

SCIP IT user group

15 July 2020



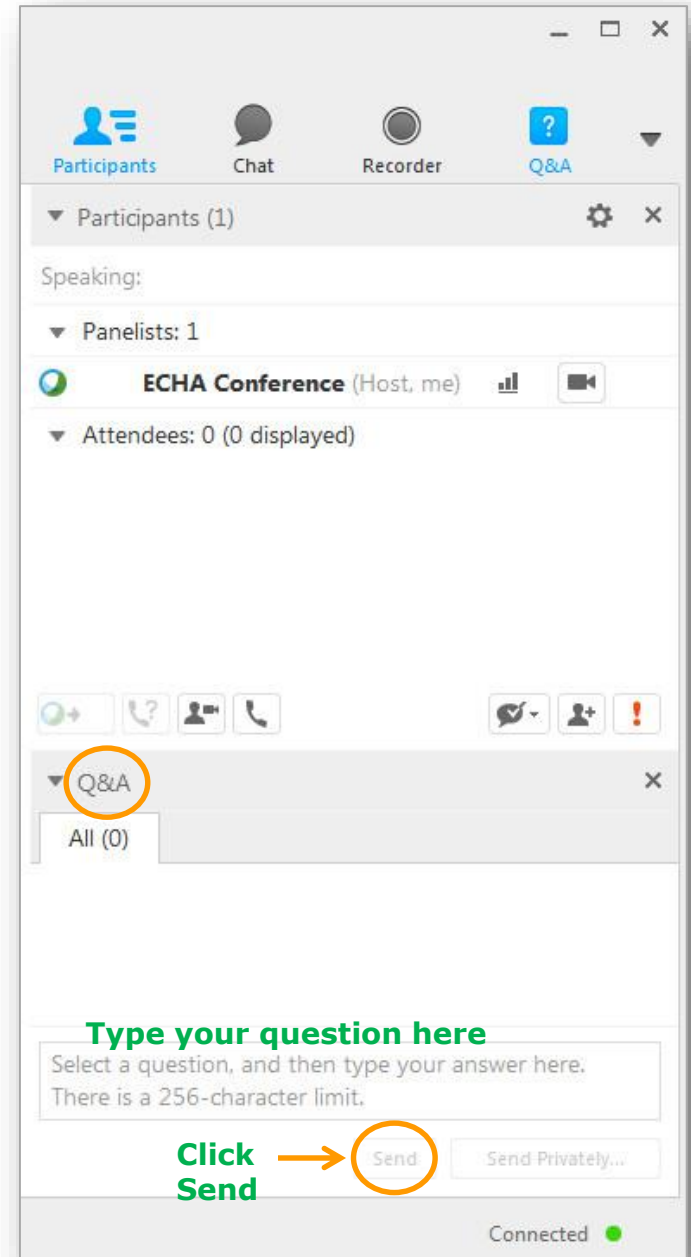
Opening remarks

- Practicalities
 - Webex instructions
 - For the floor, raise your hand
 - To ask a question: use the **Q&A panel** at any time.
 - Audio recording to support minutes

Additional comments and questions:

scip@europa.echa.eu

Include on the subject: " SCIP IT user group"



The screenshot shows a Webex meeting interface. At the top, there are icons for Participants, Chat, Recorder, and Q&A. Below these, the meeting title is "ECHA Conference (Host, me)". The interface shows "Panelists: 1" and "Attendees: 0 (0 displayed)". A "Q&A" panel is open at the bottom, with a dropdown menu showing "All (0)". A green text prompt says "Type your question here" and "Select a question, and then type your answer here. There is a 256-character limit." Below this, there is a "Send" button circled in orange, with an arrow pointing to it from the text "Click Send". A "Send Privately..." button is also visible. The bottom right corner shows "Connected" with a green dot.

Today's agenda

- State of play
- July 2020 - IUCLID Cloud Release
- Summer – Submission portal release
- Summer - S2S release
- New SCIP webpage content
- Caracal-Waste expert group meeting – Level of reporting

State of Play



2020 - From prototype to v1.0



July 2020

IUCLID Cloud Release



What's new?

- Improvements on UI for Article category and mixture category
- **Dossier preparation & 'Referencing'**
- Advance Search:
 - Datasets
 - Dossiers
 - Sliding windows to select a complex object component
- Validation report export
- New validation rules (Updated annex will be available in July)

Article category

Categorisation

Article category

Please search and select...

- OR -

Select by typing article text

⊗ This field is mandatory, based on the information previously provided.

Production in European Union

None

⊗ This field is mandatory.

Select Article category

- 4003000000 - Reclaimed rubber in primary forms or in plates, sheets or strip
- 4004000000 - Waste, parings and scrap of rubber (other than hard rubber) and powders and granules obtained therefrom
- 4005000000 - Compounded rubber, unvulcanised, in primary forms or in plates, sheets or strip
- 4006000000 - Other forms (for example, rods, tubes and profile shapes) and articles (for example, discs and rings), of unvulcanised rubber
- 4007000000 - Vulcanised rubber thread and cord
- 4008000000 - Plates, sheets, strip, rods and profile shapes, of vulcanised rubber other than hard rubber
- 4009000000 - Tubes, pipes and hoses, of vulcanised rubber other than hard rubber, with or without their fittings (for example, joints, elbows, flanges)
- 4010000000 - Conveyor or transmission belts or belting, of vulcanised rubber
- 4011000000 - New pneumatic tyres, of rubber
 - 4011100000 - Of a kind used on motor cars (including station wagons and racing cars)
 - 4011200000 - Of a kind used on buses or lorries
 - 4011300000 - Of a kind used on aircraft
 - 4011400000 - Of a kind used on motorcycles
 - 4011500000 - Of a kind used on bicycles

Select

Article category

Please search and select...

- OR -

401150

Select/Deselect all

4011500000 - Of a kind used on bicycles (SECTION VII (39 - 40) Plastics and articles thereof; rubber and articles thereof > 4000000000 - Rubber and articles thereof > 4011000000 - New pneumatic tyres, of rubber > 4011500000 - Of a kind used on bicycles)

Dossier including 'referencing'



The dataset of the link component:

Identifiers

Article name*
Wheel

Primary article identifier type*
ECHA Article ID

Primary article identifier value*
412426ef-b6b6-46b8-bc2f-2e75167978e6

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Report the most appropriate name to manage the components on your notification

NOW: use the "ECHA Article ID" to report the SCIP number.
OCTOBER: we will change the name from "ECHA Article ID" to "SCIP number" will be included

Include the SCIP number value provided by your supplier

No additional information needed

August 2020 Submission Portal Release



What's new?

- Simplified SCIP Notification (SSN)
- General improvements: searching, export feature.
- New validation rules required for features to allow the re-use to information already submitted to the SCIP database (SSN and Referencing)

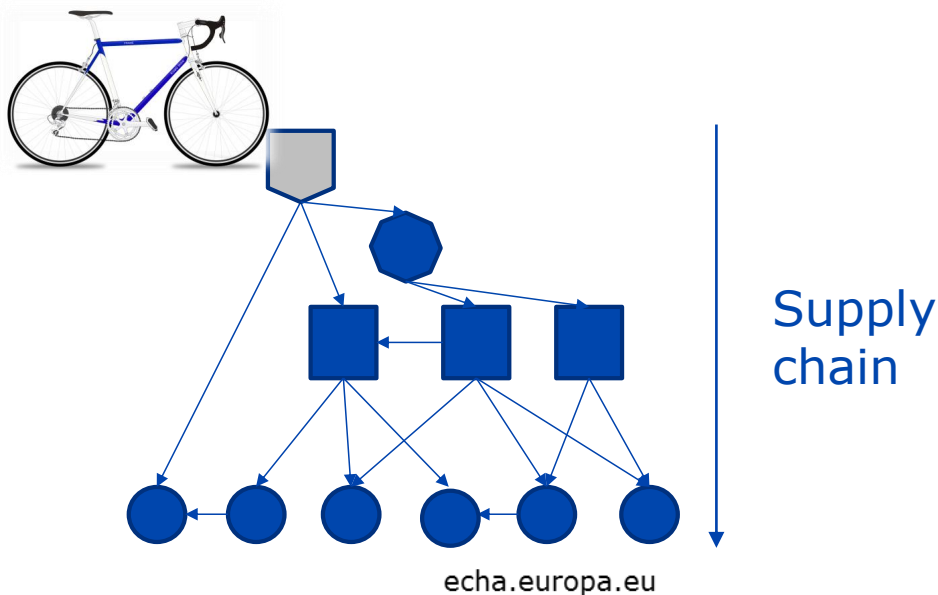
Simplified SCIP Notification





Simplified SCIP notification (SSN)

- **Target user:** Distributors
- **In which situations can it be used?** Only applicable if the article/complex object received is the same as the one supplied.
- **How does it work?** The distributor will submit a notification by referring to data submitted by his supplier. To be done via an alphanumeric identifier that the supplier receives after notification



Basic principles

1. The product received = product supplied



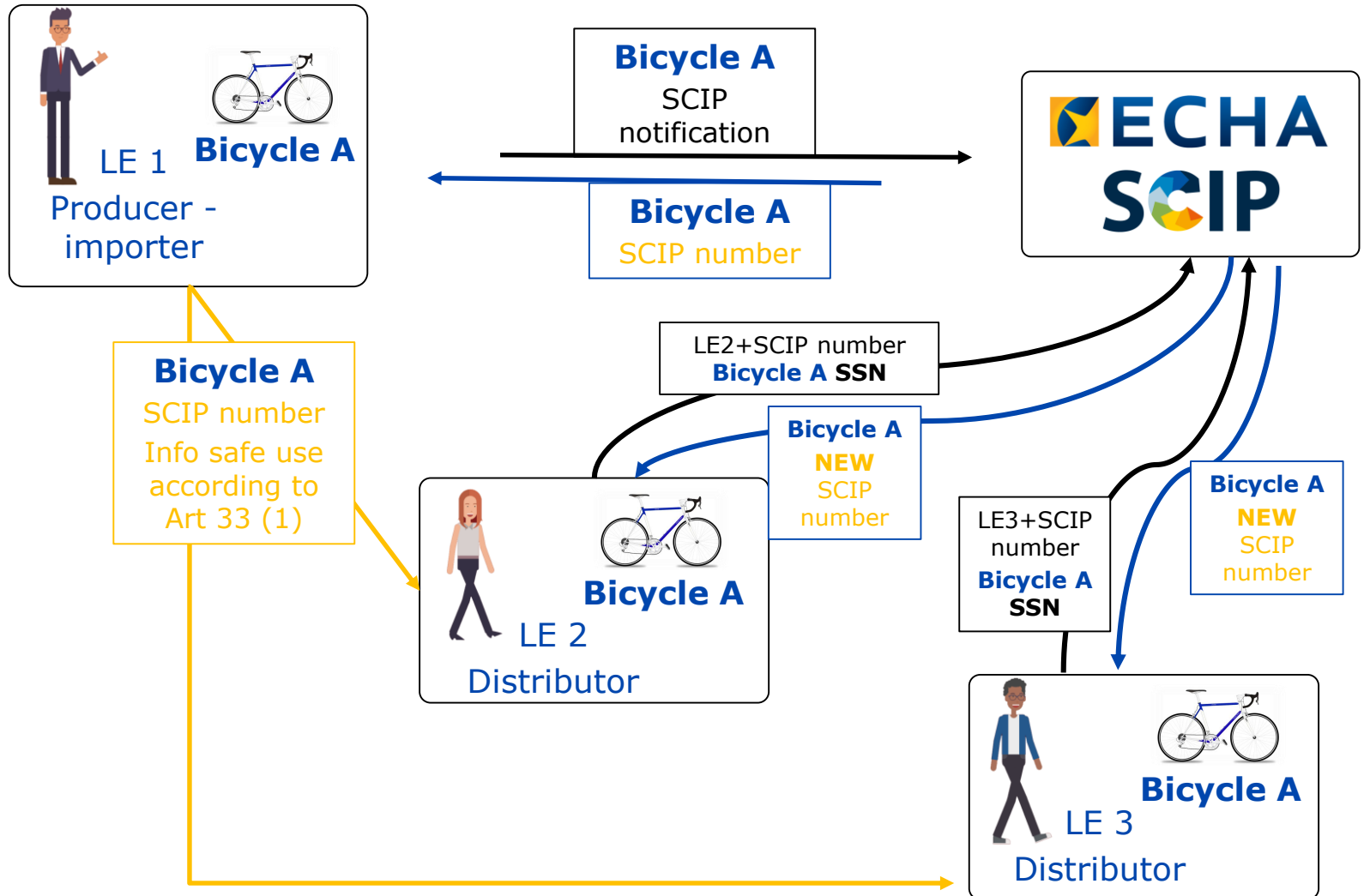
No change on
the article

2. No dossier needed in the submission



3. The distributor links to the notification of the supplier and does not need to submit updates

Simplified SCIP notification (SSN) overview



What 'product received = product supplied' means

Articles as such

No change on the physical form nor composition on article supplied in comparison to the article received



