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HOCHSCHULE DARMSTADT
UNIVERSITY OF APPLIED SCIENCES

s:ne

SYSTEM INNOVATION FOR
SUSTAINABLE DEVELOPMENT

IT Tools and Governance for Traceability (of chemicals in leather)

Workshop #3 | Subproject 2 | Eleni Kaluziak, Julian Schenten | 20.07.2021



Organisational matters

Agenda

1. **Focus of Leather Subproject 2:
IT-Tools and Governance for Traceability**
2. Empirical experience gathered so far:
 - Pilot-Study: Early learnings from an IT-Traceability-Tool tracing chemicals in leather
 - Survey
 - Discussion
 - Next steps towards a sector wide framework for IT traceability of chemicals along leather supply chains?*

s:ne aims to help the leather industry make the transition to a more sustainable chemistry.

sne.h-da.de/leather-chemistry/

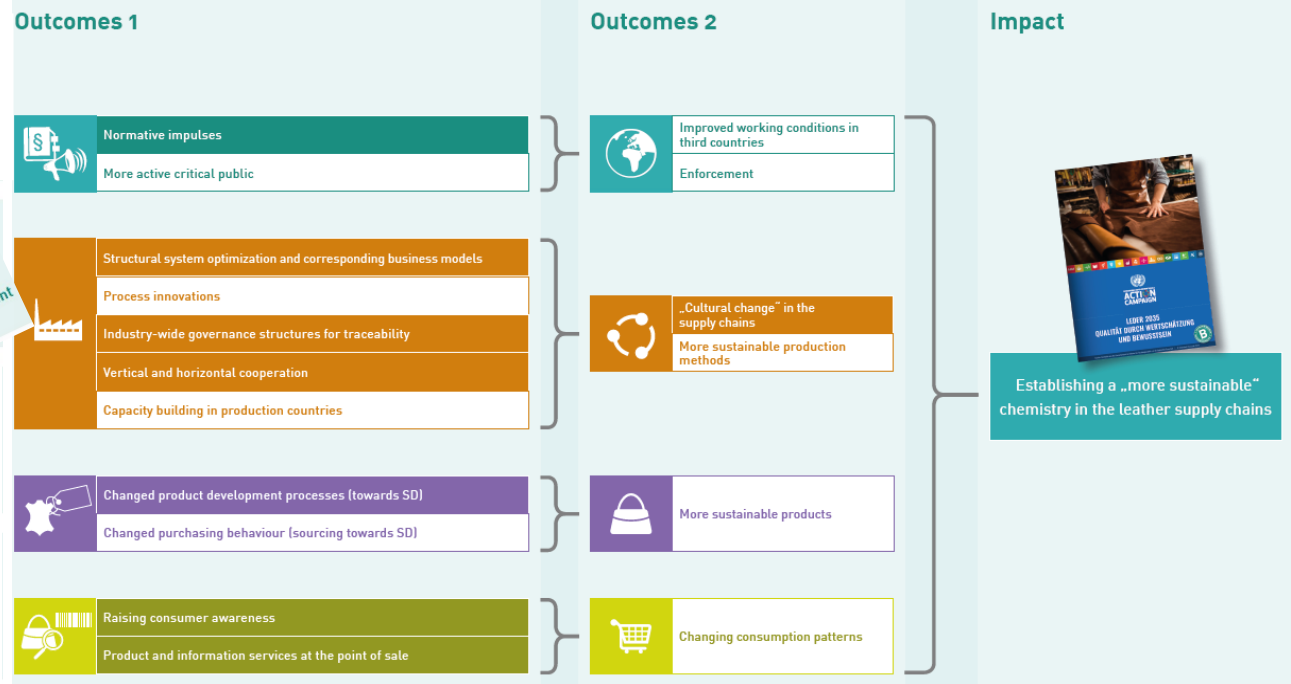
s:ne zielt darauf ab, die Leder-Branche beim Übergang zu einer nachhaltigeren Chemie zu unterstützen.



Leverages for more sustainable leather chemistry



Subproject 2 aims to build a framework for the reporting of chemicals along the leather supply chains



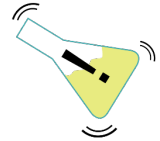
create global impact, create awareness, now consider measures, concepts, so that 2030/2035 traceability of chemicals along the leather supply chain is there

Subproject FOCUS



to build a framework for the reporting of chemicals along the leather supply chains

- ✓ Traceability of chemical substances along the supply chains
- ✓ **Know what substances are in your products (and processes)**
- ✓ Data basis provided by suppliers
- ✓ Facilitated by IT tools and governance framework
- ✓ Initiate, i.e. create a momentum, for an international sector wide dialogue to define common rules for the application of such a system
- ✓ business-to-business supply chain – from preservation at slaughterhouse until placing final product on the market



Traceability is understood as the ability to trace what chemicals are in which parts of a product and who is responsible for in a supply chain

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Next steps towards a sector wide framework for IT traceability of chemicals along leather supply chains?

“Pilot study” Design



Purpose:

Test an exemplary IT-Traceability Tool for feasibility in the leather industry.

Can it help to trace chemicals in leather articles?

What are benefits, limitations, lessons learned so far?

→ Proof of concept

“Pilot study” Design








German shoe brand **RICOSTA** launched a pilot test with the **IT traceability tool** provided by Darmstadt University h_da under the project **LIFE AskREACH**.



