

## WTO Bali Session: Standard Compliance Capacities and Trade

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#### Outline

- Key challenges of RoHS & REACH faced by firms in Thailand
- Our approaches to support industry (SMEs) to overcome RoHS & REACH
- Key capacity improvement areas

## Challenges of RoHS & REACH (for Articles)

- Complex & dynamic technical regulations
  - Chemical contents in articles
    - Unfamiliar subject to most firms/industry personnel
  - Risk-based:
    - Different obligations for different substance categories/ risk profiles
    - Regulatory requirements for specific substance can be changed based on new scientific evidences
    - Unfamiliar concept to most firms
      - Tendency to develop generalized requirements to facilitate supply-chain communication
  - Dynamic
    - Time between addition of new candidate list substances is shorter than time for S/C products to reach market
- Wide spread impacts
  - Only few 'out of REACH' area
- Approach to apply trigger limit (REACH article 7 & 33) still not unify
  - Once an article always and article (DE,FR,SE,AT,BE,NO,DK)
  - Characteristic of the product as import/as produce

#### Challenges of RoHS & REACH (for Articles) (2)

- REACH SVHC from Risk-based context
  - Some firms are responsible for
  - Some 'concern substances' in
  - Some products/parts (including packaging)
- REACH SVHC in supply-chain context
  - Every firm has responsibility to confirm (through third party verification/certification)
  - Every 'concern substance' in
  - Every product/part (including packaging)

## Our approaches to support industry (SMEs)

- Raise awareness at early stage
- Provide technical knowledge toward sound chemical management
  - Concept & implication of modern (risk-based/performance-based) regulations
  - Importance of risk management & the management of chemical substances in products
  - Lots of public/in-house training
- Provide appropriate (collaborative) tools
  - Standards/ Guidance
  - Collaborate with JEMAI/JAMP (Dissemination of JAMP tools)
- Help leverage burdens
  - Thai RoHS Standards
  - Supply-chain collaborative network
- On-line platform
  - Alert on new development
    - RoHS V.2, new EU standards, Biocidal regulation (Treated articles)
  - Q&A forum
  - Etc.

# Thailand's overcoming RoHS & REACH lead to improved competitiveness? Why?

A Driving Force for National Science and Technology Capability

# The Green Play\*



#### Approaches to manage chemical contents in products





- Large efforts spent on generating document to meet customer's requirements than on risk reduction and product improvement
  - A direct consequence of strict customer's requirement
- Overwhelming costs (of generating compliance document) and risk of non-compliance drive industries to adopt of a sound management system

Based on MTEC's survey of focused industries (EEE, Auto, Furniture, Packaging/Food) during May-Aug 2010

# **Key operational limitations**



Main Management Materials Money Machine Innovation

Scale: 5 = very important, 4 = quite important, 3 = moderate

Based on MTEC's survey of focused industries (EEE, Auto, Furniture, Packaging/Food) during May-Aug 2010

#1: Human resources#2: Management, Access to necessary inputs & Investment funds

# Key operational limitations (2)



SME: HR & fund Large Eneterprises: HR & Management



Innovation is considered important limitation for Thai & Public companies

Scale: 5 = very important, 4 = quite important, 3 = moderate

Based on MTEC's survey of focused industries (EEE, Auto, Furniture, Packaging/Food) during May-Aug 2010

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## Key capacity improvement areas

- Human Resources
  - Technical knowledge to support risk-based chemicals safety management & greener products development
  - Capacity to develop & enforce similar regulation/mechanism in Thailand
    - Reduce supply-chain burdens
    - Incubate local suppliers
    - Protect consumers/environment from the use of high risk substances
- Infrastructure
  - Supportive infrastructure to synergize green supply chain development
- Regional/ Multinational supply-chain collaboration
  - Consistent 'green' standards/ practices
  - Encourage long-term development for upstream/middle stream producers

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เพื่อผลิตสินค้ารักษ์สิ่งแวดล้อมระดับโลก

## Thank you for your attention

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## **References information**



#### Building up SMEs' Sound Chemicals Management Capability



## 2005-2006: Raise awareness



#### Thailand 1st RoHS/ELV Compliance Guideline (2006)



#### Provide Guidance (with supported information)





## 2009~

Focused on Up-to-date information dissemination & in-depth technical analysis -Training courses -Discussion forum -Technical Papers



# On-line platform (new.ThaiRoHS.org)

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## From RoHS/ELV to REACH

High degree of complexity of the Regulation

High degree of complexity of globalized production chain

Anticipated large number of concern substances to manage

Tight timeline to response (to dynamic list of concern substances)



- Beyond operational capability of a single entity
- Require new facilitating tools
- Require regional/international collaboration
- Entity along supply chain need to work in concert

Driving Force for

National Science and Technology Capability