No change on the article

Complex objects

No change on the complex object supplied in comparison to the complex object received

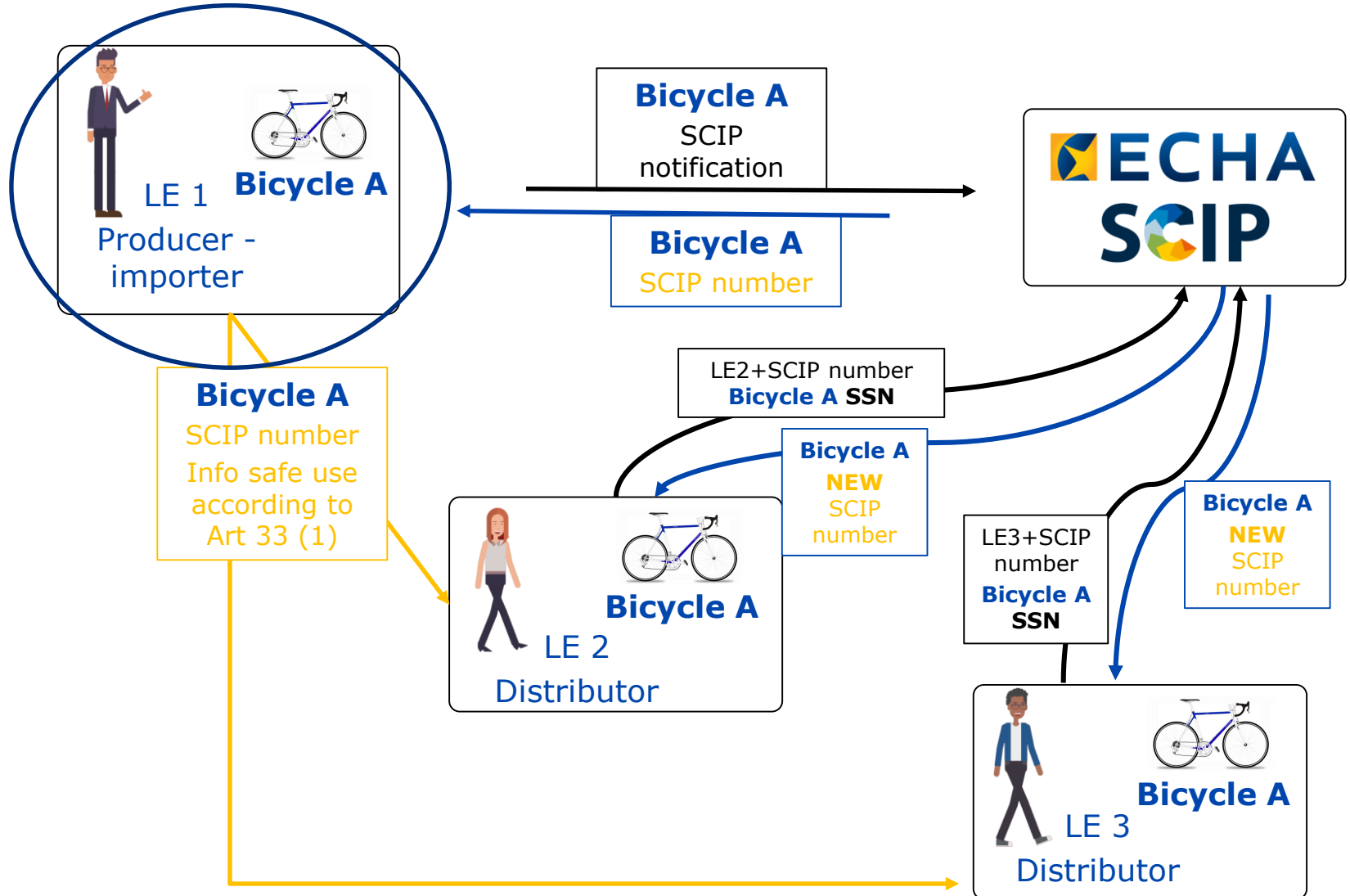



No change on the complex object

+ for both cases

The **identification elements (identifiers)**, i.e. names, alphanumeric identifiers, and article category, of the article as such or complex object (product) supplied **is the same** as that of the article or object received.

Simplified SCIP notification (SSN) overview



Submission status: Succeeded 

Dossier type: SCIP notification
Submission number: RMH209873-05
Submitted IUCLID version: 6_4

Submitted by: Stefan Supan
SCIP IT User
ECHA-e68c8e



Submission information

SCIP number **6df89c5f-e28f-4349-9a44-3884bf68bd77**
Article name Wheel
EAN (European Article... 966985755
Dossier name
Dossier UUID 5801b692-de9e-425a-819c-7ff2cceed767
File name 5801b692-de9e-425a-819c-7ff2cceed767.i6z
Notification type Initial

Submission events

24/05/2020 21:57 []
24/05/2020 21:57 []

SCIP number available in the submission report

Search | [Upload & submit](#) | [Create dossier online](#) | [Simplified SCIP notification](#)

Search criteria 

Submission number Submission status

Dossier type Submission date from to


SCIP number Notification type

Primary identifier I am looking for

Names

Page 1 of 15 results

Sort by

| | | | |
|--|--------------------------------------|------------------|--------------------------------------|
| RMH563993-00  | | 13/07/2020 18:31 | |
| SCIP number | b657d351-d95a-4b6f-959b-985b9f2918b7 | catalogue number | 8d14b4b8-d068-45ea-b764-d257547c7426 |
| Names | Dossier 1, Bicycle RR 367 | Dossier type | SCIP notification |

Export to excel feature
Submission information e.g. SCIP number

SCIP number of the notification

Name of the dossier and name of the article included in the notification

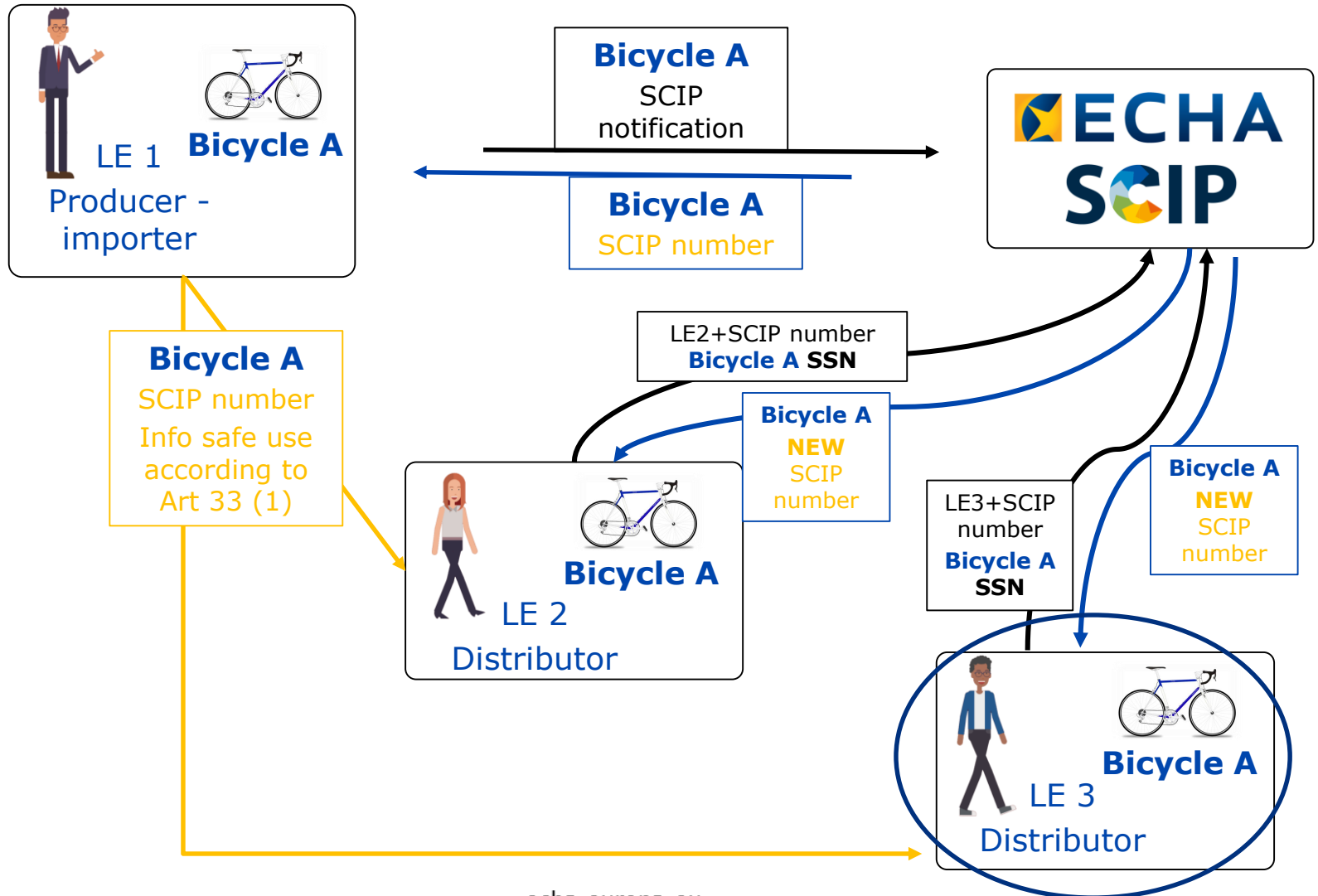
Primary article identifier type and value of the article notification.

