iPoint – White Paper

iPoint

SCIP Database Insights

TABLE OF CONTENTS

Introduction

Who hasn't had to deal with the new database SCIP yet, short for **S**ubstances of **C**oncern **I**n articles as such, or in complex objects (**P**roducts)?

The European Chemicals Agency ECHA is successively publishing more and more information, and the test version has just been released on February 17th. So, for companies affected by this new requirement it is high time to figure out how they can get ready for SCIP reporting.

With our experience in supporting actors across diverse industries in the collection, analysis, and reporting of product-related data, iPoint is here to help you evolve your processes to also meet the requirements of SCIP database reporting.

What is the SCIP database about?

In 2018, the revision of the European Waste Framework Directive (EU) 2018/851 entered into force. In its article 9, it tasks the European Chemicals Agency ECHA with the establishment of a database for the reporting of articles as such or in complex objects. The obligation concerns products supplied to the EU market containing a Candidate list substance above 0.1% w/w (weight by weight). Thereby this new obligation covers the articles and complex objects already referenced by the supply chain communication obligation defined by REACH article 33(1). The information gathered in this new SCIP database – short for **S**ubstances of **C**oncern **I**n articles as such, or in complex objects (**P**roducts) – shall be made available to waste operators and the general public.

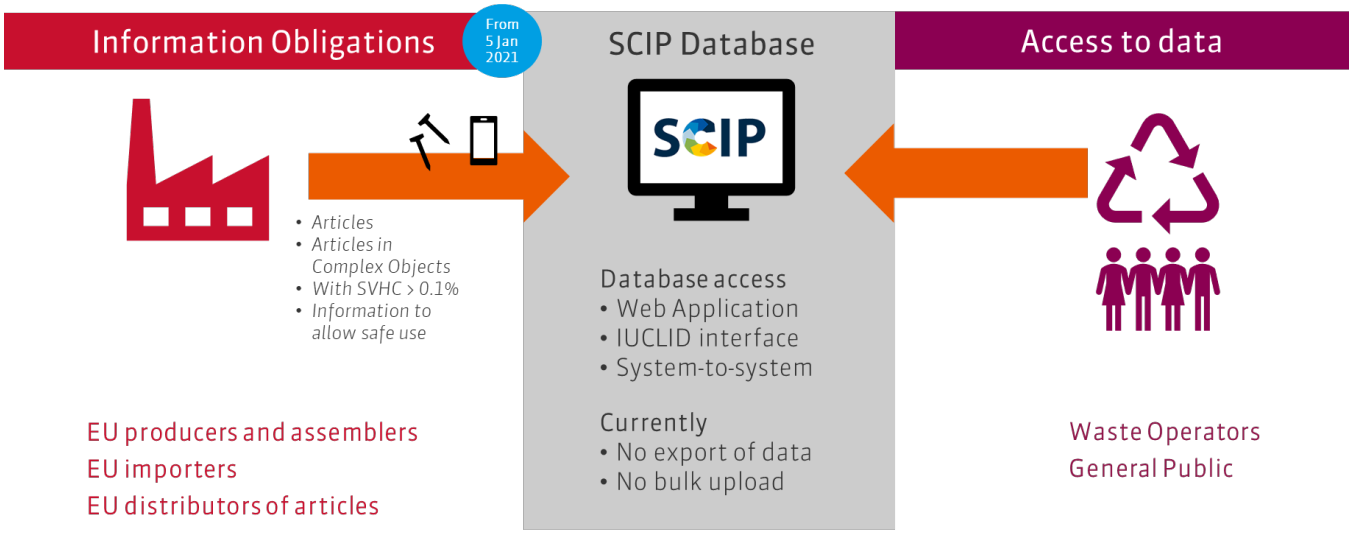


Figure 1: Basic overview of the SCIP database.

The intention of this new reporting requirement is to support Europe's development towards a more circular economy by allowing for the separate consideration of waste streams containing substances of very high concern (SVHC) and by ultimately reducing articles containing hazardous substances in our lifes.

