

Claigan Product Compliance Tracker

Method for Managing and Declaration Product Compliance

Presented by:
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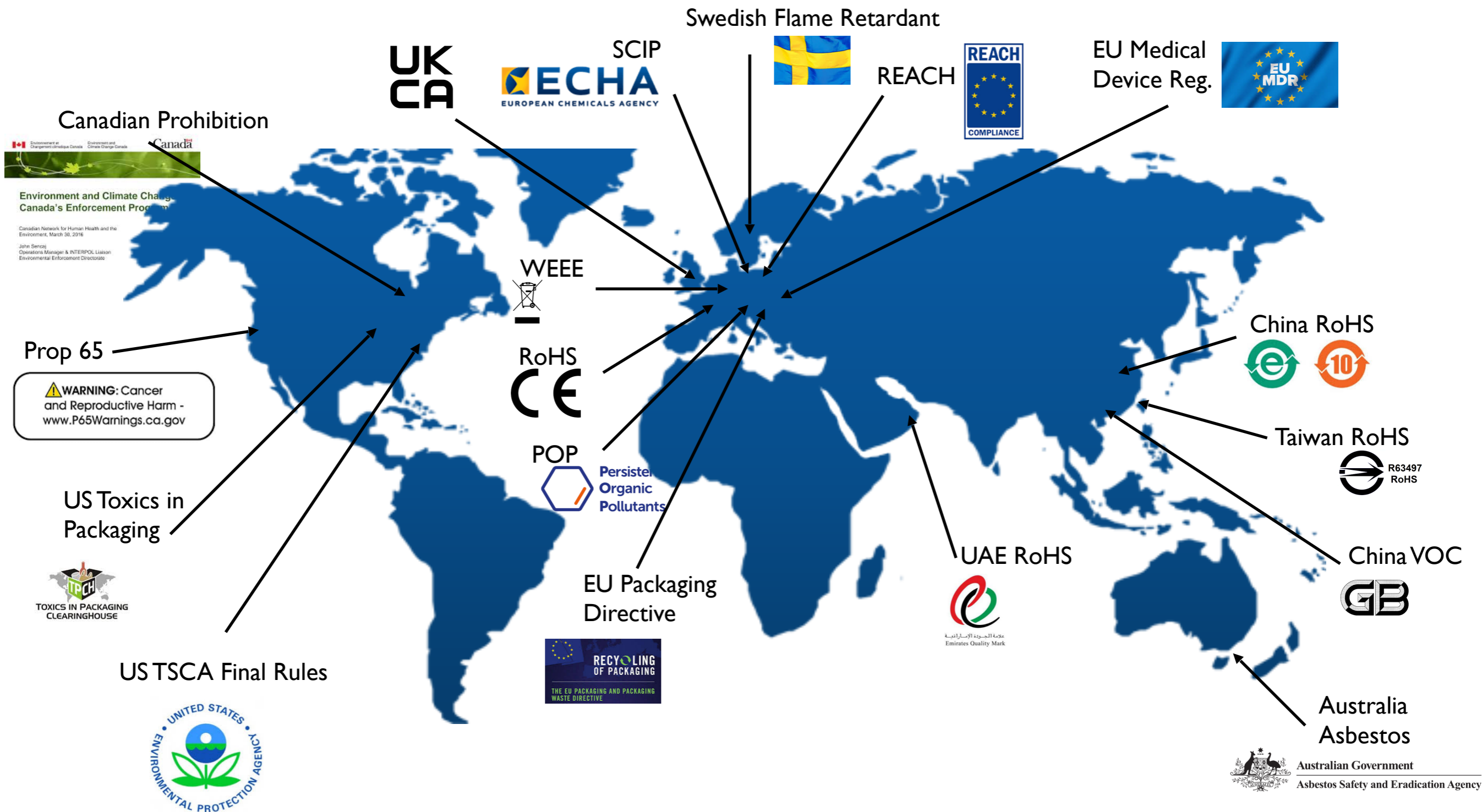
Overview - Agenda -

