

COMPLYING WITH THE ECHA SCIP REGULATIONS

How **Kärcher** uses SAP Product and REACH Compliance and opesus EHS Product Notification to fulfill their ECHA SCIP requirement



Kärcher is the world market leader in cleaning technology. With their trademark yellow and anthracite cleaning equipment, this family-owned company with its headquarter in Germany is highly recognized worldwide for its high-pressure cleaners, vacuum cleaners, and many more professional cleaning equipment. Their product development process is focused on ensuring eco-friendly and compliant products.

KÄRCHER

To serve this purpose, Kärcher implemented SAP Product and REACH Compliance as their central material compliance tool. The implementation of EHSM started in December 2017. They chose opesus Product Compliance Essentials (PCE) for a high-quality implementation delivered in a short timeframe. The basic implementation of SAP Product and REACH Compliance was quickly up and running, thanks to the PCE package, and was further enhanced to fit Kärcher's business scenarios. Today, Kärcher uses SAP Product and REACH Compliance as the database for their materials, managing worldwide regulations, customer requests, and managing supplier communication.

COMPANY INFO

Name:
Alfred Kärcher SE & Co. KG

No. of Employees:
13,500

Founding Year:
1935

No. of Locations:
130 subsidiaries in 73 countries

HQ:
Winnenden, Germany

Revenue:
2,72 bil € (2020)

Industry:
Manufacturing

Offical Website:
<https://www.kaercher.com/de/>

CHALLENGE

THE EU WASTE FRAMEWORK DIRECTIVE

Soon after having SAP Product and REACH Compliance up and running, Kärcher needed to find a software solution that helps them fulfill the requirements of the EU SCIP Database, as outlined by the Waste Framework Directive (WFD). As a manufacturer, Kärcher was familiar with other regulations such as REACH Art. 33. However, relative to REACH 33, the data requirements for the EU SCIP Database are a lot more demanding.

Key Criteria and Solutions

As soon as the SCIP database prototype became available in March 2020, Kärcher looked to the market and evaluated various software to help them fulfill their SCIP database requirement. It was a race against time to assess a provider and start implementation so that notifications can be submitted by the compliance due date of January 5th, 2021. For Kärcher, their priority was to find a solution that complements their existing system based on the following criteria:

1. Deep integration with SAP Product and REACH Compliance
2. Protect confidential business information
3. Minimize time and effort for SCIP notifications



After evaluating several providers, Kärcher chose opesus EPN for the EU SCIP Database Format because it is the best solution to run together with SAP Product and REACH Compliance. Besides having standard features such as system-to-system integration (i.e., submitting dossiers directly from your ERP system to the ECHA SCIP Database), opesus EPN has additional features that make SCIP reporting more efficient.

The following section looks at how opesus EPN completes SAP Product and REACH Compliance for EU SCIP Database reporting.

Key Criteria #1

Deep Integration with SAP Product and REACH Compliance

Having a single source of truth is crucial for companies, especially for manufacturers with thousands of materials, parts, and components. Kärcher has all their data stored about their materials in SAP Product and REACH Compliance - their central database for material compliance.

For example, Kärcher utilizes the compliance data in their SAP Product and REACH Compliance to identify the most relevant SVHC substances above 0.1% in their product portfolio for REACH Art. 33. This is already a great starting point for SCIP database requirements, as information on SVHC substances in articles in a concentration above 0.1% w/w must be reported. However, the requirements for the SCIP database are a lot more extensive, as can be seen in the table below.

REACH Art. 33(1)

- SVHC >0-1%
- Article name

SCIP Database

- Article:
 - Article name
 - Primary article identifier
 - Article category (TARIC/CN code)
 - Production in the EU (yes/no)
 - Safe use instruction(s)
 - Candidate list substance
 - Concentration range
 - Material category
- Device:
 - Same info as required for articles
 - Complex object composition / product structure

Although the SCIP Database requirements have many more data points, most of this data is already available in SAP Product and REACH Compliance or elsewhere in their SAP ERP. With opesus EPN for the EU SCIP Database, this information can be easily retrieved out of SAP Product and REACH Compliance and SAP ERP.

This only needs to be configured once during implementation, where each field was analyzed to identify the most suitable data source within Kärcher's master data. In this way, the team at Kärcher only needs to maintain data once (in SAP Product and REACH Compliance or SAP ERP), and opesus EPN will be able to "collect" this data when creating a dossier in the SCIP format.

Overall, this is a significant saving in time and effort while also reducing errors. Data must be maintained only once, and it is "reused" to create SCIP dossiers.



