

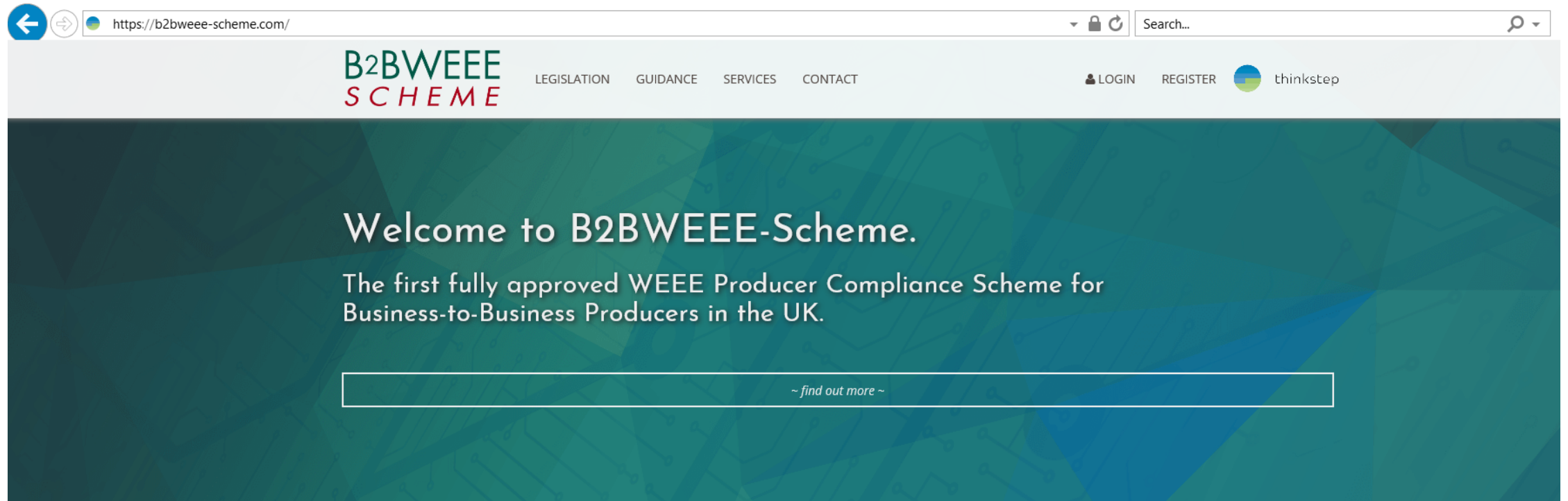
# Recommended alternatives to material-based and object-based category description of articles

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# Vast majority of industry has not collected material-based or object-based category descriptions of articles

- ECHA Technical Supporting Document envisages mandatory description of the article and complex objects using
  - Material-based category(ies) (see section 3.2.2.3)
  - Article/complex object-based category(ies) (see section 3.2.2.4)
- Automotive industry does require suppliers to identify materials when they create a mandatory Full Materials Declaration in the IMDS tool
  - A small number of OEMs control the entire automotive industry and have exceptional power over their supply chains. This power over suppliers is not found in any other industry sector
- BOMcheck also requires suppliers to identify materials when they create a Full Materials Declaration
  - However, 80% of suppliers in BOMcheck provide Regulatory Compliance Declarations because that is all of the information that they can obtain from their supply chains
- **Conclusion:** except for the automotive industry, mandatory description of article and complex objects using material-based and object-based categories would be a huge new burden on industry and would face considerable resistance

In 2006 my team set up the first UK Govt approved recycling scheme for waste electrical and electronic equipment (WEEE)



### ▲ Producer Obligations

The UK WEEE Regulations require all manufacturers and importers of affected electrical and electronic equipment (EEE) in the UK to register as a WEEE 'producer', join an approved WEEE Producer Compliance Scheme if placing more than 5 tonnes EEE per year on the UK market and provide

### ▲ Regulatory Guidance

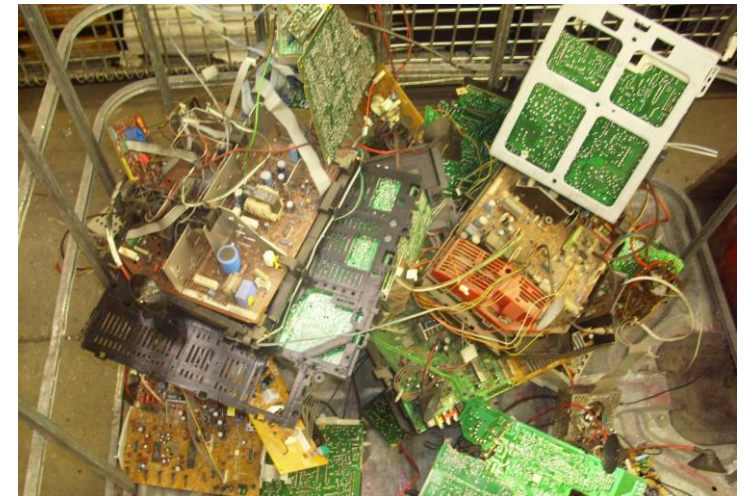
We have compiled guidance notes and publications to help you understand your WEEE obligations and how best to meet them. Our sister site B2BWEEE provides an overview of the WEEE and RoHS directives and WEEE compliance and registration requirements across Europe.

