

Whitepaper

EU Waste Framework Directive

Understanding SCIP
Database Requirements



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Introduction

The EU is committed to building a circular economy¹ in which a product's life span is extended for as long as possible and waste is minimized. That is why the European Chemicals Agency (ECHA) mandated the Substances of Concern In articles, as such or in complex objects (Products) (SCIP) database under the updated EU Waste Framework Directive (WFD) 2018/851 (WFD).

To meet SCIP reporting obligations, companies should review their data requirements, educate their supply chains (especially suppliers located outside the EU), and acquire data. A deep understanding of what information to request from suppliers, and in what format, is vital. This ensures companies can avoid redundancies and prevent overburdening suppliers with unnecessary requests for information.

This whitepaper discusses the data requirements outlined by the ECHA, including key definitions, scoping, and a submission example.

¹ European Commission. (n.d.). Circular Economy. <https://ec.europa.eu/environment/circular-economy/>



The Scope of the SCIP Database

Key Definitions: Articles, Complex Objects, Substances & Products

Companies need to be familiar with the following EU WFD definitions:

Articles & Complex Objects

An article is defined under the Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH) Regulation as “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.”²

Articles can be joined together in various ways to form complex objects. However, under the “Once an Article, Always an Article” definition established by the Court of Justice of the European Union (CJEU), an article is still an article even when it is part of a complex object.

For example, in a pencil sharpener, the plastic housing, metal blade, and the screw that attaches them are all examples of articles in one complex object.

Substance

A substance specifically refers to a substance of very high concern (SVHC) on the REACH Candidate List. Substances of very high concern are chemicals that have serious effects on human health or the environment.

In a pencil sharpener, if the metal used for the blade and the plastic contain in-scope substances, a declaration would be required from producers, assemblers, and any importers of the final product.

Products

Products are defined by the ECHA as any item placed on the market and exchanged for monetary compensation or other goods.³ Under this definition, a product may be a substance, mixture, article, or complex object. The EU WFD is not concerned with pure substances or mixtures, which is why articles and complex objects are specifically identified in the name of the database.

² European Chemicals Agency. (2017, June). Guidance on requirements for substances in articles. https://echa.europa.eu/documents/10162/23036412/articles_en.pdf

³ European Chemicals Agency. (2019, September). Detailed information requirements for the SCIP database. https://echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf/9715c4b1-d5fb-b2de-bfb0-c216ee6a785d



Companies in Scope

Every company that manufactures, assembles, imports, distributes, or sells materials or products in the EU that contain SVHCs in concentrations above the 0.1 percent weight by weight (w/w) threshold is in scope of the EU WFD and must submit data to the SCIP database.

Non-EU companies are outside of the legal scope of EU WFD. However, to maintain market access, non-EU companies should support their European importing partners by diligently responding to data requests. In the EU, first importers are responsible for submitting this data on behalf of their non-EU suppliers.

The only exception is retailers or other supply chain actors that supply directly and exclusively to consumers.⁴

⁴ European Chemicals Agency. (n.d.). Suppliers of articles. <https://echa.europa.eu/scip-suppliers-of-articles>

Substances in Scope

Under the EU WFD, reporting on hazardous substance concentrations into the SCIP database is mandatory. Companies must choose from the following concentration ranges for each substance they declare:

- ▶ 0.1 percent w/w and < 0.3 percent w/w
- ▶ ≥ 0.3 percent w/w and < 1.0 percent w/w
- ▶ ≥ 1.0 percent w/w and < 10.0 percent w/w
- ▶ ≥ 10.0 percent w/w and < 20.0 percent w/w
- ▶ ≥ 20.0 percent w/w and < 100 percent w/w
- ▶ > 0.1 percent w/w and ≤ 100 percent w/w

Companies are expected to submit data on products containing SVHCs above threshold, including all substance variations.⁵ Because the REACH Candidate List is updated approximately every six months, companies can expect the SCIP database to follow a similar update. As Candidate List updates occur, companies need to review their product data and report any changes.

⁵ European Chemicals Agency. (2019, September 18). Substances restricted under REACH. <https://echa.europa.eu/substances-restricted-under-reach>



The SCIP Database & the REACH Regulation

Though there are many similarities between the REACH Regulation and the SCIP database, there are differences companies should consider. Reporting into the SCIP database is more complex and time consuming. It requires a declaration for materials and articles at every level of manufacture and distribution across the supply chain. Companies are expected to submit the same data points they already collect for REACH, in addition to several others.

