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# Traceability of chemicals along (circular) supply chains

Insights from transformative research

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Martin Führ, Silke Kleihauer, Leonie Lennartz, Rebecca Niebler, **Julian Schenten**, Simon Winkler-Portmann (sofia)

# Societal and normative requirements for industries



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Green Deal and „Zero pollution“ Circular Economies  
Digital Product Passport

Increasing number of chemical regulations  
(restrictions, information obligations) world wide

Complex global supply chains



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# Transformative research with industry shows way to traceability



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Scenario building processes with textile (2016-17) and leather sectors (2019): Traceability (FMD) enabler to increase control and move towards more sustainable chemistry

Study with Furniture sector (2018-19) shows benefits / business cases of traceability beyond end-of-life

LIFE AskREACH launched first feasibility studies (2020) with SMEs marketing electronics and children's footwear

Solutions for chemicals present in articles, research needs for process chemicals



# Horizontal and vertical cooperation is imperative



**pro**active  
**alliance**

towards a global  
material reporting standard

Cross-sectoral solutions enhance effectivity and efficiency

**Proactive Alliance** vision: standardize data structure and information requirements across sectors, support FMD

Trust enabled by **governance mechanisms** is key to leverage benefits

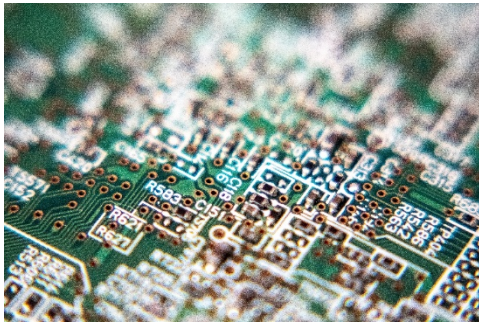
**Cooperation with suppliers:** continuous improvement processes in a learning system



# Legal challenges and prerequisites (1)

## Industry

Create framework conditions ensuring compliance  
REACH “article” definition (O5A) as yardstick



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Avoid exemptions diluting effectiveness and compliance, example of (“historic”) REC 19 in IMDS

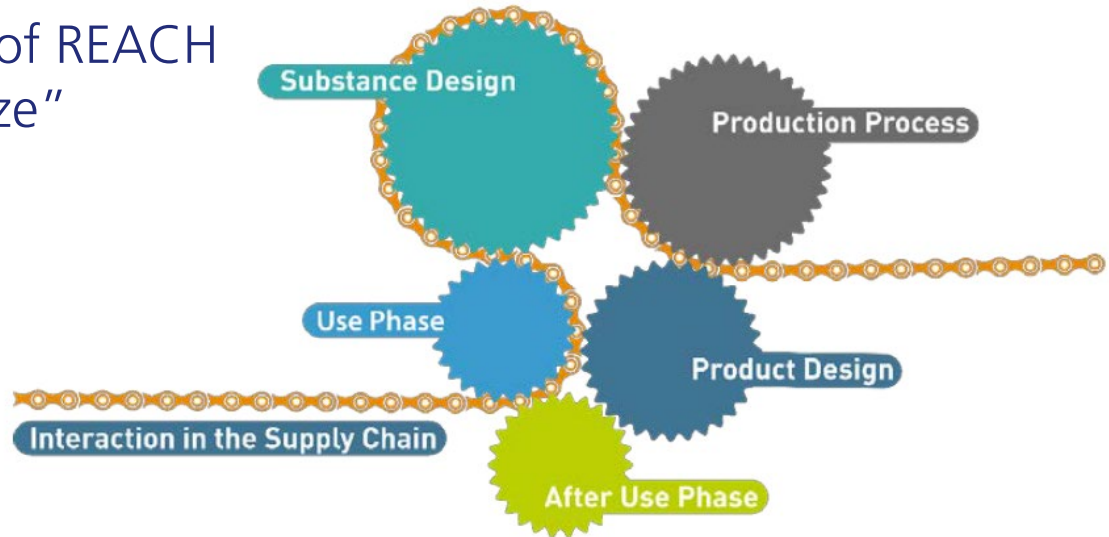
# Legal challenges and prerequisites (2)

## Legislators

Fix design flaws and advance legislation

- Proactive implementation of REACH Art. 33(1) “duty to organize”
- Provide SVHC info when “making available” in (online) catalogue
- Legal Frameworks: Advance incentives, reduce impediments

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## Conclusions

1. „Zero pollution“ Circular Economy vision leaves **no way around IT enabled chemical traceability** (perspective: FMD)
2. **Advance incentives** for (cross-) sector solutions
3. REACH re-opening anticipated for 2022 is **an opportunity** to enhance the legal framework(s)
4. Research and IT development needed on **process chemicals' "traceability"** – tech neutral; focus on actor's needs

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**Thank you for the Attention**

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[schenten@sofia-darmstadt.de](mailto:schenten@sofia-darmstadt.de), +49-6151 1638899