

Prop 65, SDS, and
More...
The Compliance
Data Connection



**STROBEL
PROFESSIONAL
SERVICES, LLC**

Speaker Background

- **38 year automotive industry veteran**
- **15+ year ACPN participant**
- **Specializes in solving complex data problems**
- **3 key roles -**
 - **VP, BackboneAI**
 - **President, SPS**
 - **Owner, Click IT of Marietta**
- **25+ years experience in compliance, regulatory, hazmat**
 - **SDS**
 - **Prop 65**
 - **and more...**



Question for the audience!

**As a Content Professional,
have you been asked to get
regulatory data, deliver
regulatory data, or create
regulatory data?
(raise hand if yes)**



Content Professionals Are Often the “Jack of All Trades”



- Product application data (ACES)
- Product specification data (PIES)
- Digital Assets
- Marketing data
- Interchange data
- VIO
- Compliance & Regulatory data



How To Manage Regulatory Data - Different Types...

- **SDS - Safety Data Sheets**
- **California Prop 65**
- **Country of Origin**
- **CARB**
- Europe Reach/RoHS/SCIP
- US State level regulations
- Canada regulations
- and more...

WHAT



A Bit About Europe...REACH

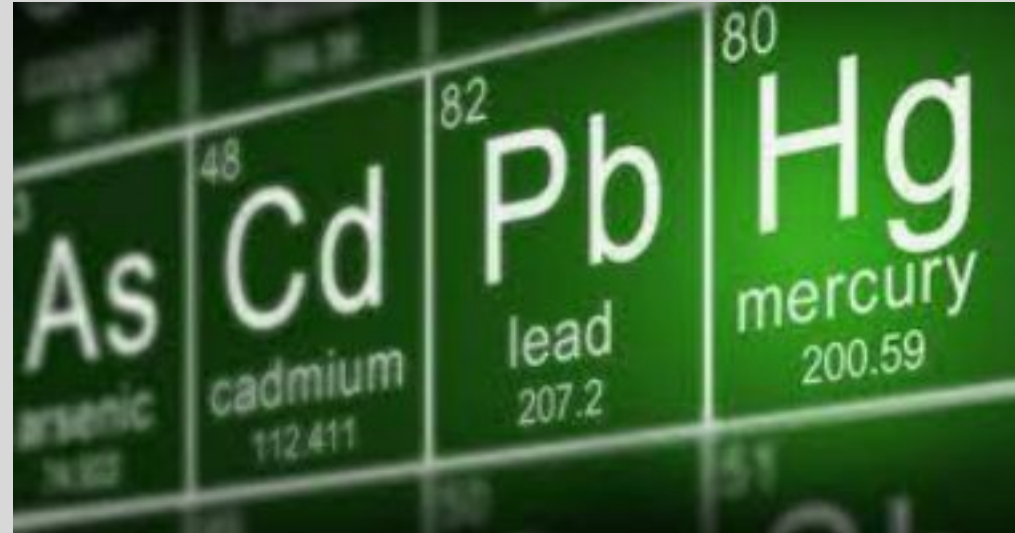
REACH -
Registration
Evaluation
Authorisation &
restriction of
Chemicals
Since 2006
Any chemical substance
143,000+ regulated
Register via IUCLID



A Bit About Europe...RoHS

**RoHS -
Restriction
Of
Hazardous
Substances**

**Restricts use of certain
substances or articles that
contain the substance.
Examples: lead in vinyl
cables, metal parts, bulbs,
batteries**



**Lead
Mercury
Cadmium
Hexavalent Chromium
Polybrominated
biphenyls (PBB)
Polybrominated
diphenyl ether (PBDE)**

**Bis(2-ethylhexyl)
phthalate (DEHP)
Butyl benzyl phthalate
(BBP)
Dibutyl phthalate (DBP)
Diisobutyl phthalate (DIBP)**



A Bit About Europe...SCIP

SCIP -
Substances of
Concern
In
Products
More in-depth
requirements for certain
substances used on or in
products



A Bit About Canada...

