

Creating a SCIP Declaration with Incomplete Component Data

How to create a SCIP declaration with partial or missing supplier information

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VP Consulting Services



Overview - Agenda - SCIP Declaration with Incomplete Part Data

- Introduction
- SCIP Database
- Incomplete part data problem
- Solutions Options
 - Options
 - Stages
- Outputs
 - Worksheet
 - IUCLID submission
 - Project tracking
- Q&A



Webinar is 50 minutes with 10
minutes of Q&A
(hopefully)

Claigan - SCIP Services

- Creation of product level REACH SVHC declarations
 - **Option 1: Testing, or**
 - **Option 2: Web or onsite engineering evaluation**
- Creation of SCIP Excel File
 - Creation of working file (excel) of SCIP declarations
- IUCLID Submissions
 - Dossier creation

(Formerly REACH SVHC Database)

- **Substances of Concern** In articles, as such or in complex objects (**P**roducts)
- Database
 - Manufacturers to register products and their SVHCs in products in IUCLID by Jan 5 2021
- Update
 - V0 Version - Start of 2020
 - V1 Version - October 2020

Challenge - Incomplete Part Data

- **Most common situation**
 - Incomplete SVHC part data
 - Missing data
 - Out dated information
 - ‘Suspect information’
- Will it improve
 - Maybe some year
 - But not right now
- **So - what is the plan?**

Two Options

- **Option 1: Product Testing**
 - Testing of a product for REACH SVHC
- **Option 2: Engineering Evaluation**
 - Engineering evaluation
 - Declaration primarily based on evaluation of risks for materials
 - Leveraging available part data

Option 1 - Testing

- Product testing
 - Most accurate method
 - Excellent for new product or representative products

Example Product - Coffee Maker

- From the Web Demonstration on March 19 2020



Option 1 - Testing - Advantages

- Product testing
 - Most accurate method
 - Defined time frame
 - Not dependant on supplier data at all
 - Can be combined with other regulations
 - RoHS
 - Prop 65
 - POP
 - REACH Restrictions

