



# SCIP database

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## SCIP overview

- SCIP is the database for information on **Substances of Concern In articles as such or in complex objects (Products)** established under the Waste Framework Directive (WFD)
- Companies supplying articles containing substances of very high concern (SVHCs) in a concentration **above 0.1% w/w** on the EU market have to submit information on these articles to ECHA, as **from 5 January 2021**
- The SCIP database ensures that the **information** on articles containing Candidate List substances is **available throughout the whole lifecycle of products and materials**, including at the waste stage

# Key definitions

- **Article** - “an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition.”
- **An article is still an article even when it is part of a complex object.**
- **Example:** Pencil Sharpener - the plastic housing, metal blade and the screw that attaches them together are all examples of article. Any of these articles may contain a substance on the REACH substances of Very High concern (SVHc)
- If the metal used for the blade and the plastic used for the housing contain in-scope substances, a declaration would be required from producers, assemblers and any importers of the final product.

# Objectives

- Allow monitoring of SVHC use in articles so appropriate actions may be taken at any stage of an article's lifespan, including the waste stage.
- Decrease waste containing hazardous substances by supporting substitutions of SVHCs in articles entering the EU market.
- Increase transparency into product composition to improve waste treatment operations.
- Establishes key relationships between the main entities within the database's scope

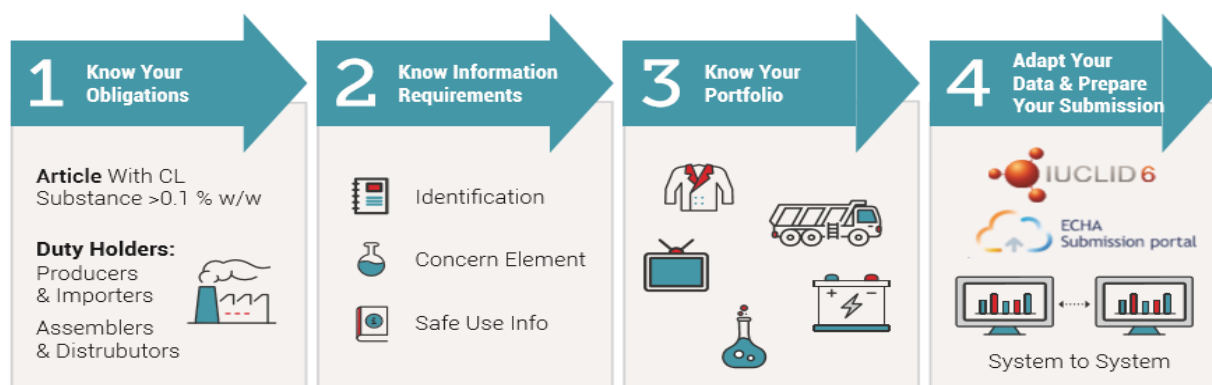
# Submission steps

1. To fulfill the notification obligations under REACH and the SCIP the following steps can be taken
2. Assess your products
3. Implement a system for identifying and tracking SVHC substances in your articles
4. Collect information (e.g. REACH certificates) from your suppliers
5. Assess if the concentration of SVHC reaches the 0.1 % threshold
6. Create a SCIP notification dossier (an IUCLID template will be available for this)
7. Submit your notification dossier.

# Data collection

- The following key steps are recommended by the ECHA:

**Figure 5: Key Steps for Collecting Data<sup>9</sup>**



# Data requirements

Figure 1: SCIP Data Reporting Requirements

Data Required for REACH	Data Immediately Required for SCIP	Data for Submission
<ul style="list-style-type: none"><li>▪ EU REACH</li><li>▪ Supplier Name</li><li>▪ Article Name</li><li>▪ SVHC Data</li><li>▪ Basic Safe Use Information</li></ul>	<ul style="list-style-type: none"><li>▪ Additional SCIP Data</li><li>▪ REACH-IT Account</li><li>▪ Article Level Data</li><li>▪ Chemical of Concern Data</li><li>▪ Substance Data (Reference Substance File)</li><li>▪ Create a Dossier File</li><li>▪ Submit Into ECHA Submission Portal</li></ul>	<ul style="list-style-type: none"><li>▪ Legal Entity</li><li>▪ Article ID</li><li>▪ More Data</li><li>▪ Reference ID (Core IUCLID)</li><li>▪ Dossier ID</li><li>▪ Submission ID</li></ul>