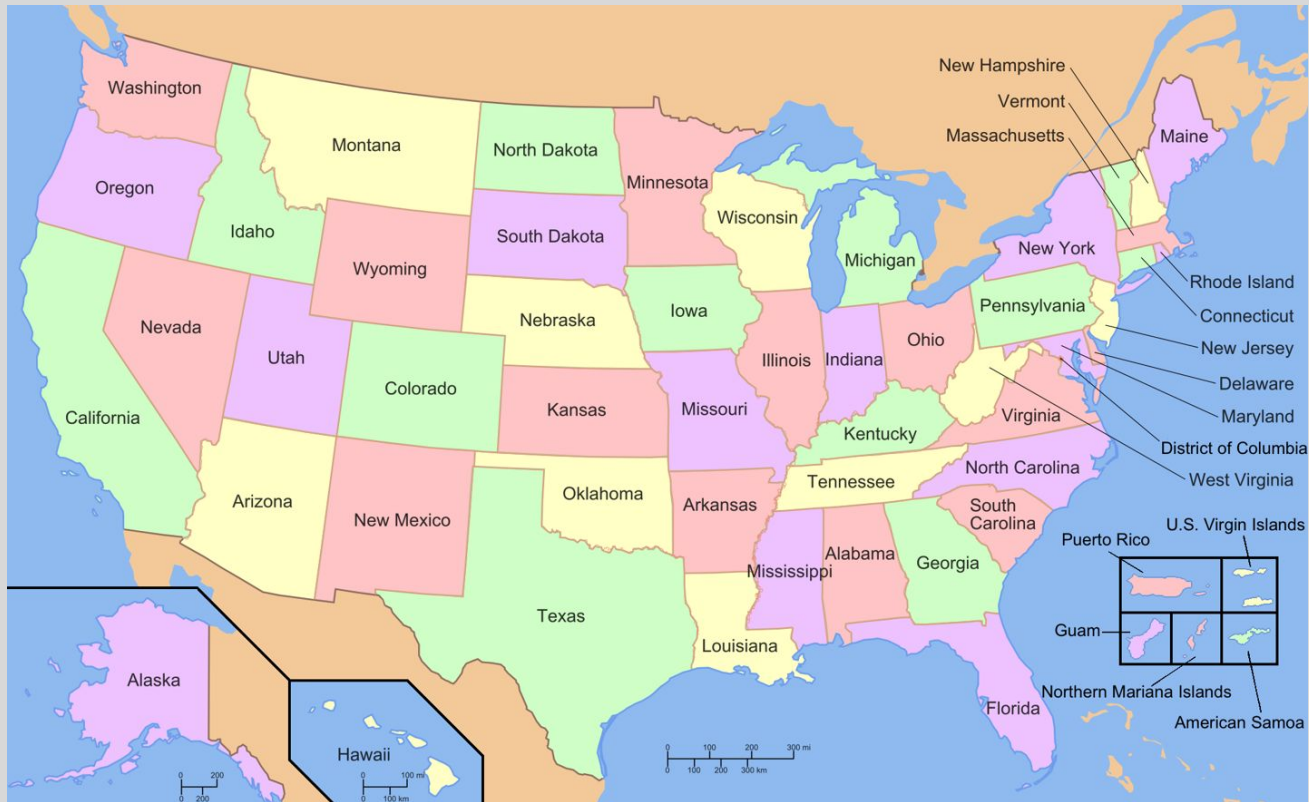
CEPA Canada Environmental Protection Act

<https://www.canada.ca/en/health-canada/services/chemical-substances.html>

Similar to REACH + Prop 65
Examples: Acetone, Lead,
Phthalates, Plastic, Petroleum
Distillates, Epoxy



Back to the USA! State Level Regulations



Each US state has the ability to regulate its own products based on the state's priorities.

- VOC
- Batteries
- Fluid Containers
- Any item the state deems "unsafe" or "at risk"



... and Then There's California...



Prop 65

Administered by Office of
Environmental Health
Hazard Assessment
(OEHHA)

<https://oehha.ca.gov/>

CARB

California
Air &
Resources
Board



Why is Compliance and Regulatory Data Required?

GOOD INTENTIONS...

The intent for most of these regulations is to protect the health and safety of those in the region. Also the intent is to protect the environment and properly dispose of potentially dangerous substances.



Oh and FINES

Penalties can include:

- Fine of \$1,000 per sku, per day, per sale (California Prop 65)
- Ban of your product
- Legal actions
- Major settlement example:
 - \$299,000 !!!



