

Active Steward

Product Stewardship and Regulatory Compliance Tool

What We Do

We provide managed service solutions for chemical-related industry, through expertise and real world experience.

What We've Done

<http://www.penmanconsulting.com/index.php/services/what-weve-done-recently>

- Central in the creation of more than 750 registration dossiers used in thousands of registrations
- Advice to businesses and strategy development - understanding the cost basis to build the business case
- Total process management of consortia – technical and operational support including:
- Lower Olefins and Aromatics (LOA) – 51 companies, 140 substances
- Higher Olefins and Poly Alpha Olefins (HOPA) – 10 companies, 80 substances
- Significant consultants for writing datasets and Chemical Safety Reports (CSRs) - refining industry, metals industry, individual companies
- Training - IUCLID, exposure, robust study summary, CSR, CLP...
- Total registration process for companies - from business case through dossier creation, submission and maintenance



Why We're Building Active Steward

We helped many companies through the 2010 registration process, now, they are asking for help with compliance and stewardship issues. We have listened to industry's ideas so that we build the right tool to meet industry needs. These include current and prospective clients - petrochemical and chemical multinationals, independent Only Representatives (ORs) and others. They have asked us to design new tools to meet new challenges:

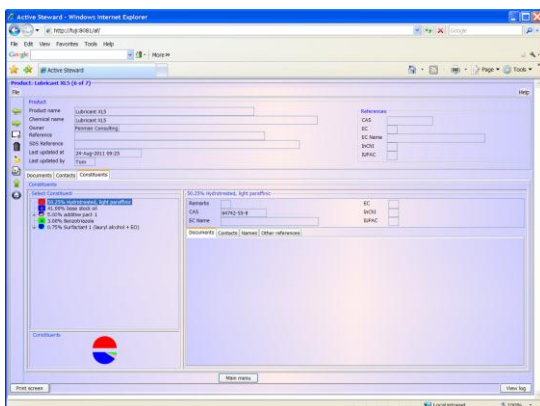
- Changing regulatory systems and increased regulator activity, including markets beyond Europe
- Only Representatives and Product Stewards swamped by documentation - difficult to demonstrate regulatory compliance
- Retiring Product Stewards – loss of subject expertise and pro-active approach
- Very complex supply chains, including confidentiality between downstream users
- Clients see products, regulators regulate substances

Active Steward for Industry

Product Stewards and Only Representatives told us what they want from Active Steward:

- Store and retrieve critical regulatory documents with ease
- Print / save reports to demonstrate regulatory or market pressure compliance – a statement with evidence – for transmission to customer or for regulatory inspection
- Store and recover a position paper - a summary of a position taken with a regulator, together with the evidence used to support that position and related correspondence, for example on classification
- Organise and store all manner of documents relating to substances, tagged and sorted as fits company policies and processes
- Recover documents easily – users can search the database by CAS, by tag, or by document text; they can then select any number of results and have them output to pdf or other formats
- Store data on products yet see the regulatory information at a substance level as well

- Have systems that interact with IUCLID so they do not have to enter data more than once or have two data sources
- Record a complex supply chain – linking a product from their client (the producer) to Downstream Users who operate with various levels of confidentiality
- Track the amounts of a substance which are passed along the supply chain and into various regulatory territories, by recording the formulation of the client's product and the transactions to and between Downstream Users
- Communicate with the supply chain via automated email and letter addressing
- Create a tonnage and uses supply chain report, for the client or regulator, covering a selected period - including tonnage of product, tonnage of each substance, uses to which each downstream user is putting the substances, and the passage of product/substances over regulatory borders
- Automate requests for updates from clients and downstream users - automatic email, plus reminders where needed, asking clients and downstream users for updated information via secure web form



Keeping in Compliance – Product Stewardship

Enforcement is high on the EU political agenda and downstream users demand demonstration of compliance from registrants to ensure their own business continues.

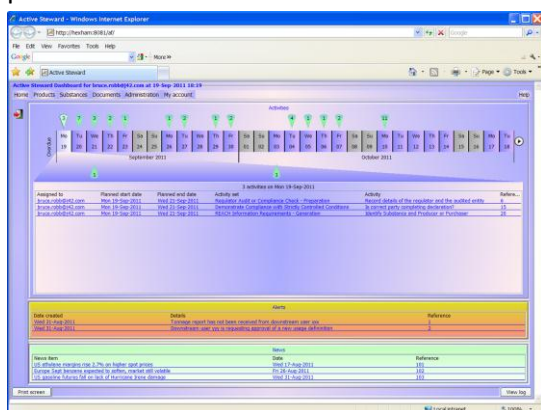
On-going compliance needs proactive approach:

- In manufacturing operations
- Up and down the supply chain
- Changing volumes / uses
- Changing legal ownership
- New assessments

Audits will require demonstration of policies and procedures to steward products and processes.

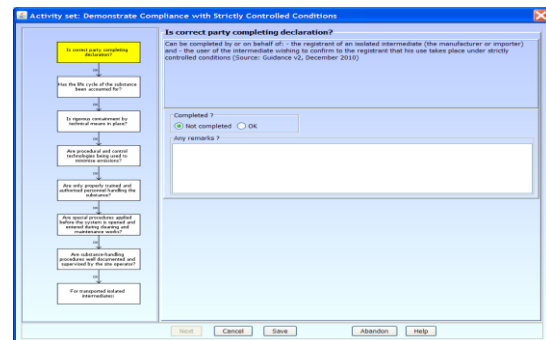
Active Steward - Proactive Approach

Active Steward's task and procedures system is unique. It enables compliance and compliance-checking for existing procedures and regulations, but is flexible enough to accommodate new procedures and regulations. A dashboard ensures users and other interested parties are always up to date with the status of workflows and activities, plus relevant news.



With Active Steward you can ensure internal and regulatory compliance in any market, in any region. Compliance documents and

reports are produced and stored by the user as they follow simple or complex procedures and guidelines – internal to the company or those demanded by the regulatory situation.



Availability

Active Steward will be released in Q4 2011 and available to try without cost.

On-site installation and maintenance is possible. A fully hosted version of Active Steward will also be available. To use the hosted version users do not need to install software or hardware on site, only a web browser is needed.

For Further Information

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