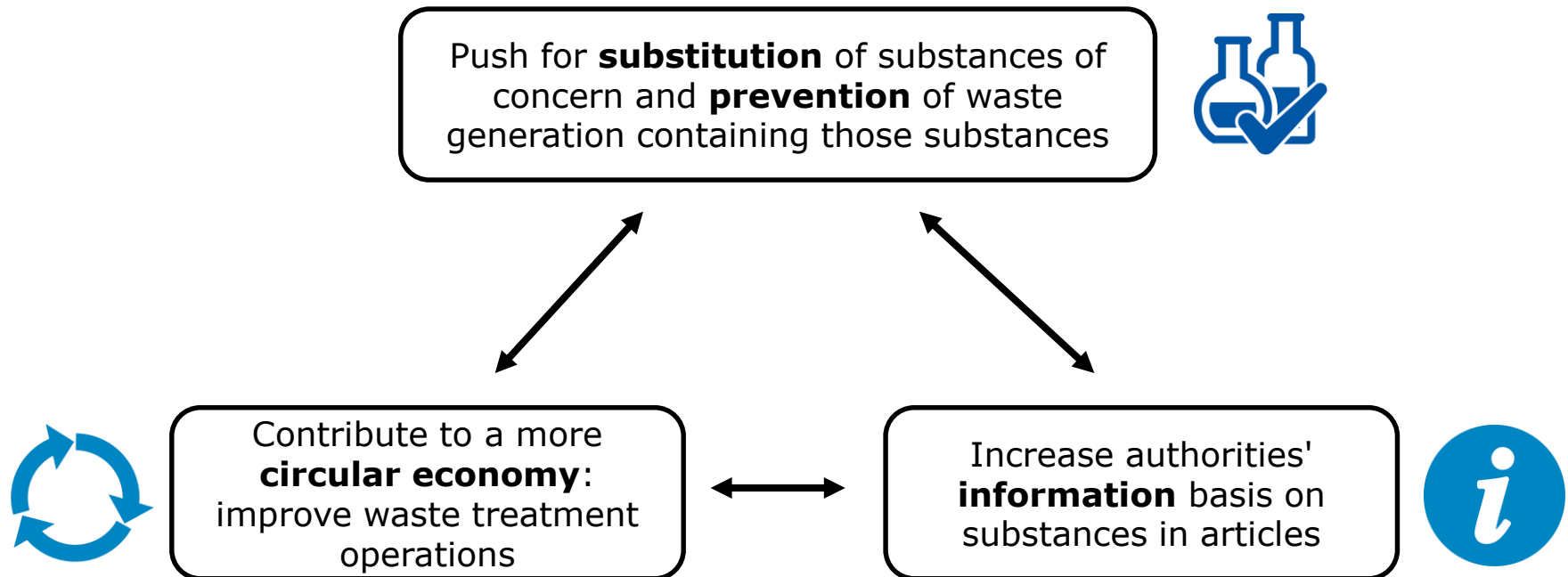# Key tips for successful SCIP notifications

December 2020
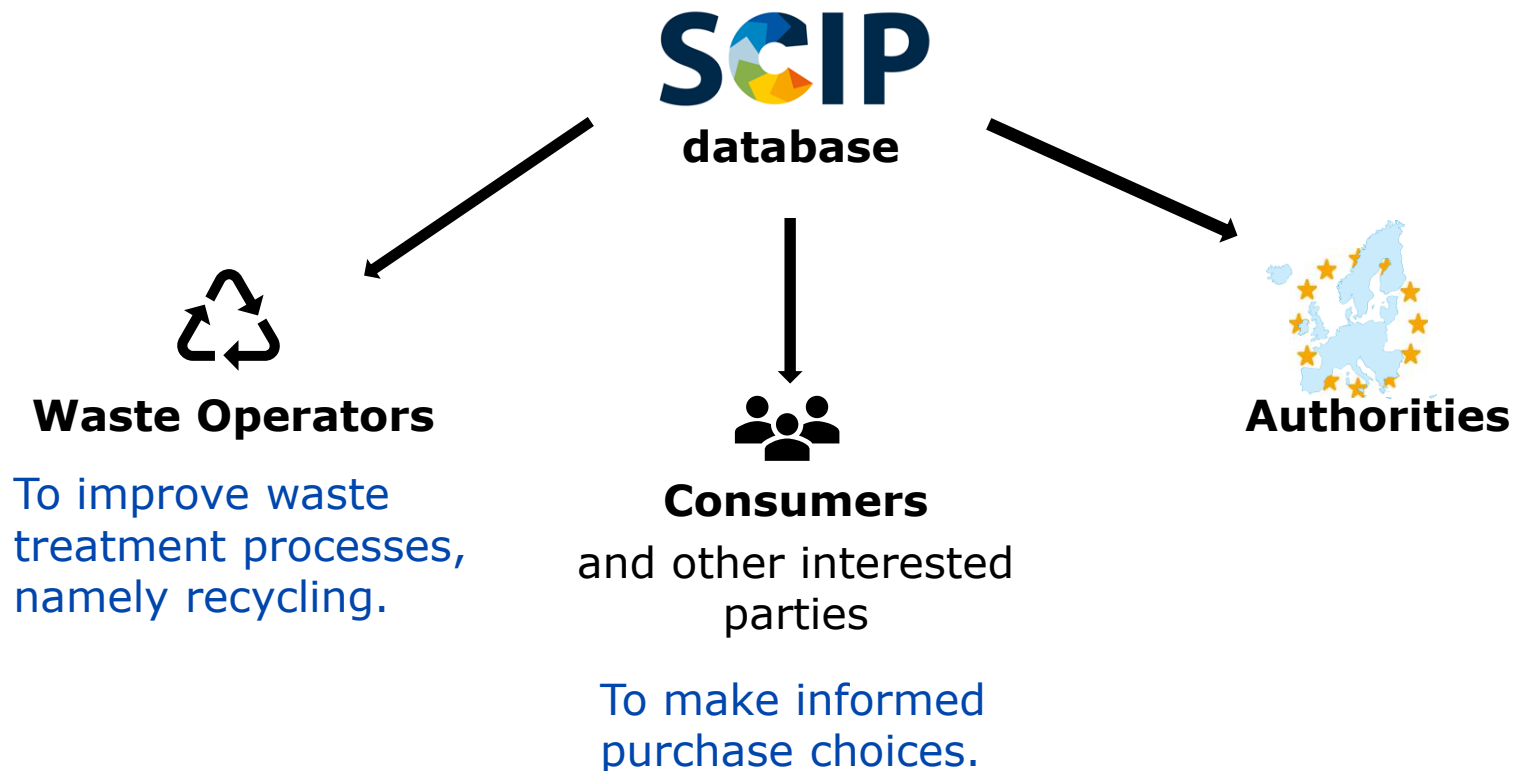V. 1.0

Keep in mind the SCIP database objectives:

- **Ensure** that the information on (severely) hazardous substances is available throughout the whole lifecycle of products and materials, including at the waste stage.
- **Reduce** their content in materials and products, including recycled materials.

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

Contribute to a more **circular economy**: improve waste treatment operations

Increase authorities' **information** basis on substances in articles

SCIP database improves transparency on articles with (severely) hazardous substances

Information to be clearly understandable to target audiences.

It is the responsibility of companies to submit their data in a clear and understandable way.

Waste Operators

To improve waste treatment processes, namely recycling.

Consumers

and other interested parties

To make informed purchase choices.

Authorities

Work in a collaborative way within your supply chain and use suitable approaches to prepare your notifications

Work in a collaborative way within your supply chain together with your suppliers and customers.

- o Use 'referencing' when preparing your notification.
- o Facilitate the work of distributors placing your products on the market by allowing them to use the 'Simplified SCIP Notification' (SSN).

Prepare simpler notifications by using 'referencing', and following the 'grouping' and 'hierarchy' recommendations from ECHA

- o If you are submitting your notifications via system-to-system (S2S), consider asking your IT service provider to implement features that allow using 'referencing' and 'SSN' and allow you to follow the 'grouping' and 'hierarchy' recommendations from ECHA

For further support please refer to 'Tools to refer to SCIP data already submitted to ECHA' and 'Requirements for SCIP notifications' available at the support section of the SCIP webpage.

Simplify your dossier!

ECHA strongly discourage the creation of SCIP notifications for complex objects with more than 1000 components*

- Use 'grouping' or 'referencing' to reduce the complexity of your dossiers and create a clear and simple 'hierarchy'.

- For very complex objects consider adding disassembly instructions, instead of having a very lengthy hierarchy!

*A component in a SCIP notification can be an article as such that contains the Candidate List substance or a complex object incorporating such an article.

Use 'referencing' in complex dossiers

Refer to data (of components):

- Submitted by your supplier
- Submitted by your own company

Benefits:

- Facilitates data management
- May reduce the complexity of the obligation
- Reduces the need to submit multiple times the same data.
- The update of the data initially submitted (for a component) will update the notifications referring to it.

Simplified SCIP Notification

SSN facilitates the fulfilment of the SCIP notification obligation by certain actors, for instance by distributors (who are not importers) within the same supply chain, without preparing a IUCLID dossier.

! If you are a **supplier** of articles, <u>share your SCIP Number</u>.

If you are a **distributor** of articles, <u>demand the SCIP Number for your products</u>!

! SSN can be used also by companies belonging to the same corporate group!

Tips to submit a clear and complete SCIP notification

- Identification of the article/complex object
- Information for safe use
- Report only articles containing Candidate List substances
- Clear and simple 'hierarchy'
- 'Grouping'
- Candidate List substances incorporated in further processing

The information that needs to be included in a SCIP notification must allow:

o   Identification of the article/complex object

o   Identification, concentration range and location of the Candidate List substance(s) present in the article (as such or in a complex object)

o   Information on the safe use of the article (as such or in a complex object), notably information to ensure proper management of the article once it becomes waste

! **Provide sufficient information to realise the objectives of the SCIP Database**

Ensure correct identification

Provide a **clear and unequivocal identification** of the article/complex object **to enable searches by SCIP database users!**

(It should allow to distinguish the article/complex object from other articles or complex objects placed on the market, e.g. by including the identification as available on the articles or complex objects, on labels, and/or in catalogues)

o Include (e.g. **brand, model**) in 'Other names' in addition to the 'Article name'

o Include **public identifiers** (e.g. EAN, catalogue number) in 'Other article identifiers' in addition to the 'Primary article identifier'

o Select **accurately** the '**Article category**'

o Provide:
  - Characteristics
  - Picture

Please, insert the information in the right field!

(e.g. do not use the field "characteristics" to report the identifiers of the article).

Sufficient information for safe use
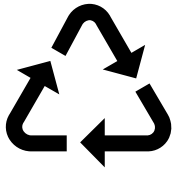
Provide sufficient information to ensure the safe use of the article over the whole lifecycle of articles, including the waste stage, notably information to ensure proper management of the article or complex object once it becomes waste

Include in your notification:

- o Identification, accurate concentration range and location of the Candidate List substance in the article
- o <u>Safe use instructions</u>
- o Disassembling instructions

Please, insert the information in the right field!

(e.g. do not use the field "safe use instructions" to report the location of the SVHC substance).

Only submit SCIP notifications for articles

- **The SCIP notification only applies to articles; substances and mixtures are not within its scope.**

  - The assessment on whether and object is an article or not under REACH needs to be carried out on a case-by-case basis, as explained in Chapter 2 and Appendices 3 and 4 of the [Guidance on requirements for substances in articles](#) and worked examples in published Q&As (e.g. Q&A [1292](#)) on ECHA website.
  - It is your responsibility as manufacturer/producer, importer, or other supplier (e.g. distributor) to make a decision based on that assessment.

Only submit notifications for articles containing SVHCs on the Candidate List

- **The SCIP notification only applies to articles containing SVHCs on the Candidate List.**
  - For example: Boron (e.g. diboron trioxide, boric acid and disodium tetraborate) and lead (e.g. lead oxide) substances in the Candidate List used in the production of a **glass article** may not be present as such in that final glass article. In such cases, there is no obligation to submit a SCIP notification for that article, nor to communicate information down the supply chain under Art. 33 of REACH.
    - It remains the responsibility of companies to assess for their specific use of the Candidate List boron and lead substances whether these are completely transformed into glass in the manufacture of the glass substance and are not present as such in the final glass article.

We invite you to consult the Q&A 1218 (*Do I need to notify and communicate information down the supply chain for certain boron substances included in the Candidate List, which are involved in the production of boron glass articles but not present as such in these articles?*) which has been developed when certain boron substances are involved in the production of boron glass articles. Similarly to the case covered by that Q&A, certain lead substances (e.g. lead oxide) included in the Candidate List may be involved in processes leading to the production of articles containing a 'glass' substance. In these processes, the lead substances may be first chemically transformed into a manufactured glass substance. The glass substance is subsequently processed into articles. In many cases, the lead substances are completely transformed and are not present as such in the final glass article.

'Hierarchy' in a complex object – Only the sufficient number of layers

✓ Include **only** he **lowest number of layers** of components and subcomponents of a complex object (**'hierarchy' length**) necessary to **allow** the **identification** and **'location'** of the **article** containing a Candidate List substance within the complex object by a SCIP database user

The hierarchy for a complex object must be constructed based on practical considerations to include the lowest number of layers that reflect the incorporation of the articles in subcomponents, as well as the incorporation of the subcomponents and components in that complex object at each assembling stage.

Appropriate hierarchy depth

Target a good balance between 'granularity' and key information!

Too many layers may not provide useful information. Focus on providing clarity concerning the 'location' of the article containing the Candidate List substance.

- Create a clear and simple structure: a very complex hierarchy does not necessarily bring any benefit to the users of the database and for the purposes of the SCIP Database!
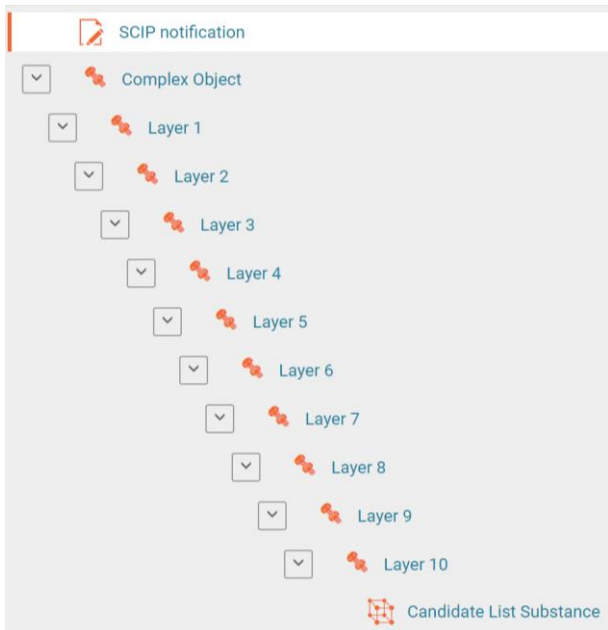
✗ Unnecessarily deep hierarchy:

strongly discouraged!
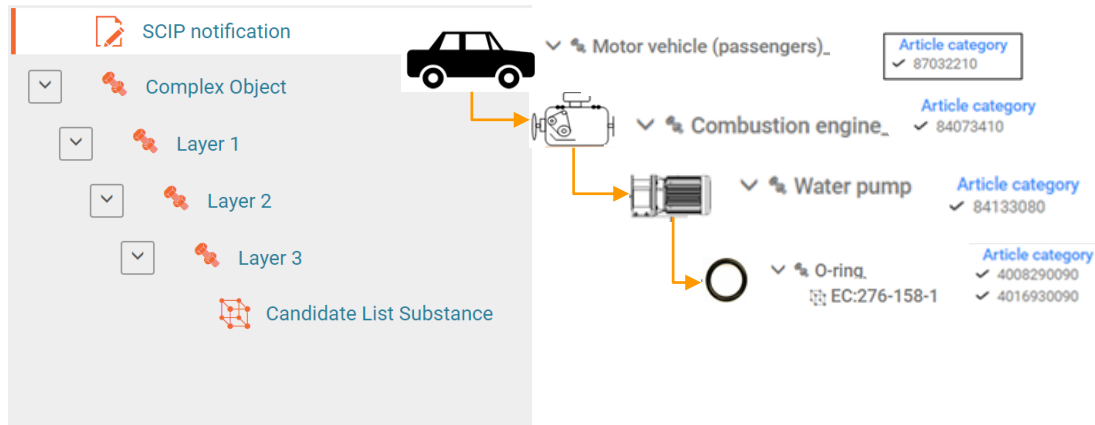
✓ Clear and simple structure: highly recommended

'Grouping'

Quasi-identical articles and complex objects placed on the market may be grouped in one SCIP notification.

**✕** **Do not submit the same information multiple times!**
Do not make submissions for each unit of an article or complex object! Group your units using the *quasi-identical* criteria.
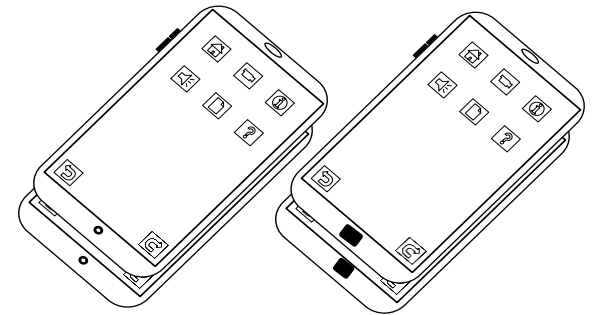
Managing the identification when using 'grouping'

Quasi-identical articles and complex objects can be grouped in the same SCIP notification, but it requires the inclusion of the necessary elements for the identification of each individual subgroups, for example:

- o under 'Other names' (e.g. brand and model)
- o under 'Other article identifiers' (e.g. Catalogue number, EAN)
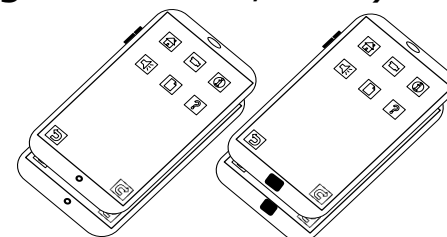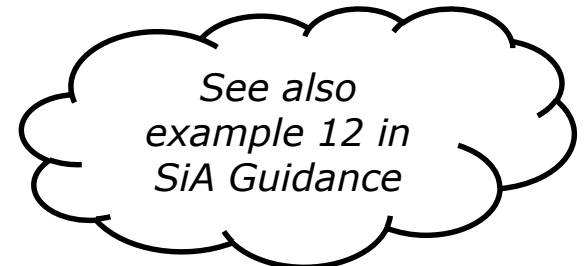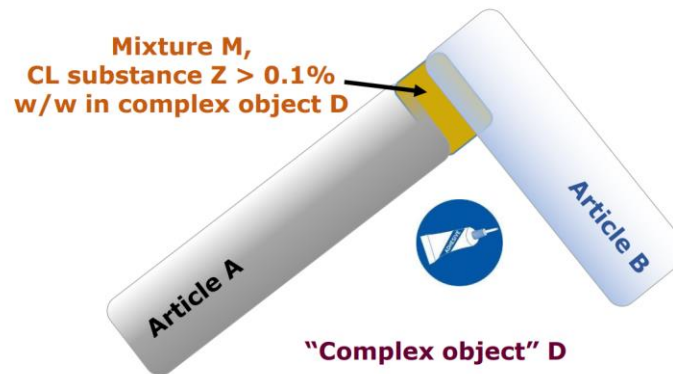
Other article identifiers   + New item

#...	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

Article Name	smartphone
Other Names: brand	BRAND 1
Other Names: model	100F
Other Names: brand	BRAND 2
Other Names: model	ABC5
Primary Article ID: item number	CCF 44499-99-57
Other Article ID: EAN (European Article Number)	3334445551234
Other Article ID: EAN (European Article Number)	1234567891019

Please, refer to the document 'Requirements for SCIP notifications', Chapter 2.1.1 and Chapter 3.1

Candidate List substance incorporated in a further processing step

*Potentially applicable to **scenarios II to IV in Table 5** of the [Guidance on requirements for substances in articles](#) (SiA Guidance)*

Scenario II: Candidate List substance as such or in a mixture used for joining two or more articles (complex object)

