



Understanding the SCIP Database Requirements

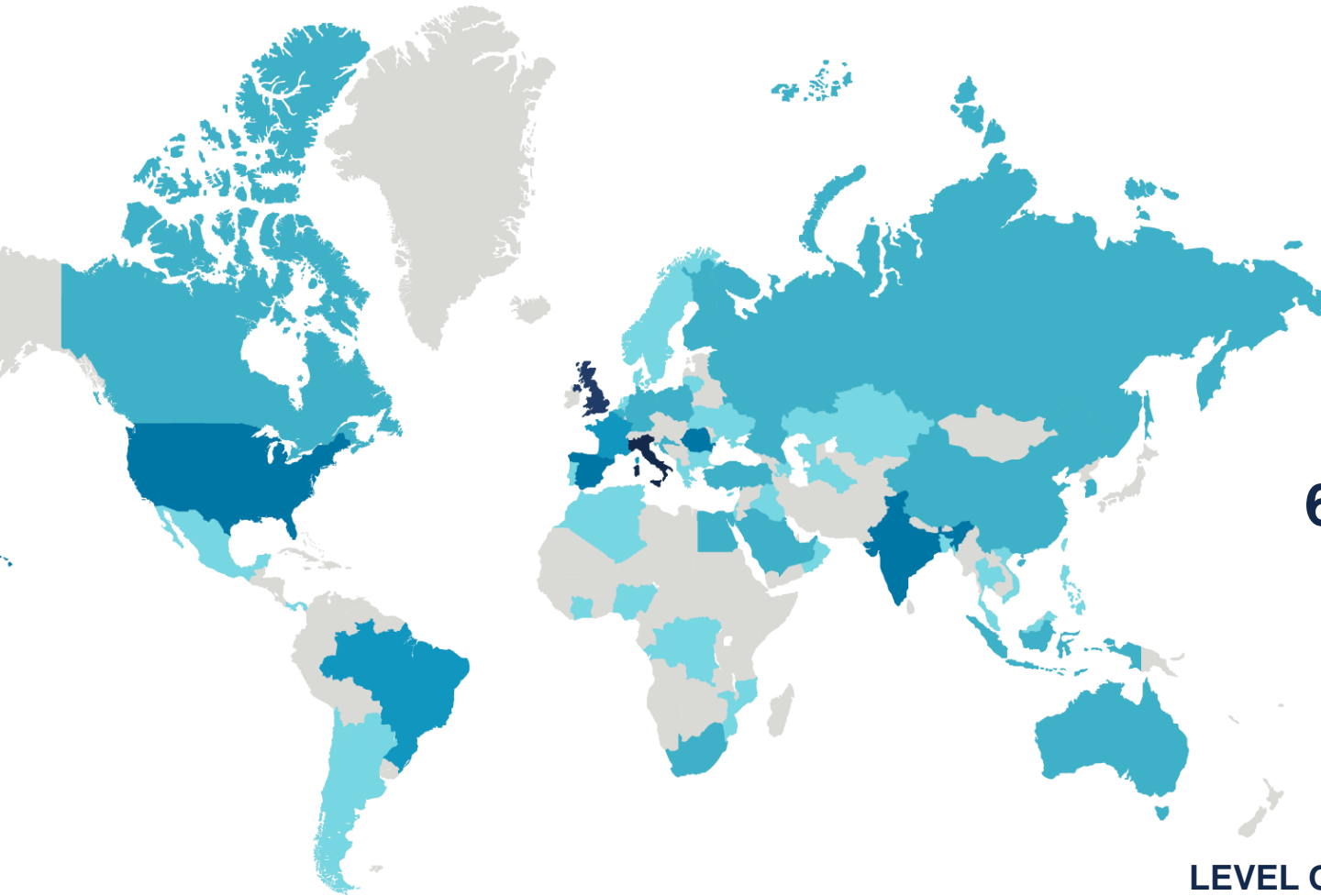


Agenda



1. RINA in brief
2. SCIP database overview
3. What are the obligations
4. The SCIP submission process
5. SCIP database information requirements
6. On-going SCIP obligations
7. Recommendations and conclusions

RINA worldwide



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170+ Offices

65+ Countries

LEVEL OF RINA PRESENCE:



