



End of Life Programs – Customers' Wants/Needs

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Disclaimer

- The views expressed in this presentation are those of the presenter only and are not intended to represent the views of his employer.



Regulatory Trends

- Trend is moving to regulate products at the end of their usefulness
- Automobiles
 - ELV Directive
- Electronics
 - WEEE and RoHS
- Packaging in landfills
 - CONEG
 - EU Packaging Directive (94/62/EC)



What's next?

- Regulate end uses of other applications
 - Medical
 - Other packaging
 - Housewares
 - Recycling issues
 - Chemicals
 - Plastics
- In the US, states taking measures into their own hands
 - e.g. MA, CA



Product Stewardship

- What can a Product Stewardship person do...
 - ...to keep up with these trends?
 - ...to stay ahead of customer requests?
 - ...to answer these end of life concerns?



Supplier Do's

- Know what laws/regulations exist
- Know what laws/regulations are potentially coming in the future
 - Get involved in the comment process
- Examples
 - Training seminars
 - Government registers (Federal, state)
 - Publications
 - Trade associations
 - Network with regulatory peers
 - Talk to customers



Supplier Do's (Cont.)

- Be proactive
 - Solicit customer needs
 - What HSE information about products does the customer want?
 - What chemicals are of concern?
 - Why?
 - Help to understand trends
 - Tool: [Product Stewardship Checklist](#)



Product Stewardship Checklist

Product Safety
Customer File – Sales
Customer Svc Rep:

From:
Date Completed:

**2008 PRODUCT STEWARDSHIP CHECKLIST
FOR CUSTOMER/DISTRIBUTOR CONTACTS**

Customer:

Contact:

Address:

Phone:

Fax:

Email:

Product(s):

Application(s):

Customer HSE Concerns (e.g., health exposure, emissions from process, handling product):

Customer has current MSDS for all purchased products? Yes No

Product Stewardship Checklist

Certificates needed? (check RAPIDS, then below)

<u>Chemical Registration:</u>		<u>Food Contact:</u>		<u>Medical:</u>	
TSCA (U.S.)		FDA (U.S.)		DMF ACCESS (US)	
DSL (Canada)		HPFB (Canada)			
EINECS/ELINCS		EU (Europe)		USP CLASS VI	
(Europe)		JHOSPA (JAPAN)		EP	
ENCS (Japan)				LATEX	
AICS (Australia)		USDA guarantee			
ECL (Korea)		CFIA submission		BSE/TSE ('mad cow') Info	
PICCS (Philippines)		FDA guarantee			
China (IECSC)					

Product Stewardship Checklist

<u>Automotive:</u>		<u>Others:</u>		
Ford 'Hex 9'		IMDS Number		Heavy Metal
Ford Tox Submission		PROP 65		Vapor Tox Package
Visteon Tox Submission		ODC		Certain Chemicals in product (provide list)
GMW3059		NSF		Other: (specify below)
Delphi MS 10949001		UL		
Daim/Chrys CS9003		CSA		
Nissan		CONEG		
Toyota EDS		EU Pkg 94/62/EC		
Any other customer information needs?				



Supplier Do's (Cont.)

- Survey customers
- Similar requests, put together general response
- Get info out proactively
 - e.g. RAPIDS



Supplier Do's (Cont.)

- Customer specific chemicals
 - Try to avoid family names or general lists
 - Example: alkylphenols
- CAS numbers necessary
- Example
 - **Benzotriazole**
 - 2-(2H-1, 2, 3-Benzotriazol-2-yl)-4,6-di-tert-butylphenol [also called 2-(2'-Hydroxy-3',5'-di-tert-butylphenyl)benzotriazole] (CAS No. 3846-71-7)



Supplier Do's (Cont.)

- Get info from suppliers
- Calculate potential level in product
 - Examples: cadmium, chromium, lead, mercury
 - ELV: "...by calculation, our product meets the requirements of....."



Supplier Do's (Cont.)

- Advocate avoidance of useless testing!
 - China has made mandatory testing for RoHS compliance
 - Questions arise
 - What is tested?
 - Who does the testing?
- This could be the biggest impact on the business
- Test only when it makes sense



Conclusions

- As the trends indicate, these end of life regulatory issues will not be going away
- Find appropriate information tools to keep up with regulatory environment
 - Better to get involved in the regulatory process than to take what comes from the legislators
 - Advocate reasonable positions
- Communicate with customers
 - Work to be proactive – alleviate burden of requests
 - Make customers be specific
- Educate whenever possible



Thanks for your attention!