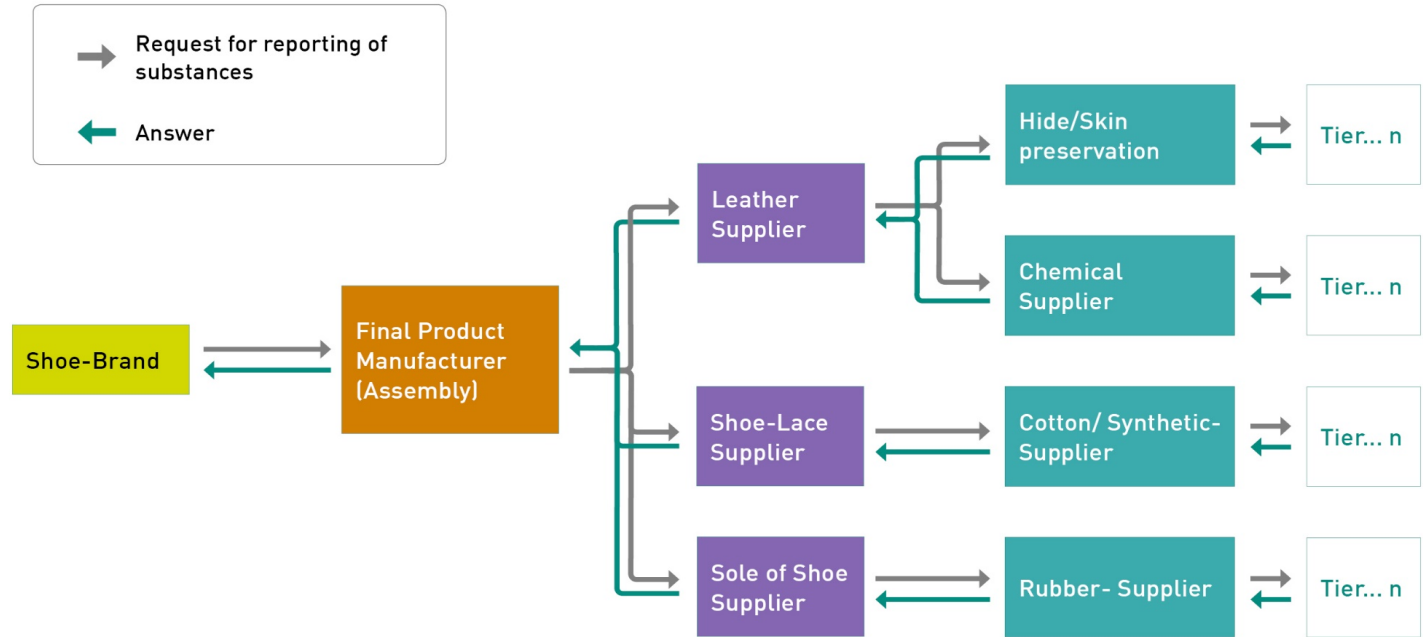
Ricosta selected for the pilot test one of its leather supplier, Lederfabrik Josef Heinen GmbH & Co. KG

“Pilot study” Design – Tool Description

-  Quick introduction of the (iPoint-systems) Traceability-Tool (a MDS – Material Data System)
-  Provided within the framework of the EU LIFE project „AskREACH“ - <https://www.askreach.eu/>
-  (Co-)Funded by EU Commission / aligns well with green deal
-  Procurement criteria based on interviews and IT tool benchmarking
-  Video tutorials etc. at www.askreach.eu/supply-chain-tool/



IT-Tool Workflow (Example for shoes)



IT-Tool Workflow



The tool controls communication (requests and responses). Supplier information/ email addresses can be stored.



- The brand sends a request (for reporting of substances) to its direct supplier (Tier 1), Tier 1 also sends a request to its supplier (Tier 2), ...etc.
- ...Tier 2 sends a response to Tier 1; Tier 1 provides information to the brand,
- i.e. each actor writes to the next actor in the supply chain without knowing who the previous actor is.





Competitive relationships are protected.



“Pilot study” Design-Example



Material Compliance   LIFE16 GIE/OE/000738
LIFE AskREACH

Dashboard Requests Statistics + Reports

Requests to Suppliers Batch Requests Requests from Customers

Regulations

Select the regulations you need a compliance statement for.

<input type="checkbox"/>	NAME	
<input type="checkbox"/>	CMR 1A&1B	8/20/19
<input type="checkbox"/>	Proposition 65	9/15/19
<input type="checkbox"/>	REACH Annex XIV	8/15/19
<input type="checkbox"/>	REACH Annex XVII	7/26/19
<input type="checkbox"/>	Halogenated Flame Retardants - Selected	12/5/18
<input type="checkbox"/>	SVHC material	7/1/20
<input type="checkbox"/>	SVHC each level	7/1/20
<input type="checkbox"/>	SVHC mixtures	7/1/20
<input type="checkbox"/>	GADSL	4/9/20
<input type="checkbox"/>	RoHS (2011/65/EU)	3/12/19

A compliance statement is not enough?

☐ Ask for product declarations instead of compliance statements.

Declaration Scope

☐ Full-Declaration

☐ Partial-Declaration

☐ Suppliers may change the product type from the requested to or from Article, Semicomponent or Mixture.

A Declaration Scope needs to be selected.

Surveys

Add surveys for your suppliers to this request. To ensure a high answer rate, please choose the surveys carefully.

