



# Understanding the SCIP Database Requirements

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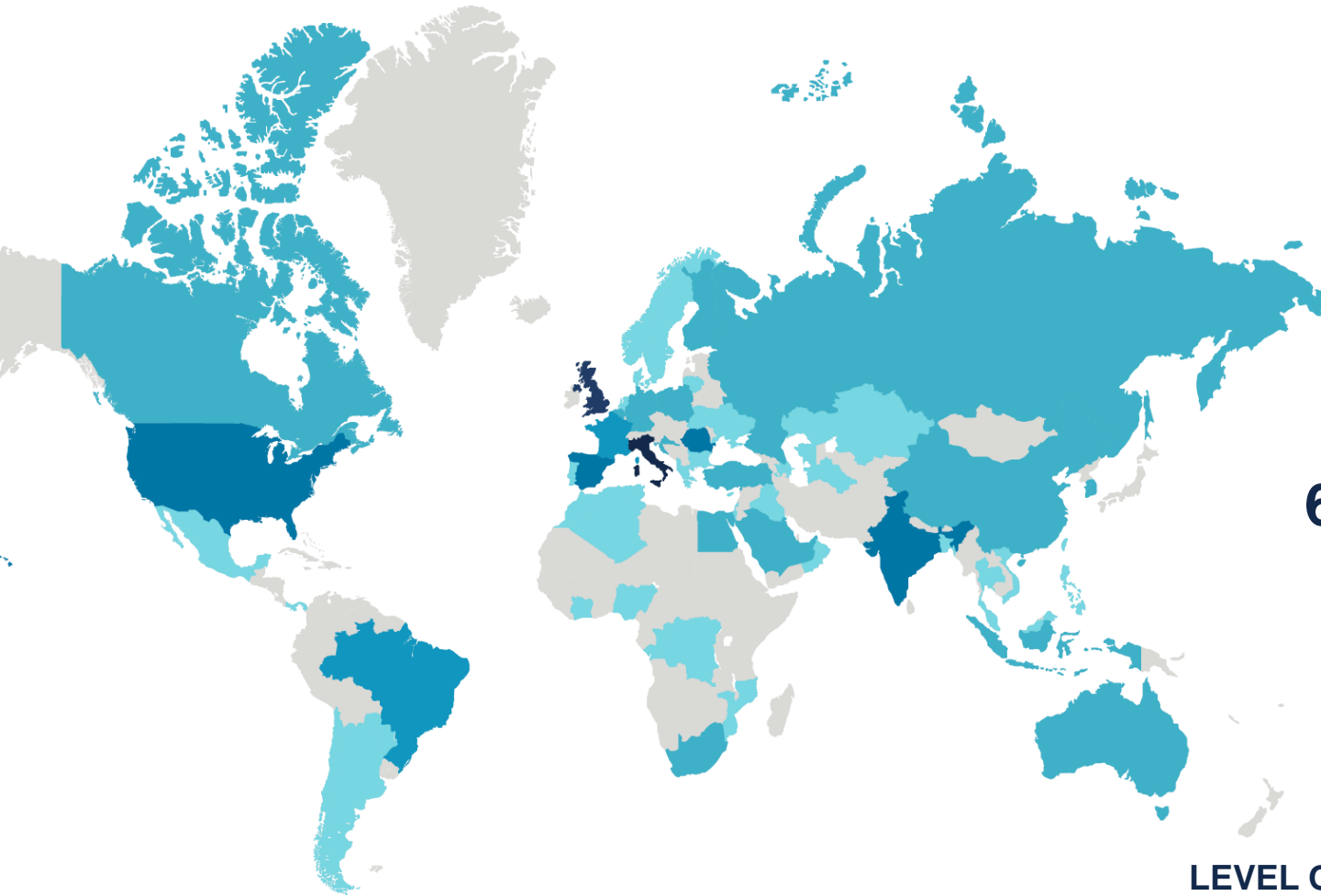
# Agenda

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1. RINA in brief
2. SCIP database overview
3. What are the obligations
4. Confidential business information
5. SCIP database information requirements
6. Data simplification methods
7. On-going SCIP obligations
8. Recommendations and conclusions

