



Get prepared for SCIP

Safer Chemicals Conference

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Bo Balduyck

#SAFERCHEMICALS

Overview

- Where we are now
- Six steps to get prepared
- Improving transparency
- Take home messages

SCIP

Where we are now

SCIP prototype released on 17 February 2020

- Allows companies to get familiar with the tools to prepare and submit a SCIP notification

*Note: submitted data is considered test data (**NOT** to be treated as real data to fulfil legal obligations, it will be deleted by October 2020)*

Provide feedback to help us further improve the final SCIP version

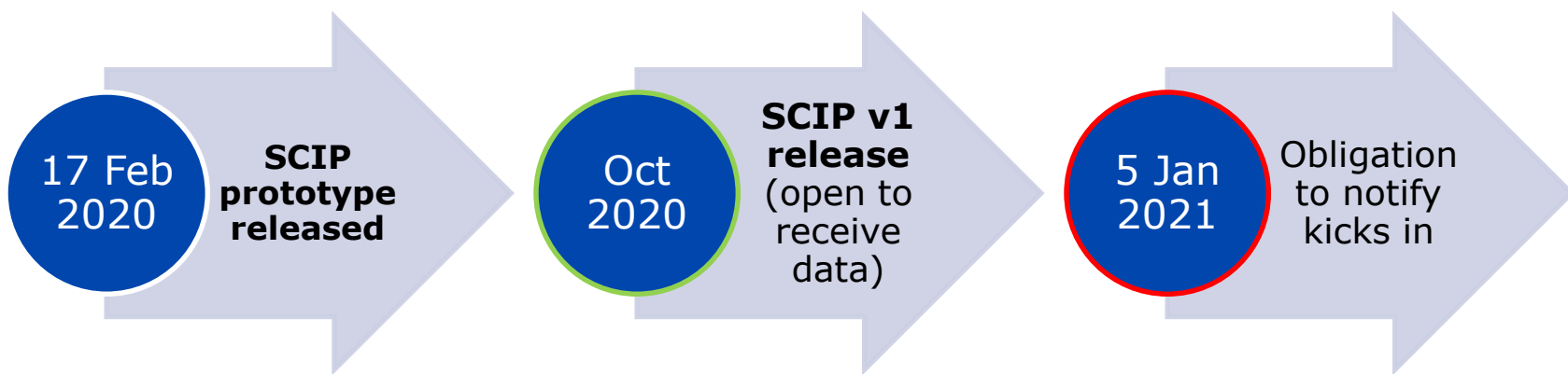
PROVIDE FEEDBACK

 [Contact ECHA](#)



SCIP

Release of SCIP v1
planned for end of **October 2020**
→ Open to receive data to fulfil legal obligations



How to get prepared

SCIP

HOW TO PREPARE FOR SCIP?

- 1 Find out whether you need to submit a SCIP notification
- 2 Know and understand the information requirements
- 3 Know your portfolio of articles
- 4 Adapt your data
- 5 Prepare your submission
- 6 Submit your notification

1. Find out if you need to submit a notification

Article



Complex object

Articles remain articles when incorporated in “complex objects” (“O5A principle”)



When does the SCIP notification duty apply?

Substance of concern (SVHC)