Option 2 - Engineering Evaluation

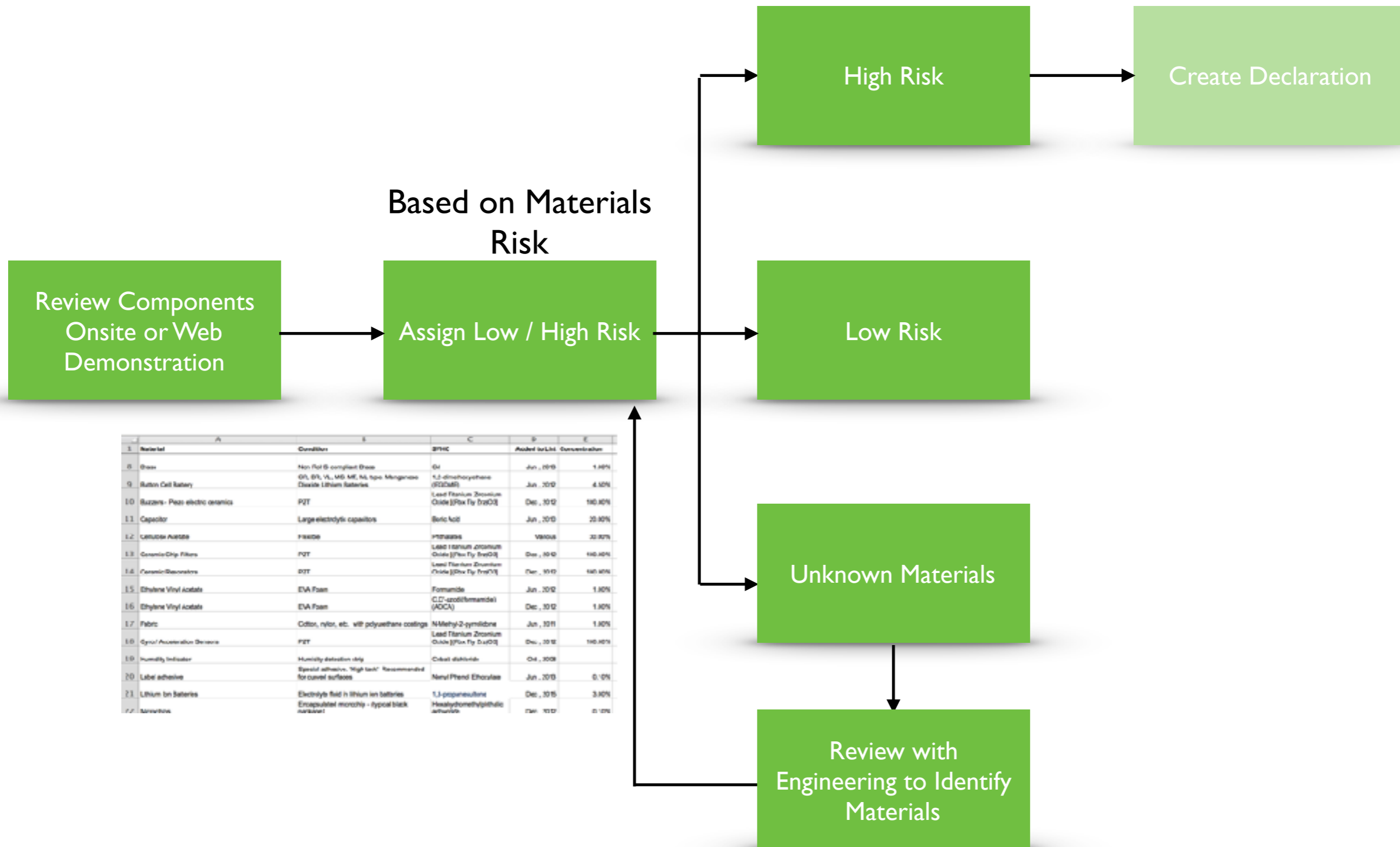
- Engineering Evaluation
 - Evaluation of a product based on risk of SVHC in each material
 - Declared based on SVHC risk per material
 - Leverage declaration for similar products
 - Update with supplier part data, if available
- *Explanation / example to follow in presentation*

Engineering Evaluation

- Hands on evaluation
 - Web version, or
 - Onsite



REACH SVHC Evaluation



	A	B	C	D	E
1	Material	Condition	SVHC	Added to List	Concentration
8	Glue	Non RoHS compliant Glue	04	Jun . 2010	1.00%
9	Button Cell Battery	05, 07, V6, M6 ME, N6, type: Manganese Dioxide Lithium Batteries	1,3-dimethylolurea (DMU)	Jun . 2010	4.50%
10	Buzzers - Piezo electric ceramic	PZT	Lead Titanium Zirconium Oxide (PbTiZrO3)	Dec . 2012	100.00%
11	Capacitor	Large electrolytic capacitors	Boric Acid	Jun . 2010	20.00%
12	Cartridge Airline	Fluoride	Hydroxide	Various	20.00%