Figure 1: SCIP Data Reporting Requirements

DATA REQUIRED FOR REACH	DATA REQUIRED FOR SCIP	DATA FOR SUBMISSION
EU REACH	Additional SCIP Data	Legal Entity
Supplier Name	REACH-IT Account	Article ID
Article Name	Article Level Data	More Data
SVHC Data	Chemical of Concern Data	REFERENCE FILE (core IUCLID)
Basic Safe Use Information	Substance Data (Reference substance file)	Dossier ID
	Create a Dossier File	Submission ID
	Submit into ECHA Submission Portal	



Submission Requirements

Companies in scope of the EU WFD must submit the name, concentration range, and location of the substance in that article; information that allows for the identification of the article; and any other information stakeholders throughout the product lifecycle will need for safe use.

The process takes place over three steps:

1. Create a REACH-IT account
2. Create an Article Record
3. Create and submit a SCIP dossier

First, companies will need a REACH-IT Account Number, which can be obtained by creating an account on the ECHA's website. The number can serve either an entire organization or numbers can be generated for each legal entity. The latter approach is the most efficient way to conduct the process.

Tariff Codes Required

The value submitted for the Article Category should be the integrated Tariff of the European Union (or TARIC) list, based on the Combined Nomenclature description and code.



Once a company has acquired its REACH-IT Account Number, it can create an Article Record, which includes all identifying article information, in the XSD format specified by the ECHA to be accepted by the International Uniform Chemical Information Database (IUCLID) 6.4.⁶ Depending on the field, companies may also be able to pick a response option from a pick list.

Figure 2: Information in an Article Record

MANDATORY	OPTIONAL
▶ Article Name ▶ Primary Article Identifier ▶ Article Category ▶ Production in EU ▶ Safe Use Instructions ▶ Candidate List Substance & Reference Substance File ▶ Concentration Range ▶ Material Category or Mixture Category	▶ Other Name ▶ Other Article Identifier ▶ Height ▶ Length ▶ Width ▶ Diameter ▶ Density ▶ Weight ▶ Volume ▶ Color ▶ Complex Object ▶ Additional Material Characteristics ▶ ECHA Article ID

The mandatory fields provide the information required to identify the article, the substance(s) it contains, and how it can be safely handled at different levels of the product’s life cycle. The optional information is used to help stakeholders pinpoint the specific article that contains the SVHC(s) within a complex object.

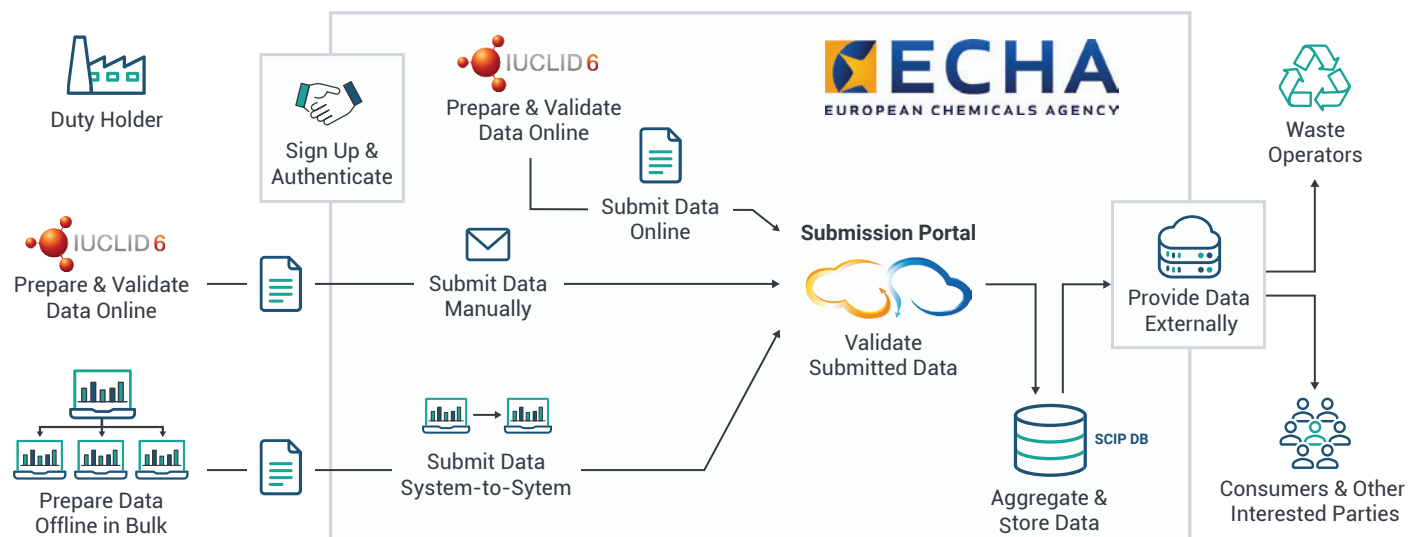
The data can be organized for submission in one of three ways:

