DUNS" identity="123456789"/>
        <CompanyID authority="ECHA" identity="ABC123DEF"/>
      </SupplyCompany>
      - <Contact name="Aidan Turnbull">
        <Email address="aturnbull@bomcheck.net"/>
        <Phone number="+441225724124"/>
      </Contact>
    </Response>
    <Declaration legalDef="." supplierAcceptance="true" legalType="Custom"/>
  </BusinessInfo>
  - <Include>
    - <Sectional name="MaterialInfo">
      <SubSectional name="C"/>
    </Sectional>
  </Include>
  - <Product numberOfInstances="1" unitType="Each">
    - <ProductID itemName="PVC coated copper wire" itemNumber="Cop11PVC22" effectiveDate="2018-09-13">
      <Amount value="100" UOM="g"/>
    </ProductID>
    - <MaterialInfo>
      - <SubstanceCategoryList>
        <SubstanceCategoryListID authority="IPC" identity="EUREACH-0618"/>
        - <SubstanceCategory name="Diisobutyl phthalate (DIBP)">
          <Amount value="8" UOM="massPercent"/>
          <Threshold overThreshold="true" threshold="0.1% by weight (1 000 ppm) of any article"/>
          - <SafeUseList>
            <SafeUseListID authority="ECHA" identity="Consumer_01"/>
            <SafeUse identity="00003" description="Avoid prolonged direct contact with skin during use"/>
          </SafeUseList>
          <SubstanceCategoryID authority="IPC" identity="00021"/>
        </SubstanceCategory>
        - <SubstanceCategory name="Benzyl butyl phthalate (BBP)">
          <Threshold overThreshold="false" threshold="0.1% by weight (1 000 ppm) of any article"/>
          <SubstanceCategoryID authority="IPC" identity="00010"/>
        </SubstanceCategory>
      </SubstanceCategoryList>
    </MaterialInfo>
  </Product>
</MainDeclaration>
```

Reporting Article 33 information for a complex object using draft IPC 1752B

Unique ECHA company identifier

Unique company identifier for complex object

List of articles in the complex object. Information reported for each article includes

- Unique ECHA company identifier
- Unique company identifier for article
- MassPercent for SVHC in article
- Safe use information for article using enumerated list of text strings

```
<?xml version="1.0" encoding="UTF-8"?>
- <MainDeclaration xmlns="http://webstds.ipc.org/1752B/2.0" version="1752B">
  - <BusinessInfo mode="Distribute">
    - <Response comment="BOMcheck" fieldLock="false" date="2018-10-01">
      - <Authorizer name="Joe Brown">
        <Email address="Joe.Brown@thinkstep.com"/>
        <Phone number="+49772213454"/>
      </Authorizer>
      - <SupplyCompany name="Thinkstep">
        <CompanyID authority="DUNS" identity="987654321"/>
        <CompanyID authority="ECHA" identity="123XYZ456"/>
      </SupplyCompany>
      - <Contact name="Joe Brown">
        <Email address="Joe.Brown@thinkstep.com"/>
        <Phone number="+49772213454"/>
      </Contact>
    </Response>
    <Declaration legalDef="." supplierAcceptance="true" legalType="Custom"/>
  </BusinessInfo>
  - <Include>
    - <Sectional name="MaterialInfo">
      <SubSectional name="C"/>
    </Sectional>
  </Include>
  - <Product numberOfInstances="1" unitType="Each">
    - <ProductID itemName="Circuit board assembly" itemNumber="AssXYZ123" effectiveDate="2018-10-01">
      <Amount value="100" UOM="g"/>
    </ProductID>
    - <MaterialInfo>
      - <SubstanceCategoryList>
        <SubstanceCategoryListID authority="IPC" identity="EUREACH-0618"/>
        - <SubstanceCategory name="Diisobutyl phthalate (DIBP)">
          <Amount value="8" UOM="massPercent"/>
          <Threshold overThreshold="true" threshold="0.1% by weight (1 000 ppm) of any article"/>
        </SubstanceCategory>
        - <ArticleList>
          - <Article itemName="PVC coated copper wire" itemNumber="Cop11PVC22">
            <CompanyID authority="ECHA" identity="ABC123DEF"/>
            <Amount value="8" UOM="massPercent"/>
            - <SafeUseList>
              <SafeUseListID authority="ECHA" identity="Consumer_01"/>
              <SafeUse identity="00003" description="Avoid prolonged direct contact with skin during use"/>
            </SafeUseList>
          </Article>
          - <Article itemName="Adhesive glue" itemNumber="Adhesive543">
            <CompanyID authority="ECHA" identity="123XYZ456"/>
            <Amount value="2" UOM="massPercent"/>
            - <SafeUseList>
              <SafeUseListID authority="ECHA" identity="Consumer_01"/>
              <SafeUse identity="00003" description="Keep away from heat, hot surfaces, sparks, open flames"/>
            </SafeUseList>
          </Article>
          - <Article itemName="20 pf capacitor" itemNumber="CAP2345-20">
            <CompanyID authority="ECHA" identity="VDW865HTY"/>
            <Amount value="1" UOM="massPercent"/>
            - <SafeUseList>
              <SafeUseListID authority="ECHA" identity="Consumer_01"/>
              <SafeUse identity="00005" description="Keep out of reach of children"/>
            </SafeUseList>
          </Article>
        </ArticleList>
      </SubstanceCategoryList>
      <SubstanceCategoryID authority="IPC" identity="00021"/>
      </SubstanceCategory>
      - <SubstanceCategory name="Benzyl butyl phthalate (BBP)">
        <Threshold overThreshold="false" threshold="0.1% by weight (1 000 ppm) of any article"/>
        <SubstanceCategoryID authority="IPC" identity="00010"/>
      </SubstanceCategory>
    </MaterialInfo>
  </Product>
</MainDeclaration>
```