13	Ceramic Chip Filters	PZT	Lead Titanium Zirconium Oxide (PbTiZrO3)	Dec . 2012	100.00%
14	Cartridge Electrodes	DOT	Lead Titanium Zirconium Oxide (PbTiZrO3)	Dec . 2012	100.00%
15	Ethylene Vinyl Acetate	EVA Foam	Formamide	Jun . 2012	1.00%
16	Ethylene Vinyl Acetate	EVA Foam	Cl-azobis(isobutyronitrile) (AIBA)	Dec . 2012	1.00%
17	Fabric	Cotton, nylon, etc. with polyurethane coatings	N-Methyl-2-pyrrolidone	Jun . 2011	1.00%
18	Crystal Acceleration Sensors	PZT	Lead Titanium Zirconium Oxide (PbTiZrO3)	Dec . 2012	100.00%
19	Humidity Indicator	Humidity detection strip	Cobalt chloride	Oct . 2008	
20	Label adhesive	Special adhesive, "high tack" Recommended for curved surfaces	Nonyl Phenol Ethoxylate	Jun . 2010	0.10%
21	Lithium Ion Batteries	Electrolyte fluid in lithium ion batteries	1,3-propanediol	Dec . 2015	3.00%
22	Microphone	Encapsulated microphone - typical black material	Hexachlorocyclopentadiene	Jan . 2012	0.10%