The legislative act which is the basis of the SCIP database is a directive. As such, it has to be transposed into individual national laws by the EU member states by July 5th, 2020 to finalize the legislative framework and specify enforcement actions.

Are you a duty holder?

The goal of the SCIP database is to give waste operators an overview of all the products on the EU market containing an SVHC > 0.1% w/w. Therefore, the range of duty holders is rather broad, covering every company supplying to the European market.

Duty holders include:

- EU producers and assemblers,
- EU importers, and
- EU distributors of articles and other actors in the supply chain placing articles on the EU market.

An exemption only applies to retailers and other supply chain actors supplying directly and exclusively to consumers. Further exemptions, e.g. in the interest of defence, are in the hand of the EU member states upon transposition of the revised Waste Framework Directive into national law.

Which timeframe do you have to stick to?

The Waste Framework Directive has set a rather ambitious timeframe for the establishment and commencement of reporting to the SCIP database. Dossiers must be submitted from January 5th, 2021, and ECHA intends to have the first version of the database up and running by October 2020, with the dissemination of data due in the first half of 2021.

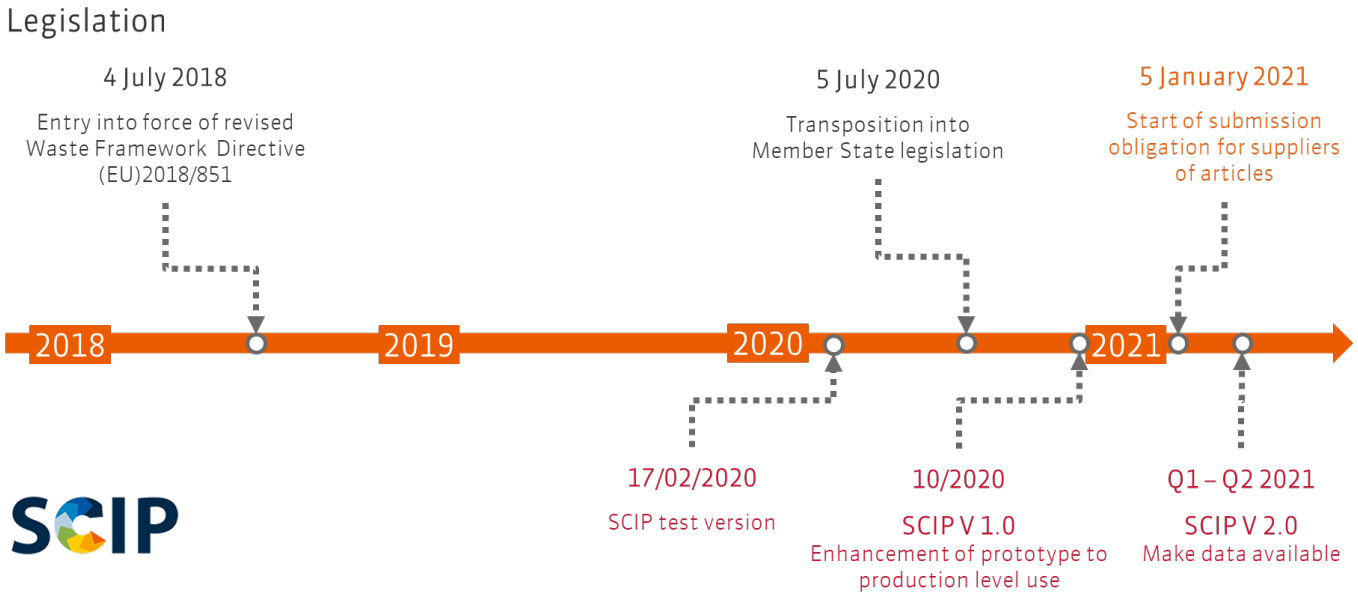


Figure 2: Timeframe set by the Waste Framework Directive and the European Chemicals Agency for the establishment of the SCIP database.

Looking at the timeframe set by both the Waste Framework Directive as well as the SCIP database development, it becomes apparent that the data collection and set-up of a process for dossier submission is an urgent requirement. Particularly when considering that the option to report will exist with the release of the first version of the SCIP database expected in October 2020, although reporting is only mandatory from January 5th, 2021.

