

20 October 2021

## Questions and answers from the SCIP session at ECHA Safer Chemicals Conference, 6 October 2021

Question	Response
If we use referencing, is there any plan to get a notification from the suppliers as soon as their notification gets updated?	This option is not in development plans now.
Can the SCIP DB substitute the REACH article 33 communication?	No, these two obligations are complementary. You can use article 33 to share the SCIP number.
We have questions about naming in our SCIP registration. How to avoid exposing our supply chain, while still providing sufficient ID information on the articles registered	We suggest to understand first what information will be disseminated for each notification to define the correct way to identify the articles you are reporting.
We have questions about naming in our SCIP registration. How to avoid exposing our supply chain, while still providing sufficient ID information on the articles registered	For the top level entity all information will be made available but not all the information for the components.
SHVC substances must uploaded in the SCIP database. Will the same apply to POP substances in the near future?	There are already Substances in the Candidate list which are restricted in the POPs regulation. The SCIP notification is triggered based on the Candidate List.
If we belong to a group where the SCIP notification is done for instance in France, and we are bringing the products for example to finland, would we need to register again locally?	Each LE placing on the market has a duty. If a corporate group has many different LE placing the same article on the market, we encourage to use simplification mechanism put in place such as SSN.
is it possible to use SCIP to know if the recyclates you buy contain any SVHC substances?	The SCIP data can be useful for waste operators to find out what substances are used in certain products. Also it can be used to find specific information for one specific brand and model.
is it possible to use SCIP to know if the recyclates you buy contain any SVHC substances?	If you are managing mixed waste you can try to use the search by article category or material category to find information of the most common substances on these streams.
When referencing to articles of suppliers by using the SCIP ID, how is it possible to check if the reference	The search by SCIP number in the SCIP DB is an important feature that will be added in the next release of the software.

20 October 2021

links to the correct article?	
If a supplier is building huge industrial plants for their customer, which include buildings, infrastructure, processing plants, machines, and so on, how should this be declared into the SCIP DB?	The obligation to submit a SCIP notification is the same as the obligation for articles under article 33(1). If something is fixed they do not fulfil the article definition.
If a supplier is building huge industrial plants for their customer, which include buildings, infrastructure, processing plants, machines, and so on, how should this be declared into the SCIP DB?	The obligation applies when the products are still mobile.
How do I, as a downstream user, know if the SCIP number I received is still relevant? Especially if you have used compressed data.	The SCIP DB does not remove the Art 33 responsibility from the supplier. Their obligation is still to inform you during the supply and to inform ECHA if there are major changes in the Article
How long does it take for a SCIP submission to be approved?	Submissions are processed automatically. A decision is provided normally immediately. Delays may happen as a result of concurrent users/submissions or volume of data/notifications to be processed.
Good afternoon, I understand that if the same article reference (same shape and exact composition) is manufactured in two different countries in the EU, a single SCIP notification must be made, right?	ECHA has defined a criteria to group articles in the same notification. If two articles are manufactured in different locations but fulfil the criteria they can be grouped in one notification.
Good afternoon, I understand that if the same article reference (same shape and exact composition) is manufactured in two different countries in the EU, a single SCIP notification must be made, right?	More details available at the document "Requirements for SCIP notifications" at <a href="https://echa.europa.eu/scip-support">https://echa.europa.eu/scip-support</a>
If a company has already made a scip notification of a product and then supplier of a certain component makes a SCIP notification as well, what should be done? Can these be somehow connected afterwards?	ECHA recommends to avoid this notification strategy and use the tools to reuse data already submitted to SCIP. Those tools are SSN and the user of referencing in a SCIP notification dossier.  More detail on these tools in the document " Tools to refer to data already submitted to SCIP" available on <a href="https://echa.europa.eu/scip-support">https://echa.europa.eu/scip-support</a>
How are waste management operators using the data?	Interesting question. It will be answered in the plenary.
What should EU-companies do if they do not get the needed information from their non-EU suppliers?	It is the responsibility of EU companies to comply with their obligations stemming from the Waste Framework Directive (and REACH) and for that to

20 October 2021

	<p>obtain the necessary required information.</p> <p>Strengthening cooperation with suppliers is also key; the experience of peer importing companies who have managed to explain, convince and train their non-EU partners, may be of help.</p> <p>Including information requirements as part of contractual agreements can also be a solution.</p> <p>In last resort, testing can be made in order to identify whether or not an importer article contains a Candidate List substance.</p> <p>Finally, in the total absence of cooperation, looking for a new supplier may be considered.</p>
<p>How can I distinguish not reported product in dissemination portal - it is because it is SVHC free or just producer does not report in SCIP. How can I be sure that product is without SVHC?</p>	<p>Good question; we would recommend this is interpreted with care. We have received many submissions we cannot assume that full compliance has been achieved so there may be some 'false negatives'.</p> <p>Note also the corresponding obligation under REACH Article 33 and consider getting in touch with your supplier if you are in doubt.</p>
<p>Are you expecting changes in the SCIP database for 2022 and beyond?</p>	<p>At this stage, the main focus of 2022 will be to stabilise and strengthen the database infrastructures and functioning, in view of an expected increase in submissions.</p> <p>Some limited updates and improvements, incl. from the dissemination end, may also be implemented, without however any major new features. As for the longer term, ECHA is not in a position at this moment to provide any further details, as it will depend on the resources and priorities allocated to this activity in 2023 and later.</p>
<p>Isn't 5700 companies a low number since every supplier of an article containing SVHC has to notify to SCIP? Echas (and others participants at the conference) reflections on that?</p>	<p>ECHA does not have any quantitative data on the expected number of duty holders/notifications. It is quite possible that some duty holders have not yet submitted and we would strongly encourage those companies to make plans to review their product portfolio and prepare to submit via our tools.</p>
<p>Why are there so many doublets of one article?</p>	<p>The obligation to submit a SCIP notification is for all actors placing an article with &gt;0.1% of a SVHC in the Candidate List. The same article may be reported many times by different actors. ECHA has designed different tools to allow to refer to data already submitted to ECHA aiming to simplify the duty and to reduce redundant data.</p>
<p>is it possible to search in database</p>	<p>We are planning to release this feature to allow the</p>