Option 2 - Engineering Evaluation

- Engineering Evaluation
 - Education
 - Review of SVHC risks based on materials used
 - Creates a model for risk
 - Can be used for multiple similar products
- Part data
 - Then compared against part data to refine specific declarable

Substance of Concern Database - Claigan

Engineering Review


From a review of materials

- Eng review
- Not testing

Complex Product

GPC Code - 665679012749
850940 - Machinery and mechanical appliances...



DEHP  6 instances
0.1% to 100%

Component /w SVHC

Component /w SVHC

Plastic - polyethylene foam
2 instances

ADCA
0.1 to 100%

Avoid breathing dust or particles
May cause allergy or asthma symptoms or breathing difficulties if inhaled.



Component /w SVHC

Copper > Brass
1 instances

Pb
1 to 10%

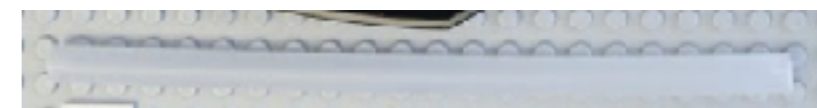
Avoid prolonged direct contact with skin during use
Wash hands after contact
Keep out of reach of children
Do not mix with municipal waste



Component /w SVHC

Plastic
Thermoset
Silicone
8 instances

D6
0.1 to 0.3%
Do not mix with municipal waste
Do not flush or pour down drain



Adding in Incomplete Part Data

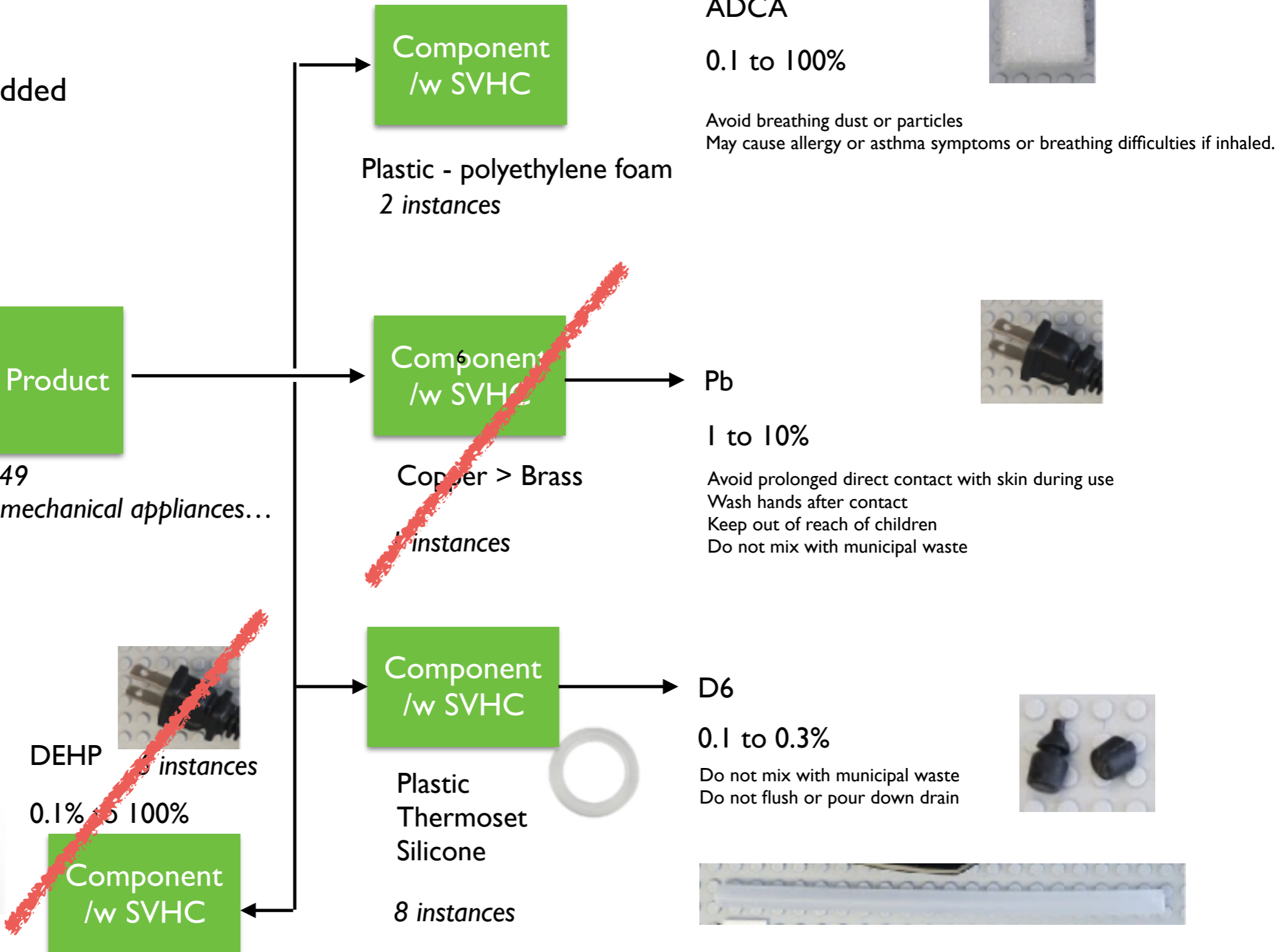
- Data collected (RoHS)
 - RoHS 2 compliant with no exemption other than 7ci
 - No 6c Pb in brass
 - Confirms not 6a, 6b, or 7a exemptions
 - RoHS 3 compliant
 - DEHP declaration not required except twist tie
 - Part data shows twist tie is polyethylene
 - DEHP is low risk in twist tie

