

Exploring New Realities in Supply Chain Compliance Management

ASUG Manufacturing SIG

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3E Company

Components of Compliance



Supply Chain

- Who and where are your customers
- How do your customers use your products
- Who and where are your suppliers
- Raw materials- what do they contain and where do they come from

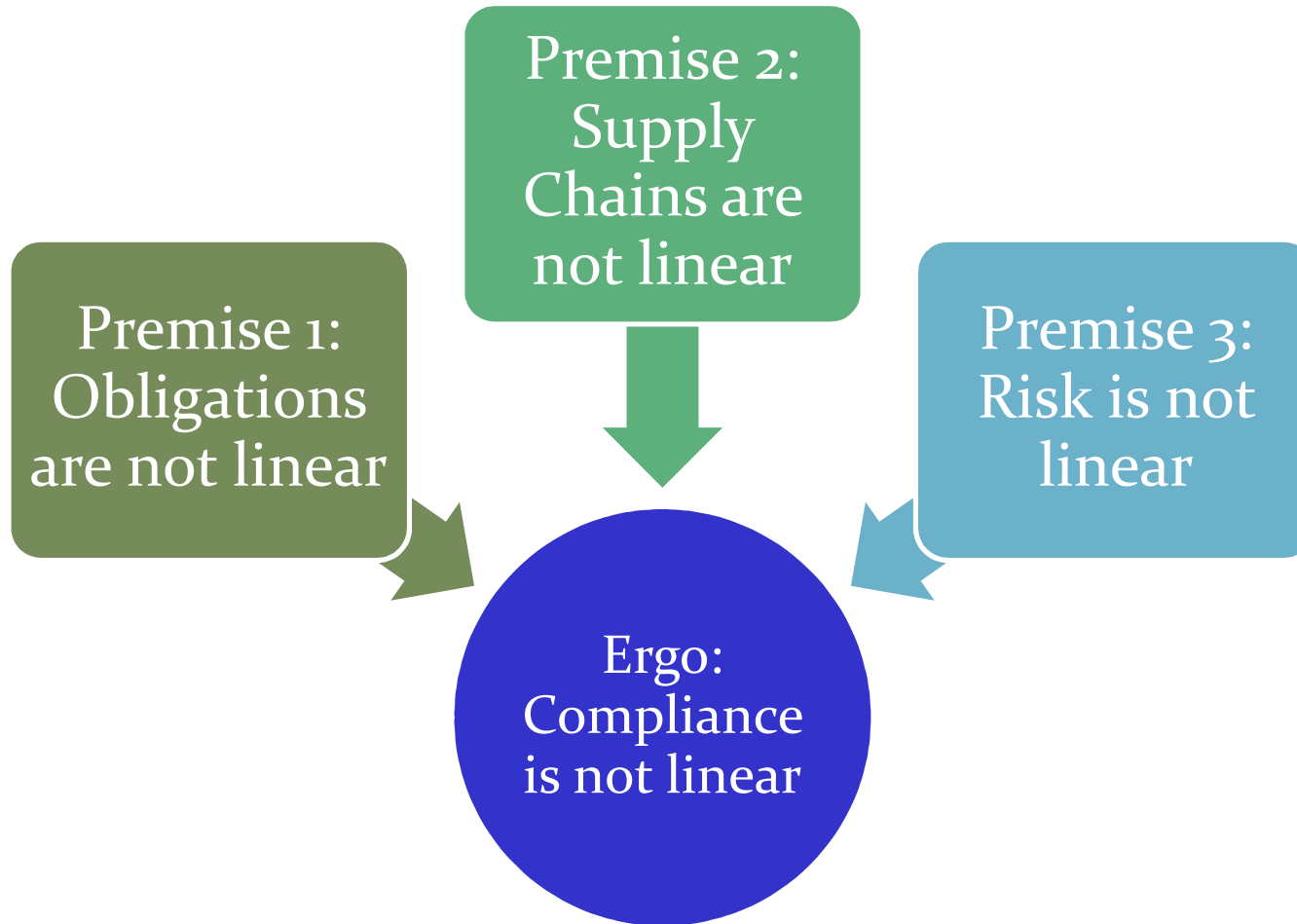
Obligations

- Regulatory, Industry, NGO
 - Where are you subject to regulation
 - What regulations apply to your products, your facilities
 - Which industry group policies do you adhere to
 - Which NGO initiatives are important to your business

