



FACTSHEET

SCIP Database

SCIP is the abbreviation for “Substances of Concern In articles, as such or in complex objects (Products)”. This database is provided by ECHA so that suppliers can submit candidate substances in their articles according to Article 9 of the Waste Framework Directive.

Introduction

The candidate list contains substances of very high concern (SVHC) such as CMR¹ or PBT² substances. It was first published in 2008 in accordance with Art. 59 of the REACH³ regulation. REACH Art. 33 requires suppliers to inform their customers if articles contain more than 0.1% of a substance on the candidate list. According to REACH, an article is an item in which the function is determined to a greater extent by its shape, surface and design than by its chemical composition. Examples of simple articles are sheet metal, foil or fiber.

In the revision of the Waste Framework Directive⁴ 2018, a provision was included at the suggestion of the European Parliament that the information required by REACH Art. 33 must be entered into an official database so that this information is also available to waste disposers. The provision was adopted in pursuit of a dual goal: on one hand, to promote more material recycling; on the other hand, to reach the goal of a pollutant-free environment. For the latter, it is important to minimize the pollutant load in secondary raw materials.

¹ CMR: Substances which are carcinogenic, mutagenic or toxic for reproduction.

² PBT: substances which are persistent, bioaccumulative and toxic.

³ EU-VO No. 1907/2006

⁴ Directive (EU) 2018/851

Information on SVHC in articles

In principle, there are four ways in which companies become aware of SVHC in their articles:

1. Information from suppliers
2. Laboratory analyses
3. Internal knowledge of material specific SVHC (e.g. lead in free cutting steel or aluminum alloys)
4. Generic information from databases

Obligation to register

Suppliers are required to give notification for articles that contain substances on the candidate list in a concentration of $\geq 0.1\%$. According to the Waste Framework Directive, this is obligatory as of January 5, 2021; however, the obligation will only become legally binding when it becomes national law (KrWG⁵ in Germany and the associated SCIP implementing regulation).

Besides the legal obligation, customer expectations are also a concern for companies. Even if no national legislation has yet been enacted, companies that supply their products (e.g. components) to several EU countries must make entries in the SCIP database so that their customers have the data available for reporting their complex products.

Scope of the notification

For the SCIP notification more information has to be provided than for the information under REACH Art. 33. Mandatory fields, in addition to the substance name, are as follows:

- > Identification number (GTIN, EAN, serial number or similar)
- > Product category (TARIC customs tariff number)
- > Indication whether it was produced in the EU or not
- > Information on the concentration of the candidate substance in the article
- > Material category or mixture category according to EUPCS⁶

There are also a number of optional input fields:

- > Other names (brand, model, etc.)
- > Other identification numbers (GTIN, EAN, serial number or similar)
- > Description (size, color, weight, pictures)

⁵ KrWG: Recycling Management Act

⁶ European Product Categorization System

However, the function of grouping individual articles into complex objects is probably of greatest importance. The companies should therefore represent the (SVHC contaminated) articles in the product they supply in the form of a tree structure.

Creating the notification

The SCIP database basically provides three ways of generating a notification dossier:

- > Online with IUCLID6 Cloud
- > Offline with an IUCLID6 installation
- > System-to-system

In the latter case, companies can generate SCIP data records automatically from their own systems (e.g. IMDS) using special IT solutions.

For most companies, the IUCLID6 Cloud is a good choice, as it does not require the complex installation of the IUCLID software on company computers. To access the IUCLID6 Cloud, you can register by following the link below:

ecs.echa.europa.eu

The SCIP notification dossier is generated in the IUCLID6 Cloud in the “Articles” section. A new record is created by clicking the “+ New Article” button.

The first step is to enter the individual articles (components, materials) containing SVHC. In the second step, a data record for the product (Complex Object) can be created, to which individual products are assigned.

When recording the complex objects, users must decide how exactly they want to reproduce the structure of their product, i.e. how many layers to enter. Since individual products and complex objects can be reused for new complex objects, it can make sense to record structures that appear repeatedly in the company’s products as complex objects. But it is also possible to represent a product as a flat hierarchy, with only one sublevel.

Once the product has been recorded, it can be checked for errors with the validation wizard. A dossier can then be generated from the data set. This dossier is submitted via the “Submission Portal.”

Special features

The SCIP database offers two special functions for special cases:

- > Simplified SCIP message for dealers, based on a reference number provided by the manufacturer to the dealer
- > Referencing for manufacturers who refer to the SCIP notification of their suppliers for purchased components. This reference number can then be used in the IUCLID6 record.

Conclusion

Those who prefer not to take on the complex task of generating the SCIP messages in IUCLID6 themselves can enlist DEKRA's help.

Our experts employ a resource-saving method that combines a set of pre-defined elements very efficiently into a product. In addition, the DEKRA laboratory can also provide support with SVHC analysis if it is not clear which substances are contained in a product.

DEKRA Process Safety and Chemical Safety

The breadth and depth of expertise in process safety makes us globally recognised specialists and trusted advisors. We help our clients to understand and evaluate their risks, and work together to develop pragmatic solutions. Our value-adding and practical approach integrates specialist process safety management, engineering and testing. We seek to educate and grow client competence to provide sustainable performance improvement. Partnering with our clients we combine technical expertise with a passion for life preservation, harm reduction and asset protection. As a part of the world's leading expert organisation DEKRA, we are the global partner for a safe world.

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