<https://apaengineering.com/compliance-blog/carb-penalizes-a-renowned-coating-manufacturing-company>



Which of These Products Requires a Prop 65 Statement?



Where to Go to Get This Information...

- EH&S (Environmental, Health, Safety)
- Legal
- OSHA
- Sourcing
- Engineering



How to Use ACES for Regulatory Data - one example

HOW

- ACES example using Qdb!
 - CARB compliant codes by vehicle
 - Qualifier for EMS (Yes or No)

22775 - CARB Executive Order <p1 type="idlist"/>

23487 - Engine Family Number <p1 type="idlist"/>



How to Use PIES 7.2 for Regulatory Data - Hazmat Segment

- **HAZM segment for SDS**
 - Country of Origin included
 - J60 = “Text Message” - not pretty but functional

```
<HazardousMaterial MaintenanceType="A" LanguageCode="EN">  
<ShippingScope>DOM</ShippingScope>  
<Bulk>N</Bulk>  
<RegulatingCountry>US</RegulatingCountry>  
<TransportMethod>A</TransportMethod>  
<Regulated>Y</Regulated>  
<Description>This is a description</Description>  
<HazardousMaterialCodeQualifier>D</HazardousMaterialCodeQualifier>  
<TextMessage>This is a text message</TextMessage>  
<OuterPackageLabel>ORM-AIR</OuterPackageLabel>  
</HazardousMaterial>
```

HOW



How to Use PIES 7.2 for Regulatory Data - Some Ideas!

- EXPI segment
 - E05 ID = P65
 - E10 Data = <Prop 65 statement>

<Descriptions>...</Descriptions>

<Prices>...</Prices>

<ExtendedInformation>

<ExtendedProductInformation MaintenanceType="A" LanguageCode="EN"
EXPICode="CTO">US</ExtendedProductInformation>

<ExtendedProductInformation MaintenanceType="A" LanguageCode="EN"
EXPICode="P65">Warning Contains Chemicals that may cause cancer
risk</ExtendedProductInformation>

</ExtendedInformation>

HOW



How to Use PIES 7.2 for Regulatory Data - Some Ideas!

- ASST segment
 - P10 Type = P65
 - P64 Description - Prop 65 Label

<DigitalAssets>

<DigitalFileInformation MaintenanceType="A"
AssetID="xyz_P65" LanguageCode="EN">

<FileName>xyz.jpg</FileName>

<AssetType>P65</AssetType>

<FileType>JPG</FileType>

...

HOW



Be Sure to Work WITH Your Trading Partners!

- Align with their requirements
- Discuss options
- Make recommendations
- Put it in writing!

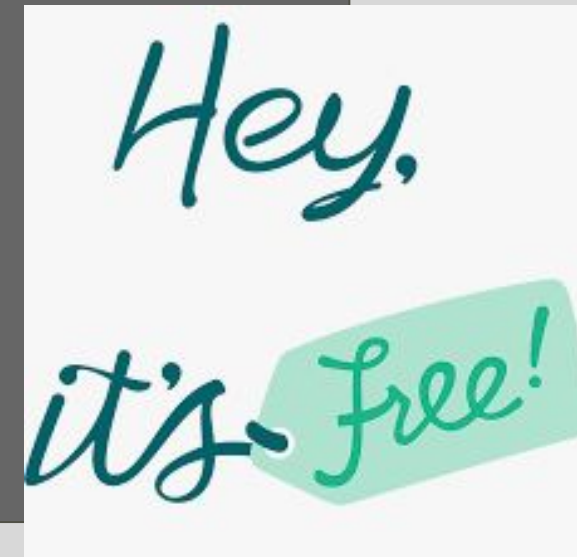
BUT...!



Participate in the ACES and PIES Communifire Groups

Help to establish best practices and discuss improvements/ideas!

<https://autocare.communifire.com/>



Next Steps...

- **Determine if your products require any compliance/regulatory data**
- **Build a plan to implement**
- **Work with experts to help!**

- **APA Engineering**
- **Strobel Professional Services**



The Future - This Isn't Going Away...



Plan for more regulatory data requirements by creating a consistent, repeatable process.





Thank You!

