



ECHA (European Chemicals Agency)

Short scientific overview, summary and conclusions for industry and businesses on new EU-SCIP database requirements effective 05.01.2021

- EU – SCIP Database (substances of concern in products (articles))
- Link for detailed information
<https://echa.europa.eu/scip-database>
- Link for Waste Framework Directive
<https://ec.europa.eu/environment/waste/framework/>



Overview on the requirements regarding the planned EU-SCIP (Substances of Concerns in Products (Articles) Database.

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1 Introduction

EPEA Switzerland GmbH subcontracted the Scientific Institute EPEA GmbH – Part of Drees & Sommer to evaluate the planned EU-Regulation of the SCIP database requirements with regard to possible tasks for EPEA Switzerland-customers and network.

The reason for the introduction of the SCIP initiative is a consequence mainly from EU regulations (excerpts see point 5). It is up to the European Chemicals Agency (ECHA) to establish a database about the presence of problematic ingredients in products.

This will be binding for industry and businesses 05. January 2021.

The document at hand shall inform producers, manufacturers, traders and importers of articles shortly about coming additional obligations in the frame of REACH.

What SCIP means: Substances of Concern In articles as such or in complex objects (Products).

However, the term “product” is abandoned in the SCIP database. So for explanation what it means we can express more simplified the subject of SCIP as “Substances of Very High Concern (SVHC) in what most people call products.”

Note: “Substances of Very High Concern” (SVHC) is synonym to “Candidate List Substances”.

Knowing problematic substances in articles shall create more transparency into product composition and therefore enable waste operators and recyclers to improve their processes. Hazardous substances can potentially be removed so that material flows of these substances can be better known and possibly decontaminated. Furthermore the SCIP database is intended to support the substitution of products which do not contain SVHC-substances.

2 What SCIP is about:

The definitions as used in SCIP are not easy to understand, as the ECHA does not use the term “products” in the context of SCIP, but only “articles”.

In the REACH-terminology the term “product” comprises

- substances,
- mixtures and
- articles (= articles as such and complex objects).

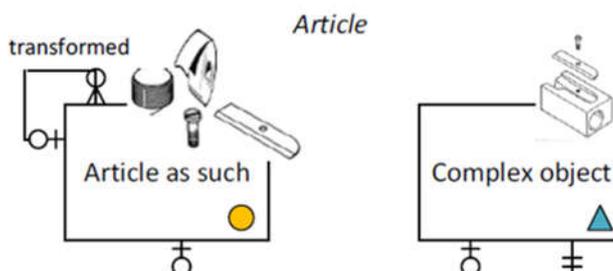
In the SCIP-Database the term article is used for an “article as such” or “complex objects”.

Articles can be joined or assembled to make complex objects, which incorporate at least two articles as such or another complex object.

Mixtures and other products are not in the scope of the SCIP-Database, because they are not regarded as articles or complex products.

Note about the possibly confusing terminology: In a Court Judgement the corresponding term “complex products” is used instead of “complex objects”.

Example: Pencil sharpener



The declaration requirements encompass Substances of Very High Concern (SVHC) in a concentration above 0,1 % w/w in an article. Synonyms: Candidate List, SVHC-List.

This information can be found on the Safety Data Sheets (SDS, MSDS).

3 Information to be delivered by duty holders:

Duty holders have to prepare a notification for articles containing a SVHC substance to the ECHA.

Duty holders are companies which place articles in the EU market:

- EU producers and assemblers,
- EU importers,
- EU distributors of articles and other actors who place articles on the market.

Retailers and other supply chain actors supplying articles directly to consumers are not covered by the obligation to submit information to ECHA.

Duty holders are obliged to deliver data about the following points (details see point 3):

- Identification of the product/article (see 3.1)
- SVHC-substances in the article(see 3.2)
- Safe use of the article, if necessary to ensure safe use of the article at all lifecycle stages incl. recycling and disposal as well as possible misuse

The ECHA defined particular data fields for the records of the data. These encompass mandatory and optional information.

- Mandatory data: Need to be filled in at the notification stage, possibly sufficient
- Optional data: Will be made public for articles or complex objects, but in certain cases will not be used as search criteria

Timeline:

- Early 2020: launch of the prototype version of the database
- Mid 2020: deadline for Member States to transpose the legal requirements into national law
- 5 Jan 2021: notification to the SCIP database officially starts

3.1 ...for Articles or complex objects:

Mandatory information to be delivered:

- Article name
- Primary article identifier (numbers)
- Article category (identification according to a harmonized list)
- Production in EU (yes or no)
- Safe use instructions (beyond the identification of a SVHC-substance)
- Information on article (only applies to complex products, otherwise to be skipped)
for articles: substituted by the information about the Concern Element and substance (3.2)
- Linked article
- Number of units

Optional information:

- Other names
- Other article identifier (identification according to a harmonized list)
- Picture
- Characteristic type (what distinguishes the article from others)
- Characteristic value
- Unit
- Disassembling instructions

3.2 ...for the Concern Element and substance:

Mandatory information to be delivered:

- Candidate List version
- Candidate List substance (Name, EU and CAS numbers, when available)
- Concentration range (>0.1; ≥0.3; ≥ 1.0; ≥ 10; ≥ 20 [% w/w] or >0,1 and ≤100%)
- Material category (from a list provided by the ECHA)
- Mixture category (from European Product Categorization System, EuPCS)

Optional information:

- Substance name
 - EC number
 - CAS number

4 Examples as provided by the ECHA

This example shall show which data have to be submitted by a duty holder.

4.1 O-Ring (article as such) containing an SVHC-substance above 0.1% w/w

The producer of the O-ring has to make a notification.

It provides information according to point 3.1, including the part of the concern element and substance of point 3.2

4.2 Imported vehicle with an engine incorporating the O-ring from 4.1

The importer of the vehicle has to make a notification

It provides information according to point 3.1 and 3.2, including identifiers and concern elements from the O-ring notification according to point 3.1

5 EU-Regulations which the SCIP database is based on:

Waste Framework Directive, Article 9, 1 i:

Member States shall take measures to prevent waste generation. Those measures shall, at least: ...promote the reduction of the content of hazardous substances in materials and products, without prejudice to harmonized legal requirements concerning those materials and products laid down at Union level, and ensure that any supplier of an article as defined in point 33 of Article 3 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council (6) provides the information pursuant to Article 33(1) of that Regulation to the European Chemicals Agency as from 5 January 2021.

Reach Regulation Article 22 (1):

1. Any supplier of an article containing a substance meeting the criteria in Article 57 and identified in accordance with Article 59(1) in a concentration above 0,1 % weight by weight (w/w) shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance.