Snap Inc.



Compliance to 42 regulations across 14 countries in less

than 3 months

Snap partners with Sphera EC4P for fast, programmatic recycling compliance

Benefits

Sphera's EC4P has significantly reduced the time and cost for Snap to achieve and maintain compliance by:

- Removing the need to employ compliance officers across Europe
- Appointing Authorised Representatives and using overseas producer arrangements to enable Snap to become compliant for internet sales
- Joining and maintaining memberships to compliance schemes for WEEE, batteries and packaging recycling in each country
- Monitoring changes to recycling legislation across Europe, advising Snap how these changes impact its business and adapting recycling arrangements in each country to ensure continued compliance

Without EC4P, Snap would have needed to appoint a compliance officer in each European country to:

- Understand company legal exposure to WEEE, battery and packaging recycling regulations
- Register with the correct authority and scheme for each waste type
- Ensure correct recycling of each waste type and comply with reporting deadlines
- Pay correct WEEE, battery and packaging recycling fees on time

Background

Five years after creating Snapchat, a social media platform with over 150 million users, Snap Inc. launched their first hardware product. Snap Spectacles (www.spectacles.com) are sunglasses with a built-in camera which the user can use to upload video clips to the Snapchat social media platform and provide a first-person account of their activities.

Snap wanted to start selling spectacles in Europe from June 2017 through its on-line web store and as an environmentally responsible company, Snap wanted to ensure compliance to local environmental regulations in every country where products are sold.

Product compliance

Snap identified that product sales in Europe are required to comply with recycling regulations for waste electrical and electronic equipment (WEEE), batteries and packaging. The requirements are different in each country and for each type of waste – a company who wants to sell products in Europe needs to comply with over 90 different waste recycling regulations!

Snap realised they needed help to understand the legal obligations, evaluate their options and implement recycling arrangements in each country. And the work needed to be carried out quickly and efficiently to meet its June 2017 sales deadline.

EC4P recommendations

Snap contacted other companies in the USA to find out how they managed European recycling requirements and were recommended to approach Sphera EC4P. Snap contacted EC4P in February 2017 and were impressed with EC4P's extensive experience, cost-effective approach, easy-to-implement services and numerous client references.

Snap commissioned EC4P and launched its European recycling project in March 2017. Within 2 months, EC4P had assessed Snap's legal compliance obligations across all EU countries and implemented recycling compliance arrangements for Snap in the five priority countries (France, Germany, Italy, Spain and UK).

EC4P implemented recycling compliance arrangements for Snap in the next nine target countries (Austria, Belgium, Denmark, Finland, Ireland, Netherlands, Norway, Sweden and Switzerland) by end of May, in time for Snap sales to all fourteen countries to start in June.

Environmental Compliance 4 Products





EC4P web platform

Sphera's EC4P (Environmental Compliance 4 Products; www.EC4P.com) is a centralised compliance platform which manages product registration, sales reporting and recycling fee payments for WEEE, batteries and packaging compliance across all European countries and other countries around the world. EC4P manages and keeps up-to-date with all WEEE, batteries and packaging reporting requirements on one dashboard and one central location which:

- Gathers and displays WEEE, batteries and packaging reporting deadlines for Snap product sales in each country
- Chases Snap personnel who have been made responsible for reporting in each country as the deadlines approach
- Checks the sales data that the Snap personnel enter into the EC4P system is in the correct format
- EC4P uses the Snap sales data to calculate and pay the recycling fees on behalf of Snap in each country
- EC4P issues annual Compliance Certificates which detail the WEEE, batteries and packaging regulations that Snap complies with through EC4P

Snap values the convenience of using one portal to submit all data needed for compliance to WEEE, batteries and packaging regulations across Europe. Instead of completing different forms for each waste type in each country, EC4P uses one standard format to gather Snap's product sales data and then EC4P translates the data into the different reporting formats required by each country.

Internet Sales

Snap has registered businesses in France, Germany and UK and wanted to become compliant for internet sales in other countries across Europe without incurring the time and expense of setting up registered businesses in these other countries.

Drawing on its detailed knowledge of the regulations, EC4P enabled Snap to register as an overseas producer in some countries and in other countries sphera helped Snap to appoint Authorised Representatives to act on its behalf.

This cost-effective approach has enabled Snap to ensure compliance to regulations in every country where products are sold, whilst continuing to focus on its core business and avoiding the need for Snap to train and manage an in-house team of regulatory experts.

Recycling Fee Payments

Ensuring compliance to 42 recycling regulations across 14 countries requires payments of registration fees and recycling fees to regulatory authorities and national compliance schemes in each country. EC4P uses its existing payment arrangements in each country to pay the invoices on behalf of Snap for each waste type and then EC4P consolidates these costs into one invoice to Snap. Avoiding the need for Snap to set up these regulatory authorities and national compliance schemes as new vendors on the Snap purchasing system saves considerable administration time and cost for Snap.

About EC4P

In 2003 the EC4P team wrote the UK Government RoHS and WEEE Guidelines. In 2007 we were the first organisation to receive license to operate a WEEE compliance scheme in the UK. In 2008, EC4P represented the Medical Device Industry at negotiations with the European Commission on RoHS and WEEE compliance. EC4P won the Elektra European Electronics Industry Environmental Award in 2014 and won Environmental Leader Top Product of the Year Awards in 2015, 2016 and 2018.

About Sphera

Sphera is the leading global provider of Integrated Risk Management software and information services with a focus on Environmental Health & Safety (EHS), Operational Risk Management and Product Stewardship. Sphera has advanced Operational Excellence for more than 30 years, serving companies and customers across the globe to create a safer, more sustainable and productive world.

For more information contact us at: https://sphera.com/contact-us

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