- Introduction
- Upcoming Deadlines
- How restricted materials compliance changes
- Problems with product compliance
 - Executing
 - Tracking
 - Updating
 - Communicating
- Claigan Product Compliance Tracker
- Q&A



Webinar is 50 minutes with 10
minutes of Q&A
(hopefully)

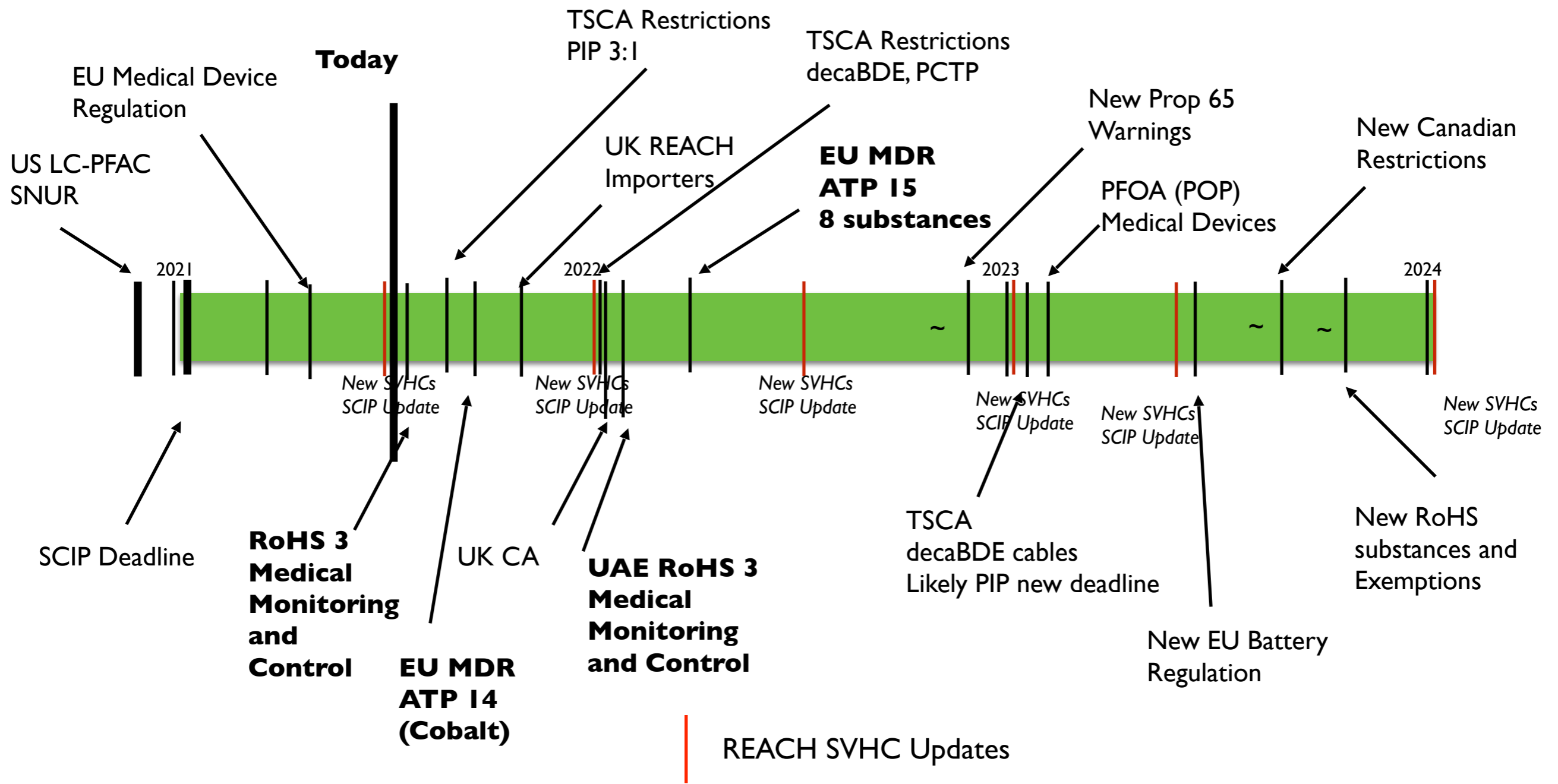
Global Restricted Materials Requirements



Compliance with each is MANDATORY to sell in each jurisdiction

Restricted Materials

Constant Deadlines



... not to mention REACH SVHC updates every six months and Prop 65 every year.