On the plus side, affected companies usually already have available quite some data required to compose a SCIP report. With iPoint's experience of gathering data from diverse sources and getting it ready for evaluation and reporting, we are ready to support you in determining which of your products requires SCIP reporting, and to get the report ready and the submissions done.

How to deal with all the data

With the multitude of products and articles in a company, which can be purchased or an in-house production, it can be a daunting task to select those of your sales products that need to be reported to SCIP database.

When taking a closer look at the legal obligations it becomes clear that a structured step-by-step selection is the most promising approach:

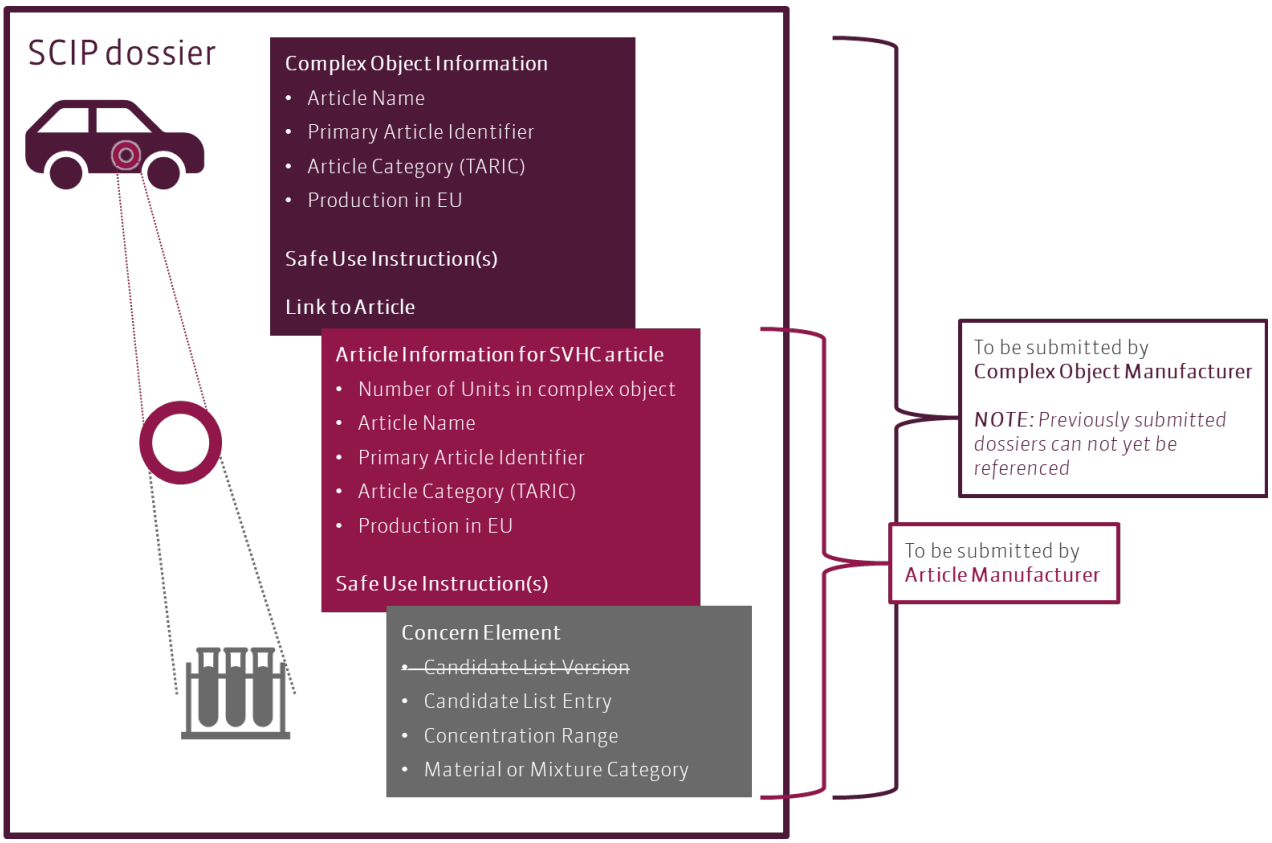
Figure 3: Step-by-step approach for the selection of articles for SCIP database reporting.