| Reference number | Names | Identifiers type | Identifiers | Submission number | Submission status |
|--------------------------------------|---|-------------------------------|-------------|-------------------|-------------------|
| 76a925fa-b6e2-4988-9084-acdec8433ed1 | RR Blue steel 26" Bicycle V1, RR Blue steel 26" Bicycle | EAN (European Article Number) | 5669988799 | RMH992272-03 | failed |
| 76a925fa-b6e2-4988-9084-acdec8433ed1 | RR Blue steel 26" Bicycle V1, RR Blue steel 26" Bicycle | EAN (European Article Number) | 5669988799 | RMH594255-08 | succeeded |
| 66c87f45-d324-47a4-9e6d-732110081f0d | Bicycle V1, RB Blue steel 26" Bicycle | EAN (European Article Number) | 56699887 | RMH811438-15 | succeeded |
| 1a1353ae-9853-4abc-bf49-c89cac3764e7 | Wheel dos, Wheel 26" | EAN (European Article Number) | 966985755 | RMH066698-02 | succeeded |
| 1a1353ae-9853-4abc-bf49-c89cac3764e7 | Wheel dos, Wheel 26" | EAN (European Article Number) | 966985755 | RMH436830-15 | succeeded |

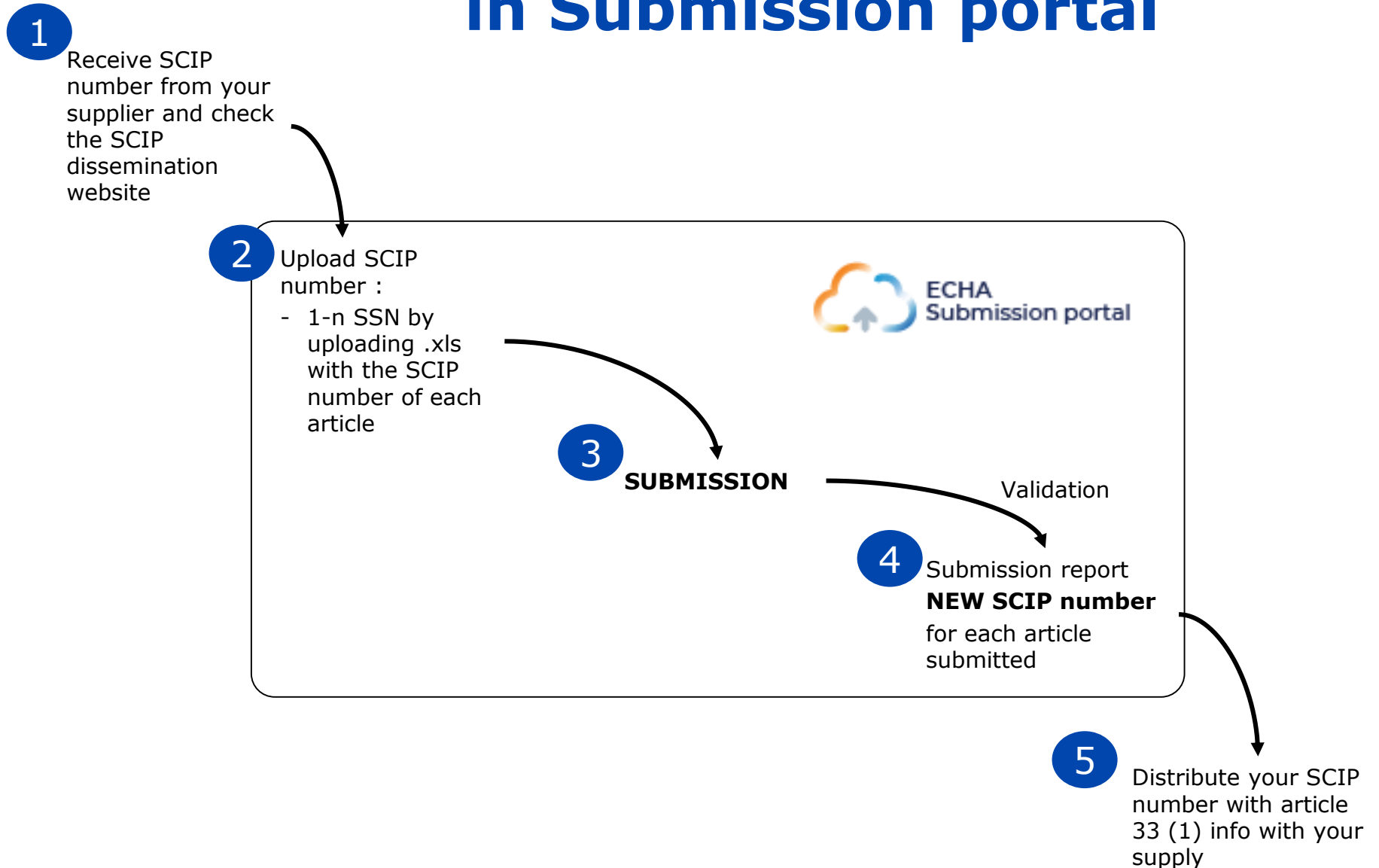
Each row correspond to the information of one SCIP notification submission

Field **order** in the excel file change from previous presentation

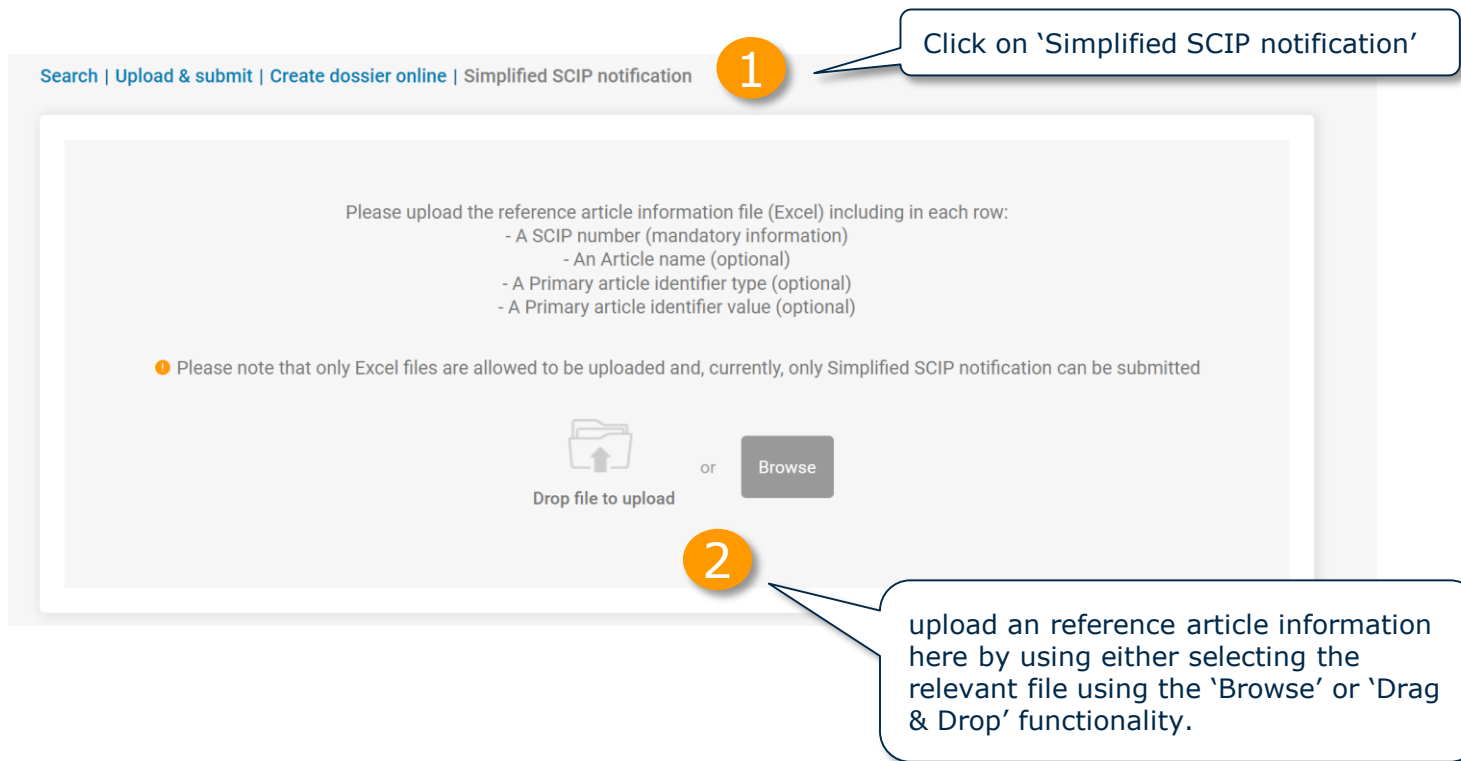
Simplified SCIP notification (SSN) overview



Simplified SCIP notification in Submission portal



SSN: Upload & Submit (I)



Search | Upload & submit | Create dossier online | Simplified SCIP notification

1 Click on 'Simplified SCIP notification'

Please upload the reference article information file (Excel) including in each row:

- A SCIP number (mandatory information)
- An Article name (optional)
- A Primary article identifier type (optional)
- A Primary article identifier value (optional)

Please note that only Excel files are allowed to be uploaded and, currently, only Simplified SCIP notification can be submitted

Drop file to upload or Browse

2 upload an reference article information here by using either selecting the relevant file using the 'Browse' or 'Drag & Drop' functionality.

SSN: Upload & Submit (II)

[Search](#) | [Upload & submit](#) | [Create dossier online](#) | [Simplified SCIP notification](#)

✔ File Search results Clara fi 13_07_2020.xlsx has been successfully uploaded.

3

7 records found

| SCIP number | Article name | Primary article identifier type | Primary article identifier value |
|--------------------------------------|-----------------------------|---------------------------------|--------------------------------------|
| b657d351-d95a-4b6f-959b-985b9f2918b7 | Dossier 1, Bicycle RR 367 | catalogue number | 8d14b4b8-d068-45ea-b764-d257547c7426 |
| a565a608-acd4-4b8d-acf0-6c06e8f33d58 | Dossier 1, Tyre 367 | part number | 8e6f0656-6456-4d90-b959-873f7d66a388 |
| f83a5f59-c6c1-4430-b2d2-8d69b638106c | Dossier 2, Tyre 366 | part number | 8a3e0337-cded-41d6-8fdc-699220c3ef0b |
| f83a5f59-c6c1-4430-b2d2-8d69b638106c | Dossier 1, Tyre 366 | part number | 8a3e0337-cded-41d6-8fdc-699220c3ef0b |
| f83a5f59-c6c1-4430-b2d2-8d69b638106c | Dossier 1 FQLT712, Tyre 365 | part number | 8a3e0337-cded-41d6-8fdc-699220c3ef0b |
| f83a5f59-c6c1-4430-b2d2-8d69b638106c | Dossier 2, Tyre 365 | part number | 8a3e0337-cded-41d6-8fdc-699220c3ef0b |
| f83a5f59-c6c1-4430-b2d2-8d69b638106c | Dossier 3, Tyre 365 | part number | 8a3e0337-cded-41d6-8fdc-699220c3ef0b |

Cancel

Click "Submit" to send your submission(s).