### ▲ WEEE Compliance

Our high quality WEEE compliance services are flexible to your needs. You can use our novel web-based system on your company's website to handle WEEE collection and recycling; or you can continue to use your existing arrangements if you already have procedures in place.

# Even recycling of valuable electronic equipment is a low-tech, low-skill business with minimal product disassembly

- Electronic equipment is one of the few waste streams which has a recycling value
- Even in this industry, recycling uses low-paid, low-skill operatives with basic tools (angle grinders, crow-bars, etc) to quickly segregate the valuable fractions
- Recycling in other industries generally involves shredding the whole waste product and using air filtration or centrifuges to separate valuable fractions



Material-based or object-based category description are unlikely to provide practical benefits to recyclers in the foreseeable future

- A much more practical approach would be to enable recyclers to identify certain model ranges from certain OEMs which do not contain REACH Candidate List substances
  - For example, Brand Y washing machines produced after 201X are clean and so materials separated from these waste washing machines have a higher recycling value
- To support this approach, ECHA should enable companies to upload 'negative' submissions that their articles or complex objects do not contain REACH Candidate List substances
  - ECHA's proposed scenario requires a 'positive' submission to the database if there are REACH Candidate List substances present above threshold in articles. No submission is required if REACH Candidate List substances are not present above threshold
  - However, absence of a 'positive' submission for an article or complex object in the ECHA database is no guarantee that no REACH Candidate List substances are present above threshold
  - Recyclers can not tell the difference between a company which has assessed all articles in their complex objects and decided that no submission is necessary, and a company which has not (yet) assessed their products



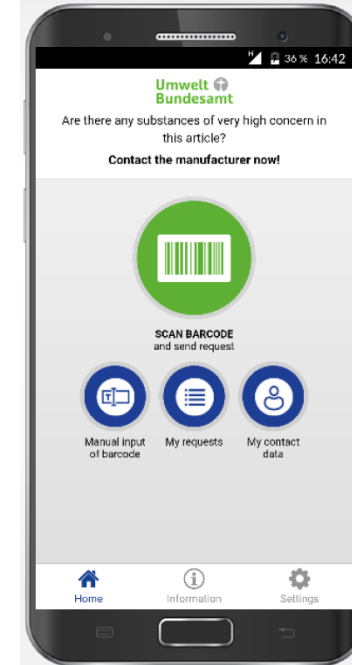
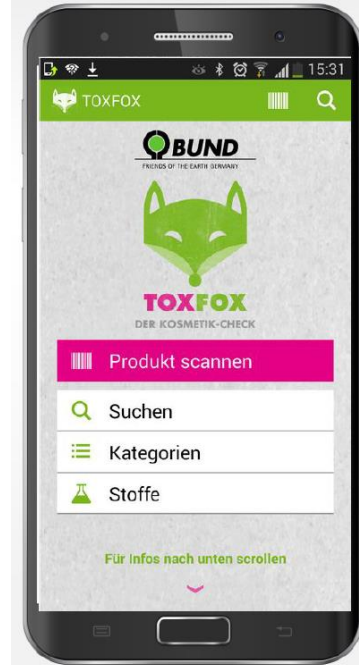
# Enabling companies to upload 'negative' submissions would lead to greater uptake and use of the ECHA database

- Leading companies could gain marketing by uploading 'negative' submissions to confirm that their articles or complex objects do not contain REACH Candidate List substances
  - Market pressure would stimulate more companies to also make 'negative' submissions



# Material-based or object-based category descriptions are not helpful to consumers

- Consumers already show very little enthusiasm and almost no interest in existing database systems to check substances of high concern in products
- An ECHA database which uses material-based or object-based category descriptions for articles and complex objects would be even less attractive to consumers



OEMs already use the suppliers descriptive part names. These part names also help consumers understand the part number

Zanussi UK

https://shop.zanussi.co.uk/cart


ZANUSSI.CO.UK SHOP LOGIN


ZANUSSI

COOKING LAUNDRY FRIDGES & FREEZERS DISHWASHERS VACUUM CLEANERS SMALL APPLIANCES

CONTINUE SHOPPING GO TO CHECKOUT

**YOUR BASKET** TOTAL: £26.99

 **WATER INLET COMPARTMENT HOSE BEND** REMOVE X  
1108513001  
In Stock  
£19.99  
Quantity  **£19.99**

 **WASHING MACHINE FILTER SEAL** REMOVE X  
1260616014  
In Stock  
£7  
Quantity  **£7**

Part name  
Part number

Part name  
Part number



ECHA should enable OEMs to use the supplier part names to describe the supplier article part numbers in the database

- Suppliers use descriptive part names for good reasons
  - The supplier part number is just an alphanumeric text string. The supplier part name enables OEMs in the supply chain to understand what is the part that they are buying
- Enabling OEMs to use the supplier part names to describe the supplier article part numbers in the ECHA database would enable consumers to make practical use of the Article 33 submissions in the ECHA database to understand which articles in the complex object contain REACH Candidate List substances
- Linking the “safe use information” to the supplier part name for the article in the ECHA database would help consumers to understand what actions they should take to avoid exposure to REACH Candidate List substances