In a first step, only those sales-relevant articles (as such and in complex objects) are selected that are supplied to the EU market – since reporting obligations exist solely for these. In case the SVHC content for these products is already known, dossiers can be prepared for those with a content of a Candidate list substance > 0.1% w/w.

If there are data gaps that prevent an evaluation at this stage, a risk assessment might be in order to help select those articles which pose a high risk of containing SVHCs, e.g. due to the materials used. Then you can request more information from your suppliers specifically for those.

This will finally lead to the selection of those of your sales products that need to be reported to the SCIP database from January 5th, 2021.Please bear in mind that – based on the current stage of discussion – the real products brought onto the market must be reported.

This e.g. means that in the case of multi-sourced parts, a "worst-case" reporting is not viable. In addition, the current version of the SCIP database does not yet allow for a referencing of SCIP dossiers from a supplier. ECHA intends to include that in their development in the course of this year. Nevertheless, this means that to be prepared you will have to gather the data for your purchased articles as well.



*Candidate List version will no longer be mandatory in October's SCIP V1.0

Figure 4: Mandatory data requirements for SCIP database reporting as described by ECHA.

The data required for the submission of a SCIP dossier is defined by ECHA's "Detailed information requirements for the SCIP database" published in September 2019. The mandatory data described there goes beyond the information requirements defined by REACH article 33(1), therefore making it necessary to gather additional product data to the available compliance information.

This additional data includes the definition of the article category via the tariff code (TARIC), a statement on the production in EU (yes/no/unwilling to disclose, the concentration range of the SVHC content, and the material or mixture category of the article containing the Candidate list substance (from a picklist).

Since this sum up to quite a lot of data to be gathered for a multitude of products, an IT solution to collect, analyze, and finally also report the data is highly recommended. This holds particularly true with regards to the fact that not only an initial SCIP reporting is required, but that updates will have to be carried out with modifications to the products, for new products being brought onto the market as well

as with the semi-annual updates of the Candidate list. The more information on products is available in an IT system, the easier it will be to carry out this repetitive task.

Does a system-to-system solution make sense?

Having had a chance to get a glimpse of the beta version of the SCIP database, we can only support ECHA's recommendation of getting a system-to-system solution in place in those cases where a multitude of dossiers need to be submitted.

This – in combination with an IT tool that allows for an automated collection and analysis of the data and creation of dossier files – will not only significantly reduce the amount of manual effort, but will also allow to send the bulk of the data to ECHA for upload.