0.1%
weight/weight

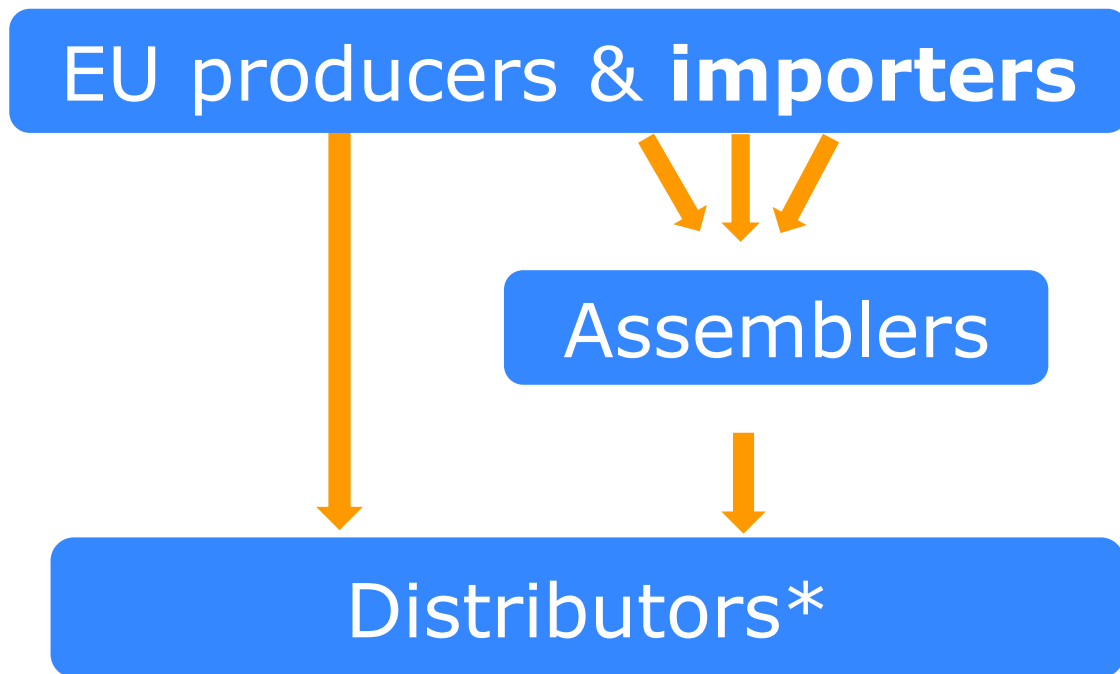


Article

→ Duty to supply sufficient information to allow safe use of the article (Article 33(1) REACH)

Who needs to submit?

Any supplier of **articles containing** above 0.1% w/w of a **substance of very high concern** on the Candidate List



* Except retailers that supply directly and exclusively to consumers

Non-EU suppliers

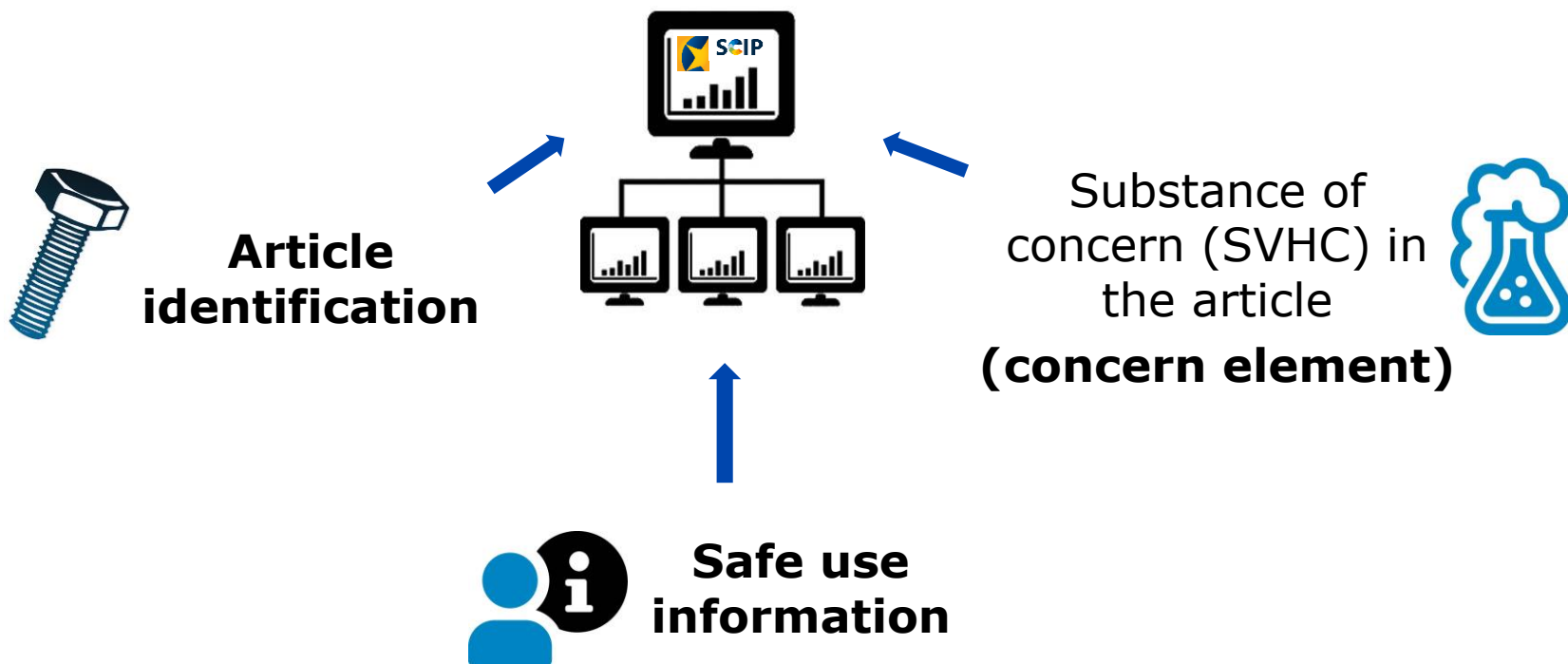


Not allowed to submit
SCIP notifications

...but should support
importers of their articles in
the EU to fulfil their
regulatory obligations,
namely to submit SCIP
notifications to ECHA



2. Know and understand the information requirements





Information requirements

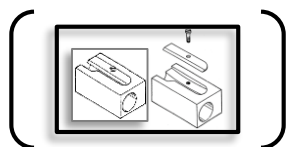
- Identifiers
 - **Article name**
 - Other names (brand, model)
 - **Primary article identifier** (EAN, GTIN, catalogue number, part number...)
 - Other identifiers (EAN, GTIN, catalogue number, part number...)
- Categorisation
 - **Article category** (CN/TARIC code)
 - **Production in the EU**
- Characteristics (picture, dimensions, colour, weight...)
- **Safe use instructions**
 - Disassembling instructions

Mandatory: no data means failed submission
Required: input needed but can be fulfilled without data for a successful submission

Information requirements

- Complex object components **if applicable**

- Number of units




- Concern elements

- **Candidate list substance**
- **Concentration range, including $> 0.1\%$ w/w and $\leq 100\%$ w/w**
- **Material category and/or**
- **Mixture category (EUPCS)**
- Additional material characteristics



Identifiers

- **Article name** 
- Other names (brand, model)
- **Primary article identifier** (EAN, GTIN, catalogue number, part number...)
- Other identifiers (EAN, GTIN, catalogue number, part number...)

Categorisation

- **Article category** (CN/TARIC code)
- **Production in the EU**

Characteristics (picture, dimensions, colour, weight...)

Safe use instructions

Mandatory: no data means failed submission
Required: input needed but can be fulfilled without data for a successful submission

Protecting confidential information



Submitter's information

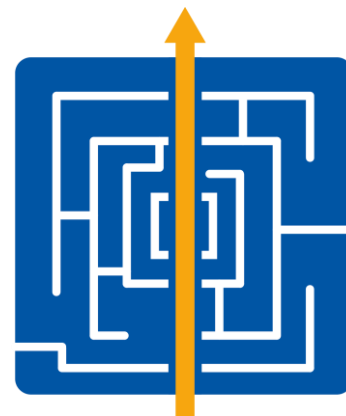
SCIP will not disclose the link between the notification and its submitter (legal entity)

Identifiers

Only identifiers of articles notified as such, or identifiers of top level articles, complex objects, will be disclosed

Level of reporting

You have a responsibility to avoid reporting information that could disclose other commercially sensitive information (e.g. detailed product composition or trade volumes)



3. Know your portfolio

Key questions

- Do you have articles containing **substances of very high concern** in a concentration above 0.1 % w/w, or complex objects (products) incorporating those articles, in your portfolio?
 - If you don't have the required information, make sure you obtain it from your suppliers
- Do you have a **tracking system** in place for tracing the harmful chemicals in your products?
- Can you substitute those substances in articles with **safer alternatives**?

4. Adapt your data

Is the information you have on the chemical content of your products sufficient?