RINA capability



SERVICES FOR



Marine



**Transport &
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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



Scope and definitions

- Applicable to all “articles” supplied in the EU containing SVHC’s >0.1% w/w, placed on the market from 5 January 2021
- 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



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

SCIP Database Submission



- Submission is to ECHA via the EU SCIP Database using IUCLID Dossiers
 - Prototype database is currently available via <https://idp-industry.echa.europa.eu/idp/>
 - Version 1 database available from October 2020 to fulfil the legal obligation
 - Requires an ECHA account with a Legal Entity assigned to it to be able to submit data

– SCIP notification can be prepared by:

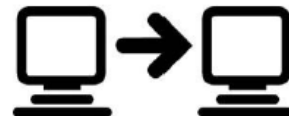
1. Online in IUCLID Cloud



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



3. System-to-system method



Submission Process



1. Ensure all data is available for submission (Start now!)
 - You will need to know a primary article identifier, CN description and code, mixture category (unless a single substance) and name/reference of linked complex articles
2. Prepare data in IUCLID portal
 - Manually or system-to-system
3. Data Validation by ECHA
 - This is carried out by the system. Any errors will be indicated and must be corrected before the data can be uploaded to the SCIP database
4. Create Dossier
5. Submit SCIP notification dossier
 - A submission report will be generated

Update Dossier as required (by same Legal entity, using the same primary article identifier)

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](#)

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

The screenshot shows the ECHA Cloud Services login page. At the top is the ECHA logo. Below it are two input fields: 'Username' and 'Password'. The password field has a placeholder text 'Enter password...'. To the right of the password field is a blue 'LOGIN' button. Below the input fields is a 'Help' section with a dropdown arrow and a list of links: 'Create an ECHA account', 'Forgot your password?', 'Forgot your username?', 'Change password', 'ECHA accounts Q&A', and 'ECHA accounts information'.

- The information in the SCIP database is made publicly available
- Some of the data required is mandatory and submission is not possible if some of this is missing

SCIP Database Information Requirements



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



Information	Details
Article name	Your name for the article
Primary article identifier	e.g. European Article Number (EAN); Global Trade Item Number (GTIN); Universal Product Code (GPC); Catalogue number; ECHA Article ID, part number
Article category	Combined Nomenclature (CN) description and code from the TARIC list (select from drop-down list)
Article characteristics	Optional field
Is it produced in the EU?	Yes, no or unwilling to say
Safe use instructions	Can state “No need to provide safe use information beyond the identification of the Candidate List substance”, or can upload instructions To be provided in any EU language
Disassembling instructions	Optional field

SCIP Database Information Requirements



Information	Details
Candidate List version	Will not be required in V1 of database
Candidate List substance	Enter name, CAS and EC numbers of SVHC using drop-down list
Concentration range	Pick from a list of ranges, including > 0.1% w/w and ≤ 100% w/w
Material category	Select from drop-down list
Mixture category	If not a single material from European product categorisation system (EuPCS)
Linked articles	Link article being submitted to an existing, previously submitted article. Usually this would be for a simple component that is part of a complex assembly
Number of articles	How many of these articles are there in the complex article to which they are linked

On-going SCIP obligations



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



- 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

How RINA is helping its customers



- **Company specific readiness analysis:** Review and identification of missing information. Recommendations on company specific steps for the preparation for SCIP declaration
- **Supply chain communications** on SCIP requirements and company specific guidance
- **Company specific training** working with identified roles within a company demonstrating SCIP declaration on company specific articles and available data
- **SCIP submissions** on behalf of customers

Conclusions



SCIP database – mandatory for any article placed on the market from 5th January 2021

- Scope – all “articles” supplied within the EU
- Most producers/assemblers/importers within the EU will be required to submit data
- Need to obtain all mandatory data before submitting
- Prototype available for trial submissions until October 2020 – all prototype data will be deleted. Note: Released version of the database will have some alterations to information requirements to prototype



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Energy-related Products **products**

SVHC

DoC
RoHS

Declaration of Conformity

obsolescence

REACH

Harmonised Standards

Conflict Minerals

authorisation
SE
ATEX
rule

compliance • Machinery

chemical

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

WEEE

Ecodesign

CFR
SDS

articles

EMC

CLP

Pressure

restriction

Directives

Regulations

Responsible Sourcing

Worldwide Regulation

Batteries

GPSD

hazardous substances
Energy-related Products