Key Criteria #2

Protect Confidential Business Information

The central goal of the EU SCIP database is to make information on articles containing substances of concern (SVHCs) publicly available to waste operators, consumers, and authorities to facilitate the gradual substitution of those substances. ECHA's dissemination platform makes the information submitted to the SCIP database accessible to everyone. Hence, it becomes even more crucial for companies to consider how they can protect their confidential business information.



What's the ECHA Dissemination Platform?

The ECHA Dissemination Platform contains the full dataset submitted to the SCIP database. Therefore, companies should carefully review their notifications before sending them to the SCIP database. For more details, check out the [article about the dissemination platform](#).

For example, when using SAP Product and REACH Compliance, the greatest possible level of detail is required to manage compliance. However, extreme detail about your products may not always be necessary to meet the goals of the SCIP database. This is where running opesus EPN together with SAP Product and REACH Compliance hits the sweet spot.

With opesus EPN for the EU SCIP database, built-in validation rules ensure that all mandatory data points are provided. At the same time, opesus EPN offers various options to view and carefully control the published data to ensure that confidential business information stays protected. Kärcher uses this to ensure that they remain compliant with the requirements of the SCIP database, but minimize disclosure of their confidential business information. Furthermore, with opesus EPN, Kärcher can conveniently centrally manage compliance for their subsidiaries thus having even more control over the information that they provide to the SCIP database.

Centrally manage SCIP database notifications?



With opesus EPN you can decide how you would like to manage SCIP notifications. Not all of your subsidiaries use SAP? Not a problem! opesus EPN provides an Excel template where subsidiaries can enter all required data. This Excel file can be easily imported into opesus EPN to be processed and submitted to the ECHA SCIP Database.

Key Criteria #3

Minimize Effort Through Process Automation

Submitting initial submissions by the compliance date is a challenge that all companies must overcome. However, it is even more important that companies think about their strategy for managing SCIP notifications in the long-term. Companies need to consider changes to underlying data such as:

- supplier changes
- engineering changes
- introducing new products
- twice yearly updates of the SVHC list
- updates to validation rules for notifications to the SCIP database

Any of these changes may require the transformation of the relevant change into new SCIP submissions or updating a previous submission. Therefore, having a system that can automatically collect and notify compliance officers about these changes is not only convenient but also saves time and effort while ensuring that you stay on top of the legal requirements for SCIP notifications.

This is the very reason why EPN is Kärcher's solution of choice to handle their SCIP database notifications. Out-of-the-box, EPN offers process automation options that can handle various workflows to minimize effort and save time.

For example, opesus EPN can be configured in such a way that a simple change (and release) of compliance data in SAP Product and REACH Compliance will do the following: validate changed data, check against existing notification, trigger a new notification (or update) for all affected products and legal entities, automatically submit to ECHA SCIP database, and update the status of notification back into your system without a single manual step required!

At Kärcher, the first process automation that was implemented focused on handling compliance data changes in SAP Product and REACH Compliance. This means that the system monitors changes to compliance information and checks their relevance regarding SCIP notifications. At the time of writing, Kärcher is on its way to implementing a fully automated change management when handling SCIP database notifications.

ABOUT

OPESUS EHS PRODUCT NOTIFICATION FOR EU SCIP DATABASE

opesus EPN is a software that supports companies to generate and submit product notifications under various national legislations. The innovative architecture of the software provides companies with the flexibility that they need. opesus EPN supports notifications for various formats such as the IUCLID-based EU Poison Centre Notification format and the EU SCIP Database.

With opesus EPN, you can easily identify articles or components in your portfolio affected by the regulations, generate dossiers for submission, and monitor the status of your submissions. For the SCIP Database format, opesus EPN has the following automation features:

- automatic evaluation of changes to article data in relation to SCIP requirements
- automatic review of changes to an article when its validation status changes
- automation submission of notifications that have been validated and approved
- automatically trigger a where-used search to keep the composition of the complex object and its parent up to date
- process and changes to the documentation for material master, bill of material, or supplier data

opesus EPN runs within SAP. Therefore, training efforts were minimal as it provides users with a unified interface for their daily work. Using opesus EPN to generate and submit product notifications is just an extension of the work that users are already performing in SAP Product and REACH Compliance. opesus EPN is highly configurable right out of the box so that you can get up and running quickly. The solution runs within SAP and maximum efficiency is achieved when implemented with SAP Product and REACH Compliance.

Contact us for a non-binding call!