1. Through the IUCLID online software hosted by the ECHA
2. Through the IUCLID offline software provided by the ECHA
3. Through a third-party software solution such as Assent

6 IUCLID 6. (n.d.). IUCLID format. <https://iuclid6.echa.europa.eu/format>

SCIP Dossier Submission Process & Requirements

Figure 3: Overview of SCIP Data Submission⁷



The final piece of documentation companies must provide is a dossier record. This must include:

- ▶ Name
- ▶ Dossier Name
- ▶ Dossier Creation Date & Time
- ▶ Version
- ▶ Submitting Legal Entity
- ▶ Dossier ID

Note: IDs – Article ID, Legal Entity ID, Dossier ID, and Submission ID – are generated once the rest of the data is submitted to the ECHA via the SCIP portal.

Legal Entity ID & Article Number

To track products and update submissions as SVHCs are added, companies will need two numbers:

1. **Legal Entity ID:** This is the number generated when an EU company registers an ECHA REACH-IT account and identifies the company submitting data to the ECHA. In cases where there is one legal entity with one account, it will be the same as the REACH-IT Account Number.
2. **Article Number:** The number that identifies individual products or parts the entity manufactures.

This process will be more complex for companies based outside the EU. Currently, any non-EU company that imports a product into the EU will have to create Legal Entity IDs for each of its suppliers and submit article data to generate IDs for products that contain SVHCs above the 0.1 percent w/w threshold.

⁷ European Chemicals Agency. (n.d.). IT implementation of the SCIP database. https://echa.europa.eu/documents/10162/28534369/3_scip_en.pdf/539e6831-9279-69b2-e8df-5aafcc41f1e7



Submission Example

In their Detailed Information Requirements for the SCIP Database guide, the ECHA provides an example declaration for a simple article, an O-ring. The example shows the information companies must collect and submit. Mandatory fields are coded blue and optional fields are coded green.

Figure 4: Sample Declaration

EXAMPLE 1: O-RING			
Identifies	Article Name	O-ring	
	Other Name	Brand	Rubber Joints RJ
		Model	Model 0.05
		Type	Type Rubber-R
	Primary Article Identifier	EAN	583322554477
	Other Article Identifier	Reference Number	RJ0.05R001
	Article Category (Name and Code)	4016 93 00: Articles of vulcanized rubber other than hard rubber; other; gaskets, washers and other seals. 4008 29 0: Plates, sheets, strip, rods and profile shapes, of vulcanized rubber other than hard rubber; of non-cellular rubber; other.	
Production in the European Union	Yes		
Picture	[Provide Image]		
Characteristics	Diameter	0.050m	
	Weight	0.05kg	
Safe Use Instruction(s)	Safe Use Instruction(s)	[Specific Instructions]	
Concern Element	Candidate List Verion	ZZZZ/TT	
	Candidate List Entry/ Substance	Candidate List substance S; EC xxx-xxx-x; CAS yyyy-yy-y	
	Concentration Range	≥ 10.0.% w/w and < 20.0% w/w	
	Material Category	Rubbers and elastomers > Ethylene-propylene-non-conjugated diene rubber (EPDM); vulcanised	



Materials Categories

Articles made for the same function can be made of vastly different materials. For instance, a tabletop could be made of wood, metal, plastic, glass, a composite, or a number of other materials. To help describe articles in submissions and improve transparency for waste operators and other stakeholders, the ECHA has made material type identification a requirement.

The ECHA suggested 11 overarching materials categories and two levels of tiered subcategories. Companies will be responsible for declaring the category and the first subcategory, while the second subcategory will only be required if it is available to the submitter.

