Introduction

Webinar: Getting ready for submitting SCIP notifications

19 November 2020

Clara Rueda, ECHA

Agenda

- **Introduction**
- **SCIP data preparation**

  ('Grouping', 'hierarchy', recommendations)
  Telmo Vieira Prazeres
- **SCIP tools**

  Ferran Villar Garcia
- **Tools to refer to data already submitted to ECHA**

  'Referencing' and Simplified SCIP Notification (DEMO)
  Clara Rueda and Tommy Hägg
- **Concluding remarks**

Webinar open for questions

Q&A

- Join Q&A at: slido.com
  Event code: #scip2020
- Send questions at any time – we will answer as many as possible until 15:00 Helsinki time
- We can only answer questions related to the scope of the webinar
- If your question is not answered by the end of the webinar, send it via our contact form: echa.europa.eu/contact

SCIP data preparation

Webinar: Getting ready for submitting SCIP notifications

19 November 2020

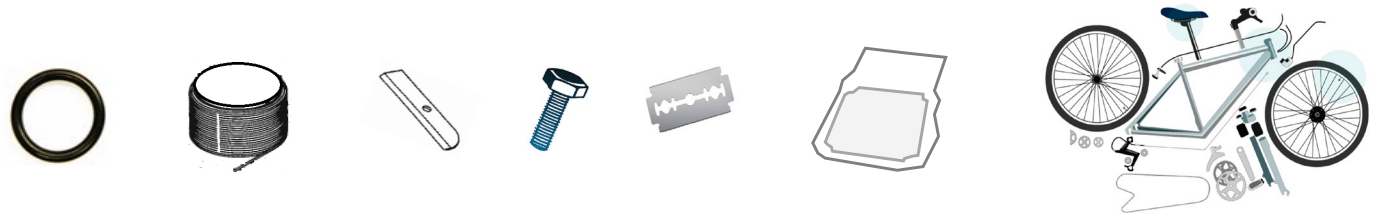
Telmo Vieira Prazeres, ECHA

Summary

- Introduction to the SCIP database and to the SCIP notification duty
- How to get prepared
- ECHA recommended solution(s) for level of reporting (‘grouping’ and ‘hierarchy’)
- Recommendations for preparing and submitting SCIP notifications

SCIP Database

- Database of information on **S**ubstances of **C**oncern **I**n articles, as such or in complex objects (**P**roducts)



- Established under the Waste Framework Directive (WFD)

- Ensures information about substances of very high concern (SVHCs) is available throughout the whole life cycle of products and materials, including at the waste stage

echa.europa.eu/scip

SCIP Database objectives

Reduce the content of (severely) hazardous substances in materials and products, including recycled materials

Push for **substitution** of substances of concern & **prevention** of waste generation containing hazardous substances

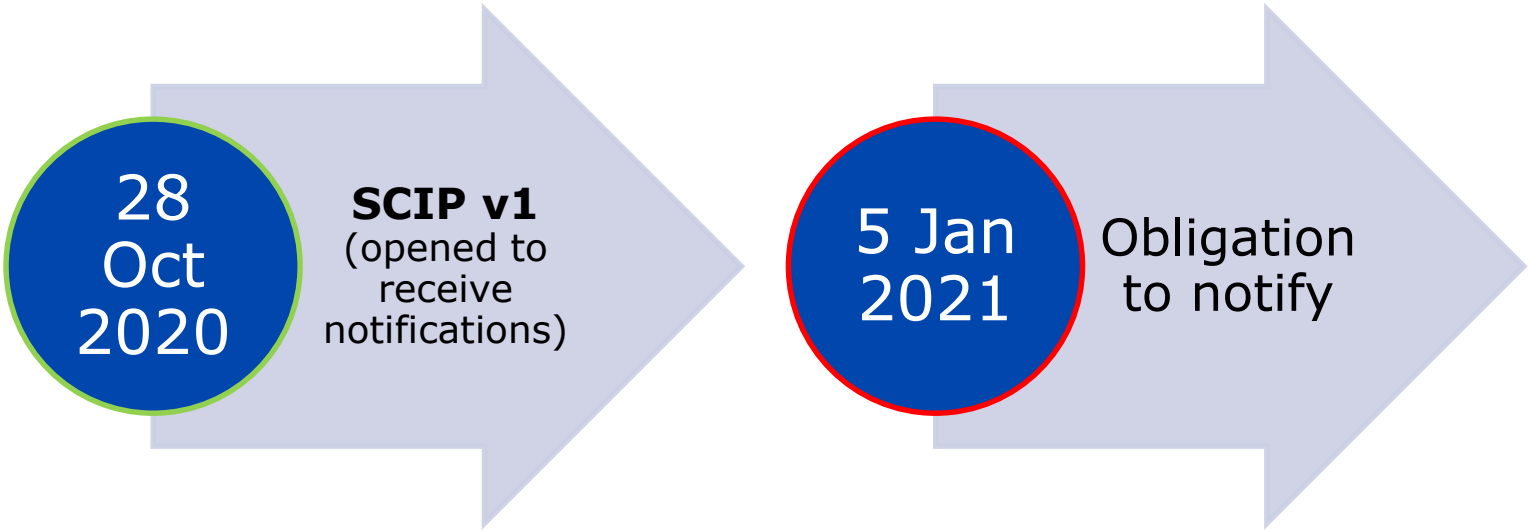
Contribute to a more **circular** economy: improve waste treatment operations

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

SCIP v1

Opened on **28 October 2020**

to receive data to fulfil legal obligation

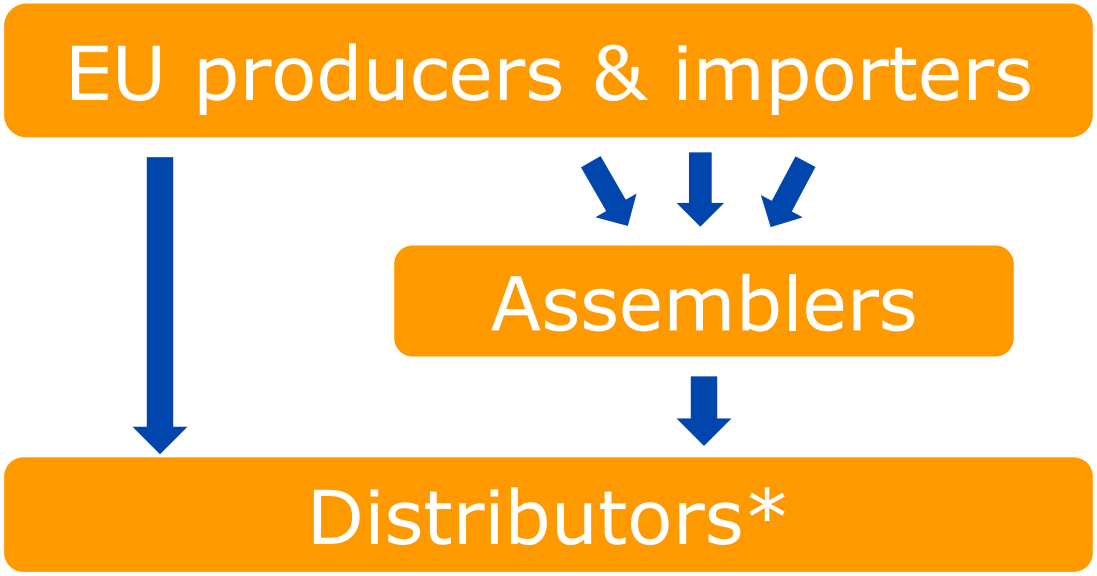


SCIP notification duty

Any supplier of **articles containing** above 0.1% w/w of a **substance of very high concern** on the Candidate List

(WFD - Directive 2008/98/EC, Article 9(1)(i))

Note: *There is no tonnage trigger for this duty*



* Except retailers that supply directly and exclusively to consumers

Non-EU suppliers

Not allowed to submit SCIP notifications

Support **importers** in the EU to fulfil their regulatory obligations by submitting SCIP notifications to ECHA

Get prepared!

ECHA
EUROPEAN CHEMICALS AGENCY

SCIP

Get prepared!

New to SCIP?
Check out our
infographic ›

Visit our SCIP webpage:

echa.europa.eu/scip

- SCIP Database
  - Suppliers of articles
  - Waste operators
  - Consumers and SCIP
  - SCIP support
  - Tools to prepare and submit notifications

Q&A Questions and answers

Contact ECHA

Access ECHA Cloud Services

ECHA Submission portal

How to track hazardous substances in the supply chain

https://echa.europa.eu/-/safer-chemicals-conference-2020

ECHA
EUROPEAN CHEMICALS AGENCY

SCIP

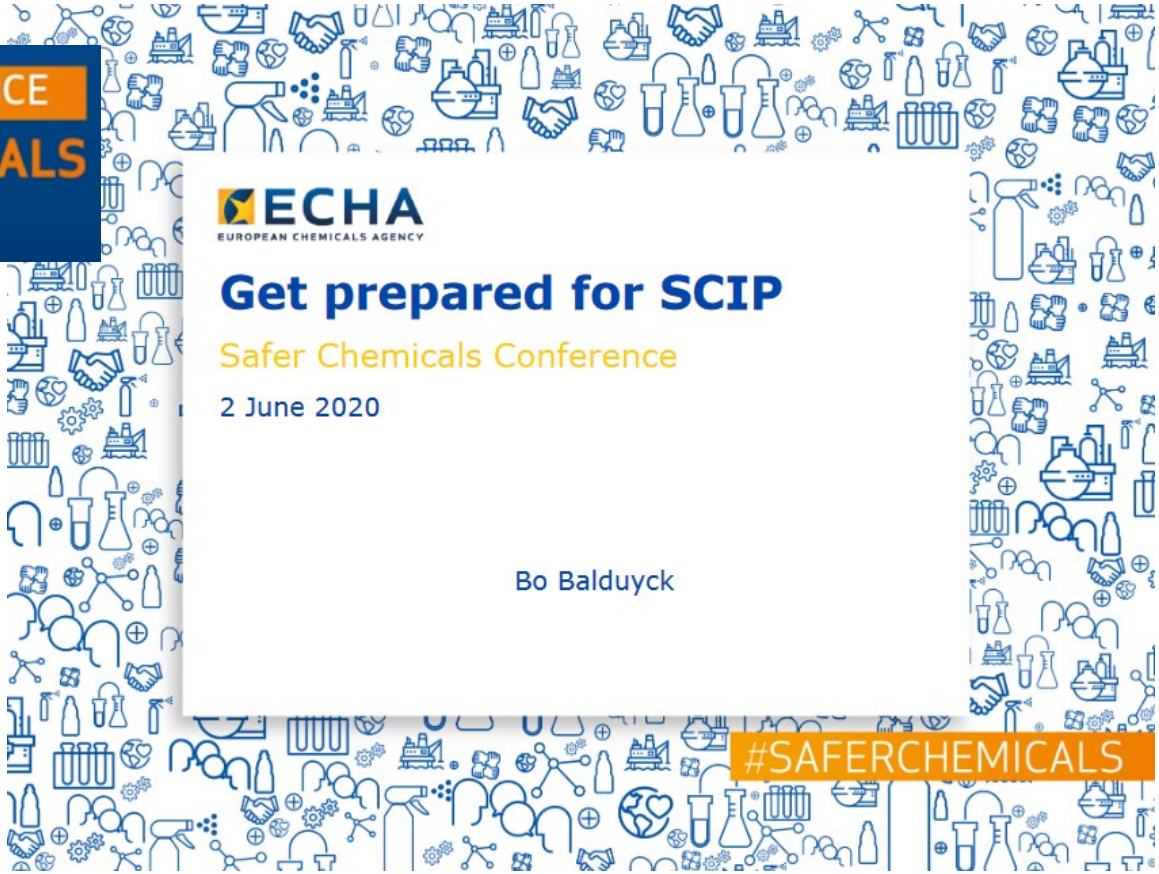
Get prepared!

HOW TO PREPARE FOR SCIP?

1. Find out whether you need to submit a SCIP notification
2. Know and understand the information requirements
3. Know your portfolio of articles
4. Adapt your data
5. Prepare your submission
6. Submit your notification

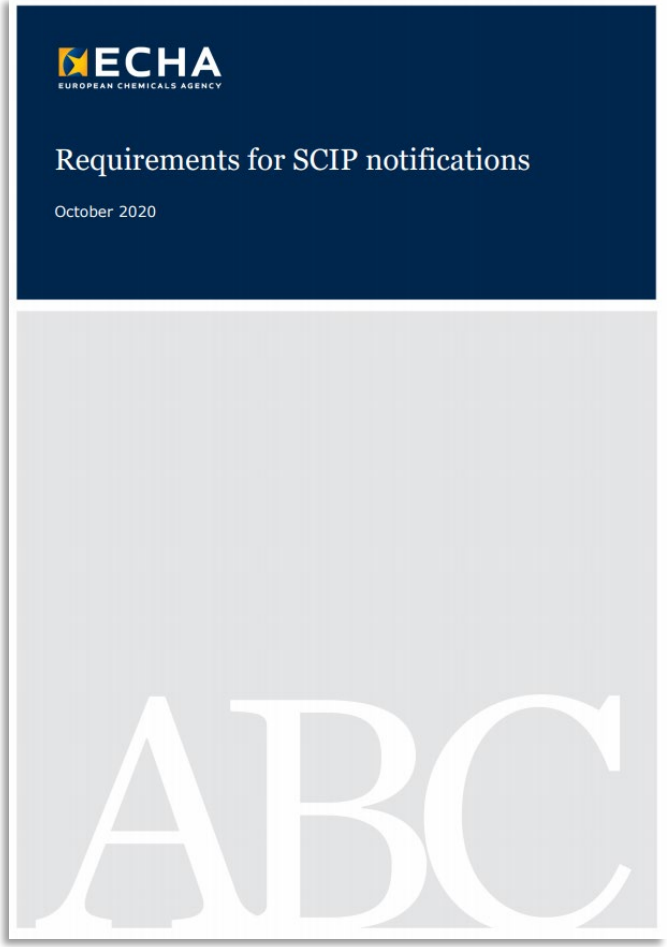
https://echa.europa.eu/scip-suppliers-of-articles

Get prepared!



https://echa.europa.eu/-/safer-chemicals-conference-2020

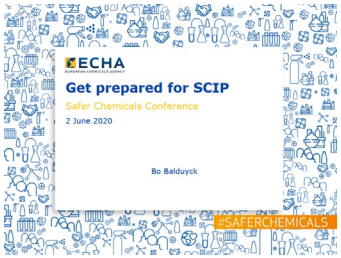
SCIP Requirements

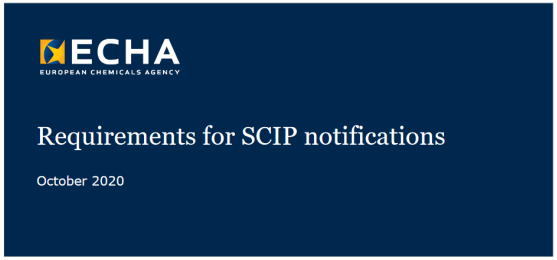


Requirements for SCIP notifications

- Introduction
  - Duty holders
  - Scope
  - Timelines
- Information requirements
- Recommended solutions for level of reporting
  - 'Grouping'
  - 'Hierarchy'

Information requirements





Common

Article Identification

- *Identifiers*
- *Categorisation*
- *Characteristics*

Safe use instructions

Complex objects (only)

Complex object components

Identifiers
- **Article name**
- Other names (brand, model)
- **Primary article identifier** (EAN, GTIN, catalogue number, part number…)
- Other identifiers (EAN, GTIN, catalogue number, part number…)

Categorisation
- **Article category** (CN/TARIC code)
- **Production in the EU**

Characteristics (picture, dimensions, colour, weight…)

Safe use instructions

Articles as such (only)

(Concern elements)
Candidate List substance in the article

Identification of articles and complex objects

Identification of articles and complex objects

	Communication in supply chain (REACH Art. 33(1))	SCIP **Notification**
Conditions	Substance of very high concern in the Candidate List + % > 0.1% w/w **'Article' defined under REACH: function, physical form** (shape, surface and design)**, chemical composition**	
Information	Sufficient information to allow safe use of the article, considering all life-cycle stages, as well as foreseeable misuse, recycling and disposal	
Identification	Available on articles/products on shelves/labels, in catalogues, etc.	Needs to be provided
Format	Not specified To be used?	SCIP format by ECHA

Target audiences

SCIP

Waste operators

Available info to
- ✓ drive waste stream decisions
- ✓ support compliant re-use
- ✓ increase recycled materials

Consumers and other interested parties

- ✓ Empower informed choices
- ✓ Improve targeted disposal

Authorities

- ✓ *SVHC monitoring to address regulatory actions*
- ✓ *Available info to support (waste) policy decisions*
- ✓ *Support enforcement*

Recommendation concerning the identification of the article or complex object

- **Provide sufficient identifiers** (names and alphanumeric identifiers available in products, labels, catalogues, etc) **enabling to search in the SCIP database** for the information linked to a specific product placed on the market by e.g.
  - waste operators,
  - consumers,
  - authorities,
  - actors in the supply chain.

The name and the primary article identifier assigned by the submitter (to facilitate creation and submission of notifications) are most likely not sufficient for the purposes of the SCIP database. Other names and identifiers may most likely needed to be submitted.

Making information available

Making information available

- ECHA will **publish** the **information as received** on its website.
- The **quality** of the data remains the **responsibility of each duty holder**.

SCIP dissemination

CBI & SCIP

Waste operators

Consumers and other interested parties

Protecting confidential information

Submitter's information

SCIP will not disclose the link between the notification and its submitter (legal entity)

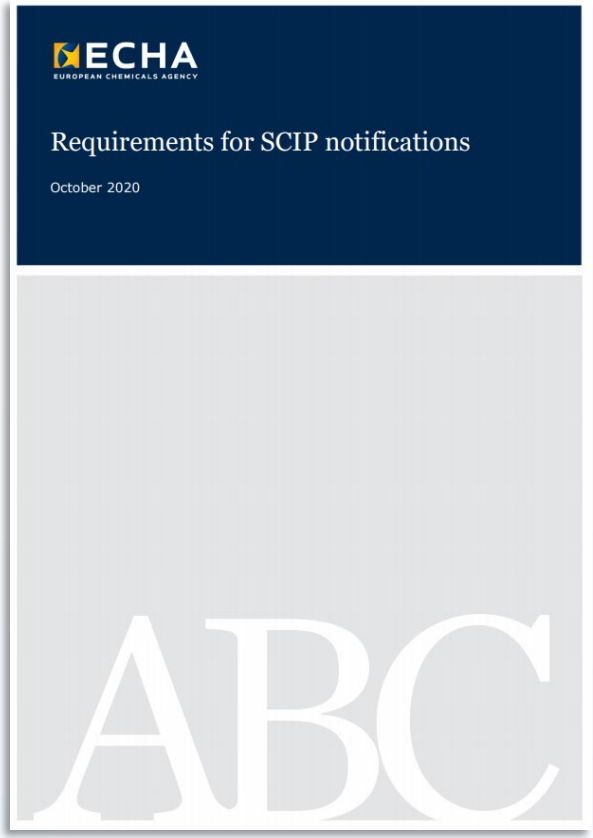
Identifiers

Only identifiers of articles notified as such, or identifiers of top level articles, complex objects, will be disclosed

Level of reporting and text fields

You have a responsibility to avoid reporting information that could disclose other commercially sensitive information (e.g. detailed product composition or trade volumes)

ECHA recommended solution(s) for ‘grouping’



The *fully identical* articles

Fully identical articles means articles on their own with

- the exact **same function** or **use** (e.g. same name and article category),
- the **same physical form** (shape, surface and design),
- and the **same chemical composition**.

Example: 100 fully identical screws = 100 SCIP notifications?

No!

One SCIP notification covering the 100 fully identical screws

Quasi-identical articles as such

Criteria for ***quasi-identical* articles as such**:

- The articles have the same function or use (e.g. same name and article category);
- They contain the same Candidate List substance(s);
- The material that the articles are made of is the same;
- The safe use instructions are the same, which is a logical consequence of the previous two criteria.

Recommendation: articles meeting these criteria can be submitted in the same SCIP notification*, provided that the right elements for the identification of each identical article (e.g. names and alphanumeric identifiers) are included in the notification.*

Quasi-identical articles as such: example

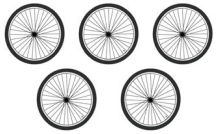
Other article identifiers + New item

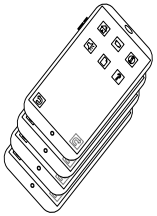
#...	Type	Value
1	item number	15x2.0B RJ
2	item number	15x2.0G RJ
3	item number	20x3.5B RJ
4	item number	20x3.5G RJ
5	item number	20x5.0B RJ
6	item number	20x5.0G RJ
7	EAN (European Article Number)	9944556677801
8	EAN (European Article Number)	9944556677812
9	EAN (European Article Number)	9944556677823
10	EAN (European Article Number)	9944556677834
11	EAN (European Article Number)	9944556677845
12	EAN (European Article Number)	9944556677856

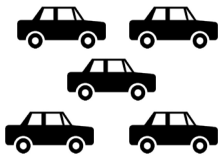
Example: O-rings made of the same material containing the same Candidate List substance, but of different width, diameter or colour

They can be submitted in the same SCIP notification, *provided that the right elements for the identification of each (identical) article are included in the notification.*

Quasi-identical complex objects







Criteria for *quasi-identical* complex objects:

1. The complex object (units) have the same function or use

[same name and article category (CN/TARIC code and description)];

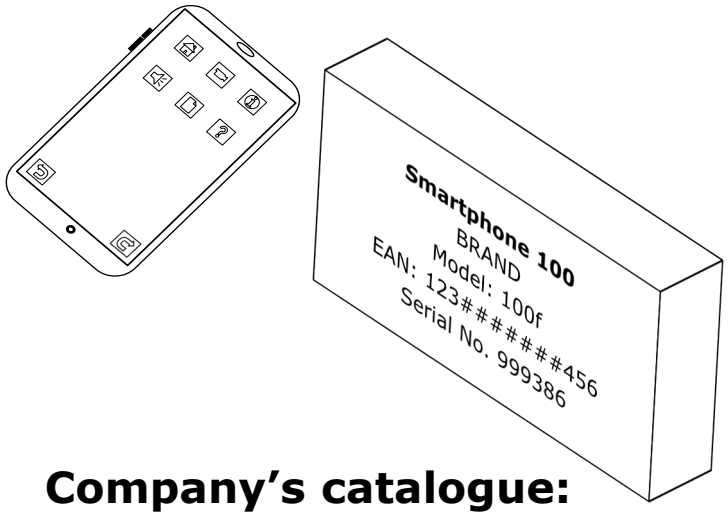
2. The complex object (units) incorporate the same components and subcomponents (i.e. having the same function/use following the previous criterion 1), and the complex object or its components and subcomponents incorporate the same articles as such, which fulfil the criteria for *quasi-identical* articles as such listed in the respective slide.

3. The safe use instructions are the same for the complex object (units)

[which is a logical consequence of the two criteria above]

Recommendation: complex objects meeting these criteria can be submitted in the same SCIP notification

Example: sets of quasi-identical complex objects



Company's catalogue:

Smartphone 100

Brand: BRAND

Model: 100f

Bar code number (EAN): 123#######456

Note: serial numbers available for the 649 units 999350–999999

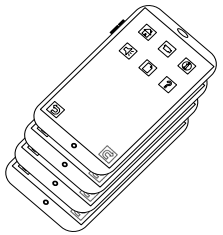
Several units from the 649 units placed on the market by a company incorporate the same combinations of components and subcomponents with articles as such containing Candidate List substances.

- Subject to the SCIP notification obligation

Those combinations are the same for different **sets of** the assembled **units**, where those units fulfil the criteria **of *quasi-identical* complex objects**.

Each of those sets must be submitted to the SCIP database as **one notification** with a **specific primary article identifier**.

Example: the SCIP identification

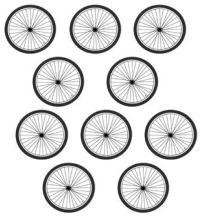


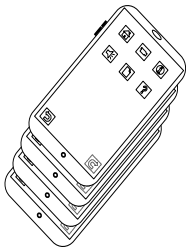
"Smartphone 100"

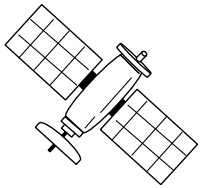
Required specific identification of the "smartphone 100" sets for SCIP notifications			
Primary article identifier	**Primary ID** *(Set 1)* *200 units*	**Primary ID** *(Set 2)* *350 units*	**Primary ID** *(Set 3)* *99 units*
Smartphone 100	**100-1**	**100-2**	**100-3**
O Printed Circuit Board PCB	PCB-01	PCB-02	-
Ø Capacitor CAP	CAP-001	CAP-002	-
- Contact CO	CO-0001 ¶ SVHC 1	CO-0001 ¶ SVHC 1	-
- Casing CA	CA-0002 ¶ SVHC 2	-	-
O Battery BAT	BAT-03 ¶ SVHC 3	-	BAT-03 ¶ SVHC 3

It is recommended to submit one SCIP notification for each set of *quasi-identical* smartphones (100-1, 100-2 and 100-3). Do not submit a SCIP notification for each individual unit.

No submissions for <u>each single unit</u>





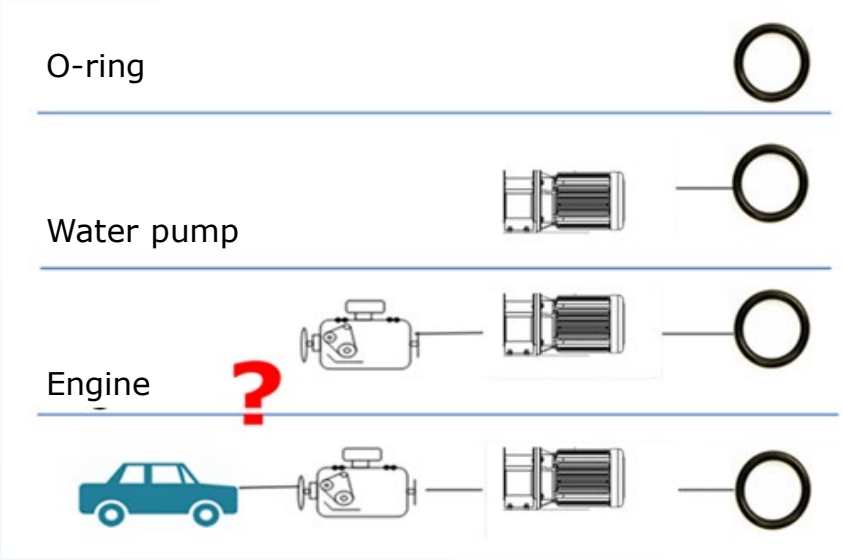


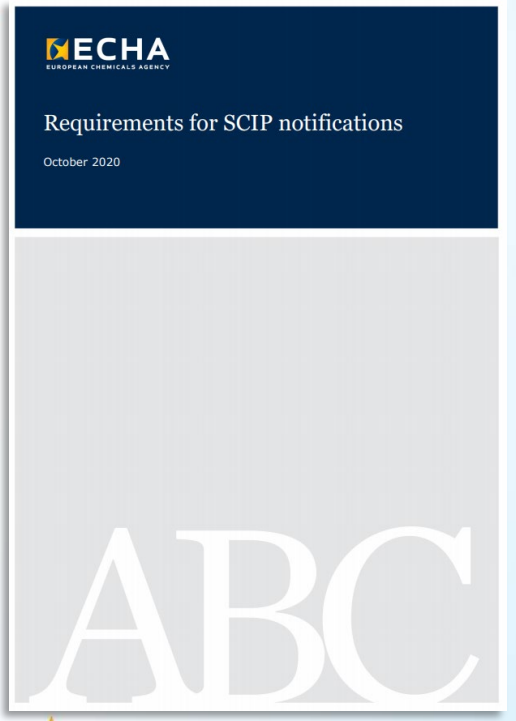
- Submissions for each single unit placed on the market **must be avoided**

- Do not submit a notification for each unit: it is the same as submitting the same required SCIP data multiple times. The WFD requires one notification per article and not per unit.

- Companies should submit identifiers or make them available in supply chains to allow users **to search in the SCIP database** for the information linked to a specific product placed on the market

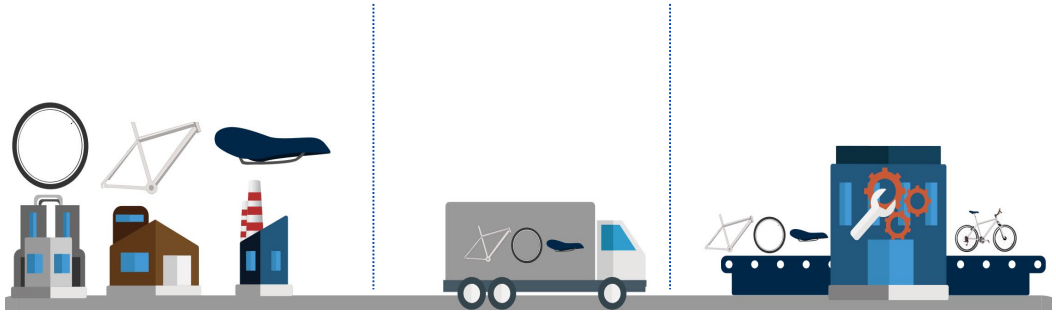
ECHA recommended solution for 'hierarchy' (for complex objects)





Recommendation for structuring 'hierarchy' for complex objects

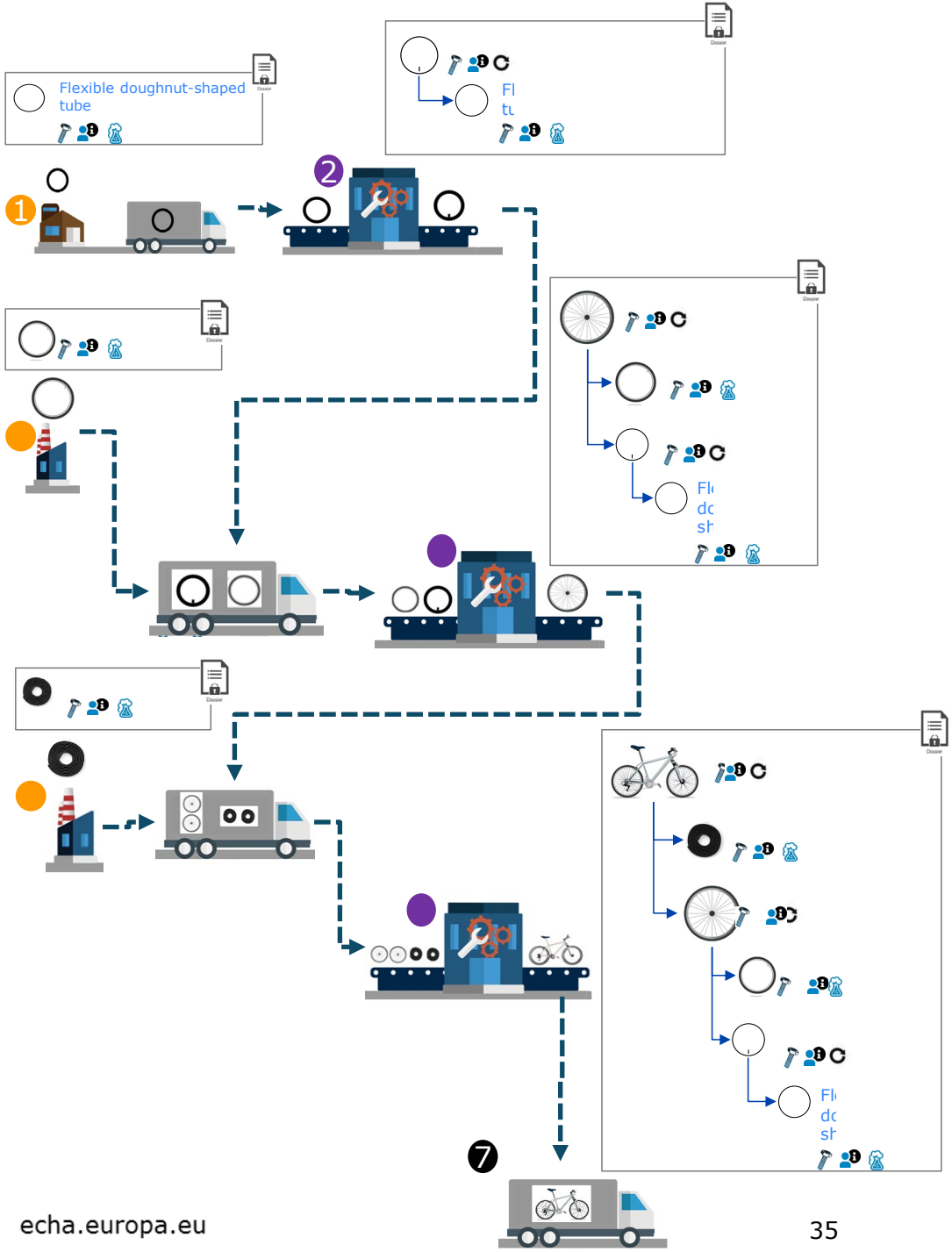
Structure the 'hierarchy' based on practical considerations, to include the number of layers that reflect the incorporation of the articles in subcomponents, as well as the incorporation of the subcomponents and components in that complex object at **each assembling stage**.



- Industry and sector associations should support their members in finding the better solutions that 'fit-for-purpose'.
- Work in a collaborative way within your supply chain with suppliers and customers. Use 'referencing' in a SCIP notification when preparing your notification.

Structuring the ‘hierarchy’ in a SCIP notification

- Follow the assembling of complex objects looking at the inputs and outputs of each assembling stage
- Make use of ‘referencing’, whenever possible



Recommendations for preparing and submitting SCIP notifications

Be transparent by making efforts to submit and structure your information in a clear and understandable way to be useful for users of the SCIP database, while ensuring compliance

Keep in mind your **company's image**

- Be aware that the publicly available information in the SCIP database will potentially be subject to scrutiny by users of the database, namely waste operators, consumers, NGOs representing the interests of consumers, and Member States authorities.

SCIP notifications without information in addition to the mandatory fields to submit a successful notification are potentially not compliant and may not fulfil the SCIP objectives.

Avoid submission of incomplete or unclear SCIP notifications

- Provide a clear identification for the article or complex objects placed on the market to enable searches by users of the database (using e.g. other names, other identifiers, characteristics, pictures)
- Provide sufficient information, including instructions, to support waste operators to treat properly waste (e.g. by including safe use instructions, uploading disassembling instructions, providing accurate concentration ranges), once the articles or complex objects become waste

Report the information following the purpose of each field (e.g. do not use the "safe use instructions" to report location of substance).

Avoid to submit the same information multiple times! Do not make submissions for each unit of a complex object placed on the market, where you can group those units using the quasi-identical complex object criteria.

Take sufficient time before submitting your notifications to

- work in a collaborative way within your supply chain with suppliers and customers.
- use ‘referencing’ in a SCIP notification when preparing your notification.
- 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 the ‘hierarchy’ recommendations from ECHA

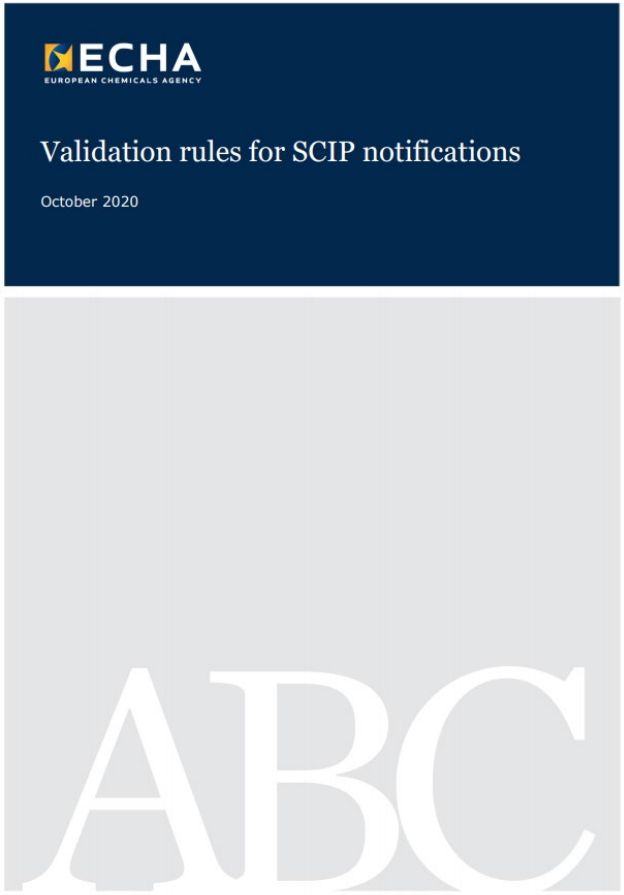
If you are submitting your notifications via system-to-system (S2S), consider asking your IT service provider to implement features that allow using ‘referencing’ and allow you to follow the ‘grouping’ and the ‘hierarchy’ recommendations from ECHA

Avoid submit notifications by mistake. ECHA is not able to delete submissions, neither prevent its dissemination.

Avoid to the extent possible the need to submit updates to correct minor mistakes. Ensure the quality of the data before submitting your notification.

Run the validation of your dossiers 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.

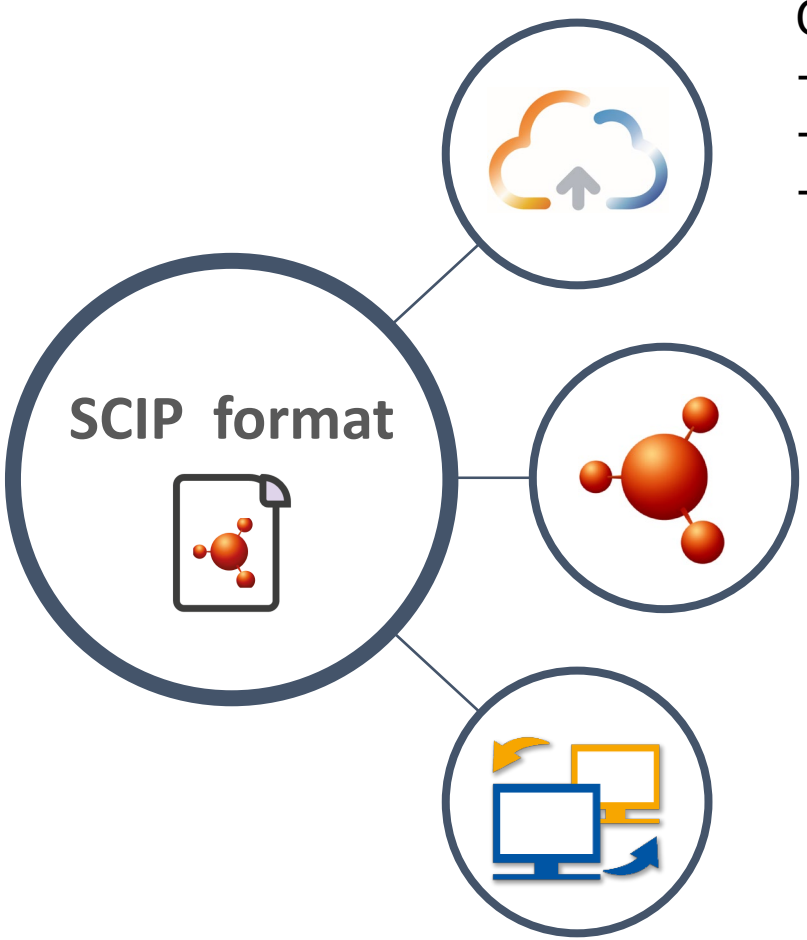


IT Tools

November 2020
Webinar SCIP

Ferran Villar Garcia
SCIP Team
European Chemicals Agency

Prepare and Submit SCIP notifications



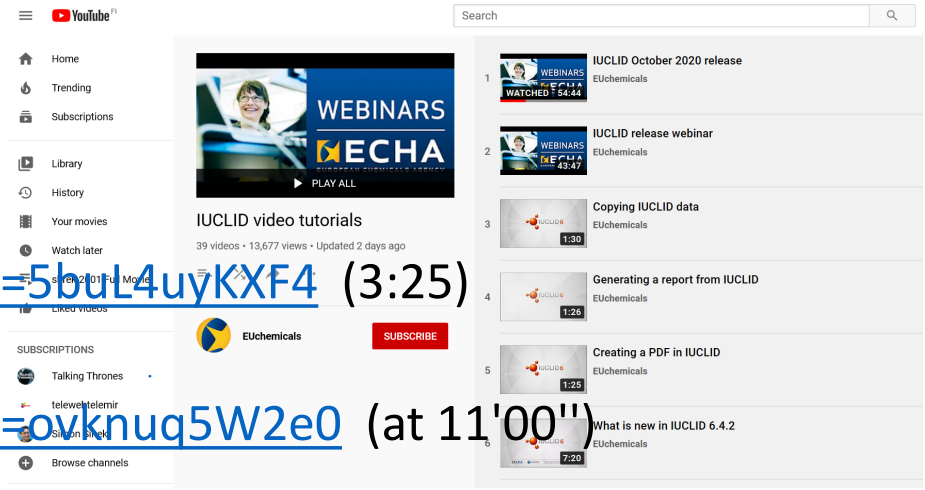
Online in ECHA Cloud service
- Maintained by ECHA
- Secure data storage
- More: https://echa.europa.eu/support/dossier-submission-tools/echa-cloud-services

Offline in IUCLID 6
- Downloaded from IUCLID website
- Desktop and server versions
- Public IUCLID API
- More: https://iuclid6.echa.europa.eu/

System-to-system service
- Prepared in company's system
- Automated approach
- Bulk submissions

Video tutorials available on how to get started

https://www.youtube.com/playlist?list=PLOPGDACSd6qyDkdXwPua1Fjb5bJksY75k



Creating an ECHA account:
https://www.youtube.com/watch?v=5buL4uyKXF4 (3:25)

Subscribe to use of the Cloud:
https://www.youtube.com/watch?v=ovknuq5W2e0 (at 11'00'')

Add Foreign user account:
https://www.youtube.com/watch?v=4JGsQUbGYqw (3:25)

IUCLID Cloud:
https://www.youtube.com/watch?v=kXaDjajaDOU (1:11)

Tools: IUCLID6

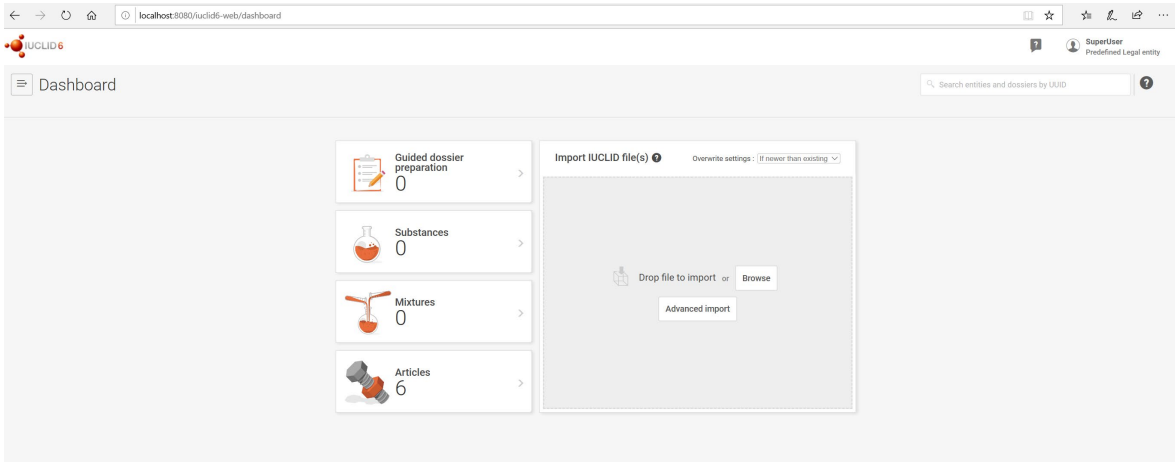
https://iuclid6.echa.europa.eu/

- Download centre (Offline in IUCLID 6):

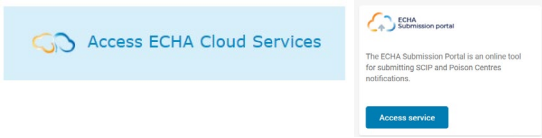
https://iuclid6.echa.europa.eu/download

- Public API descriptions:

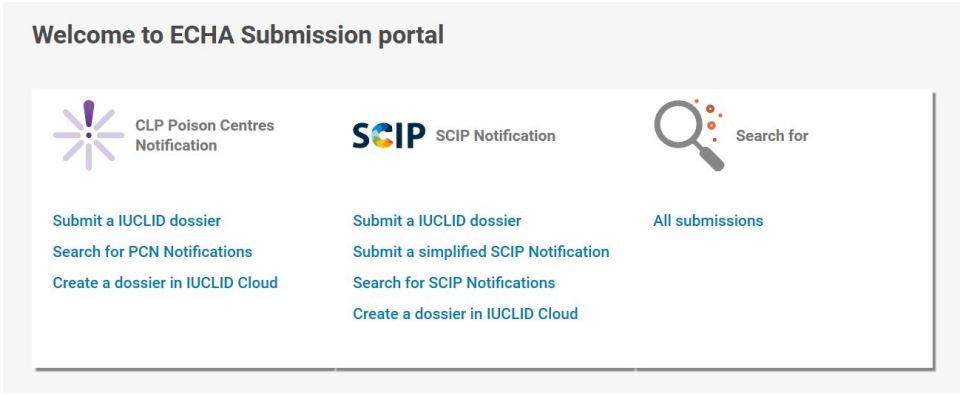
https://iuclid6.echa.europa.eu/project-iuclid-6

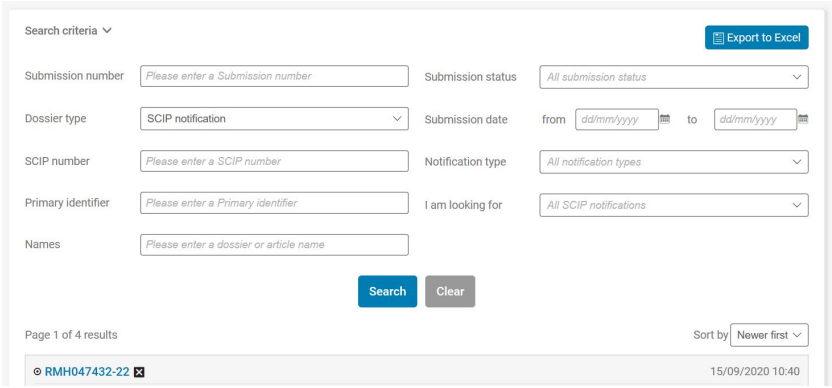


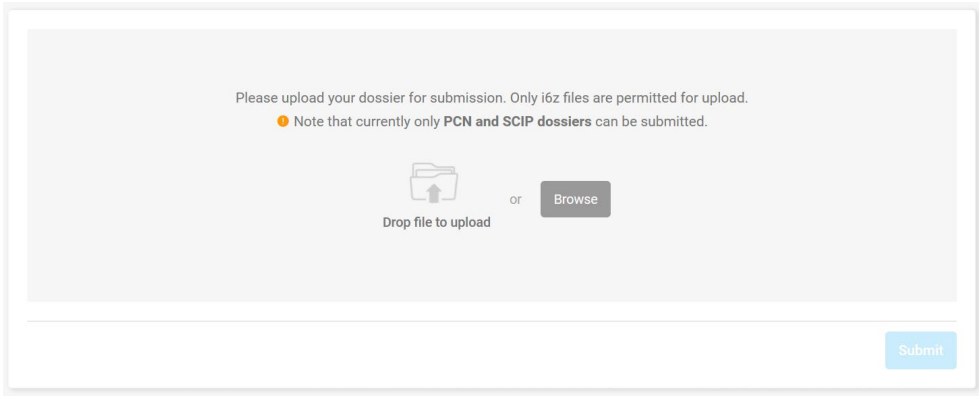
ECHA
EUROPEAN CHEMICALS AGENCY

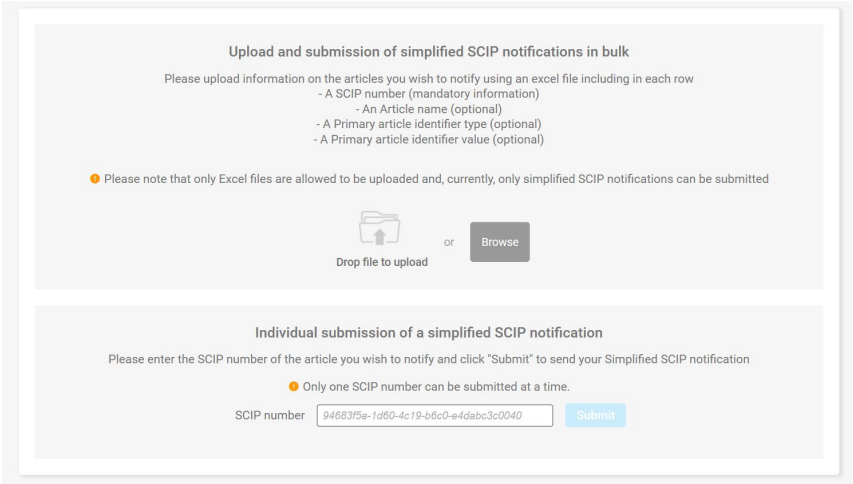


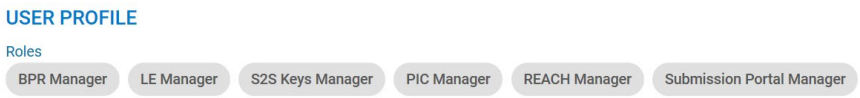
Tools: Submission Portal



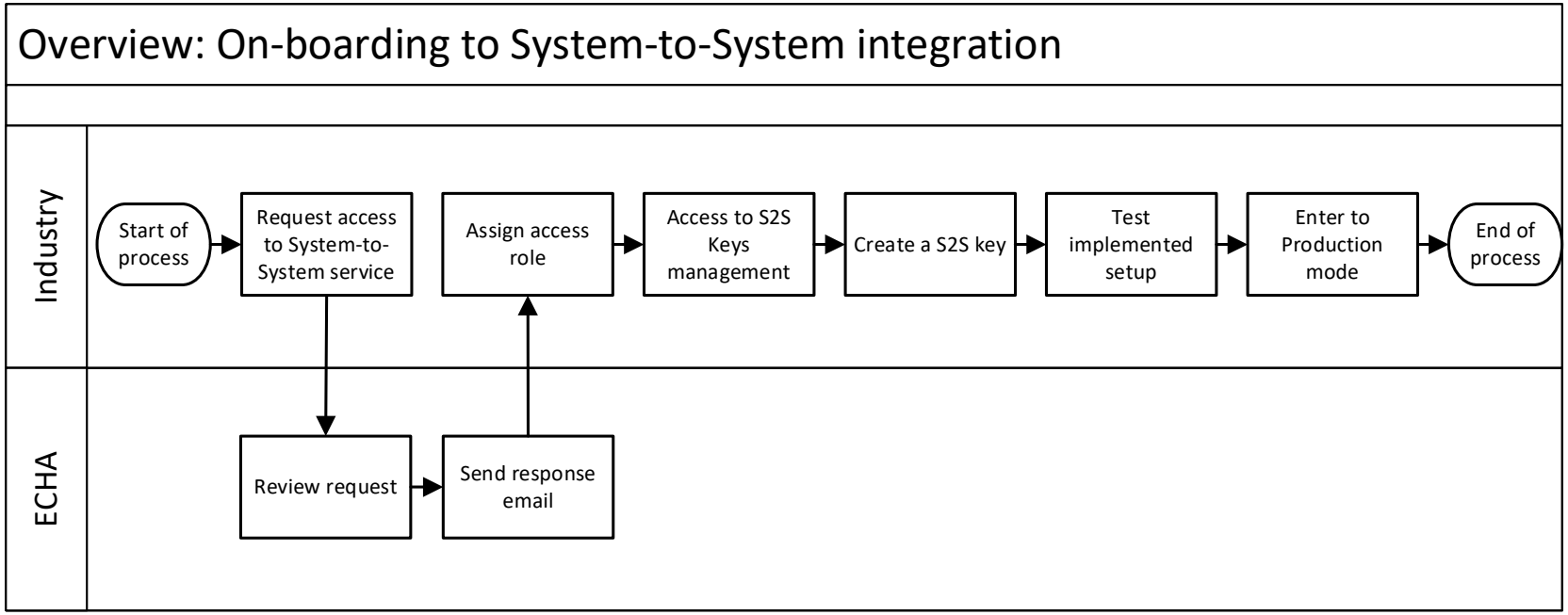








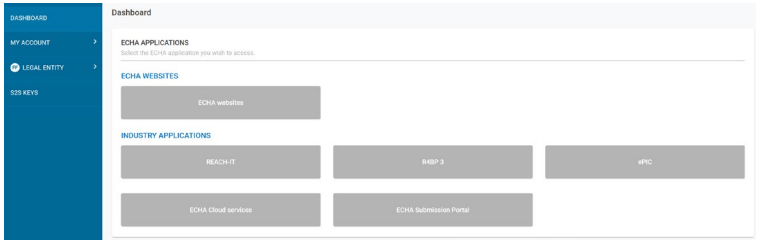
S2S - How to get on-board?



S2S - Service request

- When you ask for S2S service you may
  - Ask only for one Legal Entity
    - ECHA account username
    - Legal Entity UUID that wants to submit dossier
    - Legal Entity name
    - Software used to connect to ECHA system
  - Ask for multiple Legal Entities
    - Information about your company
    - Process you have in place to legitimate your member companies
    - Excel file containing Legal Entity name and UUI

Production Environment



Production submissions will be kept and published!

We have received some requests to delete SCIP notifications submitted to the SCIP database. ECHA does not have the capacity to delete SCIP notifications submitted to us on the production environment. The information submitted to the SCIP database will be publicly available and therefore readily available on our website from early next year.

ECHA will publish the information, as received, on its website. The quality of the data remains the responsibility of each duty holder.

In order to avoid any misunderstanding about the environment used to submit SCIP data, we recommend you to pay extra attention to the layout and the messages included in the ECHA submission portal environment if you are using the ECHA Submission portal user interface and also the need of a test flag in the HTTP header when submitting testing data via S2S.

https://echa.europa.eu/home

Test Environment for S2S

- Submissions made in the context of the integration tests will not be further processed i.e. will not disseminated.
- See technical documentation for further information

4.2 Test flags

ECHA Submission portal supports the aforementioned testing phases by using two HTTP Header elements that have to be provided while testing in every request performed by the industry system:

Table 17: Test flags in the HTTP Header

Request Param	Description
X-ECHA-Mode	HTTP Header to indicate the mode of operation, i.e. - X-ECHA-Mode=test while testing; - X-ECHA-Mode must be omitted when switching to Production mode. ⚠ In case it is provided and takes a value other than "test", it causes a 400 - Bad request.
X-ECHA-Test-Run	A test run identifier effectively provides an isolated testing environment, both from regular production submissions, but also from test submissions with a different test run identifier. It allows grouping multiple submissions, potentially from different legal entities, into a single test run, in order, in particular, to verify cross-submission and even cross-legal entity portal business rules. As a consequence, the same dossiers (and associated UUIDs, UFI, etc) can be reused in different test runs, without interfering with each other. The expected structure of the identifier consists of two parts separated by a dash "-" character: a globally unique alphanumeric "company" prefix, and an incremental number. Note that the uniqueness of the prefix is not ensured by technical means. Integrators are advised to use a characteristic acronym or name that has little chance to be selected by another company or group e.g. the legal entity key. Obviously, generic choices such as "test", "pilot", "echa", should be avoided. ⚠ This must be only provided when X-ECHA-Mode=test, otherwise it causes a 400 - Bad request. ⚠ This must be always provided in lower case.

X-ECHA-Mode	X-ECHA-Test-Run	Testing phase/purpose
test	(absent)	Connectivity tests - no actual processing of the submitted file - dummy responses
test	(absent)	Authentication and authorisation tests - no actual processing of the submitted file - dummy responses
test	mycompanyid-001 (example)	Integration tests - actual processing of the submitted file - actual response
(absent)	(absent)	Production mode - actual processing of the submitted file - actual response - valid dossiers are dispatched - valid dossiers become available in Remote Access portal

https://echa.europa.eu/contact

Support while preparing your notifications

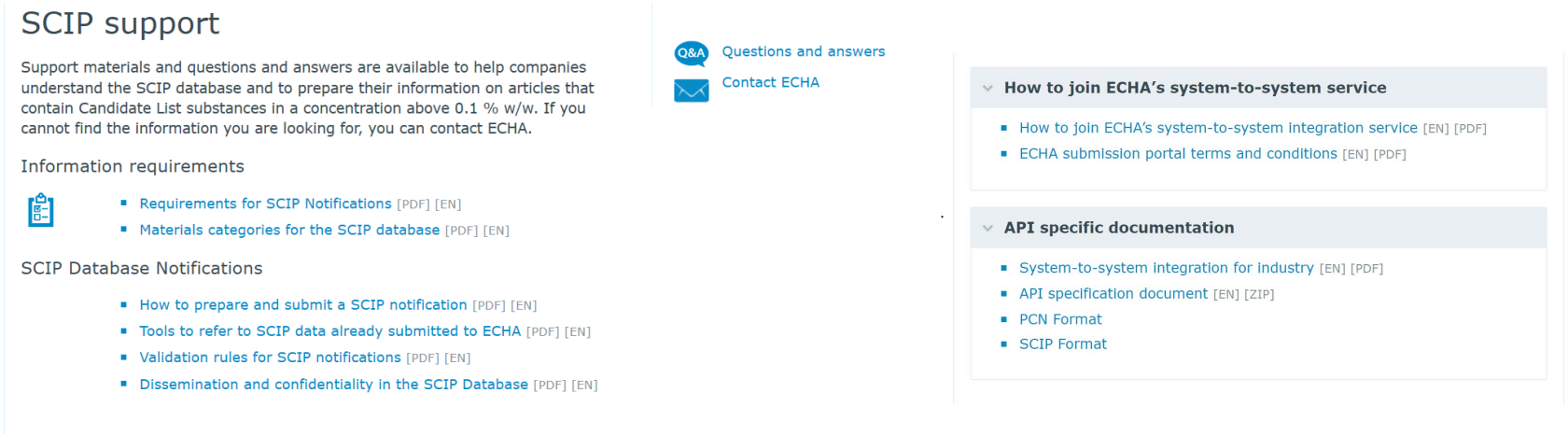
Do you want a share your Articles with ECHA? We can provide feedback to ensure that the work you are performing is aligned on the recommendations ECHA has been presenting.

- Concerning the identification of the article or complex object
- Concerning the hierarchy to drive the location of the concern element
- Concerning the grouping used to simplify your notifications
- Concerning the categorisation of the article or complex object

Remember that from the i6z we are not going to deduct any LE name and that all the information we will be reviewing won't be disclosed in any manners to third parties.

Now to be the right moment to perform those activities so initial submissions are aligned with latest recommendations ☺!

Documentation



SCIP support

Support materials and questions and answers are available to help companies understand the SCIP database and to prepare their information on articles that contain Candidate List substances in a concentration above 0.1 % w/w. If you cannot find the information you are looking for, you can contact ECHA.

Information requirements

- Requirements for SCIP Notifications [PDF] [EN]
- Materials categories for the SCIP database [PDF] [EN]

SCIP Database Notifications

- How to prepare and submit a SCIP notification [PDF] [EN]
- Tools to refer to SCIP data already submitted to ECHA [PDF] [EN]
- Validation rules for SCIP notifications [PDF] [EN]
- Dissemination and confidentiality in the SCIP Database [PDF] [EN]

Q&A Questions and answers

Contact ECHA

How to join ECHA's system-to-system service

- How to join ECHA's system-to-system integration service [EN] [PDF]
- ECHA submission portal terms and conditions [EN] [PDF]

API specific documentation

- System-to-system integration for industry [EN] [PDF]
- API specification document [EN] [ZIP]
- PCN Format
- SCIP Format

https://echa.europa.eu/scip-support
https://echa.europa.eu/de/manuals?panel=s2s#s2s

Tools to refer to data already submitted to ECHA (Demo)

Webinar: Getting ready for submitting SCIP notifications

19 November 2020

Clara Rueda, ECHA
Tommy Hägg, ECHA

Tools to refer to data successfully submitted to SCIP

Aim: facilitating data management, reducing the complexity of the obligation and the need to repeat already submitted data.

How? A company can create a notification by referring to a previous notification (**Simplified SCIP notification**) or can create a 'light weight' dossier by including 'referencing' to already submitted information for components in complex objects (**'Referencing'** in a SCIP notification).

Each duty holder is responsible for the information submitted.

It is up to the individual actors in the supply chain, or otherwise, to enter into the necessary arrangements, if considered needed, to use these voluntary tools.

’Referencing’ in a SCIP notification

‘Referencing’ in a SCIP notification

- An assembler using ‘referencing’ can create a “*light-weight*” dossier for a complex object, where the complex object component information is represented by the SCIP number of the already submitted component.

- **Pre-condition**: to receive the SCIP number of the article’s or complex object’s SCIP notification already submitted to ECHA.

  (for instance as an element of the information to be provided by your supplier under REACH Art. 33(1).)

- **Common scenarios**:
  - Assemblers making ‘referencing’ to data submitted by their suppliers.
  - Assemblers making ‘referencing’ to data already submitted by themselves.

Basic principles

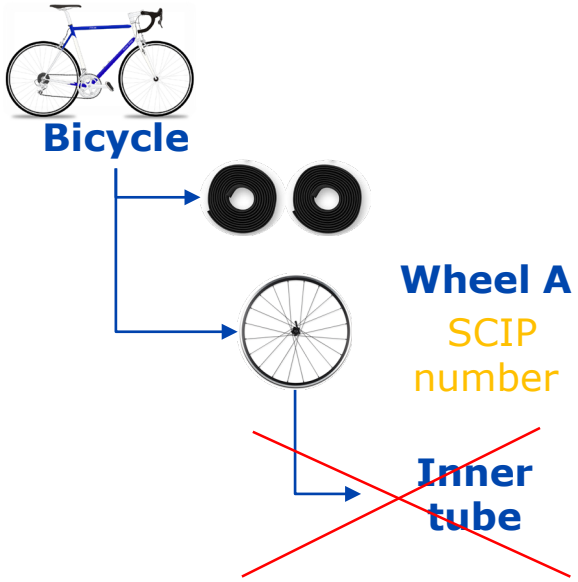
1. No change on the physical form nor composition on the referenced article is allowed

No change on the article

2. The article referenced is always a component of a more complex object.

3. The article referenced can not have additional components linked to it.

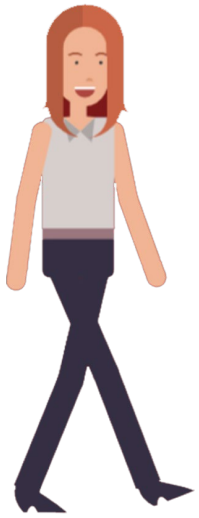
4. By using 'referencing' you are **linking your notification** to your supplier's article or complex object notification and its updates.



Demo use case ‘Referencing’

We are a **bicycle producer** located in Helsinki, Finland and our wheel’s supplier has informed us that the wheel A, he is supplying, contains a substance of very high concern. He informs us that he has already submitted a SCIP notification for wheel A.

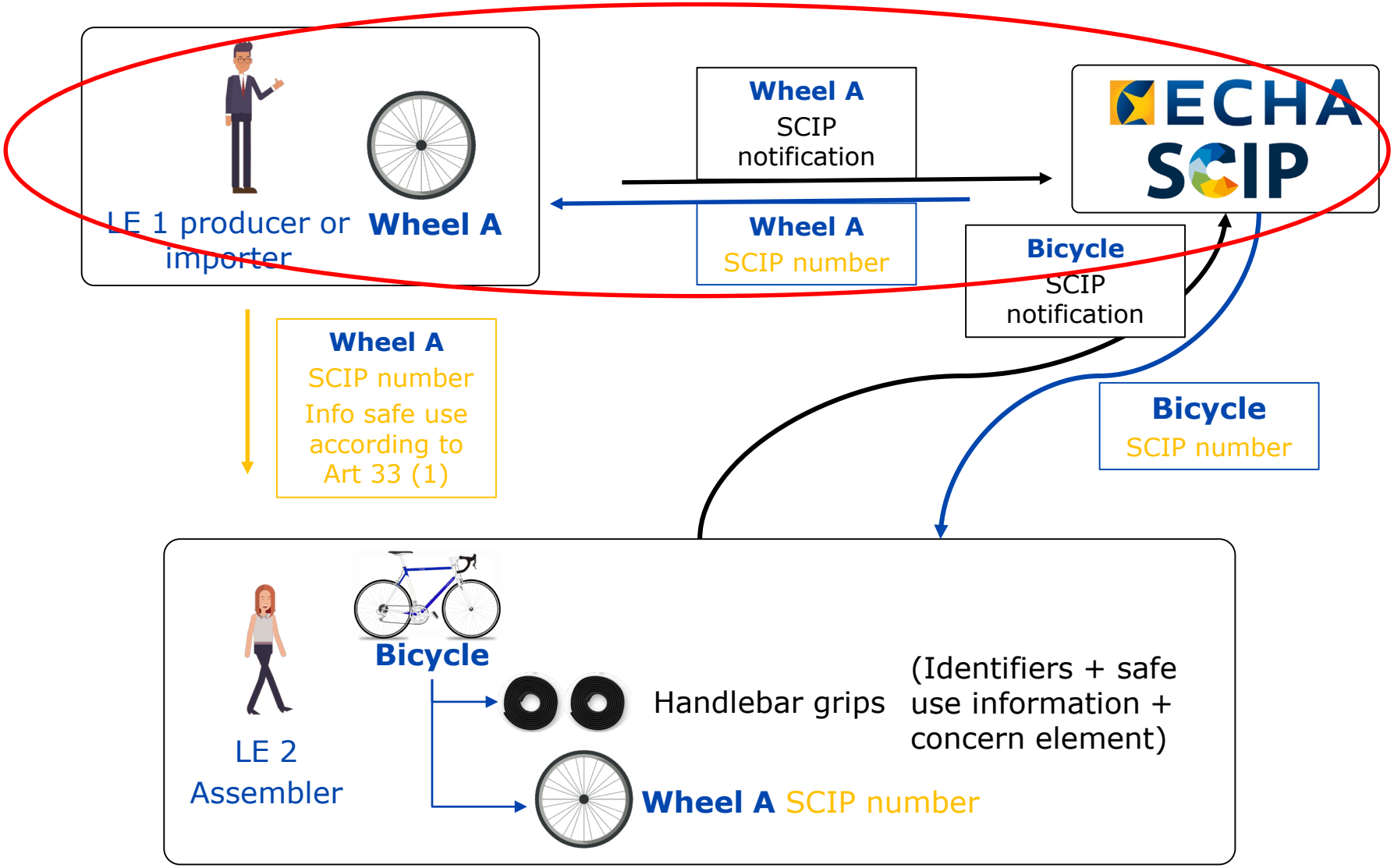
We have identified that this type of wheel is used in our CB Blue steel 26” bicycle so we have the obligation to submit a SCIP notification for it.



Helsinki
Bicycle producer

wheel producer or importer

Referencing overview



Precondition: received SCIP number

Submission report

Submission status: Succeeded

SCIP number available in the submission report

Dossier type: SCIP notification
Submission number: RMH144599-06
Submitted IUCLID version: 6_5
Submitted by:

Submission information

SCIP number	432849c1-f62c-4a32-974f-61e9e69fe41e
Article name	Wheel A
EAN (European Article...	966985755-19
Dossier name	V1 Nov
Dossier UUID	434853e1-70da-4d91-873d-918f5d0c97e8
File name	434853e1-70da-4d91-873d-918f5d0c97e8.i6z
Notification type	Initial

Submission events

11/11/2020 12:06
11/11/2020 12:07

ECHA Submission portal

Export to excel feature Submission information e.g. SCIP number

wheel producer or importer

Search criteria

Export to Excel

Submission number	Please enter a Submission number	Submission status	All submission status
Dossier type	SCIP notification	Submission date	from dd/mm/yyyy to dd/mm/yyyy
SCIP number	Please enter a SCIP number	Notification type	All notification types
Primary identifier	Please enter a Primary identifier	I am looking for	All SCIP notifications
Names	Please enter a dossier or article name		

Search Clear

Page 1 of 1 results

Sort by Newer first

RMH144599-06 11/11/2020 12:06

SCIP number	432849c1-f62c-4a32-974f-61e9e69fe41e	EAN (European ...	966985755-19
Names	V1 Nov, Wheel A	Dossier type	SCIP notification

SCIP

< 1 > Items/page 10

How to use 'Referencing'?

Create ECHA account

Prepare SCIP notification

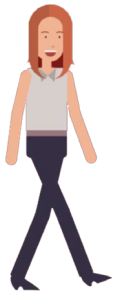
Submit SCIP notification

The complex object components contains a reference (SCIP number) to information already submitted to ECHA.

Dataset creation → Validation process → **Dossier** creation

Check validity of the SCIP number

Upload & Submit → Submission validation checks → Submission outcome



Helsinki Bicycle producer

Simplified SCIP Notification

Demo

Simplified SCIP notification (SSN)

- SSN is a simplified solution to refer to information already submitted to ECHA by submitting only the existing and relevant SCIP number (i.e. without the need to prepare a dossier) through the ECHA Submission portal.

- **Pre-condition:** to receive the SCIP number of the article's or complex object's SCIP notification already submitted to ECHA.

  (for instance as an element of the information to be provided by your supplier under REACH Art. 33(1)).

- **Main target group**: distributors (within a supply chain)

Basic principles

1. The product received = product supplied

No change on the article

2. No dossier needed in the submission

3.The distributor links to the notification of the supplier and does not need to submit updates

What ‘product received = product supplied’ means

Articles as such

No change on the physical form nor composition on article supplied in comparison to the article received

No change on the article

Complex objects

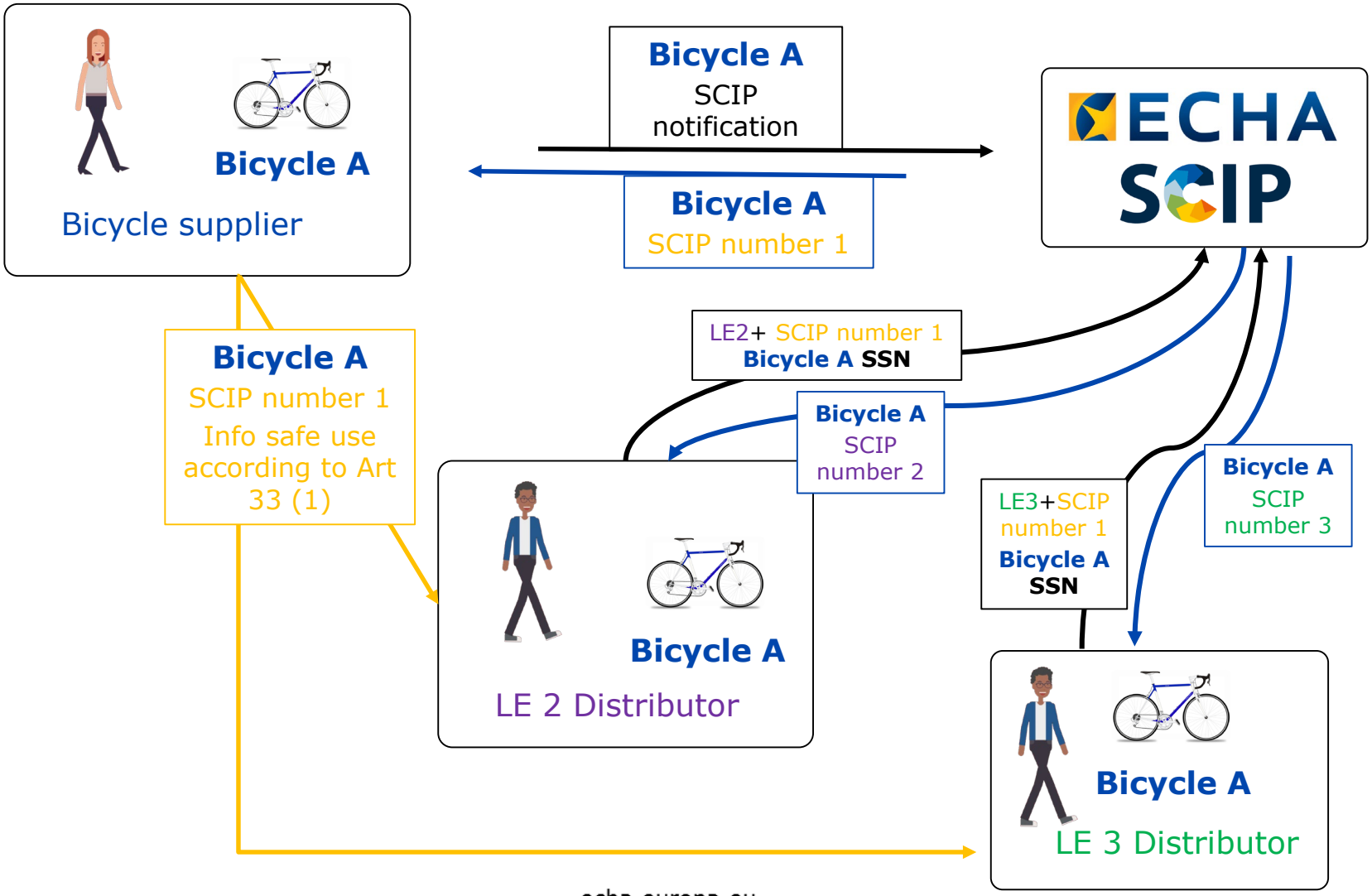
No change on the complex object supplied in comparison to the complex object received

No change on the complex object

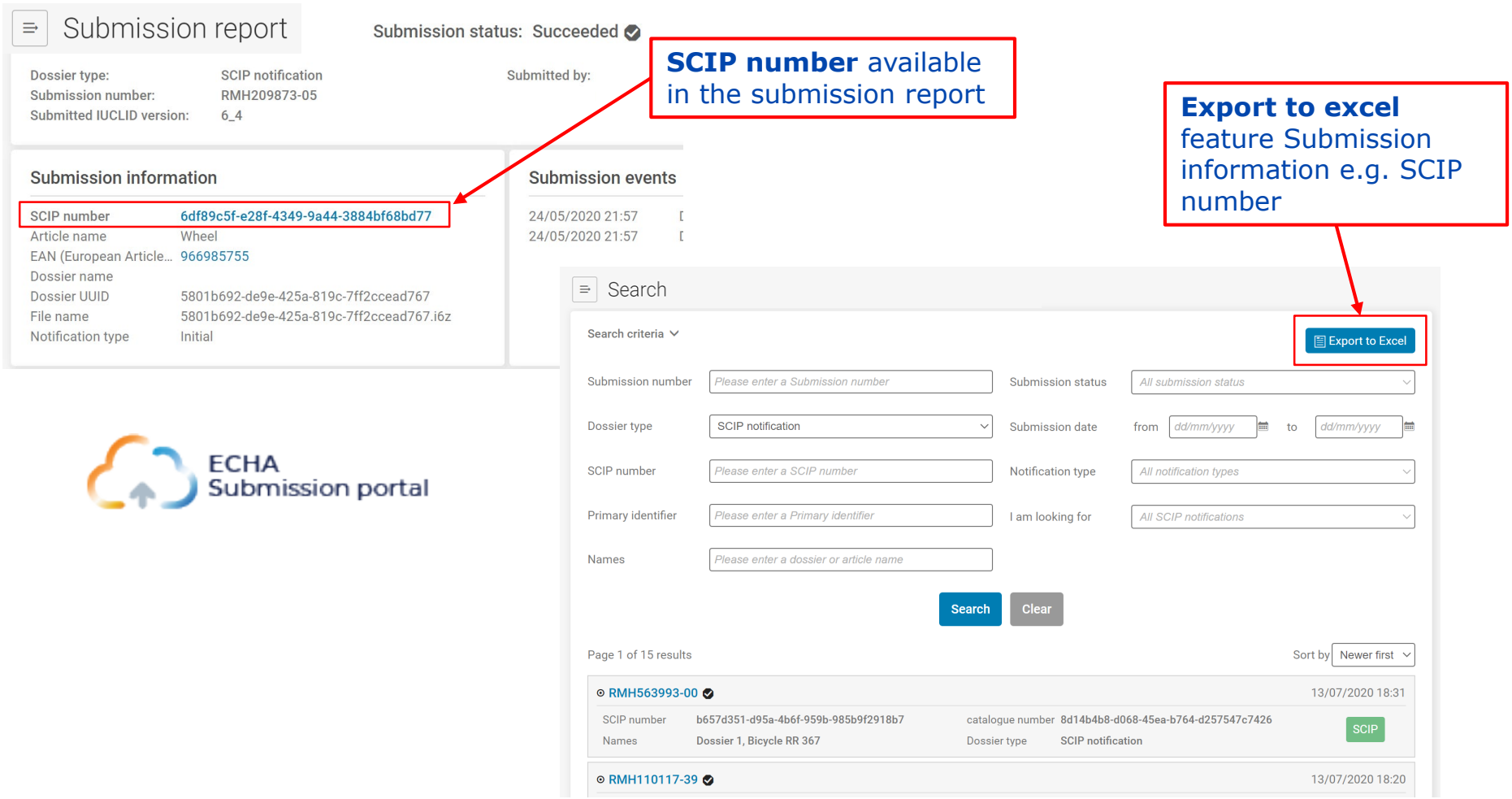
+ for both cases

The **identification elements (identifiers)**, i.e. names, alphanumeric identifiers, and article category, of the article as such or complex object (product) supplied **is the same** as that of the article or object received.

Simplified SCIP notification (SSN) overview



Precondition: received SCIP number



How SSN works?

Create ECHA account

ECHA Submission portal

1-n SCIP Numbers

Check validity of the SCIP number

Submit Simplified SCIP notification

Upload & Submit

Submission validation checks

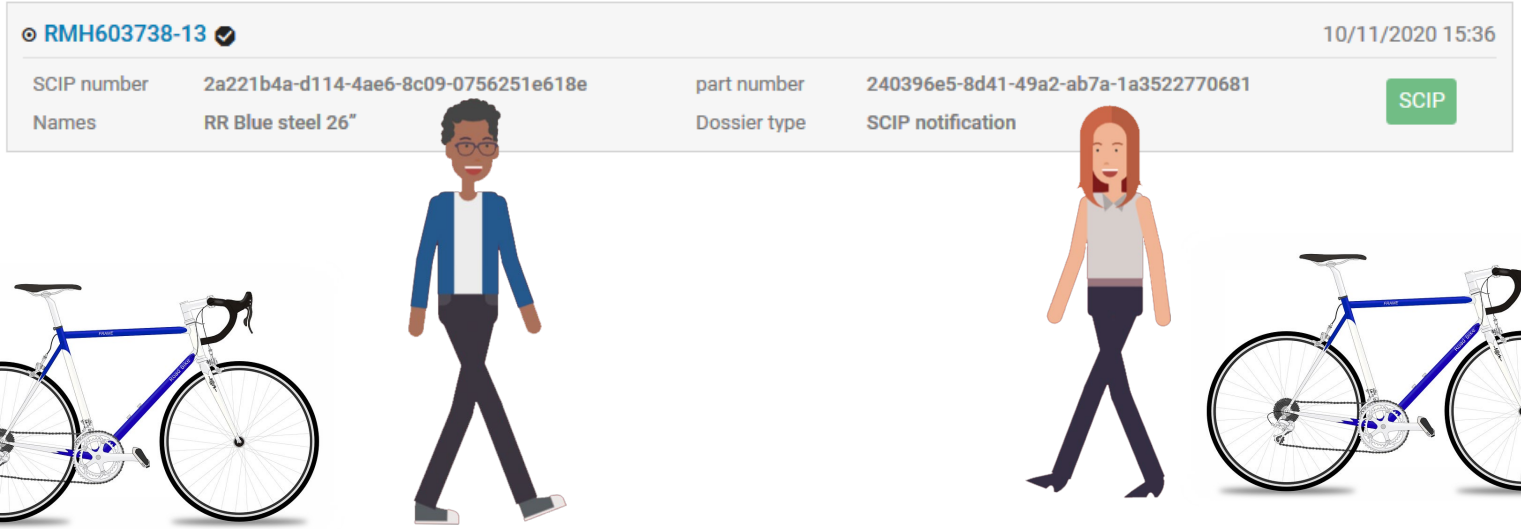
Submission outcome

Bicycle distributor

RR Blue steel 26" bicycle

Demo use case SSN (I)

You are a **bicycle distributor** located in Helsinki, Finland and your supplier of bicycles has indicated that some of the parts in the RR Blue steel 26” bicycle contain substances of very high concern (SVHCs). She informs you that she has already submit a SCIP notification for the bicycle RR Blue steel 26” and provides you the SCIP number.



Demo use case SSN (II)

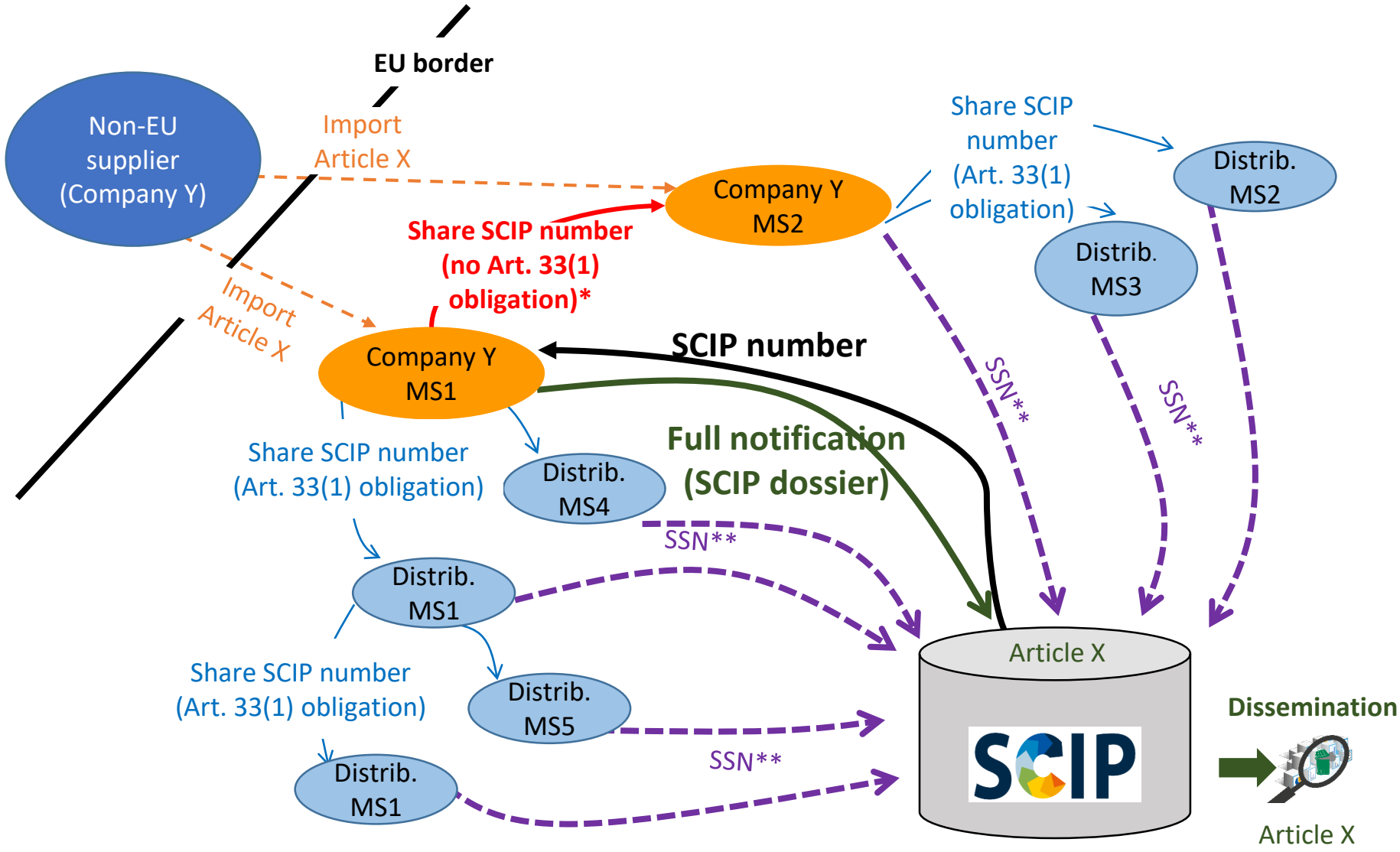
Target user:

Companies at the top of 'parallel' EU supply chains, where there is no 'direct' commercial relationship

- 'Sister' companies within a group
- Companies with exclusivity rights (exclusivity agreement) to place products from a brand in a specific MS market

Each legal entity placing an article on the EU market that fulfils the WFD obligations needs to submit a SCIP notification.

Extension of the SSN



* Intra-parties arrangement

** For each SSN submission, a new SCIP number is issued

Demo use case SSN (II)

Target user:

Companies at the top of 'parallel' EU supply chains, where there is no 'direct' commercial relationship

Demo use case:

Affiliate 1 for Company A has been requested via a contractual agreement to support the SCIP Notification process for the two EU Affiliates of the non-EU Company

Affiliate 1 has been made a foreign user for Affiliate 2 in order to submit on their behalf.

- Affiliate 1 from Company A submit SCIP notifications (dossier) for the 3 articles (Done)
- Affiliate 1 will extract an EXCEL file from the submission portal with the SCIP numbers and submit them on behalf of Affiliate 2

Concluding remarks

Webinar: Getting ready for submitting SCIP notifications

19 November 2020

Clara Rueda, ECHA

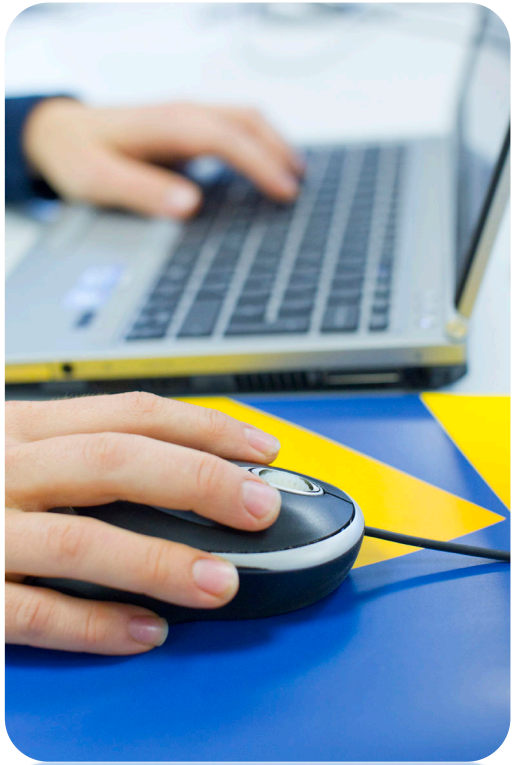
Take home messages

- Start preparing now, support your customers.
- Get familiar with the available tools (prepare, submit and refer to data already submitted).
- Review our recommendations for an appropriate level of reporting.
- Ensure a proper identification of the articles on the SCIP notifications.
- Follow the SCIP webpage for more information and support material.

Q&A panel

- Webinar open until 15:00 Helsinki time to answer questions

- If your question is not answered by the end of the webinar, send it via our contact form: echa.europa.eu/contact



Thank you!

echa.europa.eu/contact

Subscribe to our news at
echa.europa.eu/subscribe

Follow us on Twitter
@EU_ECHA

Follow us on Facebook
Facebook.com/EUECHA