Please confirm before sending the requests:

☐ I have checked the data and confirm their accuracy. I am aware that an information email about the request will be sent to the primary contact of the supplier as well as a copy to all other contacts of the supplier.

Example for the substance regulation (REACH; RoHS; etc). that a brand can request ist supplier to report on.



“Pilot study” Design-Example



MC Material Compliance

LIFE16 GIE/DE/000738
LIFE AskREACH

Dashboard

Anfragen von Kunden

Anfrage-Details

Produktdeklaration

Kontaktdaten

NAME	INFO	GEWICHT	KONZENTRATION	CAS-NR
Product name		deklariert: 14,577g / 30g	deklariert: 48,59%	
▼ Leder		deklariert: 14,577g / 30g	deklariert: 48,59%	
▲ Reactior		0,486g	1,62%	
▲ 2-(2-But		4,2g	14%	112-34-5
▲ Natriuml		0,021g	0,07%	1310-73-2
▲ C.I. Acid		1,95g	6,5%	12270-00-7
▲ 1-Metho		3,15g	10,5%	107-98-2
▲ Ameiser		4,5g	15%	64-18-6
▲ Tetranat		0,21g	0,7%	64-02-8
▲ Glycine,		0,06g	0,2%	3624-77-9

Substances

Weight

Concen-
tration

CAS-Nr.

Produkt bearbeiten

Typ: * Halbzeug

Produktname: * Product name

Produktnummer: * 028400/4214/14

Menge: * 0,03 Quantity m³

Gewicht: * 30 Weight g

UNITS

Ausnahmen

Angefragte Regularien: REACH-Annex XVII, SVHC material, REACH Annex XVII, REACH Annex XIV

REGULARIUM	NUMMER	BESCHREIBUNG

Hinzufügen

Entfernen

Example for a Product-
Strcuture-Tree (not
finished) of cowhide

LIFE • ASK
REACH

“Pilot study” Design-Example



MC Material Compliance

LIFE16 GIE/DE/000738
LIFE AskREACH

Dashboard

Requests from Customers

Review Request Declare Product Contact Data Attach Documents

Legend and Help

NAME	INFO	WEIGHT	CONCENTRATION	CAS-NO
▼ Dress SS 21 (1)		declared: 400g / 400g	declared: 100%	
▼ Front part (1)		declared: 200g / 200g	declared: 100%	
▼ Cotton		declared: 200g / 200g	declared: 100%	
▲ Poly(10g	5%	9002-92-0
▲ Cellu		190g	95%	9004-34-6
▼ Back part (1)		declared: 200g / 200g	declared: 100%	
▼ Polyeste		declared: 200g / 200g	declared: 100%	
▲ Forrr		2g	1%	50-00-0
▲ Polye		198g	99%	9002-88-4

Edit product

Type: Article

Product Name: Dress SS 21

Product Code: 0987-0986

Defined Weight: 1 Each weighs 400 g

Exemptions

Requested regulations: REACH Annex XIV, RoHS (2011/65/EU), REACH Annex XVII

REGULATION	NUMBER	DESCRIPTION
------------	--------	-------------

Add Remove

Update Cancel

Further Example for a Product- Structure-Tree of a dress with different components generated by the Traceability Tool

LIFE + ASK
REACH



“Pilot study“ Design-Example



Further Example for a
(non-leather) Product-
Structure-Tree with
automated red flags in
Traceability Tool

REACH Annex XIV
Product Fails to Meet Regulation Requirements

REACH Annex XIV acc. EU Regulation amended by EC 2017/999, http://eur-lex.europa.eu/Result.do?T1=V1&T2=2013&T3=348&RechType=RECH_naturei&Submit=search

Product Meets Regulation Requirements

Product Meets Regulation Requirements with Ex

COMPLIANCE CHECK RESULT	REMARK
Checked with errors	Sunset date: only to use if a notification has occurred to ECHA REACH Annex XIV and or granted by EC Commission
Checked	This substance is listed in REACH Annex XIV. Mind sunset dates and granted authorisations

Regulatory compliance status calculated at: 2020-03-16

Product Declaration

Declared Product

NAME	INFO	WEIGHT	CONCENTRATION	CAS-NO
▼ SURFACE MOUNT TRANSORB TRANSIENT VOI		declared: 93mg / 93mg	declared: 100%	
▼ Solder		declared: 3.4mg / 3.4mg	declared: 100%	
▲ Confidential Substances	⛔	0.17mg	5%	*****
▲ Lead chromate	⚠	3.15mg	92.647059%	7758-97-6
▲ Silver		0.08mg	2.352941%	7440-22-4
▼ Encapsulation		declared: 48.5mg / 48.5mg	declared: 100%	
▲ Confidential Substances	⛔	0.12mg	0.247423%	*****
▲ Additive 460		0.36mg	0.742268%	
▲ Antimonytrioxide		0.49mg	1.010309%	1309-64-4
▲ Reaction mass of Charcoal and Formaldehyc		5.82mg	12%	
▲ Formaldehyde, polymer with (chloromethyl)ox		7.76mg	16%	29690-82-2
▲ Quartz (SiO2)		33.95mg	70%	14808-60-7
▼ Surface Finish		declared: 2.1mg / 2.1mg	declared: 100%	

Substance

Name: Lead chromate

CAS No.: 7758-97-6

EINECS/ELINCS: 231-846-0

EU-Index: 082-004-00-2

Weight: 92.647059

☐ Confidential Substance ☒ SVHC

Regulated by: RoHS (2011/65/EU) (v.14)



Ricosta's Expectation of the IT-Tool

“Pilot study” Design



German shoe brand **RICOSTA** launched a pilot test with the **IT traceability tool** provided by Darmstadt University h_da under the project **LIFE AskREACH**.