## Data holders

- The obligation to provide information to ECHA starts with **the first supplier (producer/importer)**, because they have the best knowledge of the article.
- Concerning other suppliers further down in the supply chain (such as distributors who are not importers), a pragmatic approach may be chosen as regards to the way they fulfil their obligation, such as making reference to information already submitted by the upstream supplier. Such an approach would **avoid double reporting and thereby limit unnecessary administrative burden for both duty holders and authorities.**
- The **“Link to a component article”** allows a complex object to link to a supplier’s part (if already in the SCIP database) or otherwise a component article submitted by the manufacturer.

# Timeline

- **Feb 2020 – Oct 2020**  
SCIP DATABASE TRIAL PERIOD
- **Oct 2020**  
RELEASE FINAL SCIP DATABASE VERSION
- **5 January 2021**  
ENTRY INTO FORCE

# Article 13 of French Circular Economy Law

## As of January 2022 Manufacturers must:

- Inform the consumer about **the qualities and environmental characteristics of products** that generate waste (Article 13)
- Inform the consumer of **the presence of** known or presumed **endocrine disruptors ( as listed by ANSEN)** (Article 13)

## Impact on manufacturers

- Impact on product labelling and environmental data management
- Additional administrative procedures to be introduced
- Possible impact on products' ecodesign

## Associations:

- Essential to monitor the work of ANSES (French Agency for Food, Environmental and Occupational Health & Safety) on known, presumed and suspected endocrine disruptors

# Points of concern

- National mandatory requirements, not aligned with European requirements, will install:
- competitive distortion,
- jeopardise the level playing field within the EU and the good functioning of its market. F
- Increase the complexity of information gathering along the value chain for those companies placing products on the French market.
- Labelling requirements, not in line with EU obligations, will affect the free circulation of goods within the EU. (Concrete examples to be added by each sector)
- Beyond REACH:
  - Obligation to inform consumers of the presence of SVHC in products, whereas REACH states that information to consumers should be given on demand (article 33.2).
  - Extends to informing consumers of the presence of substances having a comparable concern to SVHC, but not listed on Candidate List.
  - No explicit reference to Article 57 of REACH
  - No threshold for application of information requirements. Industry asks for a harmonisation of the obligations in France with European regulations.

	Law E.C.		Waste Directive 2008/98	Ask Reach	D.o.P.
	Article 13	Article 14			
	Mandatory in France		Mandatory	Not mandatory	Mandatory for construction products
Substances concerned	Candidate list substances; Hazardous substances + proven or suspected Endocrine Disruptors	Hazardous substances + proven or suspected Endocrine Disruptors	SVHC	SVHC	Substances listed in the harmonised standard
Articles	All	Some products linked to women	All	All	Construction products
Initial recipient	Consommateurs		Echa	Base	B to B
Final recipient	Consumers		Pro & Recycleurs (Final consumers on request)	Consumers	B to C (On request)
Medium	open format, easily reusable and usable	Pictogramms	SCIP Database	*Data base * Voluntary application of a legal obligation	All. (paper, fax, letter, QR code, link, ...)
Start date	01/01/2022		05-Jan-21		2016
Technical remarks	Threshold not defined Presence +Federation of Paint, Inks, Colors SVHC, POP and CMR 1A Demand for a threshold of 0.1%		Threshold 0,1 %	Threshold 0,1 %	
Availability	* Discussion avec la DGPR en 01/2021		Already 50000 datas.	Proto available Already available in Luxembourg	

# Request for action

- European organizations deliver these messages directly to the commission
- ideally local national organization should have an advocacy actions toward their own authorities, that means a mandatory answer from France.