# RINA worldwide



**3700+** Staff

**170+** Offices

**65+** Countries

**LEVEL OF RINA PRESENCE:**



# RINA capability



## SERVICES FOR



**Marine**



**Industry**



**Energy**



**Transport &  
Infrastructure**



**Certification**

# About Product Regulatory Compliance



- We support the European Commission, manufacturers, importers and distributors of electrical and engineering products to identify, understand and meet technical and environmental legislation
- Compliance & Risks Knowledge Partner since 2008



# SCIP Database Requirements



**SCIP** = **S**ubstances of **C**oncern **I**n articles, as such or in complex objects (**P**roducts) Database

- SCIP is a database set up by the European Chemicals Agency (ECHA) to collect data on REACH Substances of Very High Concern (SVHCs) in “articles”

What is it intended for?

- SCIP was adopted by the EU as part of the Waste Framework Directive. Its aims are stated (by the EU) to be:
  - To make available SVHC data to the public and business users
  - To provide information to recyclers (unclear how they would affectively use the information)

# SCIP Database Scope

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## Scope and definitions

- Applicable to all “articles” supplied in the EU from 5 January 2021 containing SVHC’s >0.1% w/w
- Articles are defined as products whose shape is more important than their composition
  - This is the same definition as the REACH Regulation
- Data is needed for all “simple articles” as well as for complex products that consist of many articles

## Who **will be** required to submit data?

- All importers into the EU of articles
- All producers and assemblers of articles within the EU supply chain (except exporters of products out of the EU)

# SCIP Database Scope

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Circumstances where it will not be required to submit data?

- **Direct supply**

- Articles supplied directly and exclusively to consumers, without the participation of a distributor or other actor in the supply chain

- **Repair**

- Articles or complex objects that are repaired, provided that they are not supplied to another legal entity

- **Export**

- Items produced or assembled solely for export outside the EU

- **End of life**

- Users of articles that reach their end of life and become waste do not need to submit data

- **Defence**

- Member State may choose, where necessary, to allow for an exemption for the interests of defence



# UK Obligations

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- The **scope** of the regulation applies to all products, containing a SVHC >0.1% w/w within the EU
- UK Government has not released any plans indicating that there may be a UK SCIP requirement
- DEFRA have confirmed there is no requirement for NI based suppliers of articles, as it is not listed in Annex 2 of the Northern Ireland Protocol
- However, EU customers may request information to be able to support their submissions

# SCIP Database Submission



- Submission is to ECHA via the EU SCIP Database using IUCLID Dossiers
  - Version 1 database now released (available since 28<sup>th</sup> October 2020)
  - Prototype database still available for trial submissions
  - >50,000 submissions already

- SCIP notification can be prepared by:

1. Online in IUCLID Cloud



2. 'Offline' in company's own IT infrastructure in IUCLID 6



3. System-to-system method



# SCIP Database



Welcome to ECHA Cloud Services

### Login

If you already have an ECHA Account, for example to access REACH-IT, please log in here.

Log in

### Register

If you do not have an ECHA Account, you can create one and then assign a legal entity to it.

For more information please see the [Q&A](#).

Register



Need help?

Important information on ECHA apps availability

### WELCOME

Please enter your login information

Username \*

[Forgot username?](#)

Password \*

[Forgot password?](#)

Login with "ECHA Account"

Don't have an account? [Create an ECHA account](#)

Or

Login with "EU Login"

(<https://ecs.echa.europa.eu/cloud/home.html>)

- Requires an ECHA account with a Legal Entity assigned to it to be able to submit data
- Some of the data required is mandatory and submission is not possible if some of this is missing

# Confidential Business Information



- The information in the SCIP database is made publicly available
- SCIP will not disclose the link between the Notification and its submitter
- Responsibility of confidentiality relies on the duty holder

## Complex object identification



Name: Pencil sharpener  
Brand: Deneb®  
Model: FC500

Identifier  
558877899  
(bar code)

Article Category  
(CN Code):  
821410

### Component of a complex object identification



Name: Blade  
Brand: ALTAIR®  
Model: Altan 500

~~Identifier  
111xyz111zyx~~

Article Category  
(CN Code):  
821410

+ safe use instructions, disassembling instructions and characteristics

# SCIP Database Information Requirements

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What information is needed:

1. Identification of the article;
2. The name, concentration range and location of the Candidate List substances present in it; and
3. Information that allows its safe use – notably information to ensure the article is properly managed once it becomes waste.



- Additionally, certain types of optional data may also be submitted (such as a photograph of the article, brand names, etc.)

# SCIP Database Information Requirements



## Mandatory Information

Article name

Primary article identifier

**Article category**

**Is it produced in the EU?**

Safe use instructions

Candidate List substance

Concentration range

Material category

**Mixture category**

## Optional Fields

Article characteristics

Disassembling instructions

## Changes between Prototype and V1:

- IUCLID 6.5- may require upgrade, details on IUCLID website.
  - [Update substance package](#)
- 'Candidate List Version' removed
- PICK lists have changed in items in **Bold**
- Visualisation and terms in the database

# Data Simplification (1)

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Ways of simplification by using suppliers SCIP numbers:

- **Simplified SCIP Notification (SSN):** no change (form/composition/data attributes), aimed at distributors
- **Referencing:** incorporation into a complex object



Benefits:

- No dossier required in the submission- Lower data management requirements
- Automatic Updates

Results in a New SCIP number (LE + Article Information)

Requires the communication of the SCIP number (voluntary basis)

# Data Simplification (2)

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Ways of simplification:

- **Quasi-identical articles:** similar articles.

**Grouping is allowed by ECHA when:**

- The articles have the same function/use;
- The articles contain the same Candidate List substance;
- The material that the article is made of is the same; and
- The safe use instructions are the same for all articles in the group.

Requires the identification of each identical article (e.g. names and alphanumeric identifiers) are included in the notification- e.g. In other article identifiers



# Data Simplification (3)

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Ways of simplification:

- **Representative article:** worst case article (May contain Nuts)
  - Useful for 'multi-sourcing' issues
  - Concerns on right to know, ability to recycle and reduce pressure to find alternative
  - May not be supported by all Member States

ECHA recommendation: Could it be applied temporarily for certain very complex objects, at a company's own risk, while progressively adapting their IT tracking tools and reporting methods to the extent possible by aligning them with the criteria for grouping of quasi-identical complex objects?

# On-going SCIP obligations

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Dossier updates should be completed by same Legal Entity, using the same primary article identifier:

- **Mandatory Update-at point of supply**

- A substance present in an article already notified is included in the Candidate List after 5 January 2021
- An already listed SVHC on the Candidate List substance is incorporated in one of the component articles, due to e.g. a change in production or you become aware of the presence of that substance
- A component in a complex object already notified requires a change in notification

# On-going SCIP obligations

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- Optional (although recommended by ECHA) Update
  - Removal of a Candidate List substance from a previously notified (component) article, for instance due to successful substitution effort, to indicate that the substance is no longer present

# Conclusions

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SCIP database – mandatory for any article supplied in the EU from 5th January 2021

- Scope – all “articles” supplied within the EU
- Most producers/assemblers/importers within the EU will be required to submit data
- Requirement triggered when you become aware of a SVHC
- Need to obtain all mandatory data before submitting
- Reduce the data requirements where possible
  - Simplified Notification, Referencing, Quasi-identical articles and Representative article

# RINA SCIP\* Service



Data submission



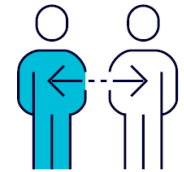
SCIP policy authoring




Business impact advice



Training



Supply chain engagement

- Legal obligation on all who supply articles in the EU from 5 January 2021
  - arises from the Waste Framework Directive
- RINA can help you
  - understand your obligations
  - prepare, simplify and validate your SCIP submissions
  - upload your SCIP submissions system-to-system 
  - provide evidence of compliance

\* Substances of Concern In articles, as such or in complex objects (Products) Database

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# Questions?





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Energy-related Products **products**

**SVHC**

**DoC**  
**RoHS**

Declaration of Conformity

obsolescence

**REACH**

Harmonised Standards

Conflict Minerals

**SE**  
authorisation  
**ATEXrule**

compliance • Machinery

**chemical**

Conformity Assessment  
Substances of very high concern  
Dodd-Frank, Section 1502

**WEEE**

Ecodesign

**CFR**  
**SDS**

articles

**EMC**

**restriction**

**RED**

**CLP**

**Directives**

Pressure

**Regulations**

Responsible Sourcing

Worldwide Regulation

Batteries

**GPSD**

hazardous substances  
Energy-related Products