Submit

4

Click on 'Submit' to send the submission

SSN: Upload & Submit (III)

[Search](#) | [Upload & submit](#) | [Create dossier online](#) | [Simplified SCIP notification](#)

7 out of 7 records submitted

| Submission number | SCIP number | Article name | Primary article identifier type | Primary article identifier value |
|------------------------------|--------------------------------------|-----------------------------|---------------------------------|--------------------------------------|
| RMH067213-25 | b657d351-d95a-4b6f-959b-985b9f2918b7 | Dossier 1, Bicycle RR 367 | catalogue number | 8d14b4b8-d068-45ea-b764-d257547c7426 |
| RMH402209-29 | a565a608-acd4-4b8d-acf0-6c06e8f33d58 | Dossier 1, Tyre 367 | part number | 8e6f0656-6456-4d90-b959-873f7d66a388 |
| RMH398780-98 | f83a5f59-c6c1-4430-b2d2-8d69b638106c | Dossier 2, Tyre 366 | part number | 8a3e0337-cded-41d6-8fdc-699220c3ef0b |
| RMH616507-15 | f83a5f59-c6c1-4430-b2d2-8d69b638106c | Dossier 1, Tyre 366 | part number | 8a3e0337-cded-41d6-8fdc-699220c3ef0b |
| RMH509326-11 | f83a5f59-c6c1-4430-b2d2-8d69b638106c | Dossier 1 FQLT712, Tyre 365 | part number | 8a3e0337-cded-41d6-8fdc-699220c3ef0b |
| RMH455233-18 | f83a5f59-c6c1-4430-b2d2-8d69b638106c | Dossier 2, Tyre 365 | part number | 8a3e0337-cded-41d6-8fdc-699220c3ef0b |
| RMH810488-07 | f83a5f59-c6c1-4430-b2d2-8d69b638106c | Dossier 3, Tyre 365 | part number | 8a3e0337-cded-41d6-8fdc-699220c3ef0b |


[New Submission](#)

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Following Submission, a Submission Number is assigned per each submission process

SSN: Submission report

Search | Upload & submit | Create dossier online | Simplified SCIP notification

Submission status: Succeeded 

| | | | |
|---------------------------|-------------------|---------------|---|
| Dossier type: | SCIP notification | Submitted by: | Clara esp Rueda |
| Submission number: | RMH402209-29 | | Pontejos Fi Esp |
| Submitted IUCLID version: | N/A | | ECHA-6de52215-9892-4904-8e68-232eb4802d96 |


Submission information

| | |
|------------------------|---|
| SCIP number | f6965202-6940-4175-a0b8-1dc693354b15 |
| Referenced SCIP num... | a565a608-acd4-4b8d-acf0-6c06e8f33d58 |
| Article name | Tyre 367 |
| part number | 8e6f0656-6456-4d90-b959-873f7d66a388 |
| File name | Search results Clara fi 13_07_2020.xlsx |
| Notification type | Initial |

Submission events

| | |
|------------------|----------------------------------|
| 13/07/2020 18:46 | Dossier submitted |
| 13/07/2020 18:46 | Dossier passed validation checks |

Submission history

| | |
|------------------|--|
| SCIP number | f6965202-6940-4175-a0b8-1dc693354b15 |
| 13/07/2020 18:46 | RMH402209-29  |

Submission information

| | |
|------------------------|---|
| SCIP number | f6965202-6940-4175-a0b8-1dc693354b15 |
| Referenced SCIP num... | a565a608-acd4-4b8d-acf0-6c06e8f33d58 |
| Article name | Tyre 367 |
| part number | 8e6f0656-6456-4d90-b959-873f7d66a388 |
| File name | Search results Clara fi 13_07_2020.xlsx |
| Notification type | Initial |

NEW SCIP number to be share with next actor in the supply chain

SCIP number from the reference article (from supplier)

Name, Primary article type and value **from the reference article (from SCIP database)**

Summer System to System Update



S2S status update: Summer 2020

New version of S2S API:

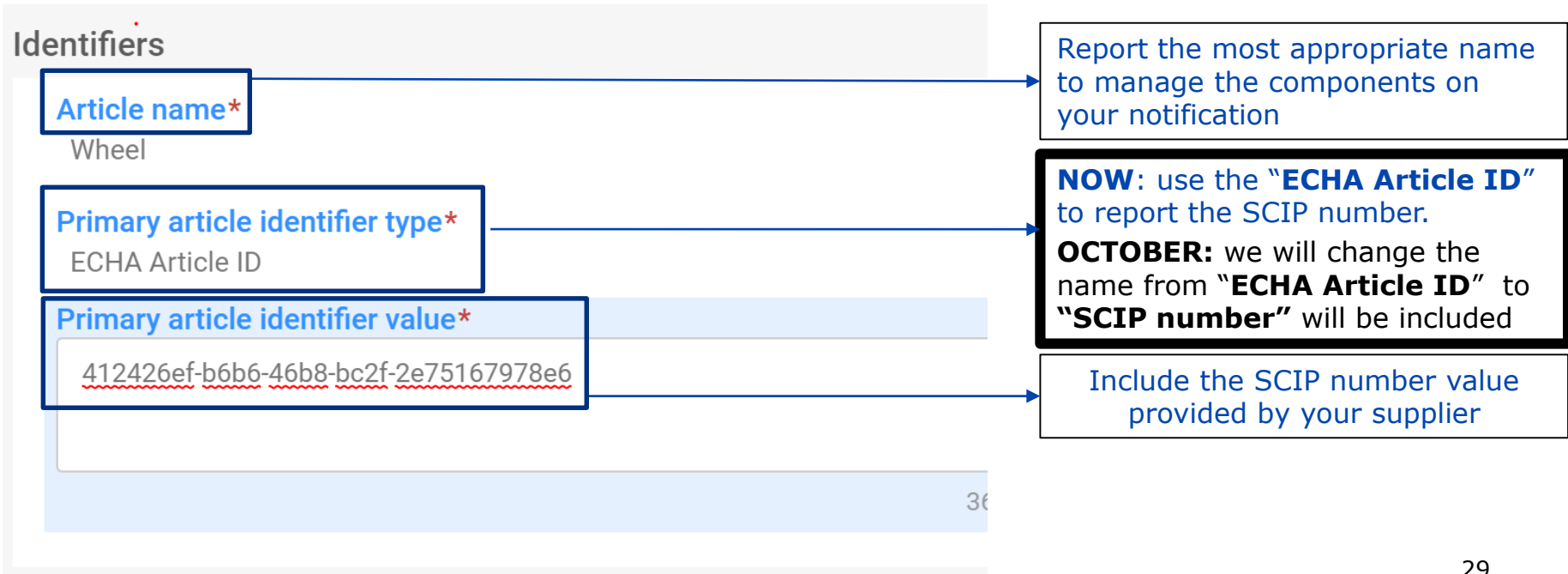
- Will include SCIP number on the response
- New feature to submit SSN via S2S

This service is used to submit A Simplified SCIP notification via S2S by submitting a list of SCIP numbers of the article or complex object you are referencing to.

Referencing & S2S

You can start creating a SCIP dossier including link component by referencing by creating a link component which include:

- Article name
- Primary article identifier type: ECHA Article ID
- Primary article identifier value: UUID



The screenshot shows a form titled "Identifiers" with three main fields, each highlighted with a blue box and connected by an arrow to an explanatory callout box on the right.

- Article name***: The value "Wheel" is entered. Callout: "Report the most appropriate name to manage the components on your notification".
- Primary article identifier type***: The value "ECHA Article ID" is selected. Callout: "**NOW:** use the **“ECHA Article ID”** to report the SCIP number. **OCTOBER:** we will change the name from **“ECHA Article ID”** to **“SCIP number”** will be included".
- Primary article identifier value***: The value "412426ef-b6b6-46b8-bc2f-2e75167978e6" is entered. Callout: "Include the SCIP number value provided by your supplier".

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New content on our website

SCIP IT user group



IUCLID format-supporting document

ECHA > Legislation > WFD > SCIP Database > Tools > SCIP Format

WFD

[Understanding WFD](#)

☐ [SCIP Database](#)

[Suppliers of articles](#)

[Waste operators](#)

[Consumers and SCIP](#)

☐ [SCIP support](#)

☐ [Tools](#)

[SCIP Format](#)

[SCIP Prototype](#)

[Candidate List Package](#)

[Legislation](#)

SCIP Format

The SCIP format structures substances in concentration ECHA.

The format is XML-based and (i) of the Waste Framework paper on the implementation of Framework Directive 2008/5 substances in articles.

The SCIP format is compatible with the OECD, which provides additional information about

Format versioning

- Version 1.0 of the SCIP
- Version 2.0 of the SCIP can already be downloaded

SCIP Format

The SCIP format structures the information on articles that contain Candidate List substances in concentration above 0.1 % weight by weight that has to be submitted to ECHA.

The format is XML-based and defined taking into account the legal text of Article 9(1) (i) of the Waste Framework Directive, REACH Article 33(1), the Commission's "Non-paper on the implementation of Articles 9(1)(i) and 9(2) of the revised Waste Framework Directive 2008/98/EC", and ECHA's Guidance on requirements for substances in articles.

The SCIP format is compatible with IUCLID, a tool developed by ECHA in collaboration with the OECD, which promotes the harmonisation of chemicals data. You can find additional information about this tool on the IUCLID website.

Format versioning

- Version 1.0 of the SCIP format was published in October 2019
- Version 2.0 of the SCIP format will be published in October 2020. A draft version can already be downloaded from this page.

To help companies implement this format outside of the IUCLID tool, the following support materials are available:

- SCIP format
 - [SCIP format version 1.0](#) [ZIP] October 2019
 - [SCIP format version 2.0 \(DRAFT\)](#) [ZIP] June 2020. It includes a word version of the format elements, an excel file with the differences between both versions, an excel file listing the draft fields for the version 2.0 format and an XML file describing the define migration rules.
- SCIP format annex – Picklists: October 2019 [XLSX] | [ZIP] Note that the XML list of picklist values contains all IUCLID phrases, not only the ones relevant for SCIP.

- [SCIP Notification Format - SCIP data model](#) [PDF] [EN]
- [SCIP Notification Format - Preparing a SCIP dossier](#) [PDF] [EN]
- [Validation rules for SCIP notifications](#) [PDF] [EN]

New!!!

- Developers' guide to the IUCLID format: in IUCLID, the exchange of chemical information is facilitated through a zip/archive file with the extension .i6z (IUCLID 6 zip). This file contains information concerning all (inter)related IUCLID 6 entities (documents and attachments), in a well-defined and structured format. This guide explains the structure of the IUCLID file to help developers build accepted notification dossiers from their own systems.

SCIP Notification format:

- ✓ SCIP data Model
- ✓ Preparing a SCIP dossier

Supporting documents (I)

SCIP support

Support materials and questions and answers are available to help companies understand the SCIP database and to prepare their information on articles that contain Candidate List substances in a concentration above 0.1 % w/w. If you cannot find the information you are looking for, you can contact ECHA.