Risk

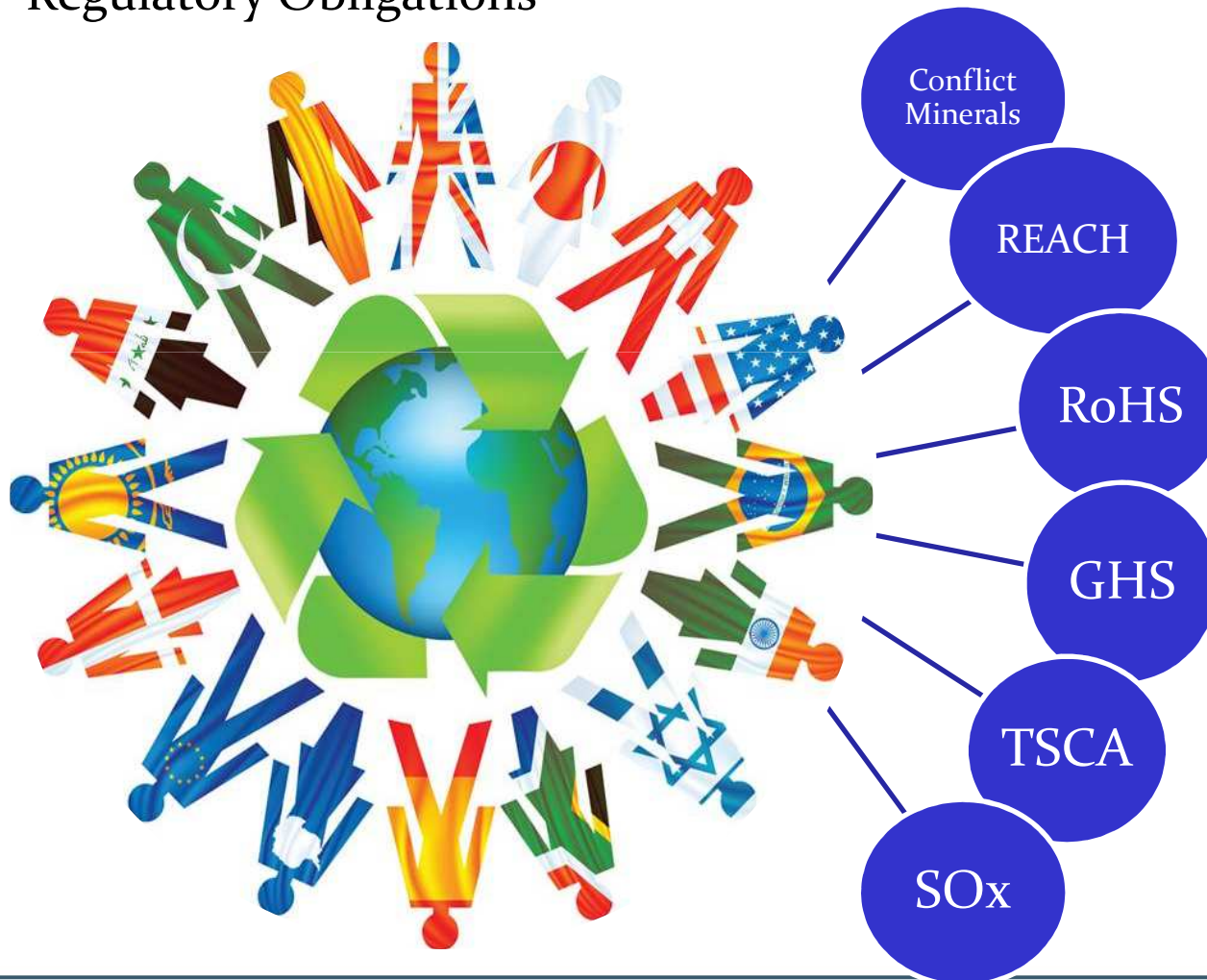
- Strategic
- Operational
- Financial
- Market Risk
- Business continuity
- Regulatory

The New Compliance Reality



Obligations are not Linear

Regulatory Obligations



- Registration

- First deadline was 30 November 2010:

- Phase-in substances $> 1,000$ t/y
 - CMRs > 1 t/y
 - Substances very toxic to aquatic environment (R50/53) > 100 t/y

- Second deadline is 30 May 2013

- Phase-in substances > 100 t/y

- Third deadline is 31 May 2018

- Phase-in substances $> = 1$ t/y