Ricosta selected for the pilot test one of its leather supplier, Lederfabrik Josef Heinen GmbH & Co. KG



Expectation:



To demonstrate how the communication and exchange of information on the IT-Tool works



To receive a Full Material Declaration (FMD) - Bill of Material (BOM) on the chemicals present in the supplied leather







To search for products containing e.g. future SVHCs (Substance of Very High Concern) to ensure REACH-compliance in case of legislation changes




Ensure due diligence in the supply chain („German Lieferkettengesetz“)

IT-Tool - Features I


-  Display a structure tree for a product, showing which components and materials a product is made of
-  Questionnaires/ attachments on e.g. sustainability aspects such as land use, animal welfare and social criteria can be uploaded
-  Reuse of existing declarations for new requests, data can be duplicated. Business added value for companies (brands and suppliers).
-  Supplier can report substances in a standardized way for all customers: Mixtures (e.g. pure tanning process chemicals) can be recorded as modules and stored in the tool

IT-Tool – Features II


 Show, via CAS-numbers, which leather chemicals are contained in the product

 Show, also which process chemicals have been used:

Via a BOM: one for the composition material and
one for process chemicals

 „Placeholders" can be selected, if quantity information is uncertain

 Create a FMD for leather, i.e. substances used can be declared up to 100%

 Present which substances/ materials are in products and at what concentration

IT-Tool – Features II



Dashboard Anfragen

Reinstoff auswählen □ ×

Suchargumente

Name:

ⓘ Für eine exakte Suche muss der Name in Anführungszeichen gesetzt werden.

SVHC:

CAS-Nr.:

EINECS/ELINCS:

EU-Index:

[Zurücksetzen](#) 🔍 Suchen

NAME	SVHC	CAS-Nr.	EINECS/ELINCS	EU-INDEX
Misc., not to declare	nein	system	system	system
not yet specified, not to declare	nein	system	system	system
Inorganic Ingredient, not to declare	nein	system	system	system
Organic Ingredient, not to declare	nein	system	system	system
Impact modifier, not to declare	nein	system	system	system
Plasticizer, not to declare	nein	system	system	system
Flame Retardant, not to declare	nein	system	system	system
Further Additives, not to declare	nein	system	system	system
Pigment portion, not to declare	nein	system	system	system
Other Ingredients	nein	system	system	system
Request/Hg/Cr6/Cd/Pb	nein	system	system	system
Cannot be answered at the moment	nein	system	system	system
Reinforcement/Filler	nein	system	system	system
Stabilization UV, light, heat	nein	system	system	system
Biocide	nein	system	system	system
Lubricant	nein	system	system	system
Antistatica	nein	system	system	system
Inorganic Ingredient, not to declare	nein	system	system	system
Impact modifier, not to declare	nein	system	system	system
Plasticizer, not to declare	nein	system	system	system
Further Additives, not to declare	nein	system	system	system



+ Auswahl hinzufügen

✕ Schließen



IT-Tool – Features II

Example for a product
with two BOMs -Bill of
Materials: 1. Finished
Shoe / 2. Process
Chemicals and Mixtures
1, ...

Material Compliance   LIFE16 GIE/DE/000738
LIFE AskREACH

Dashboard **Requests** **SL**


Requests to Suppliers **Requests from Customers**

Review Request **Declare Product** **Contact Data** **Attach Documents**

01 **02** 03 04

Load a product from your master data, or insert product and substance information manually.

Apply Product Declaration:

 Legend and Help Autosave ☐

NAME	INFO	WEIGHT	CONCENTRATION	CAS-NO
MaterialWerks				
finish Shoe		declared: 0g / 10g	declared: 0%	
Process Ch		declared: 0g / 100g	declared: 0%	
Mix 1 (r		declared: 0g / 10g	declared: 0%	

Product

Parent Product: Process Chemicals (PC001)

Type: Mixture

Product Name: Mix 1

Product Code: mix1

Quantity: 1 **Liter**

Weight: 10 **g**

Product Categories: No categories specified.



2



IT-Tool – Features III



Automated signals for regulated substances:

- ➡ When displaying chemicals/substances, red flags appear in case they are regulated substances, currently SVHCs + Annex XVII are deposited.

Other relevant substances/lists can be included.



Product Screening/ Search Functions:

- ➡ Brand can search for recorded specific substances via the tool on its products: Full Material Declaration (FMD) helps identifying substances that are not yet declared in Safety Data Sheets (SDS).

If their legal status changes, a decision can be made immediately by the brand as to whether action is required.

IT-Tool-Benefits



Ensure compliance with existing legislation



Prepare in case of regulatory developments to be compliant in future



Proactively manage chemicals used in supply chains for more sustainable ones



Benefit from the reporting standard shared with other sectors or companies as this increases suppliers' willingness to provide data



Enhance companies risk management, and of supply chain processes

IT-Tool-Benefits



More informed product design



Help to draw conclusions on the reaction of two process chemicals, by process chemical screening



Reduce costs of risk based testing



Facilitate the material classifications needed for recycling



Substantiate green claims (consumers, investors, NOGs)



Allow for trustful transparency



Establish new business models

Prerequisite: Leather Sector in collaborative approach agrees on **framework** / approach to untap efficiency

Ricosta's feedback

Lederfabrik Heinen's feedback

Questions on feedback?

“Pilot study”– Points of Discussion I

What should be reported?



Full Material Declaration 100% (FMD) or Partial Material Declaration x?



Should the IT tool only report what remains in the product?



Should additionally also the process chemistry be reported and how can we manage that?

Background: Groups of chemicals in relation to leather:

- ➡ Chemicals intended **to be present** in the product (e.g. coating)
- ➡ **Process chemicals:** these are not intended to remain in the finished product (e.g. salt, biocide, tensids)



Boundaries to be discussed with the leather sector

“Pilot study”– Points of Discussion II



Leather supplier may need to test his product for chemicals prior to provide data to the tool:

→ The composition/ recipe of chemicals for the treated leather is difficult to provide:

Substances may be washed-out during the treatment of leather (how much remains in the product?)



Safety Data Sheets of chemicals to not declare every single chemistry contained (black box). Supposedly (non classified) harmless substances are missing.



There must be communication from actors in multiple directions.

“Pilot study”– Points of Discussion III



Preparation needed for tool: Shoe manufacturer needs to tell suppliers how much weight (grams) of leather goes into the finished shoe:



If goal is to end up with a full declaration for all components of the shoe: material/ substances would have to add up to 100 percent by weight, so it is important to know exactly how much of that is leather.



Therefore, it makes sense that the supplier of the leather already indicates the appropriate number of grams.



There needs to be communication from actors in both directions.

How many shoes will be manufactured out of 1 sqm (squaremeter) leather?

What chemicals/ at what concentration are in 1 sqm leather?

Questions?

What do the workshop
participants think of the IT-tool?

Open Discussion

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 - **Survey**
 - Discussion
Next steps towards a sector wide framework for IT traceability of chemicals along leather supply chains?

You are here: [Home](#) | [Implementation project](#) | [More sustainable chemistry in the leather supply chains](#) | [Details](#) [More sustainable Leather](#)

04/06/2021

Survey on Traceability - Call for Participation

Have your say regarding the scope of chemicals reporting, and related exemptions, which IT Tools for Traceability should take into account.

Since intense communication with industry and other stakeholders is essential for the project, we are inviting you to take part in the first round in a series of surveys. This is a call to chemical suppliers, tanneries, brands, retailers and all other actors in the global leather supply chains, as well as to NGO's, consultants and certifiers. This time, the survey focusses on a bunch of subjects related to IT Tools and Governance for Traceability of chemicals along the leather supply chains. Please have your say regarding the scope of chemicals reporting, and related exemptions, which IT Tools for Traceability should take into account. Your answers will help the project to derive rules for a governance framework for the reporting. It is important that the sector agrees on such basic rules, as standardisation will unlock reporting efficiency and thus reduce costs.

How would an IT Traceability Tool work? The goal is that a company knows exactly which chemicals are present in the products it places on the market. Thus, it is necessary to report chemicals along the leather supply chains, meaning that all suppliers will have access to such an IT tool (or adequate interfaces in regions with poor IT accessibility).

The upstream suppliers will report information to their downstream users/customers. This means that a "data requestor" (e.g. brand, retailer, tier1, tier2, ...) will receive a Bill of Materials (BOM) with chemicals present in his/her article. It is intended that a "data requestor" only communicates with the direct supplier while he/she cannot access the identities of other (sub)suppliers in the value chain.

[Start Survey](#)

PLEASE take part: The leather project designed a survey addressed to all leather stakeholders, aiming to identify a common ground when it comes to the reporting of chemicals in leather (visit our homepage).

SUBSCRIBE TO OUR NEWSLETTER

MELDUNGEN



New Article on our Theory of Change
Our theory of change for a more sustainable leather chemistry has been published by the swiss academy of sciences. Click here to read the open access...

Survey on Traceability - Call for Participation
Have your say regarding the scope of chemicals reporting, and related exemptions, which IT Tools for Traceability should take into account.

Results Leather Survey 2020
This Factsheet outlines the results of the "Survey on Leather Goods and Consumer Behaviour" conducted by the Citizens' Panel in the period from April...

MATERIAL & RESOURCES



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Survey „IT Tools and Governance for Traceability of chemicals along the leather supply chains “

Aim: Inform subproject 2 (and others) on scope of reporting

Implementation:

Launched together with our project newsletter in March 2021

Dissemination via LinkedIn

Freiberg Leather Days (FILK)



Product group(s) relevant for activities

Shoes	15
Fashion	13
Accessories	11
Furniture	15
Automotive	14
any leather application	1