Information requirements



- Detailed Information Requirements for the SCIP database [PDF][EN]
 - Stakeholder consultation on information requirements (Wood, 2019) [PDF] [EN]
- Safe use instructions and the SCIP database – stakeholder views and current practices (Wood, 2019) [PDF] [EN]
- Materials categories for the SCIP database
 - Supporting the development of appropriate material categories for the SCIP database [PDF] [EN]

SCIP Database Notifications

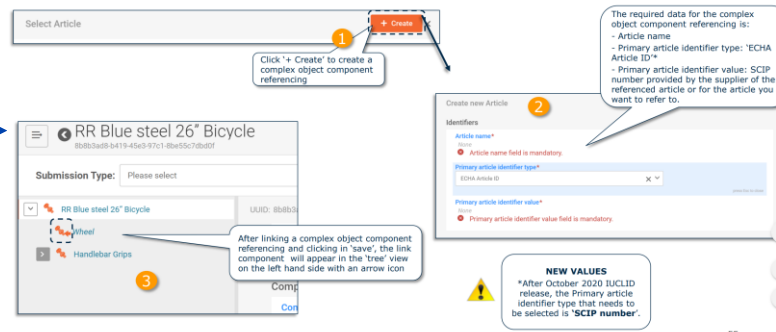


- **How to prepare and submit a SCIP Notification Dossier [PDF] [EN]**
- Validation rules for SCIP notifications [PDF] [EN]
- Dissemination and confidentiality in the SCIP Database [PDF] [EN]

✓ How to prepare and submit a SCIP Notification Dossier Update

SCIP

complex object component(s) & Referencing



The screenshot illustrates the process of creating a new article and linking complex object components. It is divided into three numbered steps:

- Step 1:** A 'Select Article' dropdown menu with a '+ Create' button. A callout box says: 'Click '+ Create' to create a complex object component referencing'.
- Step 2:** A 'Create new Article' form. Fields include 'Article name*', 'Primary article identifier type*', 'ECHA Article ID', and 'Primary article identifier value*'. A callout box explains: 'The required data for the complex object component referencing is: - Article name - Primary article identifier type: "ECHA Article ID" - Primary article identifier value: SCIP number provided by the supplier of the referenced article or for the article you want to refer to.' Another callout box notes: 'Article name field is mandatory', 'Primary article identifier type*', and 'Primary article identifier value field is mandatory'.
- Step 3:** The article details page for 'RR Blue steel 26" Bicycle'. It shows a 'Submission Type' dropdown and a list of components: 'RR Blue steel 26" Bicycle' (with a link icon) and 'Handlebar Grips'. A callout box states: 'After linking a complex object component referencing and clicking in "save", the link component will appear in the "tree" view on the left hand side with an arrow icon'.

NEW VALUES
*After October 2020 IUCLID release, the Primary article identifier type that needs to be selected is "SCIP number".

Supporting documents (II)

SCIP support

Support materials and questions and answers are available to help companies understand the SCIP database and to prepare their information on articles that contain Candidate List substances in a concentration above 0.1 % w/w. If you cannot find the information you are looking for, you can contact ECHA.

Information requirements



- [Detailed Information Requirements for the SCIP database](#) [PDF] [EN]
 - [Stakeholder consultation on information requirements](#) (Wood, 2019) [PDF] [EN]
- [Safe use instructions and the SCIP database – stakeholder views and current practices](#) (Wood, 2019) [PDF] [EN]
- [Materials categories for the SCIP database](#)
 - [Supporting the development of appropriate material categories for the SCIP database](#) [PDF] [EN]

SCIP Database Notifications



- [How to prepare and submit a SCIP Notification Dossier](#) [PDF] [EN]
- [Validation rules for SCIP notifications](#) [PDF] [EN]
- [Dissemination and confidentiality in the SCIP Database](#) [PDF] [EN]



✓ Dissemination and confidentiality in the SCIP Database

New!!!

2.1 Information disseminated

Detailed information on articles as such containing Candidate List substances and complex objects (products) incorporating those articles for which ECHA has received SCIP notification dossiers is made available on the ECHA website.

ECHA has established a harmonised IUCLID format for preparing SCIP notifications. Table 1 will summarise which information from the SCIP notification will be disseminated.

Table 1: Dissemination of information from the SCIP notifications

| SCIP notification content | | Dissemination of the information | |
|---------------------------|---|-------------------------------------|--------------------------|
| Notification data | Description | Top level article or complex object | Complex object component |
| Article name | The name of the article or complex object given by the duty holder. The name should be concise but descriptive of the specific article or complex object notified (e.g. screw, blade, pencil sharpener, digital watch, engine, motorcycle). It is a text field. | Yes | Yes |
| Other names | Any additional name of the article or complex object (e.g. brand, model) given by the duty holder. Each article may be identified by more than one name. It comprises two attributes: value and type. The type is selected from a picklist and the name is a text field. Other names rather refer to other names used to identify the article or complex object within a family, category or group (e.g. brand, model) than to synonyms of the name provided in 'Article name' field. Therefore, they must be must inserted for articles or complex objects to be supplied to consumers, when such names are available to them and are key to allow | Yes | No |

Coming soon



SCIP support

Support materials and questions and answers are available to help companies understand the SCIP database and to prepare their information on articles that contain Candidate List substances in a concentration above 0.1 % w/w. If you cannot find the information you are looking for, you can contact ECHA.

Information requirements



- [Detailed Information Requirements for the SCIP database](#) [PDF][EN]
 - [Stakeholder consultation on information requirements](#) (Wood, 2019) [PDF] [EN]
- [Safe use instructions and the SCIP database — stakeholder views and current practices](#) (Wood, 2019) [PDF] [EN]
- [Materials categories for the SCIP database](#)
 - [Supporting the development of appropriate material categories for the SCIP database](#) [PDF] [EN]

SCIP Database Notifications



- [How to prepare and submit a SCIP Notification Dossier](#) [PDF] [EN]
- [Validation rules for SCIP notifications](#) [PDF] [EN]
- [Dissemination and confidentiality in the SCIP Database](#) [PDF] [EN]

• Validation rules for SCIP notifications Update

2. Validation rules

A business rule (**BR**) failure leads to the failure of the submission. A quality rule (**QLT**) warns the notifier of common shortcomings and inconsistencies. Quality rules will not lead to the failure of the submission.

2.1 List of validation rules in IUCLID

| Rules regarding whole SCIP notification | |
|---|--|
| BR702 | Same 'Article' record cannot be provided more than once in a line. Circular references are not allowed. |
| BR720 | Same 'Article' record cannot be reported more than once as 'Complex object component' from the same 'Article' record. |
| BR724 | "Referenced Article" record should be the last 'Article' record reported in a line. Therefore all the 'Article' records after "Referenced Article" record must be removed. |
| Rules regarding 'Article' record | |
| BR701 | The maximum accepted size of attachments (pictures, disassembling instructions) is 10 MB per 'Article'. |
| BR723 | "Referenced Article" record cannot have more information than the information regarding referencing i.e. only fields 'Article name', 'Primary article identifier type' and 'Primary article identifier value' can be filled in in the "Referenced Article" record. |
| Identifiers | |
| QLT704 | Other names: If you wish to provide information regarding 'Other names', then |

In August

- Updated Candidate List package
- Updated S2S supporting documents with new features
- New supporting document for the new approaches for re-use of data submitted to ECHA

Level of reporting: *'grouping'* & *'hierarchy'*

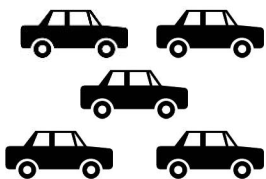
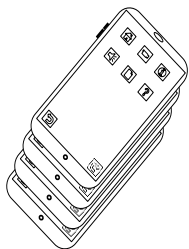
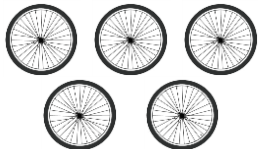
SCIP IT user group



Articles: REACH and SCIP notification

| | Communication in supply chain (REACH Art. 33(1)) | SCIP Notification |
|-----------------------|---|----------------------|
| Conditions | Substance of very high concern in the Candidate List | + % > 0.1% w/w |
| Information | Sufficient information to allow safe use of the article, considering all life-cycle stages, as well as foreseeable misuse, recycling and disposal | |
| Identification | Available on articles/products on shelves/labels, in catalogues, etc. | Needs to be provided |
| Format | Not specified Could be re-used? | SCIP format by ECHA |

Commercial identification



A large number of a complex object units are usually placed on the market with a common:

- Trade name,
- Brand,
- Model, and
- Bar code number.

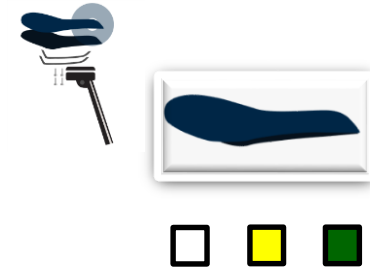
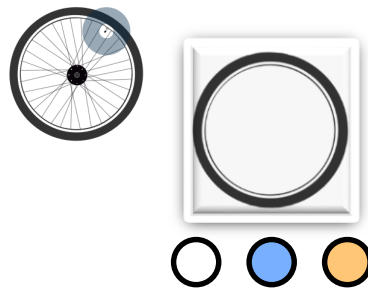
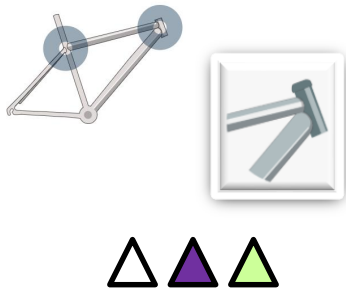
For certain complex objects, such as electronic devices and vehicles:

- Serial or identification number (for each unit)

Mismatch between identification and 'composition'

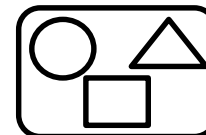


- Trade name,
- Brand,
- Model, and
- Bar code number.



- 3 articles as such with Candidate List substances, each filled colour, except white, represents a specific Candidate List substance
- White filled symbols = articles without Candidate List substances

27 possible combinations for the bicycle, including one without Candidate List substances



One main objective of the SCIP database

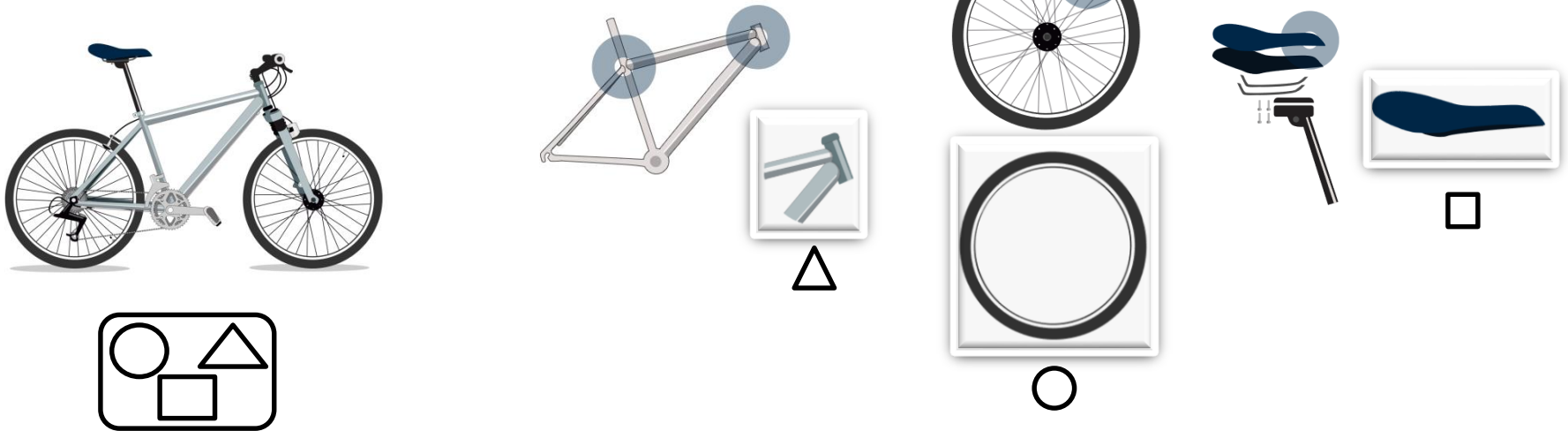
SCIP Database

Reduce the content of Candidate List substances in materials and products, including recycled materials

Push for **substitution** of Candidate List substances and **prevention** of generation of waste containing those substances