- Is your data at the right level of granularity?
- Does it match the SCIP database information requirements and format?
 - If yes, you can do automated submissions (system-to-system)
 - If not, only manual submission is available



Grouping notifications

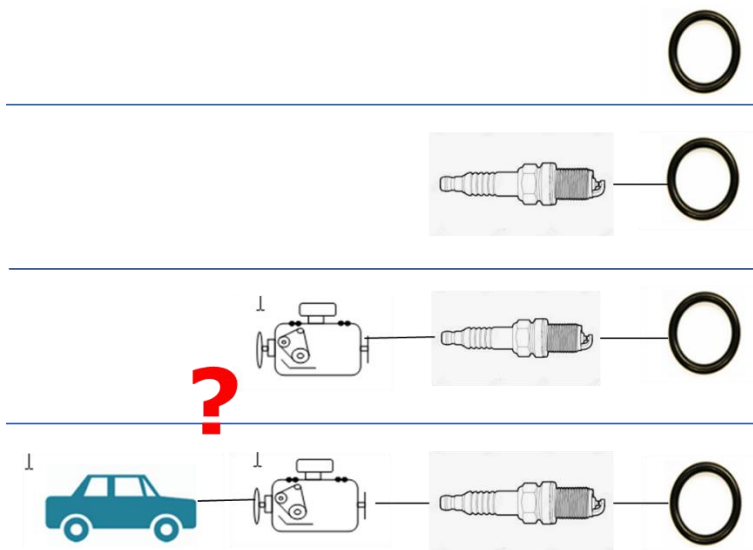
- Consider if certain complex objects sharing components, sub-components and articles with similar properties and compositions can be **grouped** in a single notification

Example: grouping in one notification O-rings made of the same material (styrene-butadiene rubber – SBR), with the same Candidate List substance at different concentrations, with different diameters, thicknesses and weights

						
Brand:	Rubber joints RJ					
Diameter:	15mm	15mm	20mm	20mm	20mm	20mm
Thickness:	2.0mm	2.0mm	3.5mm	3.5mm	5.0mm	5.0mm
Colour:	Black	Grey	Black	Grey	Black	Grey
Item No.:	15x2.0B RJ	15x2.0G RJ	20x3.5B RJ	20x3.5G RJ	20x5.0B RJ	20x5.0G RJ
EAN (barcode):	994455667 7801	994455667 7812	994455667 7823	994455667 7834	994455667 7845	994455667 7856
Article Category*:	4016 93 00 90	4016 93 00 90	4016 93 00 90	4016 93 00 90	4016 93 00 90	4016 93 00 90
Candidate List substance	CAS No. 71888-89-6	CAS No. 71888-89-6	CAS No. 71888-89-6	CAS No. 71888-89-6	CAS No. 71888-89-6	CAS No. 71888-89-6
Concentration:	8% w/w	8% w/w	8% w/w	8% w/w	8% w/w	8% w/w
Material:	SBR, vulcanised	SBR, vulcanised	SBR, vulcanised	SBR, vulcanised	SBR, vulcanised	SBR, vulcanised

Level of reporting for complex objects

It is key to define the right **amount of layers of components** and **sub-components** to identify the product and allow safe use, including at the waste stage

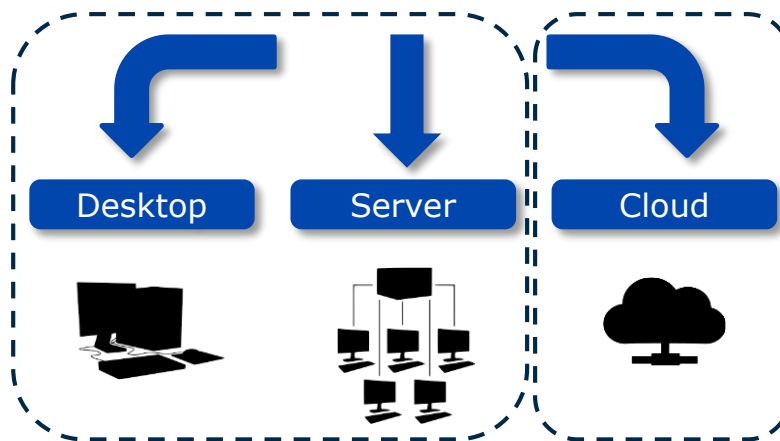


5. Prepare your submission

Three options to prepare your SCIP notification:



2. Offline in company's own IT system

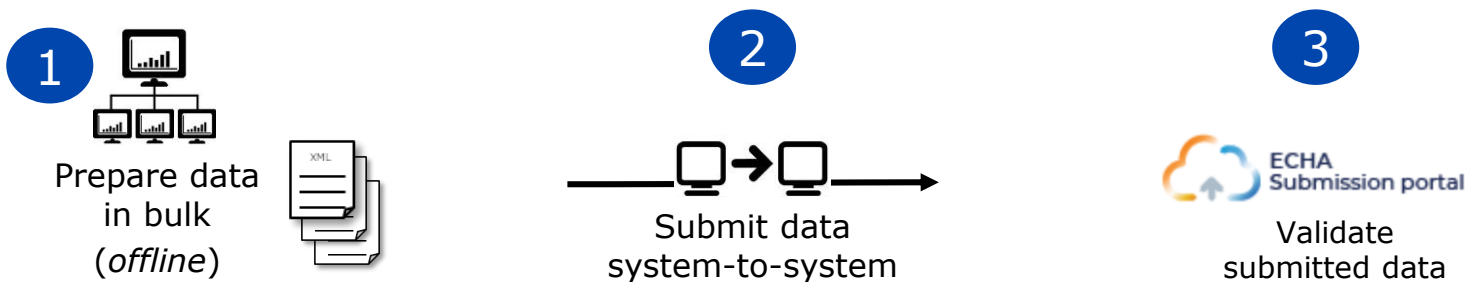


1. Online



3. System-to-system service

System to system



- 1** Your company does an IT investment to prepare SCIP notifications (in IUCLID format) from data in your own IT systems
- 2** Interaction between your company's own IT system and ECHA Submission portal is performed using pre-defined interfaces (API)
- 3** Submitted data is validated in the same way as manual submissions and the outcome can be accessed via the submitting system and manually

Simplifying submission of data

- Third parties can submit data on your company's behalf, based on intra-party arrangements ('**foreign user**' concept)
- Defining how to **re-use** data submitted by a supplier
 - **Simplified notification**: if an article is not changed, the duty holder can benefit from a simplified notification referring to the data submitted by his supplier, without preparing a dossier (e.g. useful for distributors)
 - **Referencing**: if an article (already notified by a supplier) is incorporated into a complex object, the duty holder can refer to the submitted data without re-entering it



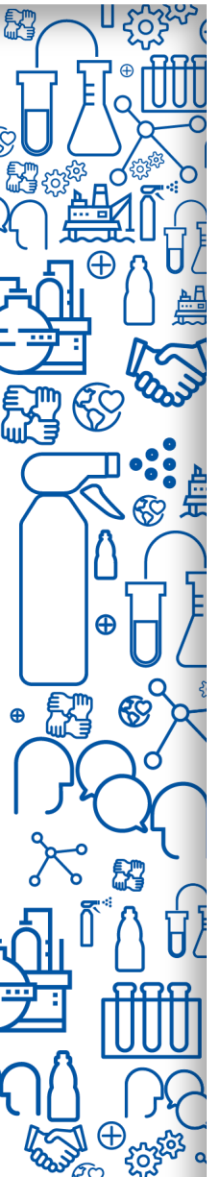
6. Submit your notification

- With the release of the next version of SCIP, end of **October 2020**, the submission window will open
- Legal obligation kicks in on **5 January 2021** for articles placed on the market



ECHA
Submission portal

Target audiences



Waste operators

Available info to:

- ✓ drive waste stream decisions
- ✓ support compliant re-use
- ✓ increase recycled materials

SCIP



Consumers and other interested parties

- ✓ Empower informed choices
- ✓ Improve targeted disposal

Authorities

- ✓ SVHC monitoring to address regulatory actions
- ✓ Available info to support (waste) policy decisions
- ✓ Support enforcement





Different user needs for information

- Different use cases for different target users require a different level of aggregation of data:
 - **(Complex) article level** (*Example: Which brand of pencil sharpeners contain SVHCs? Which article in the radio needs to be removed before shredding?*)
→ can be retrieved directly
 - **Product family level** (*Example: Regular occurrence of SVHCs in fridges? Which parts of cars usually contain SVHCs?*)
→ can be retrieved via "article categories (CN codes)"
 - **Waste stream level** (*Example: Which plastics often contain SVHCs in which uses?*)
→ can be retrieved via "material categories"

Take home messages

- Start preparing now
- Get familiar with the SCIP database
 - prototype
 - supporting material
- Provide your feedback
- Follow the SCIP web page for more information and support





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