Region

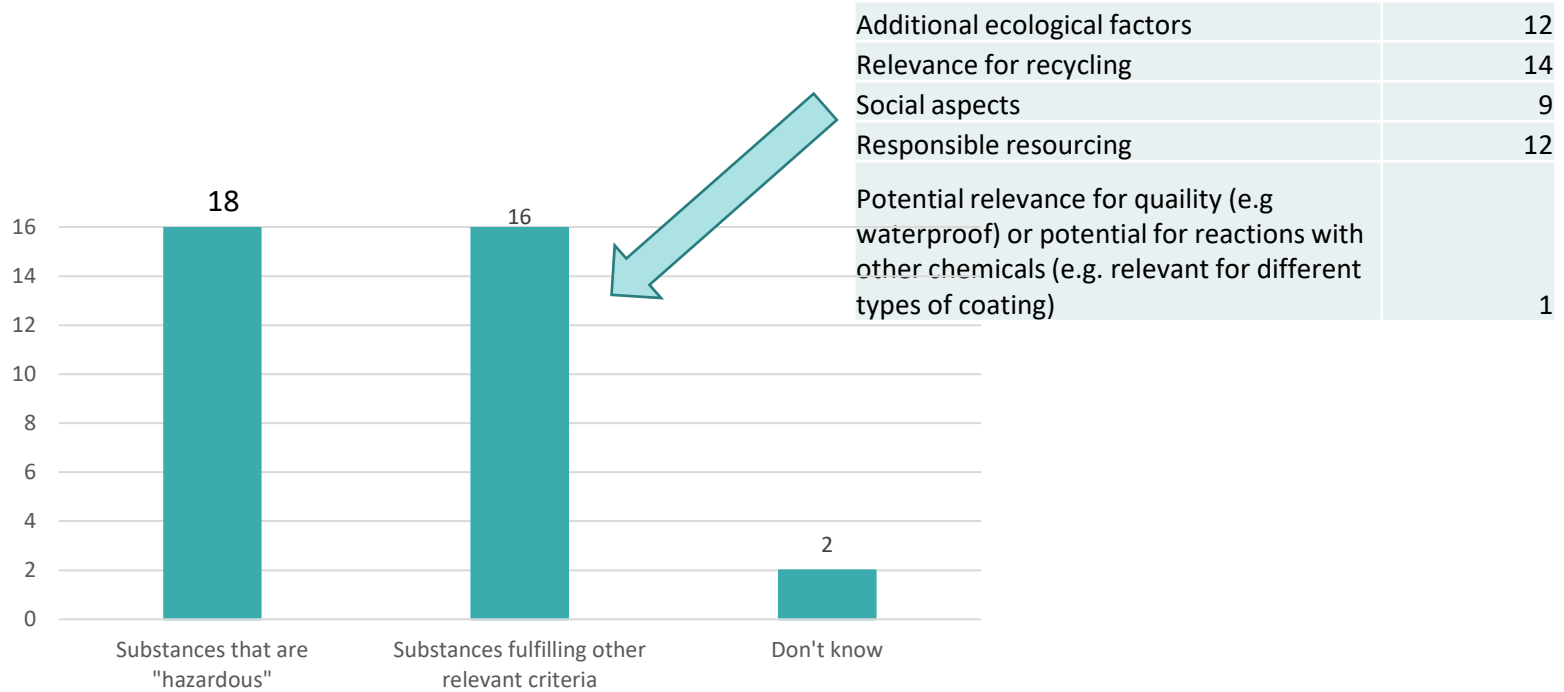
Europe	15
Asia	8
North America	3
Central America	3
South America	3
Oceania (e.g. Australia, New Zealand, ...)	3
Africa	5
Middle East	3
Global	9

Role in the leather sector

Chemical supplier	3
Slaughterhouse/abattoir	
Tanner: pre-tanning	3
Tanner: tanning	3
Tanner: finishing	3
Trader	
Leather (products) manufacturer	2
Brand	3
Retailer	
Wholesaler	
Importer	
NGO	2
Consultant	7
Certifier/Inspector	2
Other	5

Chemicals in articles (materials)

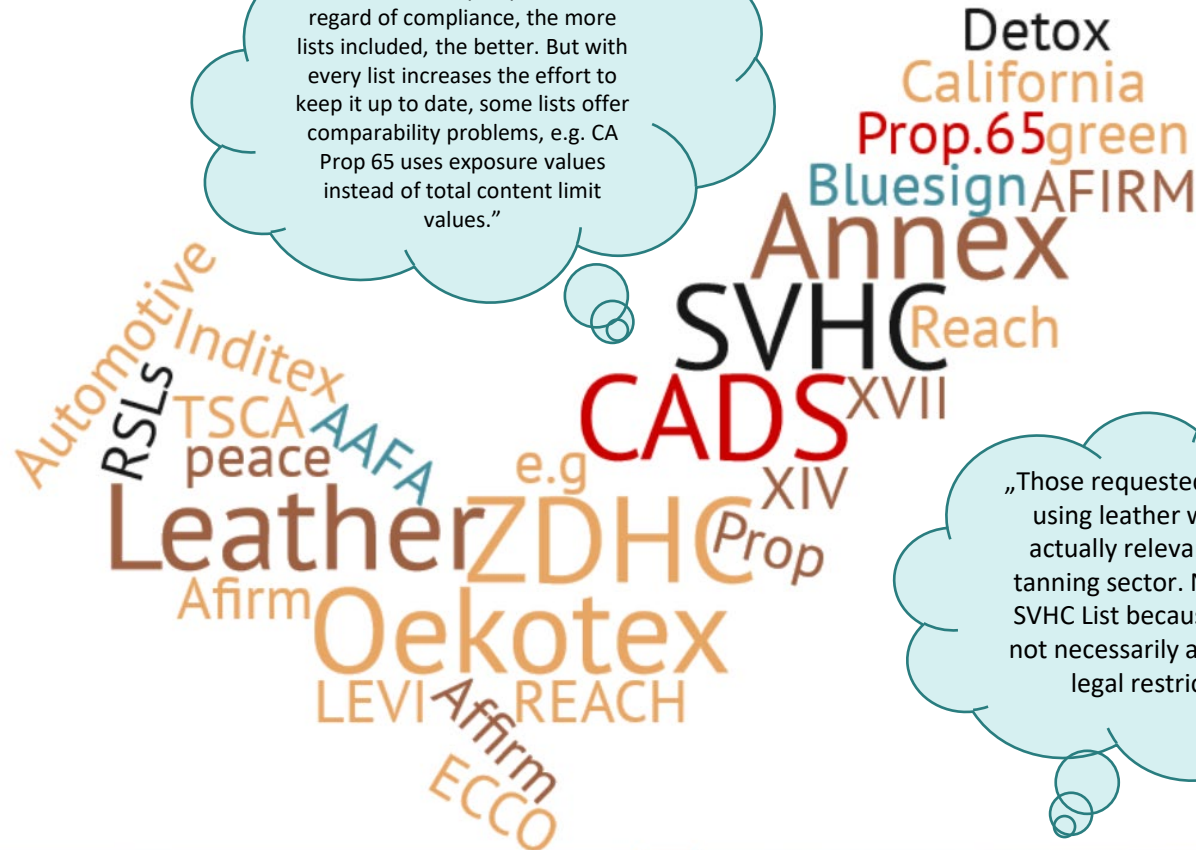
The Traceability IT-system needs a **SUBSTANCE REPORTING LIST (SRL)** on chemicals in materials. What criteria can trigger the inclusion of chemicals to such a list?