How

Restricted Material Compliance Changes

New Regulations

- SCIP
- TSCA
- LC-PFAC

Amendments to Current Regulations

- RoHS Recast
- REACH Restrictions
- EU POP
- Canadian Prohibition
- EU Battery Regulations

Regular Restricted Materials List Updates

- REACH SVHC
- EU MDR
- California Prop 65

4 Problems with Compliance Management

1. Executing
2. Tracking
3. Updating
4. Communicating

Compliance Management

I. Execution - Output Focused

- First question (for any regulation)
 - What are the outputs?
- Second question
 - What is the best way to get there?
- Paths to get there
 - Claigan is solution path 'agnostic'
 - ie. different outputs / situations have different optimal solution paths
 - Companies have often put a lot of effort into one pathway or another

Compliance Management

I. Execution - Output Focused

- Some updates are just risk assessments



Claigan Environmental Inc.
10 Brewer Hunt Way, Suite 200
Kanata, ON, Canada, K2K 2B5

January 19, 2021 Addition of SVHCs

Risk assessment of potential presence in physical products of the two (2) REACH SVHC substances added to the EU Candidate List for Authorisation on January 19, 2021.

Substance	Risk	Justification	Materials of Risk
Diocetyl tin dilaurate, stannane, dioctyl-, bis(coco acyloxy) derivs., and any other stannane, dioctyl-, bis(fatty acyloxy) derivs. wherein C12 is the predominant carbon number of the fatty acyloxy moiety	Medium risk (uncommon use in one application)	Stabilizer in rigid PVC. May have limited use in silane polymers and silicone polymers, but six months of laboratory test data did not identify its presence.	Rigid PVC
Bis(2-(2-methoxyethoxy)ethyl) ether	Low risk except one situation	Uncommon electrolyte in lithium ion batteries. Aprotic polar solvent similar to EGDME	Lithium Ion Batteries, and Fluoride Ion Batteries

This risk is based on a reasonable technical review of the current chemical data, EU information, internal test data, and other publicly available data. It may not include unforeseen or unpublished uses. The risk is based on whether or not there is any reasonable expectation for it to be potentially present in physical products above 0.1% w/w in any component.

Mostly commonly reported SVHC (SCIP)

- Most commonly (numerous) reported SVHC
 - **Pb**
 - **Pb monoxide**
 - *Misreporting of leaded glass in thick film resistors*
 - **Diboron Trioxide**
 - *Misreporting of borosilicate glass. Also a test error regarding use of HCl as a washing agent during the test*
 - **BPA**
 - *Misreporting of BPA monomer in polycarbonate including circuit boards*
 - **Pb Titanium Trioxide**
 - *Often misreporting due to a common test error. Measuring Pb and titanium in an electronic component such as a thick film resistor*
 - *And some real uses in some ceramic electronic components*

Compliance Management

2. Tracking

- Tracking compliance
 - How do you track compliance of complex products?
- Easy to track
 - One or two products
 - Snapshots in time
 - Small number of regulations
- Hard to track
 - Complex product lines
 - Continuously changing regulations
 - 10+ regulations (mandatory for selling globally)

Compliance Management

3. Updating

- Updating compliance
 - How do you update compliance of complex products?
- Easy to update
 - One or two products
 - One regulation
 - Few new products
- Hard to update
 - Complex product lines
 - Products that took a lot of work to achieve compliance

Compliance Management

4. Communicating

- Updating compliance
 - How do you communicate compliance of complex products?
- Audience
 - Internal stakeholders
 - Management
 - Customers
- Hard to communicate
 - Compliance status
 - Compliance declaration

Product Compliance Tracker

- There's got to be a better way
- What are the outputs?
- What are the best ways to get there?
- Can we communicate it?