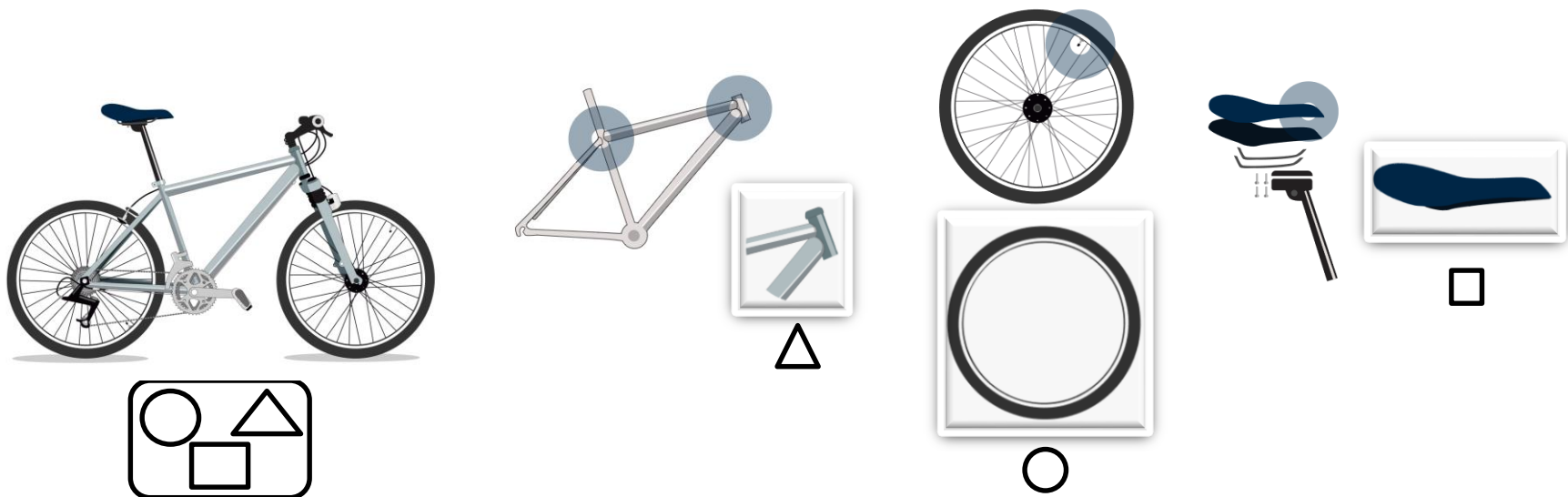


Result:



No Candidate List substances \longrightarrow No need to submit a SCIP notification

Recommendations



- **Whenever possible**, select suppliers which supply components and subcomponents without incorporating articles as such with Candidate List substances.
- Under the conception and design of a new complex object (product), take into account the possibility of avoiding the use of components and subcomponents incorporating articles as such with Candidate List substances.

Not always possible!

SCIP format

- One-size-fits-all solution to cover all possible articles or complex objects (products) placed on the EU market



- Constrains that would fail a SCIP notification submission kept to a minimum



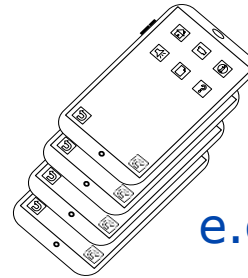
- Provides a lot of discretion on how to report data to the SCIP database
- **Increases the responsibility of submitters**
- Creates some uncertainty on the appropriate level of structuring and submitting data

Outstanding questions

- Can identical or quasi-identical articles as such and complex objects (products) be submitted in one notification? (*'grouping'*)

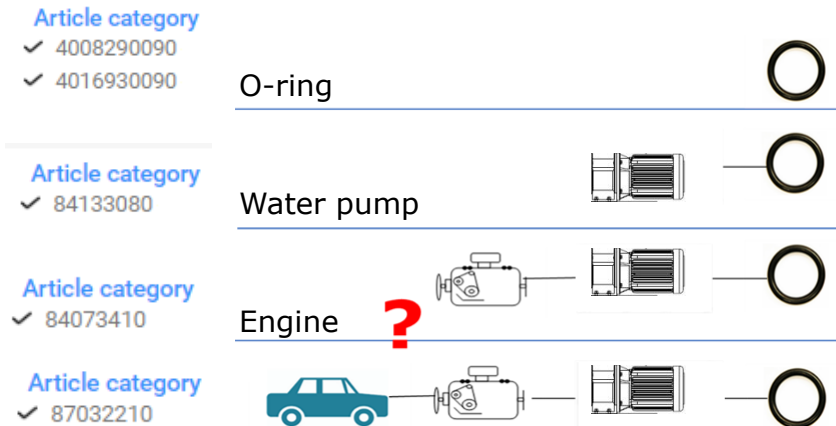


e.g. O-rings



e.g. Smartphones

- How many layers of components and subcomponents of a complex object have to be reported in order to allow the identification and 'location' of the article containing a Candidate List substance? (*'hierarchy'*)



How many layers of components and subcomponents of a complex object have to be reported in order to allow the identification and 'location' of the article containing a Candidate List substance? (*'hierarchy'*)

Article category

✓ 4008290090

✓ 4016930090

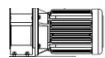
O-ring



Article category

✓ 84133080

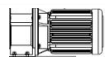
Water pump



Article category

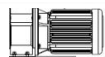
✓ 84073410

Engine



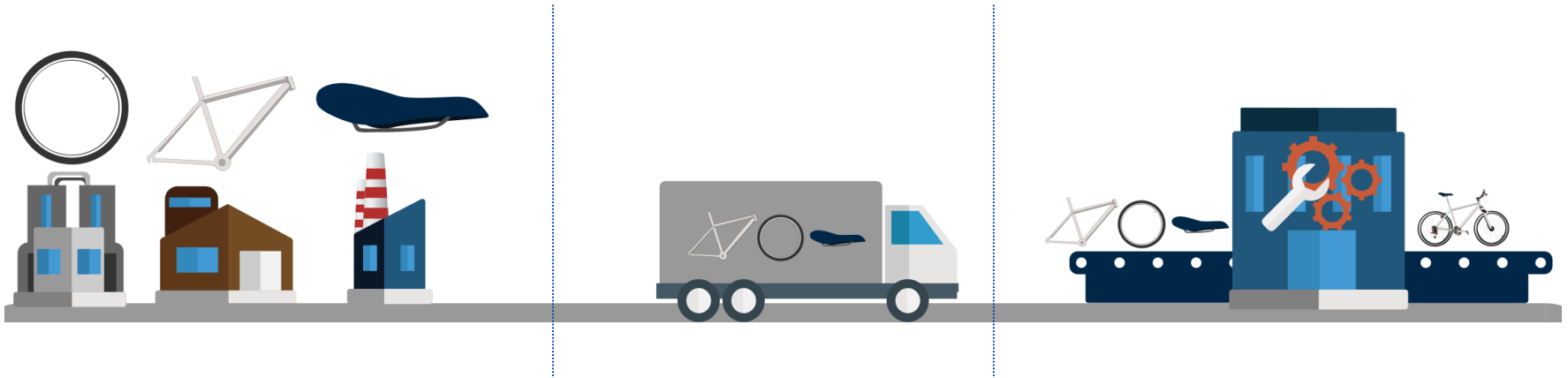
Article category

✓ 87032210

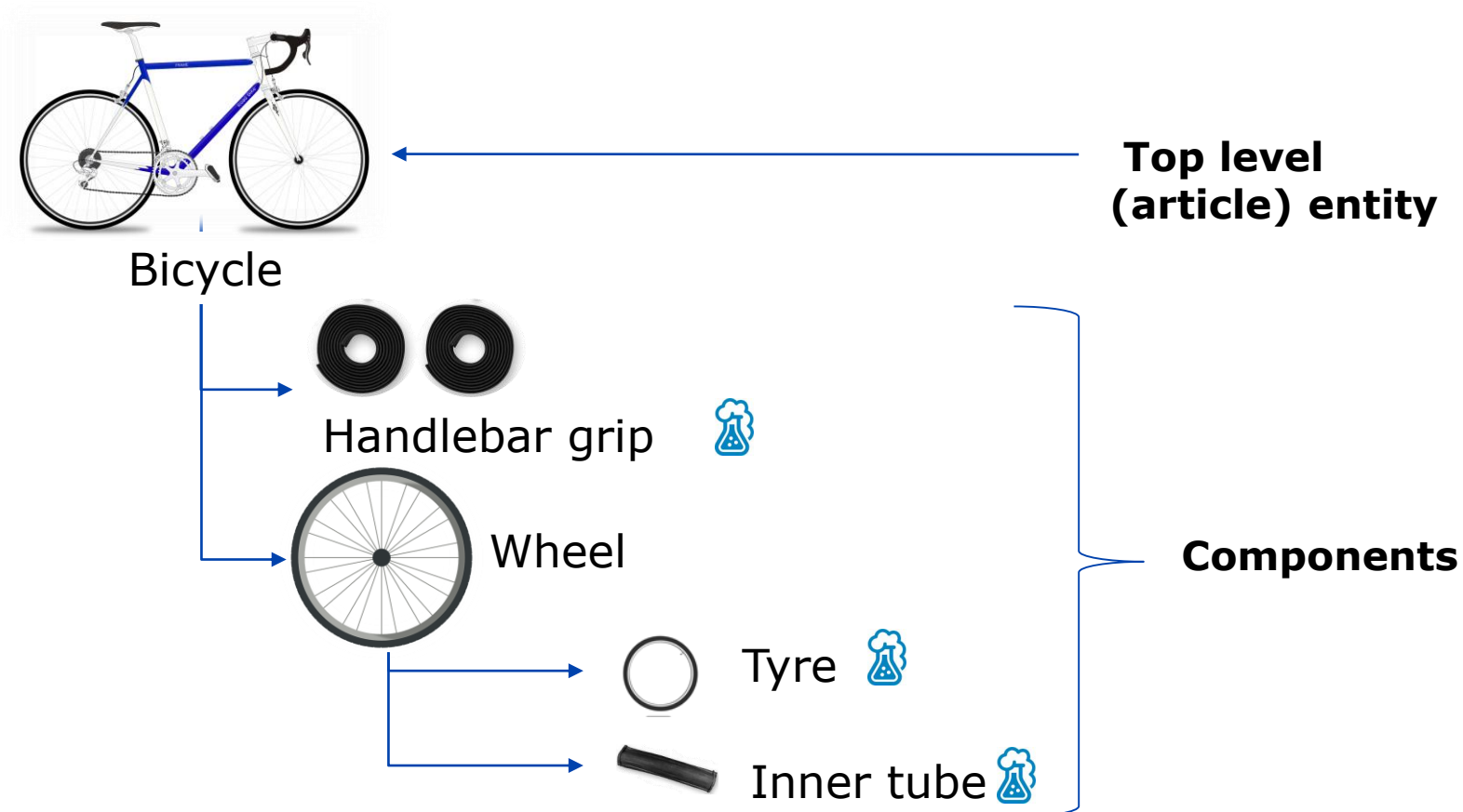


Recommendation

Follow the components placed on the market and incorporated in complex objects at each assembling stage through its **article category** (CN/TARIC code & description)






How does it work?





How does it work?


EU producer




 **Name: Tyre**  

Primary article identifier type & value: EAN: 951263055

Article category: 401150
(...)