The 11 categories are:

1. Ceramics
2. Glass
3. Leather and rawhides
4. Metals
5. Paper and board
6. Plastics (and polymers)
7. Rubbers and elastomers
8. Stone, plaster and cement
9. Textile fibers and other fibers
10. Wood and cork
11. Other

For example, company producing the blades for a pencil sharpener may report:

- ▶ Category (Level 1): Metal
- ▶ Subcategory (Level 2): Steel
- ▶ Subcategory (Level 3): Stainless steel

In the case of composite materials, companies will report by selecting the appropriate category and subcategory for each material used in their product.

Safe Use Information

Safe use information for each stakeholder across a product's life cycle — consumers, professional/industrial end users, various service operators, waste operators, etc. — should be provided in enough detail to enable risk management and ensure safe use. Optionally, this can include a supplementary document with disassembly information.

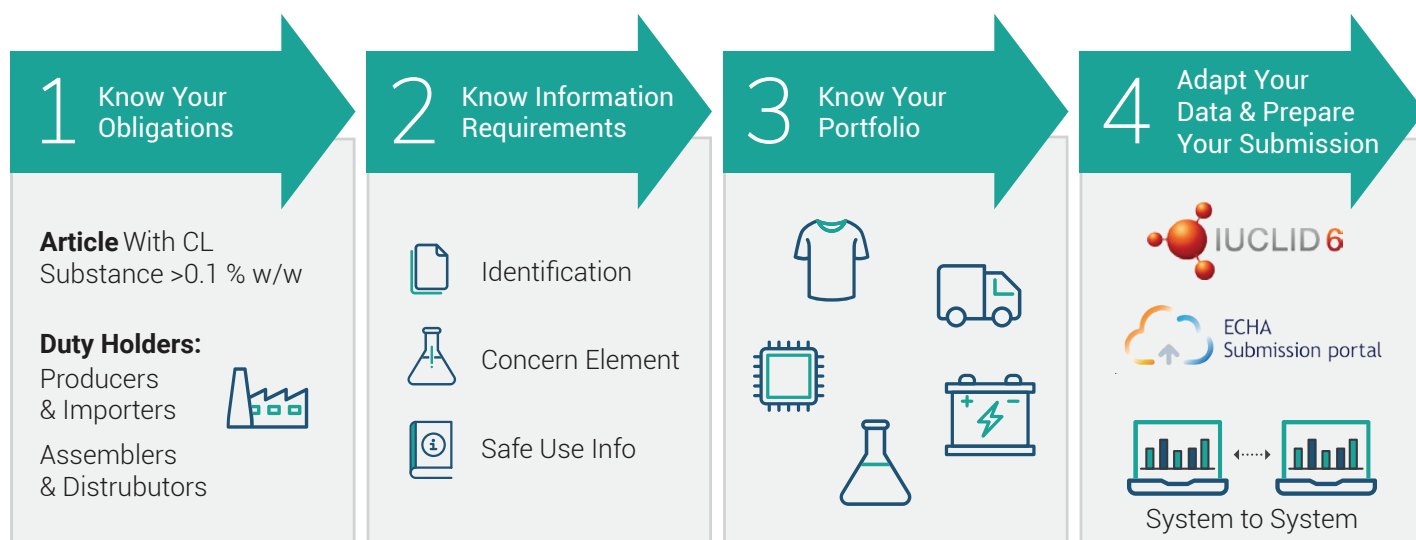
Companies will initially be able to select an option that no safe use information is needed beyond the identification of the substance. However, the ECHA is expected to produce a harmonized list of statements over time that companies can use as a basis for their safe use information.



Data Collection Best Practices

In order to collect the volume of data that must be submitted to the SCIP database, companies should start proactively acquiring information. The following key steps are recommended by the ECHA.

