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Small weights – big impact

With ruling [C-106/14](#) in regard to §33 of the REACH regulation, the court of the EU has given a clear statement on the scope of reporting duties under REACH. The subject of compliance evaluation is substances in articles – and every article will remain subject to reporting on further usage in complex products: **“once an article, always an article”** (O5A).

The definition of an article is actually quite clear in the wording of the law: “an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition“. This definition includes the smallest screws and mechanical components, but also the **smallest electronical components**, as well as **nano materials**. The 0.1% thresholds now renders dimensions reportable that are far beyond current practice: **µg** (10⁻⁶g) and **ng** (10⁻⁹g).

CDX 5.3.1 introduces precision to the nanogram (previously the precision was microgram), allowing CDX to comply with reporting duties under REACH from the smallest to the largest. CDX will represent **articles between 1ng up to 1 mega ton**, allowing reports for the smallest electronical components, as well as **large-scale machinery, ships** including the **largest carrier, biggest airplanes** etc. Once again, CDX proves its strength as a **cross-industries material reporting service** for the supply chain.

Updated ECHA REACH guidance, version 4.0, June 2017

Of relevance is the update of ECHA’s REACH guidance, released June 2017 (<https://echa.europa.eu/guidance-documents/guidance-on-reach>). The major focus of the update to version 4.0 are changes related to the EU court O5A ruling.

Those sections that deal with REACH §7 and §33 have undergone a full revision and restructuring. Many examples – in particular related to **articles in complex products** – illustrate roles and duties within the supply chain under REACH.

Presentations and examples confirm that the approach that DXC Technology has chosen within CDX since adoption of the REACH regulation is congruent with the official understanding of **REACH §33 under O5A**. Since its beginning, CDX has evaluated the concentration of substances at the level of **homogenous materials** and **articles** in terms of REACH and therefore is ideally suited to comply to **reporting duties** imposed on **complex supply chains** under REACH §33.

AEM Materials Regulatory Compliance Summit in Pontiac

DXC Technology, in collaboration with the **Association of Equipment Manufacturers (AEM)** Sustainability Steering Committee and other experts in regulatory compliance, hosted a Materials Regulatory Compliance Summit August 15-16, 2017, in Pontiac, Michigan for suppliers in these industries.

Following an agenda fully packed with expert know-how 48 attendees discussed the complexity of regulatory compliance and the challenge for AEM member companies to secure their business following compliance requirements.

AEM has selected **CDX (Compliance Data Exchange)** as the most appropriate IT solution to systematically and effectively collect and analyse product compliance information throughout the supply chain. In addition, a **Full Material Disclosure (FMD)** was recommended that balances the suppliers' needs to protect their intellectual property with a forward-looking gathering of necessary compliance information.

Video key notes from Caterpillar, CNH Industrial, Cummins and Volvo executives underlined the management commitment to further focus on product compliance. Select companies have already started a pilot project to implement CDX within their company and their whole supply chain. DXC has committed to support these projects and to extend CDX's functional scope, based on requirements and feedback from AEM member companies and their customers.

For further information please contact the CDX team: cdx-info@dxc.com.