



SCIP Notifications under the Waste Framework Directive

SCC can support you with your
obligations!



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INTRODUCTION

From January 5, 2021 onwards, companies placing articles on the EU market need to provide information to the EU “**Substances of Concern In articles as such or in complex objects (Products)**” (SCIP) database on articles which contain Candidate List substances (**Substance of Very High Concern (SVHC)**) in a concentration above 0.1% w/w.

The SCIP database has been established under the EU **Waste Framework Directive (WFD, 2008/98/EC** as amended by Directive (EU) 2018/851). The directive requires all companies that produce, import or supply articles containing any SVHC on the candidate list, in a concentration **above 0.1% weight by weight (w/w)** to submit information on these articles to the SCIP database. The database aims to complement the existing communication and notification obligations for Candidate List substances in articles under REACH.

Information regarding the articles need to be provided by EU producers and assemblers, EU importers and EU distributors of articles and other actors in the supply chain placing articles on the market.

Retailers and other members of the supply chain providing articles directly to consumers are not obliged to provide information to the SCIP database.

WHAT IS AN ARTICLE?

According to REACH, an **article** is an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition.

A “**complex object**” is an object made up of more than one article. Articles that are assembled or joined together in complex objects remain articles, as long as they keep a special shape, surface or design, or as long as they do not become waste.

Important note: Packaging is also considered an article under REACH.

HOW TO SUBMIT A SCIP NOTIFICATION?

The submission of a SCIP notification is a three-step process:

1. **Collection of available information on SVHCs in your articles**
2. **Compilation of all SVHC information for the SCIP notification in IUCLID format**
3. **SCIP notification submission to the ECHA Submission Portal**

Please visit our website for more information:

<https://www.scc-gmbh.de/scip-database-notification-support>

or contact one of our experts:

scc@scc-gmbh.de

1. SVHC INFORMATION COLLECTION

The most direct method to determine the presence of any SVHCs in articles is to test for each of these substances in the article. However, this is a very expensive method, with the cost of testing one article for all of the SVHC on the current Candidate list ranging between €500 and €700, which will increase as more substances are added to the Candidate list.

A recommended alternative method is:

- 1. Portfolio Analysis:** determining which products in your portfolio are considered articles under the REACH definition.
- 2. Article Information Review:** reviewing all available compliance information, such as compliance statements, safety data sheets, test reports, etc. to identify potential SVHCs in your articles.
- 3. SVHC Likelihood Assessment:** verifying the likelihood of finding SVHC in your article, based on the raw materials used.
- 4. Data Gap Analysis:** detecting possible data gaps and specifying recommended actions to close them.
- 5. Closing Data Gaps:** collecting SVHC information from your supply chain, including raw material test reports or ingredient disclosure via Bill of Materials (BOM) or Bill of Substance (BOS). This step can include additional analytical testing for SVHCs, if no information is available in the supply chain.

Note: The candidate list is updated every 6 months.

2. COMPILATION OF SVHC INFORMATION

To prepare for the SCIP notification, available data need to be combined and provided in IUCLID format prior its submission to the ECHA.

Minimum required information on the article is:

- Article name and other names
- Article identifiers
- Article category: identification of the article or complex object from a harmonised list based on function/use
- Safe use instructions (in relation to the SVHC present).
- For complex objects: information on the components containing SVHCs and the specification of the number of occurrences of the component in the complex object.

Required information on SVHC(s) in the article:

- Identification of the SVHC;
- Identification of the Candidate List version the SVHC was published on;
- Concentration range of the SVHC in the article;
- Identification of the material category of the article or the mixture category where the SVHC is present.

3. SCIP NOTIFICATION IN IUCLID

After data compilation and formatting, the notification can be submitted to the ECHA via the ECHA Submission Portal.

Are you ready for the SCIP notifications? Don't hesitate to contact us if you want to enhance your flexibility and secure your supply chains in Europe!

For more information please contact SCC at scc@scc-gmbh.de