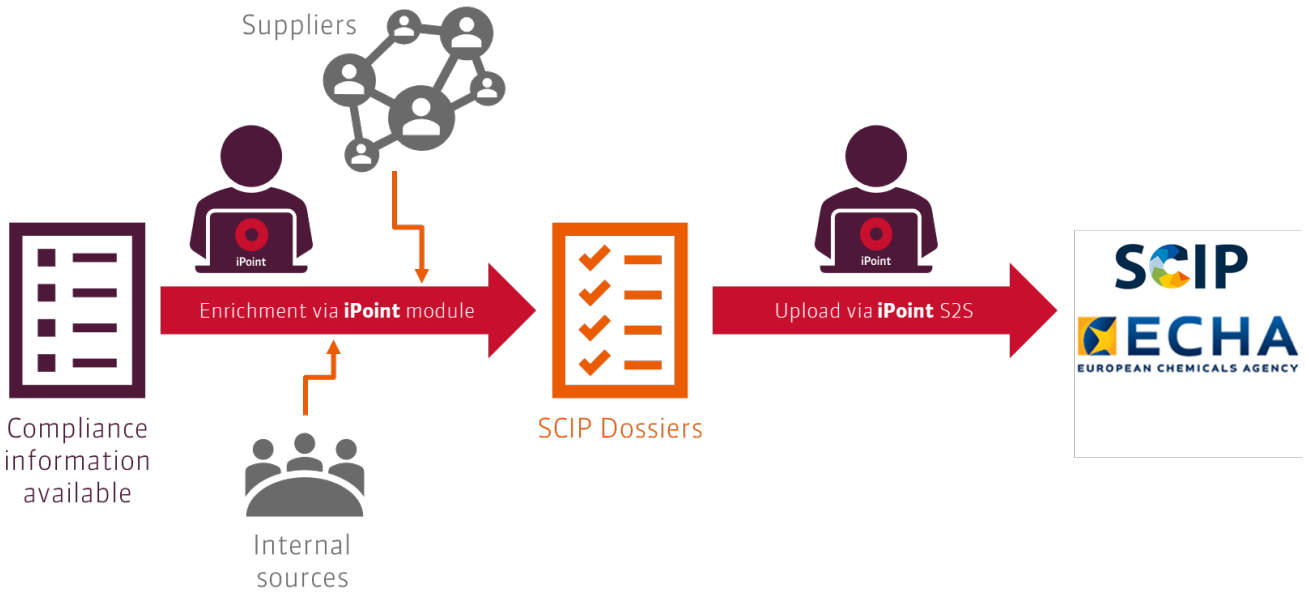


Figure 5: Enrichment, collection, and upload of data via iPoin's SCIP solution.

Get ready for SCIP

With the timeframe being quite tight, the break-down of the product portfolio daunting, and the data requirements rather extensive, how does one go about to get ready for SCIP in time and ideally in a way which reduces your effort for the following steps?

Select the products you supply to the EU market that need to be reported (see: "How to deal with all the data").

- ☐ If you have a larger number of dossiers to submit, chose a system-to-system solution provider.
- ☐ If you are handling a large number of products, implement an IT system for automatic collection, analysis, and reporting of product compliance data.
- ☐ Determine your data gaps and gather information from within the company (e.g. TARIC numbers) and your suppliers (e.g. SVHC content).
- ☐ Get your dossiers ready for submission, ideally in a way that allows for easy updates.

Please be aware that reporting obligations along the supply chain, e.g. the ones set by REACH article 33(1), have to be met in addition to SCIP reporting.

If you require support with any or all the items above, we're happy to help. Please do not hesitate to contact iPoint (contact@ipoint-systems.com).

Summary

The upcoming requirement to provide information to the SCIP database on all articles and complex objects (products) supplied to the EU market with an SVHC content of > 0.1% w/w (weight by weight) from January 5th, 2021, proves to be quite a challenging and complex task for companies.

Considering, the tightness of the timeframe and extent of data to be considered requires that everyone affected by the new requirement gets started now. This includes analyzing the product data already available, determining data gaps, collecting missing data, and finally creating SCIP reporting dossiers.

In order to keep manual efforts to a minimum – not only for the initial submission to the SCIP database, but also for the following updates required –, it is highly recommended to have an IT tool at hand for the collection, analysis, and reporting of data. In most of cases where a high number of articles and / or complex objects have to be reported, a solution offering a system-to-system interface to SCIP database is necessary to allow for the bulk processing of data.

iPoint's experience in handling compliance data throughout diverse industries as well as our technical expertise allow us to support you in getting ready for SCIP. Our experts are actively involved in the European Chemicals Agency's SCIP-related meetings and workshops, which gives us an in-depth insight into SCIP database requirements which are then converted into iPoint's solutions.

You need support in getting ready for SCIP and on your company's compliance journey in a world that is getting more and more circular? Then please do not hesitate to get in touch with us at contact@ipoint-systems.com, we're happy to help.

We're ready for SCIP – are you?

About the Author

As Senior Expert Compliance, Sustainability and Innovation, Angelika Steinbrecher is experienced in dealing with regulatory topics, currently with a strong focus on SCIP database. She holds a doctorate in chemistry with many years of experience in research and development at a chemical company. At iPoint she is also active in the areas of innovative business development and pre-sales.

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