 Safe use information  Concern element(s)


EU importer

 **Name: Inner tube**  

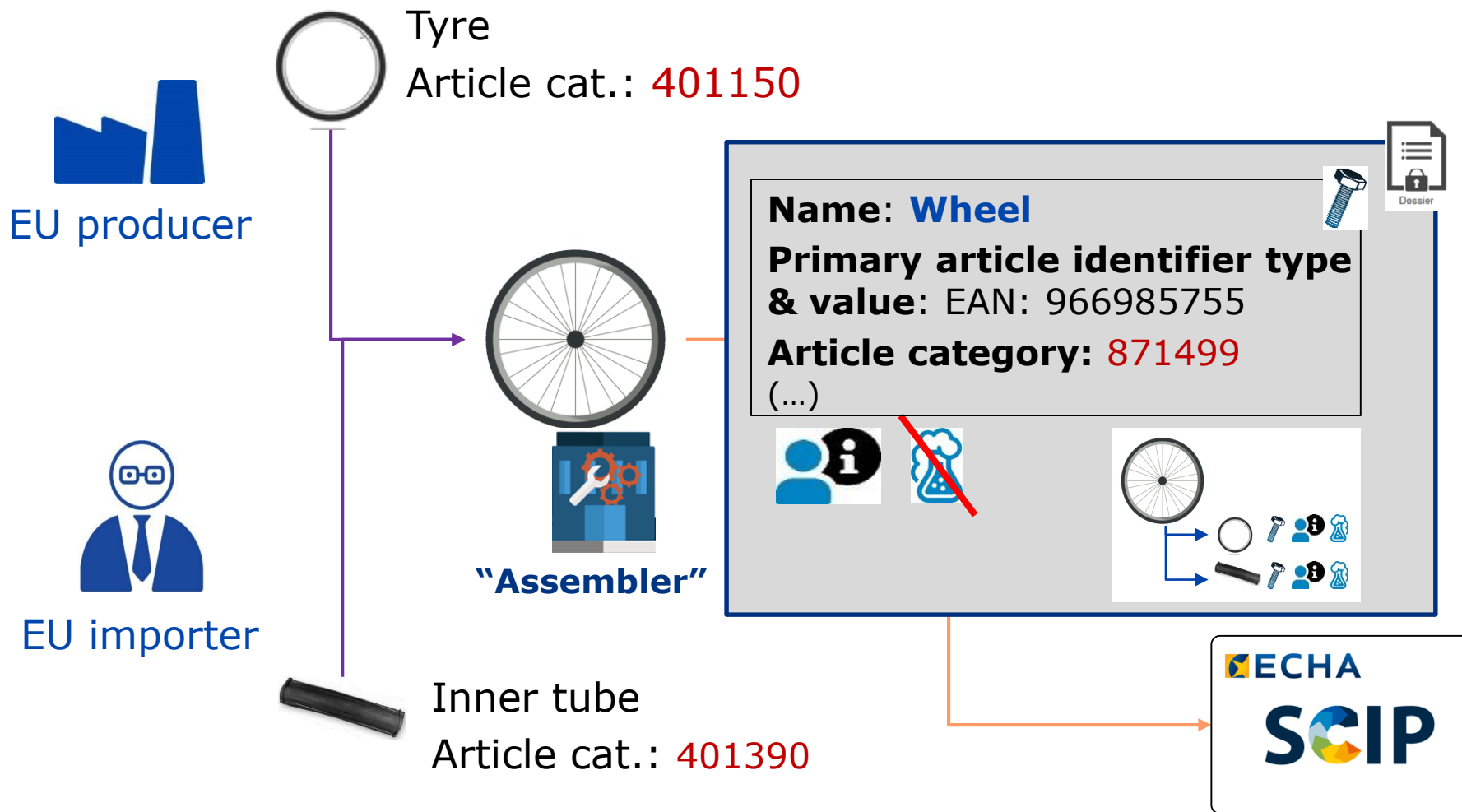
Primary article identifier type & value: EAN: 123654855

Article category: 401390
(...)

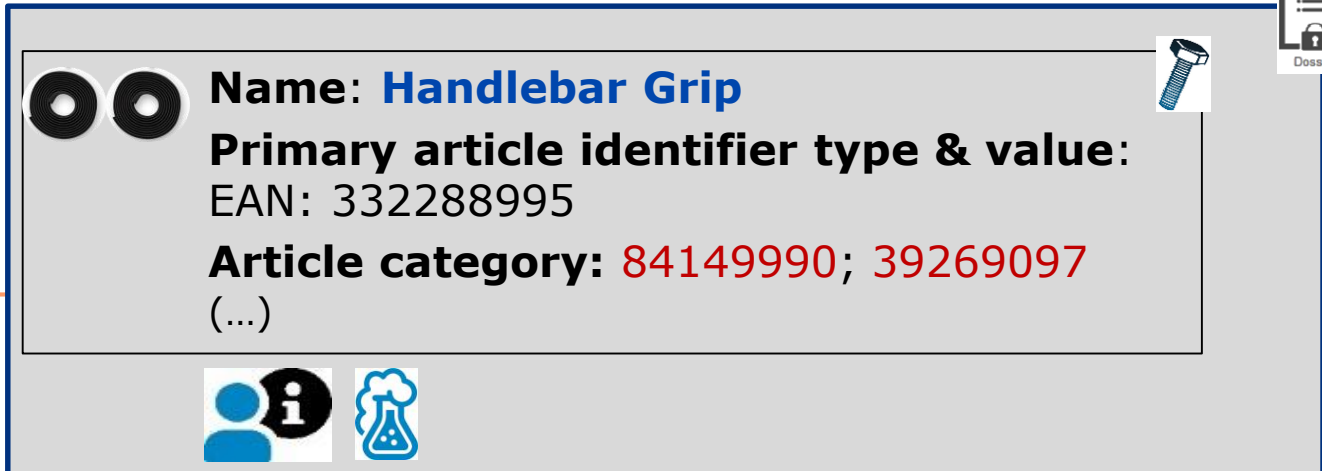
 





SCIP

How does it work?






How does it work?




  **Name: Handlebar Grip** 

Primary article identifier type & value:
EAN: 332288995

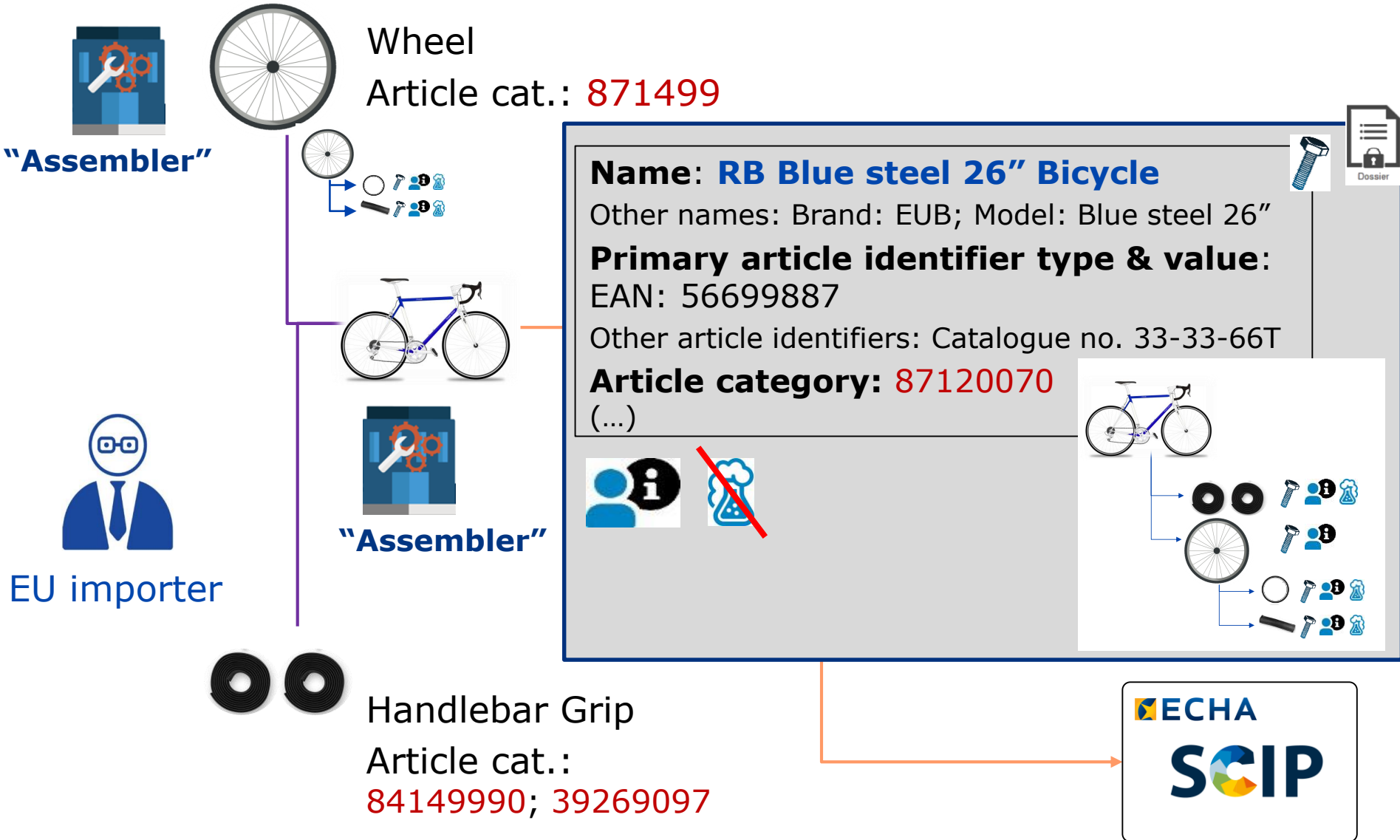
Article category: 84149990; 39269097
(...)

 Dossier



How does it work?



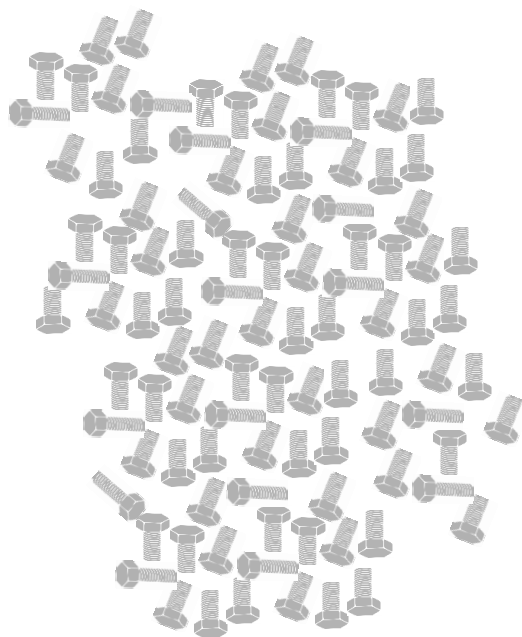
**Can identical or quasi-identical articles
as such be submitted in one SCIP
notification?**



Identical articles as such

Identical articles are articles with the exact same function/use, same physical form (shape, surface and design), and same chemical composition.

They can be submitted in a single SCIP notification by a supplier.



Example: 100 identical bolts

= 100 SCIP notifications? **No!**

It is generally accepted under REACH that the communication under REACH Article 33(1) is managed as 1 article to cover 100 identical bolts

One SCIP dossier covering the 100 identical bolts

Quasi-identical articles as such

'Sameness' criteria for quasi-identical articles as such:

- The articles have the same function or use;
- They contain the same Candidate List substance(s);
- The material that the articles are made of is the same;
- The safe use instructions are the same, which is a logical consequence of the previous two criteria.

Recommendation: articles meeting these criteria can be submitted in the same SCIP notification, provided that the right elements for the identification of each identical article (e.g. names and alphanumeric identifiers) are included in the notification.