Mixture M,
CL substance Z > 0.1%
w/w in complex object D

Article A

Article B

"Complex object" D

See also example 12 in SiA Guidance

Example 1

Example 2

(Illustration purposes only)

See also example 21 in SiA Guidance

Printed circuit board ← Top level entity (complex object)

'**PCB joints**' (*)

(Lead, EC 231-100-4)

Concern element + New item

1 **Candidate list substance**
Lead | Lead | 7439-92-1

Concentration range
≥ 0.3% w/w and < 1.0% w/w

Material categories + New item

1 **Material category**

Additional material characteristics
None

Mixture category (EUPCS)
✓ PC-TEC-24 Welding, soldering, and flux products

- • *Identifiers / categorisation / characteristics*
- • *Safe use instruction(s)*
- • *Complex object component(s)*
- • *Concern elements*

**(*) Provide a suitable name, e.g. 'PCB joints'**

Note: This approach for a printed circuit board has not been discussed with Member States Competent Authorities; It may not be accepted by those Authorities.

Additional tips
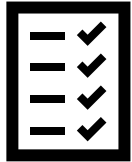
Validate your dossiers using the 'validation assistant' in IUCLID before submitting your notification! If you are submitting via S2S, please validate "representative" dossiers in IUCLID.

Become familiarised with the **validation checks** that are implemented in the ECHA Submission Portal in addition to those available in IUCLID.

ECHA
EUROPEAN CHEMICALS AGENCY

Validation rules for SCIP notifications

October 2020

ABC
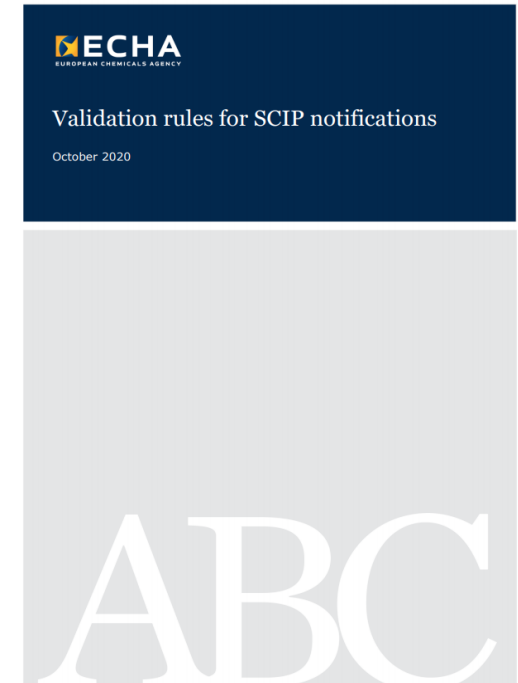
Please, avoid to submit updates to correct minor mistakes! Instead, ensure the quality of the data before submitting your notification.

Also, avoid to submit notifications by mistake: ECHA is not able to delete submissions, neither prevent their dissemination.

You are responsible for your own information!
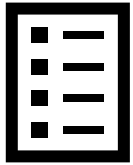
Be transparent! While ensuring compliance, make efforts to submit and structure your information in a clear and understandable way that is useful for the intended users of the SCIP Database.

Keep in mind your company's image and reputation! The publicly available information in the SCIP database will potentially be subject to scrutiny by the users of the database, namely waste operators, consumers, NGOs representing the interests of consumers, and Member States Authorities.

Please, refer to the document 'Requirements for SCIP notifications', Chapter 2.4

SCIP notifications without complete information in addition to the mandatory fields are potentially not compliant and may not fulfil the SCIP objectives

(e.g. articles or complex objects placed on the market for consumers)

Please, refer to the document 'Requirements for SCIP notifications', Chapter 2.1.1

Key tips for successful SCIP notifications
December 2020
V. 1.0

Disclaimer

This document aims to assist users in preparing SCIP notifications under Article 9(1)(i) of the Waste framework Directive (WFD). However, users are reminded that the text of the WFD is the only authentic legal reference and that the information in this document does not constitute legal advice. Usage of the information remains under the sole responsibility of the user. The European Chemicals Agency does not accept any liability with regard to the use that may be made of the information contained in this document.