Which existing substances lists on chemicals present in the materials (e.g. regulatory lists such as the REACH SVHC list, widely used RSLs etc.) should be embedded into the tool?



"From a brand perspective in regard of compliance, the more lists included, the better. But with every list increases the effort to keep it up to date, some lists offer comparability problems, e.g. CA Prop 65 uses exposure values instead of total content limit values."



„Those requested by Brands using leather which are actually relevant for the tanning sector. Not REACH SVHC List because listing is not necessarily a reason for legal restriction“

Additional substance groups to be added mentioned



What	Who
Recycle contents/ components	Brands
Skin sensitisers	Leather Association
data on CO2-emissions producing chemicals, water usage and other ecological effects	NGO
sector specific/ product specific lists (many times yet tbd)	Consultant
Bisphenols, D4, D5, D6 containing products, products based on renewable raw materials	Chemicals
Biocides	Chemicals
Bisphenol, Aldehydes, Chrome, VOC, TOC	Consultant
plastic	Leather Association

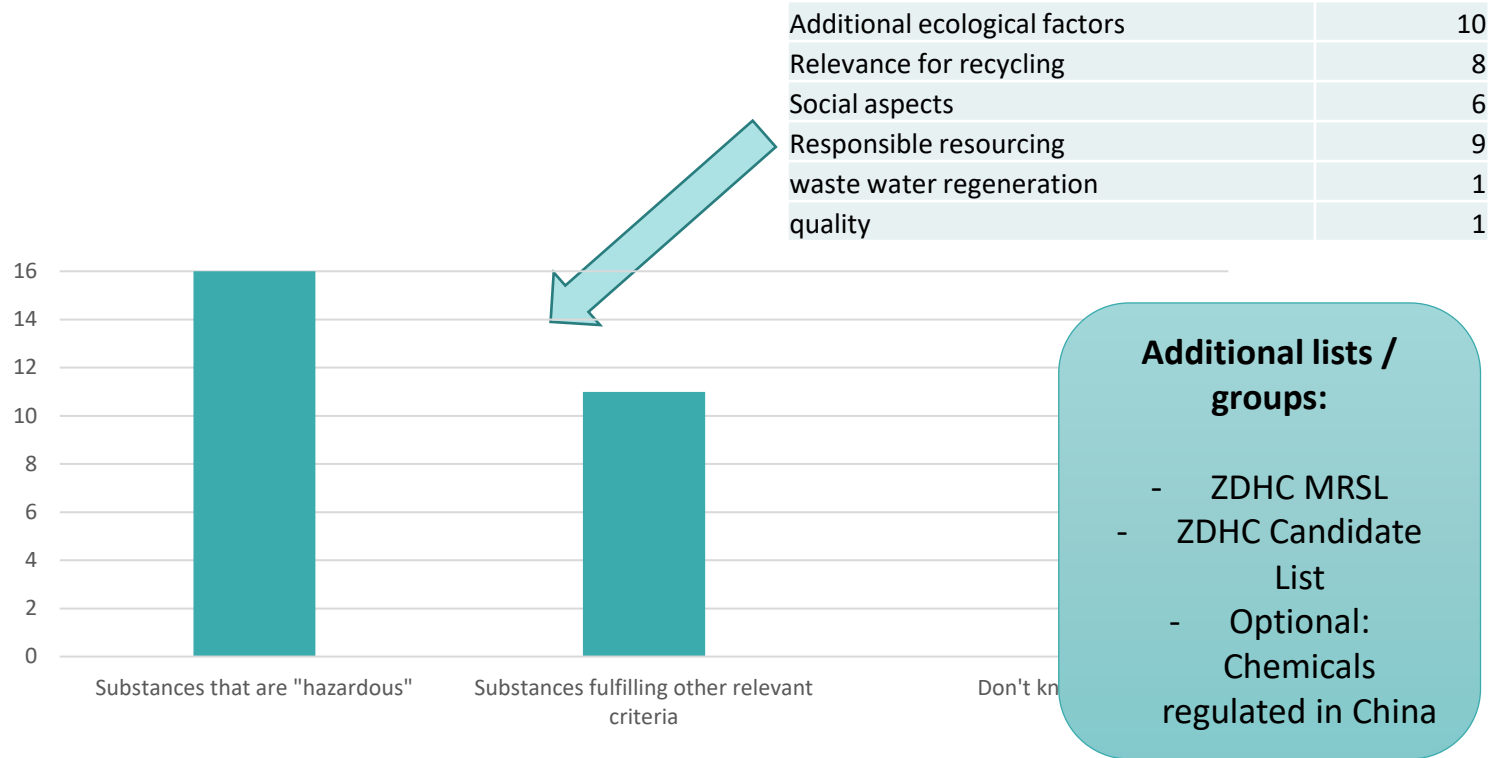
Substance groups NOT to be added (and why)