E	F	G	H	I	N	O	P	Q	R	S
Select Mode Here					EU					
OUTPUT					PRODUCT INFO					
CertLink	"X"	Product	Matching products	Fam. ID	RoHS	REACH SVHC	SCIP	REACH Restriction	POP	WEEE
REGULATION PICK LIST					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Carrot		Carrot		BBunny	RoHS 2+3	Jan 2021	Jan 2021		Aug 2020	
Declaration - July 9, 2021	Bypassed. Pls Chk Status	Advil	Hammer, Comically Large Wooden Mallet	W.E.C.	RoHS 3	Jan 2021	Jan 2021	Not Evaluated	Mar 2016	Jul 2012
Declaration - July 9, 2021	Decl. created: July 9, 2021	TNT		W.E.C.	N/A	Jun 2020	N/A		Jun 2019	
Bird Cage and similar	Cert created: July 12, 2021	Bird Cage	Tweety's Swing	TB	RoHS 2+3	Jul 2021	Jan 2021		Aug 2020	
Declaration - July 9, 2021	Decl. created: July 9, 2021	Bird Cage 2	Hanger	TB	RoHS 2+3	N/A	N/A		Mar 2016	
Declaration - July 13, 2021	Decl. created: July 13, 2021	AH1 Server		Servers	RoHS 2+3	Jun 2020	Jun 2020	Jan 2021	Aug 2020	Jul 2012
Alpha Scope		Alpha Scope		Scopes	RoHS 2+3	Jul 2021	Jul 2021	Jul 2021	Aug 2020	Jul 2012

4 Problems with Compliance Management

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Claigan Product Compliance Tracker

- Details
 - We manage it for you
 - We or you can declare products
 - We help you with solution paths for new regulations and updates
 - Annual program

Claigan Product Compliance Tracker



- There is a better way
- And not an expensive way

Q&A



ACME Corporation
123 ACME Road
July 13, 2021

Environmental Regulations Compliance

Product:
AH1 Server

The product described above is in conformity with the following regulations:

- RoHS Directive 2011/65/EU and its amendment directives, including Commission Delegated Directive 2015/863
- EU REACH Regulation 1907/2006 article 33 (SVHC) (Jun 2020 - 209 Substances)
- Waste Framework Directive 2008/98/EC (SCIP) (209 Substances)
- EU REACH Regulation 1907/2006 article 67 (Restriction) (Jan 2021)
- EU POP Regulation 2019/1021 (Aug 2020)
- Packaging Directive 94/62/EC up to and including amendment Directive 2018/852
- Regulation of Certain Chemical Substances and Mixtures under Section 6 of TSCA, 40 CFR 751
- California Proposition 65 (The Safe Drinking Water and Toxic Enforcement Act, 1986) (Mar 2021)

Included below are any applicable exemptions, declarables, and/or warnings

RoHS:

The following RoHS exemptions are applicable to the products in this declaration. Exemptions are from Annex-III unless otherwise noted:

- 7a: Lead in high melting temperature type solders (i.e. lead-based alloys containing 85 % by weight or more lead)
- 7c1: Electrical and electronic components containing lead in a glass or ceramic other than dielectric ceramic in capacitors, e.g. piezoelectronic devices, or in a glass or ceramic matrix compound.
- 6a: Lead as an alloying element in steel for machining purposes and in galvanised steel containing up to 0,35 % lead by weight
- 6b: Pb in aluminum up to 4000 ppm (0.4%).
- 6c: Copper alloy containing up to 4 % lead by weight

REACH SVHC:

No SVHCs were found to be present in excess of 0.1% except as noted below:

- Steel components may contain Lead (EC# 231-100-4) above 0.1% w/w
- Aluminum components may contain Lead (EC# 231-100-4) above 0.1% w/w
- Brass components may contain Lead (EC# 231-100-4) above 0.1% w/w

E		F		G		H		I		N		O		P		Q		R		S	
Select Mode Here		< When ready select mode								EU											
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