Engineering Review /w RoHS Data

With RoHS data added

Complex Product

GPC Code - 665679012749
850940 - Machinery and mechanical appliances...



Adding in Incomplete Part SVHC Data

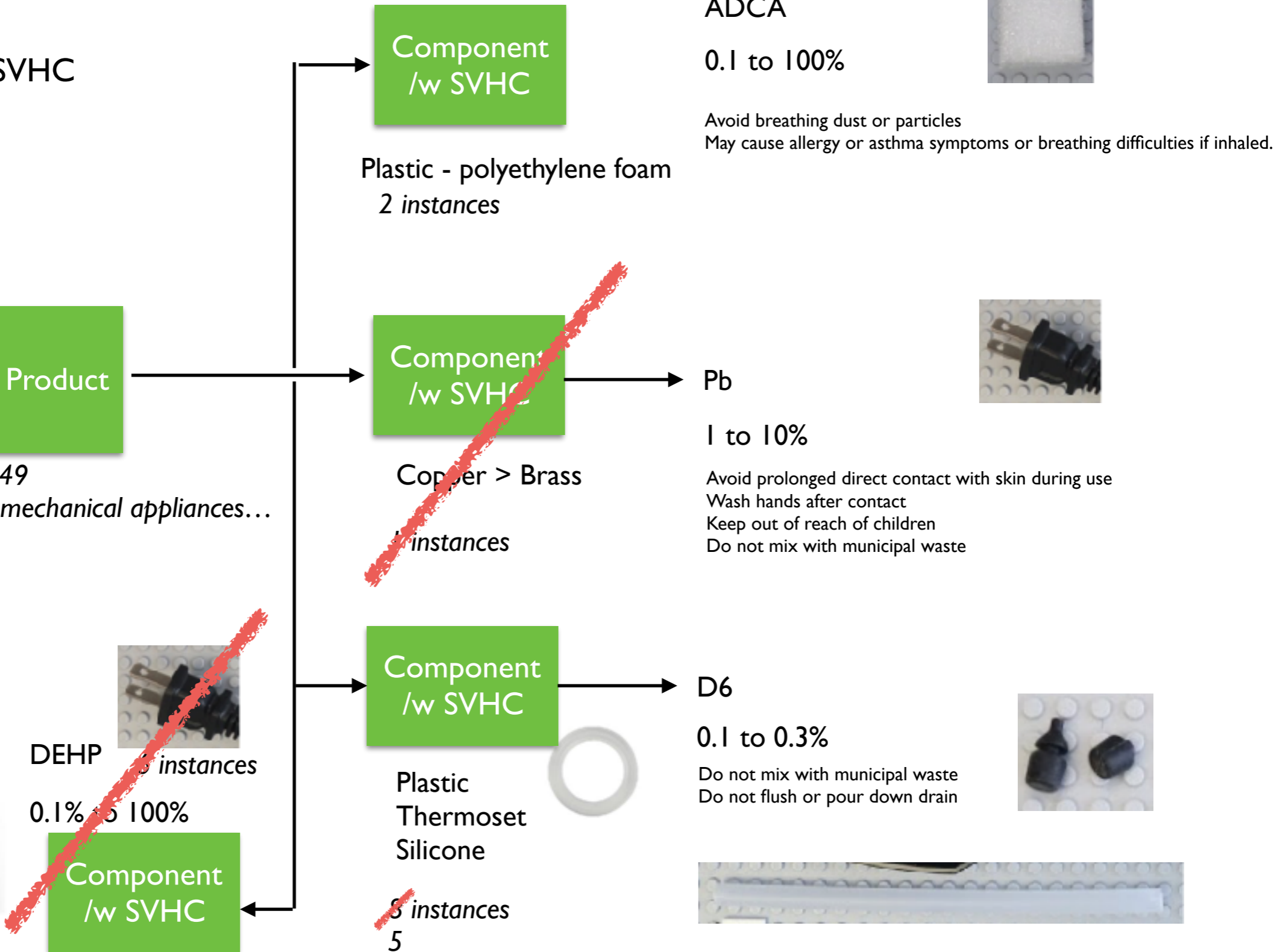
- Data collected (REACH SVHC)
 - 8 silicone parts
 - 3 silicone parts (no SVHC data)
 - 2 silicone parts (SVHC data pre-July 2018)
 - 3 silicone parts (SVHC data to Jan 2020)
 - Foam
 - No SVHC data

Engineering Review /w Incomplete SVHC Data

With incomplete SVHC data added

Complex Product

GPC Code - 665679012749
850940 - Machinery and mechanical appliances...



Engineering Review

After Leveraging Available Part Data

With incomplete SVHC data added

Complex Product

GPC Code - 665679012749
850940 - Machinery and mechanical appliances...



Component /w SVHC

Plastic - polyethylene foam
2 instances

ADCA

0.1 to 100%

Avoid breathing dust or particles
May cause allergy or asthma symptoms or breathing difficulties if inhaled.



Component /w SVHC

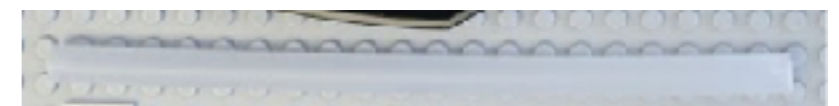
Plastic
Thermoset
Silicone

5 instances

D6

0.1 to 0.3%

Do not mix with municipal waste
Do not flush or pour down drain



Complex Article Example Spreadsheet



A	B	C
Identifiers	Article Name	Stainless Steel Coffee Maker, 12-Cup
Primary Article Identifier Type	GPC (Universal Product Code)	665679012749
Company	IUCLID ID	
Product IUCLID #	Product IUCLID ID	
	Article Category	851671 - Electro-thermic coffee or tea makers, domestic
	Production in European Union	No
Safe Use Instruction	Safe use instruction (s)	See component safe use instructions
<i>optional</i>	Characteristic	Declaration contained here is to the best of ACME's ability. Individual units may have more or less of each REACH SVHC components then shown here.
<i>optional</i>	Model(s)	
<i>optional</i>	image (filename)	
Linked article	Linked article 1	<u>Brass Component</u>
	# of occurrences of article 1	0
	Linked article 2	<u>Closed cell foam</u>
	# of occurrences of article 2	2
	Linked article 3	<u>Silicone Component</u>
	# of occurrences of article 3	5
	Linked article 4	<u>Aluminum Component</u>
	# of occurrences of article 4	0

Sub-Article Examples (Components)

A	B	C	D	
Identifiers	Article Name	Closed Cell Foam	Silicone Component	Br
Product IUCLID #				
Primary Article Identifier Type	part number ▼	FO01	SI01	BC
	Article Category	390110 - Plastics and articles thereof; rubber and articles thereof > Plastics and articles thereof > Polymers of ethylene, in primary forms > Polyethylene having a specific gravity of less than 0,94	40169340 - Gaskets, washers and other seals	74 pa 99
	Production in European Union	unwilling to disclose ▼	unwilling to disclose ▼	ur
Safe Use Instructions	Safe use instruction (s)	Avoid breathing dust or particles May cause allergy or asthma symptoms or breathing difficulties if inhaled.	Do not mix with municipal waste Keep out of water supplies and sewers	Av us W Ke Do Do
Concern Element	Candidate List Version	2020/01 ▼	2020/01 ▼	
	Candidate List Entry / Substance	Diazene-1,2-dicarboxamide (C,C'-azodi(formamide)) (ADCA) EC# 204-650-8 CAS# 123-77-3 ▼	Dodecamethylcyclohexasiloxane EC# 208-762-8 CAS# 540-97-6 ▼	Le
	Concentration range	> 0.1% w/w and ≤ 100% w/w. ▼	> 0.1% w/w and < 0.3% w/w; ▼	≥
	Material category	plastic (and polymers) - polyethylene, high ▼	rubber and elastomers - silicone rubber ▼	me

IUCLID Version



Name: SCIP / ARTICLE : ACME Mixer Mon, 2 Mar 2020, 19:53:07+0200 / ACME Mixer
 SCIP Dossier 2020-03-02

Printing date: 2020-03-02T19:53:28.569+02:00

Submission Type:

Identifiers

Article name*
 ACME Mixer

Other names + New item

#	Type	Name	Action
1	Plenary identifier type*	plenary identifier value*	
2	Other article identifier		

Article category
 Machinery and mechanical appliances, electrical equipment, parts thereof, sound recorders and reproducers, television image and sound broadcast apparatus, and parts and accessories of such articles or technical machinery and equipment and parts in general, except electrical, except those of the kind specified in sub-sections of this title. - This section includes the apparatus, and parts and accessories of such apparatus, used in agriculture, horticulture, stock raising, fishing, hunting, forestry, and in the transport of goods, persons, animals or vehicles.

Characteristics

Picture() + New item

Submission Type:

Other characteristics + New item

Safe use instructions

No need to provide safe use information beyond the identification of the Candidate List substance

Safe use instructions + New item

Disassembly instructions + New item

#	Attached document	Language	Action
1			

Complete object component(s)

Complete object component(s) + New item

1. Name
 Object name and number
 Number of units

2. Name
 Object component (MOS)
 Number of units

Other characteristics + New item

Safe use instructions

No need to provide safe use information beyond the identification of the Candidate List substance

Safe use instructions + New item

Safe use instruction
 Avoid prolonged direct contact with skin during use. Wash hands after contact. Hang up at least 10 days in a clean and dry place.

Disassembly instructions + New item

#	Attached document	Language	Action
1			

Concern elements

Candidate list version
 2020/1

Concern element + New item

1. Candidate list substance
 Lead (Lead, 7439-02-1)
 Description range
 > 0.0% w/w and < 10.0% w/w
 Hazard category
 + New item

2. Hazard category
 H302 + H332
 Additional hazard characteristics
 None

Hazard category priority
 None

Candidate List substance no longer present + New item

Web Interface (Prototype)

- Three (3) options

Option 1

Offline IUCLID

Downloadable software on desktop

Create dossiers / submissions on desktop for upload into IUCLID

Option 2
(Prototype available)

Direct IUCLID Web Portal

Direct web interface into IUCLID

Option 3

3rd Party Software

Upload by xml into IUCLID.

Not likely to be practical. The problem is more with creating the declaration not the upload. The desktop version will likely be more effective and less time consuming

Or

Or

SCIP Submission

Data Gathering and REACH SVHC Declarations

Here is the Articles data, and its related dossiers.

Click on the icon to view Article datasets, and dossiers.

previous

next



Guided dossier preparation ?

0



Substances

0



Mixtures

0



Articles

8

Import IUCLID file(s) ?

Overwrite settings: If newer than existin



Drop file to import or Browse





Data Gathering and REACH SVHC Declarations

here you can import IUCLID data


To import IUCLID data, drag and drop the IUCLID file into the import area here.

previous

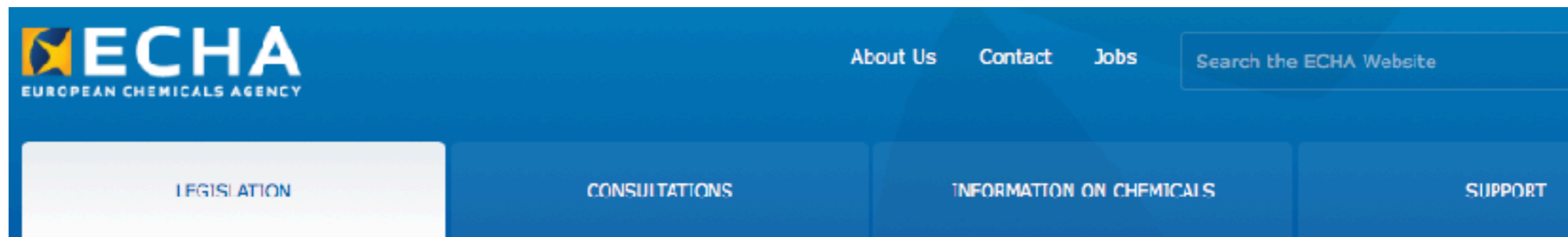
next

-  **Guided dossier preparation** ?
0
-  **Substances**
0
-  **Mixtures**
0
-  **Articles**
8

Import IUCLID file(s) ? Overwrite settings: If newer than existin ⌵

 Drop file to import or Browse

Data Gathering and REACH SVHC Declarations



ECHA > Legislation > WFD > SCIP Database > Tools > Candidate List Package

WFD

[Understanding WFD](#)

SCIP Database

[Suppliers of articles](#)

[Waste operators](#)

[Consumers and SCIP](#)

SCIP support

Tools

[SCIP Format](#)

[SCIP Prototype](#)

[Candidate List Package](#)

[Legislation](#)

Candidate List Package

The information on Candidate List substances is provided in SCIP notifications by using a IUCLID reference substance entity.

A reference substance is an entity in IUCLID that is used to identify a substance, in such a way that it may be re-used.

A reference substance can be created in IUCLID, but we recommend you, as a SCIP notification submitter, to use the Candidate List reference substances package provided by ECHA for your SCIP notifications and to import it into your own IUCLID instances.

The version of the Candidate List reference substances package allows you to specify the Candidate List version used when assessing the article that is being notified. This version number will be requested in the SCIP notification dossier. The available Candidate List reference substances package for SCIP notifications is aligned with every official update of the Candidate List.

> What does the Candidate List reference substances package for SCIP notifications include?