	AZO, CHROME VI, DMFA, HEAVY METALS, PFOS	Impurities	In general substances that are used in the context of processes e.g, machinery, ETP etc. (some NGOs like to put them on RSL as well...)
Reporting this substance (group) would infer with our intellectual property	X (Brand)		
This substance (group) is negligible		X	X
Why negligible?		They are not reported in SDS and are not used on purpose	In general substances that are used in the context of processes e.g, machinery, ETP etc. (some NGOs like to put them on RSL as well...)

Chemicals in processes

The Traceability IT-system needs a substance reporting list on chemicals in processes. What criteria can trigger the inclusion of chemicals to such a list?



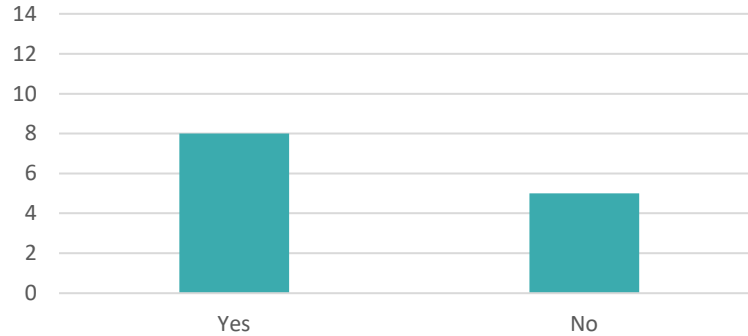
Substance groups NOT to be part of reporting (and why)



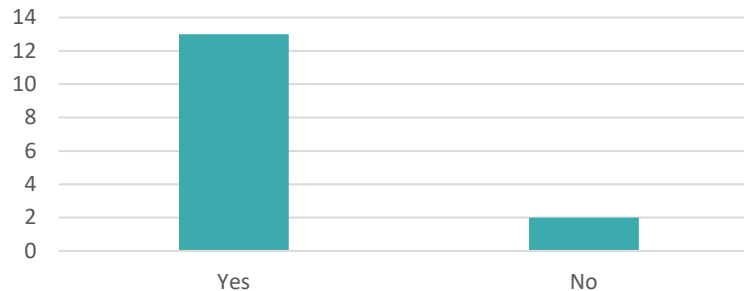
Installation Cleaning Chemicals or *similar* → They are not relevant for leather

Other aspects

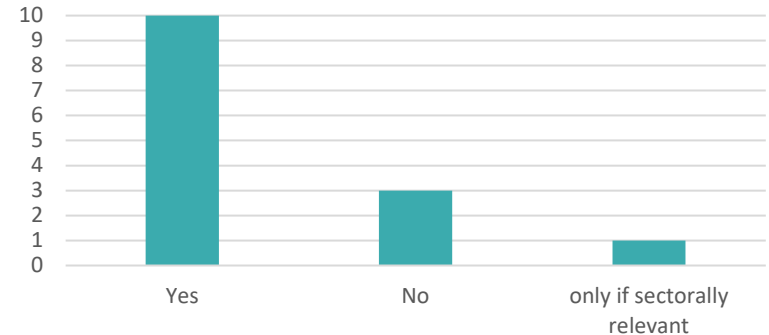
Should the IT Traceability Tool cover data on **social aspects** as well?



Should the IT Traceability Tool cover data on **environmental aspects** (e.g. emissions) as well?



Should the IT Traceability Tool cover data on **occupational health** as well?



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Next steps?

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Next steps towards a sector wide framework for IT traceability of chemicals along leather supply chains?

Next steps?

Additional case studies

Interviews

Our Leather Subprojects



Subproject #1

Harmonisation of standards for a “more sustainable” leather chemistry

Dr. Julian Schenten | julian.schenten@h-da.de



Subproject #2

IT Tools and Governance for Traceability

Dr. Julian Schenten | julian.schenten@h-da.de

Eleni Kaluziak | eleni.kaluziak@h-da.de



Subproject #3

Chemical und Process Innovation

Prof. Dr. Frank Schael | frank.schael@h-da.de



Subproject #4

Leather-Design-Guidelines for Sustainable Development

Dr. Jonas Rehn | jonas.rehn@h-da.de



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SYSTEM INNOVATION FOR
SUSTAINABLE DEVELOPMENT

Thank you for your attention

For any comments or questions please reach out to us

sne.h-da.de/leather-chemistry

| Julian.Schenten@h-da.de
Eleni.Kaluziak@h-da.de

Eleni Kaluziak,
Project s:ne,
h_da Darmstadt
University of Applied
Sciences

**Innovative
Hochschule**



EINE GEMEINSAME INITIATIVE VON
Bundesministerium
für Bildung
und Forschung



Deutscher
Wissenschaftsrat
DFG