



Substance Volume Tracking (or SVT), how are you handling it (or does the maths stack up)?

Tue, 12 Jan 2016



Under the EU REACH Regulation, a substance manufactured or imported in quantities of one tonne or more per year has to be registered with ECHA (European Chemicals Agency) which also includes substances within mixtures or present in articles. Therefore REACH's scope goes far beyond chemical manufacturers, formulators and distributors and touches downstream Supply Chain actors putting products on the market such as article manufacturers and retailers.

So capturing and tracking substance volumes plays a critical role in determining when a registration for a substance is due and failure to register will be considered a serious non-compliance issue with consequent costs to a business and reputational damage.

Many chemical manufacturing companies will have carried out an inventory of their product portfolio prior to 2008 and pre-registered substances under REACH as necessary. Some are re-visiting this in the run-up to the final tonnage bands which need to be registered by 2018 and there is plenty of guidance on forums regarding that.

But for companies further down the supply chain importing mixtures and articles, this has become a whole new business challenge. Can you get meaningful formulation data from your suppliers along with the %w/w in order to do the calculations across multiple product lines to ensure you meet your REACH reporting requirements? Getting the information is enough of a challenge, but once you have that information, what do you do with it?

Article manufacturers that manage their component lists through BOMs (Bills of Material), now have to translate these into BOS (Bills of Substances) where component masses can be used to work up SVT calculations.

And with substances now regularly being added to the Candidate List, it is necessary to be able to quickly identify the percentage content and volume of component. Suppliers of articles containing an SVHC on the 'Candidate List' in a concentration above 0.1% (w/w) have a duty to provide the recipient of the article with sufficient information to allow safe use of the article, information which also needs to be provided to consumers within 45 days of a request.

Similar registration requirements, based on volumes, are also required by other countries' regulatory regimes.

Tools and techniques we've come across

Products change, suppliers change, manufacturing schedules change, Legal Entities change; this is a dynamic situation. The "finger in the air" best-guess method of determining annual substance tonnages within mixtures, and within multi-level article BOMs may have been ok as a one-off exercise back in 2008, but isn't robust enough going forward; there needs to be a way to do this on an ongoing basis. Overloaded Compliance officers within companies are frantically trying to backward-formulate their products using spreadsheets. Then things change – again. How can a company be expected to be able to keep comprehensive, meaningful records about intricate calculations that are required for many years after a product is taken off the market – with a spreadsheet and file system?

What are the available alternatives? Some companies may have expensive, comprehensive ERP software for this – but it tends to only be available to companies with large budgets. Less expensive alternatives go some way to providing supplier audits of sorts – but is that enough? The spreadsheet would seem to have reached the limits of its capabilities in this area.

The ProductTraq way...

ProductTraq has been developed from the ground up to track and support Regulatory Compliance in all types of chemical handling businesses, from SMEs to large multinationals.

It provides Substance Volume Tracking (SVT) of component substances necessary (Bill of Substances) to ensure compliance with global regulations including EU REACH tonnage bands, and also provides a convenient way to identify which products contain substances of concern.

It can manage batch tracking, batch sizes and associated documentation and addresses the gap in systems that many organizations are now acknowledging, between Manufacturing and Sales systems which record items manufactured/bought/sold, and SDS systems which all play a vital role in their respective specialized areas. ProductTraq enhances these systems to fulfil today's compliance challenges.

Developed by UK-based Baytouch Ltd using its extensive experience of delivering cloud-based regulatory compliance solutions, ProductTraq is designed to meet the needs of chemical handling businesses and organisations of all sizes.

It's surprisingly cost effective, quick to set up and easy to use and connects to and exchanges data with other systems e.g. main stream ERP and SDS authoring tools.