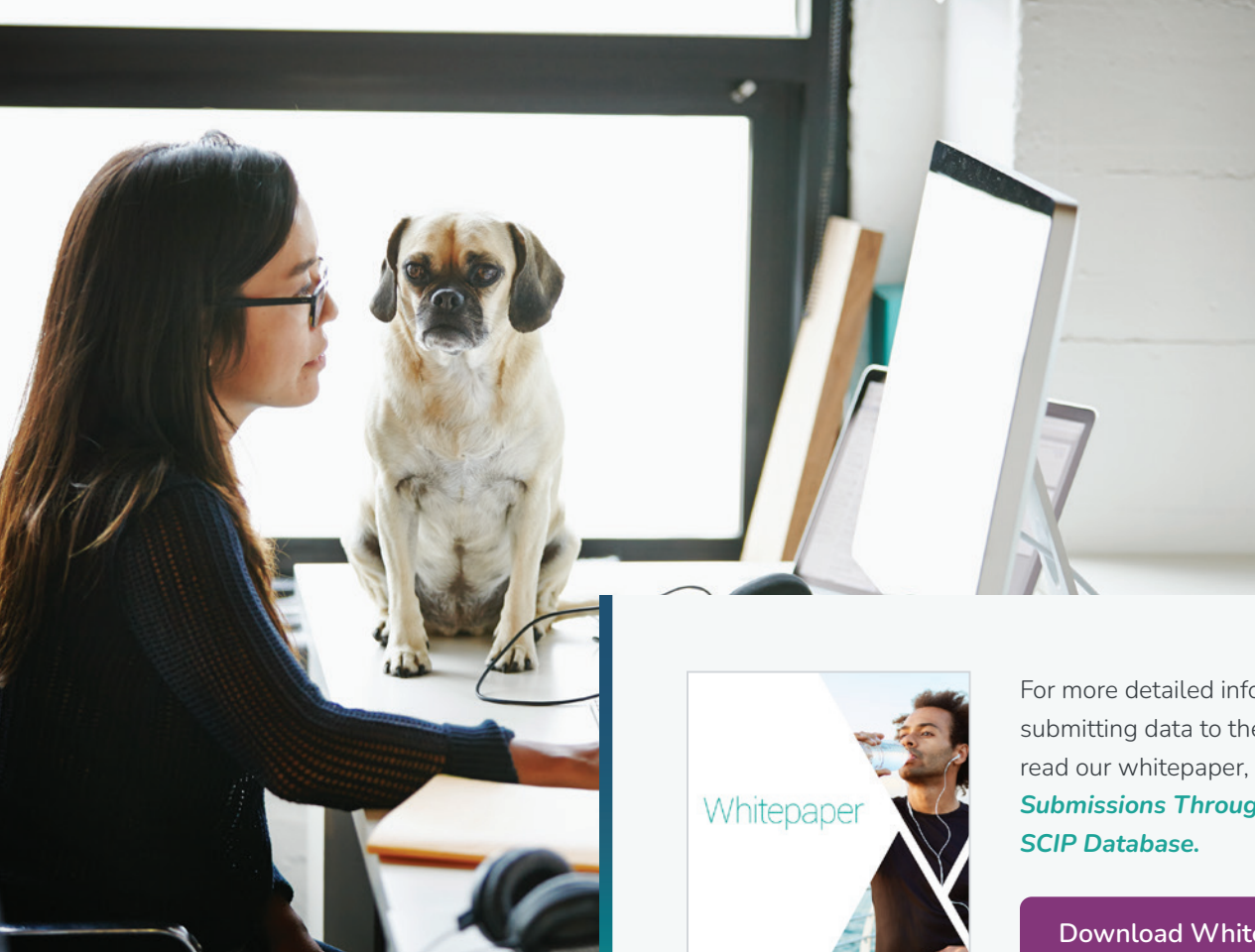
Figure 5: Key Steps for Collecting Data⁸



Companies that report on SVHCs under REACH should already know where these substances exist in their products. They can then determine what additional information to report by evaluating the XSD structure supplied by the ECHA. From there, it is a matter of campaigning for data, testing articles where necessary, and submitting the data to the SCIP database.

⁸ European Chemicals Agency. (n.d.). IT implementation of the SCIP database. https://echa.europa.eu/documents/10162/28534369/3_scip_en.pdf/539e6831-9279-69b2-e8df-5aafc-c41f1e7





For more detailed information on submitting data to the SCIP database, read our whitepaper, ***Managing Data Submissions Through the ECHA SCIP Database.***

[Download Whitepaper](#)

Ensuring Compliance

Companies in scope of the EU WFD face rigorous data requirements requiring a comprehensive data collection and management plan. Communicating clearly with suppliers will help companies get the support they need to meet deadlines and customer expectations.

A supply chain sustainability management solution like Assent streamlines supply chain communication and helps manufacturers overcome due diligence challenges.

To learn more about how Assent will help your company see deeper into your supply chain and grow better, contact us at info@assent.com.





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