20 October 2021

with the scip number?	search by SCIP number in the coming months. The user will be able to see the information submitted related with a specific SCIP number.
Could you confirm whether or not there are different access levels for data from SCIP? Eg. are waste handlers able to see more detailed information on an article, compared to a consumer?	The SCIP database is publicly available. There is no need to indicate a role for any user of the SCIP database.
The entity seems not to be identified when consulting SCIP : is it planed to see and even filter by entity ?	The entity that submits data to the SCIP database is not displayed, nor it will be disclosed.
Do you know if there are any penalties in the member states in case of non conformity on SCIP obligations?	An answer will be provided in the plenary. Please take a look to the transposition table in the following EUR-LEX webpage: <a href="https://eur-lex.europa.eu/legal-content/EN/NIM/?uri=celex:32018L0851">https://eur-lex.europa.eu/legal-content/EN/NIM/?uri=celex:32018L0851</a>
The security breach on ECHA website on June has decreased confidence of some users on the security of SCIP database (for hackers above all). Thanks for sharing experience with SCIP and comments	A data exploit was identified and aborted by ECHA unrelated to SCIP. No data was exposed. Further info at: <a href="https://echa.europa.eu/fi/-/security-breach-on-echa-website">https://echa.europa.eu/fi/-/security-breach-on-echa-website</a>
There are intrinsic risks for confidentiality of information using referencing, beacuse you will have in the SCIP database a level of disclosure of your supply chain, in case of SCIP hacking.	A notifier of a SCIP notification does have control on the linked SCIP number via referencing if understood that only article names and article categories from original notification are displayed
Does the 11.9 Million include SSN?	Yes. ~6 million SCIP numbers with an article notification; ~ 6 million SCIP numbers with an SSN referring to one of the already notified articles.
Can ECHA prepare a specific webinar about SCIP? I am lost....	You can already access to our specific SCIP webinar that are already published at <a href="https://echa.europa.eu/scip-events/2020">https://echa.europa.eu/scip-events/2020</a> .  We highly recommend to look at our support material for more details (manuals, webinars, Q&A). <a href="https://echa.europa.eu/scip-support">https://echa.europa.eu/scip-support</a>
How i can find in dissemination portal all update for article? There should be possibility to search for all updates on part.	In the current approach only the latest update per article is available. When an update submission is received it will overwrite any earlier submission.  We are considering how to proceed in relation to updates and the related search functionalities for the future, if resources allow.

20 October 2021

<p>How is it possible that successfully submitted SCIP dossiers cannot be found in the dissemination table?</p>	<p>Millions of SCIP notifications have been made. Where functionalities like referencing are used the processing can be quite complex. As of today 92% of all notified articles are published.</p> <p>We anticipate having all submitted data pending publication online by mid October, at the current rate; and thereafter we will publish daily what was submitted by the previous day.</p>
<p>Of 11 million SCIP entries, there are only 5.6 million reported in the dissemination portal. Why such a large difference?</p>	<p>~12 million SCIP notifications have been made. Of these ~6 million are linked with actual article data. It is these which are eligible to be Disseminated at present. As of today 92% are published.</p>
	<p>The other ~6 million notifications are so-called simplified SCIP notifications (SSNs). These do not contain any article data as such, but simply point to an article that is already notified.</p>
	<p>By the end of the year the SSN notifications will be processed too in Dissemination, and will be available as part of the search by SCIP number functionality that is to come.</p>
<p>Should the article name translated into English? Maybe it makes more sense to use the original language that consumers can find the article.</p>	<p>All data is published as received, in the language in which it was submitted. There is no translation of any kind. It is possible to find article identifiers in e.g. German, French, and more.</p>
<p>when all questions are answered, can you provide us with time slot?</p>	<p>Apologies for the short time available for the live QA.</p>
<p>Are search blocks connected with "AND" or "OR"?</p>	<p>The search blocks (Article Identity, Article category etc) connect with AND. Within each block filters connect with OR. E.g., multiple article categories give results matching any selected category.</p>
<p>Does ECHA have a plan to be able to download SCIP data with .xls/.csv/.xml by user?</p>	<p>No data is or will be available in the public SCIP database presented per user or submitting legal entity.</p>