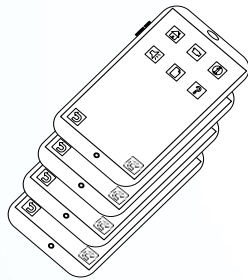


| Other article identifiers + New item | | |
|---|-------------------------------|---------------|
| #... | Type | Value |
| 1 | item number | 15x2.0B RJ |
| 2 | item number | 15x2.0G RJ |
| 3 | item number | 20x3.5B RJ |
| 4 | item number | 20x3.5G RJ |
| 5 | item number | 20x5.0B RJ |
| 6 | item number | 20x5.0G RJ |
| 7 | EAN (European Article Number) | 9944556677801 |
| 8 | EAN (European Article Number) | 9944556677812 |
| 9 | EAN (European Article Number) | 9944556677823 |
| 10 | EAN (European Article Number) | 9944556677834 |
| 11 | EAN (European Article Number) | 9944556677845 |
| 12 | EAN (European Article Number) | 9944556677856 |

Example: O-rings made of the same material containing the same Candidate List substance, but of different width, diameter or colour

They can be submitted in the same SCIP notification, provided that the right elements for the identification of each (identical) article are included in the notification.

**Can quasi-identical complex objects
(products) be submitted in one SCIP
notification?**

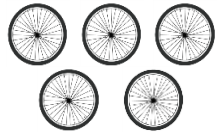


ECHA recommended solution



Quasi-identical complex objects: Criteria

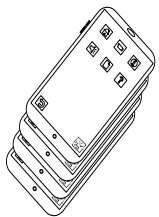
Criteria for 'grouping':



1. The complex object (units) have the same function or use [same article category (CN/TARIC code and description)];



2. The complex object (units) incorporate the same components and subcomponents (i.e. having the same function/use following the previous criterion 1), and the complex object or its components and subcomponents incorporate the same articles as such, which fulfil 'sameness' criteria for quasi-identical articles as such listed in slide 48.



3. The safe use instructions are the same for the complex object (units)

[which is a logical consequence of the two criteria above]

Recommendation: complex objects meeting these criteria can be submitted in the same SCIP notification



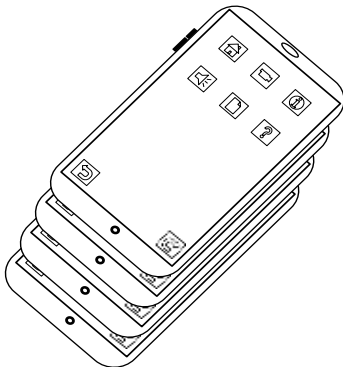
Example: sets of quasi-identical complex objects

Several units from the 649 units placed on the market (according to the commercial identification) incorporate the same combinations of components and subcomponents with articles as such containing Candidate List substances.

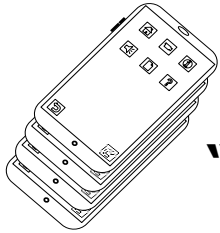
- Subject to the SCIP notification obligation

Those combinations are the same for different **sets of** the assembled **units**, where those units fulfil the criteria of **quasi-identical complex objects**.

Each of those sets must be submitted to the SCIP database as **one notification** with a **specific primary article identifier**.



Example: the SCIP identification

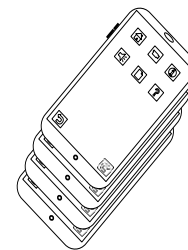


“Smartphone 10”

Required specific identification of the “smartphone 10” sets for SCIP notifications

| Primary article identifier | Primary ID (Set 1) 200 units | Primary ID (Set 2) 350 units | Primary ID (Set 3) 99 units |
|-----------------------------|------------------------------------|------------------------------------|-----------------------------------|
| Smartphone 10 | 10-1 | 10-2 | 10-3 |
| ○ Printed Circuit Board PCB | PCB-01 | PCB-02 | - |
| ∅ Capacitor CAP | CAP-001 | CAP-002 | - |
| - Contact CO | CO-0001 | CO-0001 | - |
| | ¶ SVHC 1 | ¶ SVHC 1 | |
| - Casing CA | CA-0002 | - | - |
| | ¶ SVHC 2 | | |
| ○ Battery BAT | BAT-03 | - | BAT-03 |
| | ¶ SVHC 3 | | ¶ SVHC 3 |

It is recommended to submit one SCIP notification for each set of quasi-identical smartphones (10-1, 10-2 and 10-3), instead of for each individual unit



Mismatch between commercial identification and the SCIP identification

| Commercial identification | |
|-----------------------------------|------------------------------|
| Article name (trade name): | Smartphone 10 |
| Brand: | BRAND |
| Model: | 10 |
| Bar code number (EAN): | 123456789 |
| Serial number(s)*: | 999350-999999 (649 units) |

*Each unit is assigned with a serial number provided with each unit sold. The serial number appears in the package of the "smartphone 10" unit, but not in the supplier's catalogue.

| SCIP identification | | | |
|-----------------------------------|--|--|---|
| Article name (trade name): | Smartphone 10 | | |
| Brand: | BRAND | | |
| Model: | 10 | | |
| Bar code number (EAN): | 123456789 | | |
| Primary article identifier | 10-1 <i>(Set 1)</i> 200 units | 10-2 <i>(Set 2)</i> 350 units | 10-3 <i>(Set 3)</i> 99 units |

No need to submit a SCIP notification for each unit of "smartphone 10" placed on the market, which would be submitting the same SCIP data multiple times.

Recommendation concerning the commercial identification

One of the main aims of SCIP is allowing informed purchase choices for which a precondition is for the user to know a specific identifier enabling to search in the SCIP database for a specific product.

This could be done by

- incorporating progressively the SCIP identifier as part of the 'commercial identification' of complex objects placed on the market

or

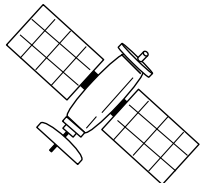
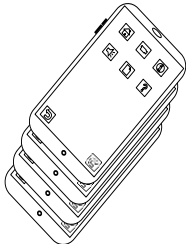
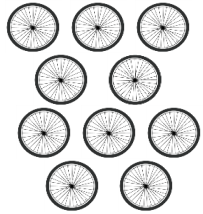
- progressively adapting in a suitable way the commercial identification of those complex objects, taking into account the submitted SCIP data

ECHA's recommended approach

ECHA recommends the **grouping of quasi-identical complex objects** based on the criteria listed above.

- It can be considered in line with a strict reading of the legal text and the definition of “article” and the reporting duties under Articles 9(1)(i) of the WFD and 33(1) of REACH.
- It allows to largely reduce the number of notifications to be submitted to ECHA, in particular for simpler complex objects, and thus reducing the impact on industry and ECHA in terms of the data volumes to be stored and processed by ECHA.
- It ensures that meaningful data will be submitted to the SCIP database for consumers and waste operators, by facilitating searches in the database.
- It avoids the submission of the same data multiple times.

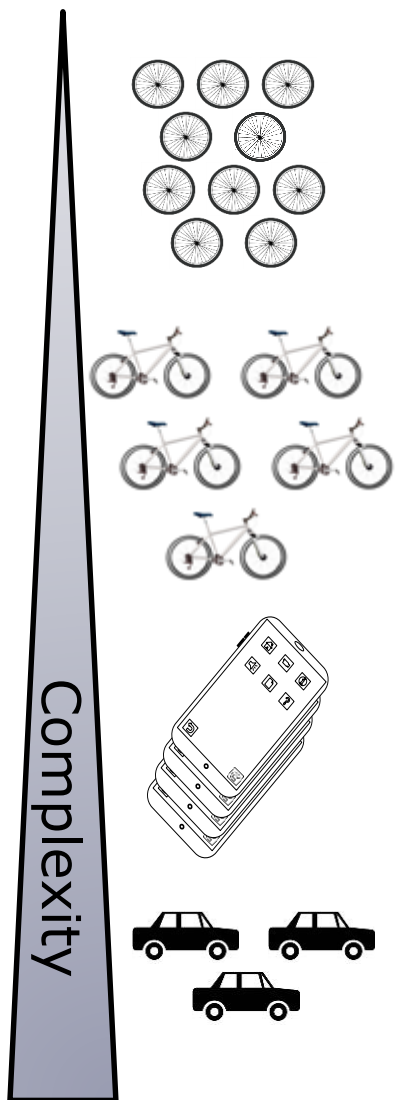
No submissions for each single unit (1)



Complexity

- Submissions for each single unit placed on the market **must be avoided**
 - except potentially, for (very) very complex objects
- In most cases, submitting data for each unit is submitting the same required SCIP data multiple times

No submissions for each single unit (2)



- Information about the total number of units of a product placed on the EU market will be potentially disseminated (potentially commercially sensitive)
 - ECHA is not planning to invest in preventing the dissemination of this information.
- May not allow informed purchase choices by actors in the supply chain and consumers
 - Each unit will have a specific 'commercial identifier' (e.g. serial number) which frequently is only available after making the purchase.

**More far-reaching 'grouping'
approaches:**

- 'representative article approach'



Not recommended by ECHA

More far-reaching 'grouping' approaches

Among other possible far-reaching grouping approaches analysed, ECHA found that the '**representative article approach**' could be the most suitable.

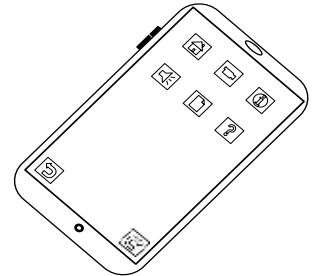
- It is **not recommended by ECHA**, because it is questionable if such solution is still in line with the legal text which requires reporting at "article" level.
 - Users of the SCIP database will only find information that an article or product "may contain" an SVHC, which may not allow an informed purchase choice
 - It may also reduce the pressure on supply chains to substitute or track more precisely the presence of SVHCs in articles

Representative article approach

- Variation of what is sometimes also referred to as 'worst case' reporting.
 - Consists in the 'worst' possible combination of potential components and subcomponents containing Candidate List substances in a given complex object and reported in the SCIP notification **under the umbrella of a 'fictitious' complex object**.
- Articles in complex objects with different Candidate List substances in their composition are reported individually in the SCIP notification under a **generic identification for those complex objects ('fictitious' complex object inserted in the hierarchical tree of components and sub-components)**.
- The components and sub-components (and respective SCIP data) under **the umbrella of a 'fictitious' complex object** are reported with their respective names and primary article identifiers.

Representative article approach: Example

- Smartphone 10 (primary article identifier 10-RAA)
 - Battery BAT-F (primary article identifier BAT-F-01)
 - Battery BAT3 (primary article identifier BAT-03)
 - Candidate List substance 3
 - Battery BAT4 (primary article identifier BAT-04)
 - Candidate List substance 4
- The assembler could report in the SCIP notification the two subsets of batteries (BAT3 & BAT4) under a single 'fictitious' battery identification (name: e.g. Battery BAT-F; primary article identifier: BAT-F-01), regardless whether the concrete battery incorporated in a specific set of units of the "smartphone 10" placed on the market belongs to one subset (e.g. BAT3) or another (e.g. BAT4)



Question concerning the 'representative article approach'

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?

It is up to the Member State competent authorities at national level to agree with such approach to submit SCIP notifications



Next SCIP events

SCIP IT user group





Next SCIP IT user group meeting

4 September 2020 (15:00 – 16:30 Helsinki time.)

Thank you for your participation!

scip@echa.europa.eu

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