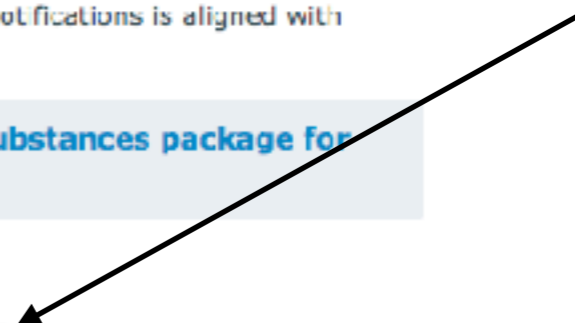
Version 2020/1:

- Master dataset V 2020/1 (300 ref. substances) [IGZ]
- Individual reference substance datasets V 2020/1 (300 ref. substances) [ZIP]
- List of reference substances Version 2020/1 [CSV] [TXT] [XLSX]
- README – SCIP Candidate List 2020/1 [TXT]


RELATED LINKS


- [Candidate List](#)

REACH SVHC dataset file




Data Gathering and REACH SVHC Declarations



Guided dossier preparation 

0


>



Substances

0

>



Mixtures

0



>





Articles


8

>

Import IUCLID file(s)  Overwrite settings: If newer than existin 

 **Clear completed**

 Master_dataset_V_2020-1.i6z

 Drop file to import or Browse

SCIP Entry Example

ECHA Cloud Services - Product



Claigan
Claigan Environmental Inc.

Dashboard > Articles > Stainless Steel Coffee Maker, 12-Cu...

Stainless Steel Coffee Maker, 12-Cup

edc0d544-bac3-4631-8286-e2e7bbafabd5



Submission Type:

View Dossiers

Validate

Create dossier

Stainless Steel Coffee Maker, 12-Cup

Closed Cell Foam

Silicone Component

Identifiers

Article name*

Stainless Steel Coffee Maker, 12-Cup

Other names [+ New item](#)

#	Type	Name	Action
---	------	------	--------

Primary article identifier type*

GPC (Universal Product Code)

Primary article identifier value*

665679012749

Other article identifiers [+ New item](#)

#	Type	Value	Action
---	------	-------	--------

Categorisation

Article category

- ✓ 851671 - Machinery and mechanical appliances; electrical equipment; parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles > Electrical machinery and equipment and parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles > Electric instantaneous or storage water heaters and immersion heaters; electric space-heating apparatus and soil-heating apparatus; electrothermic hairdressing

SCIP Entry Example

ECHA Cloud Services - Product



Claigan
Claigan Environmental Inc.

Dashboard > Articles > Stainless Steel Coffee Maker, 12-Cu...

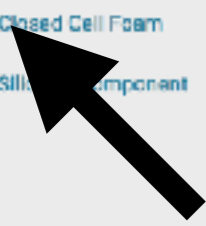
Stainless Steel Coffee Maker, 12-Cup
edc0d544-bac3-4631-8286-e2e7bbafabd5



Submission Type:

[View Dossiers](#) [Validate](#) [Create dossier](#)

- Stainless Steel Coffee Maker, 12-Cup
 - Closed Cell Foam
 - Silicone Component



- Stainless Steel Coffee Maker, 12-Cup
 - Closed Cell Foam
 - Silicone Component

Identifiers

Name	Action

Other article identifiers [+ New item](#)

#	Type	Value	Action

Categorisation

Article category
✓ 851671 - Machinery and mechanical appliances; electrical equipment; parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles > Electrical machinery and equipment and parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles > Electric instantaneous or storage water heaters and immersion heaters; electric space-heating apparatus and soil-heating apparatus; electrothermic hairdressing apparatus; electric space-heating apparatus and soil-heating apparatus; electrothermic hairdressing apparatus

Engineering Review

After Leveraging Available Part Data

With incomplete SVHC data added

Complex Product

GPC Code - 665679012749
850940 - Machinery and mechanical appliances...



Component /w SVHC

Plastic - polyethylene foam
2 instances

ADCA

0.1 to 100%

Avoid breathing dust or particles
May cause allergy or asthma symptoms or breathing difficulties if inhaled.



Component /w SVHC

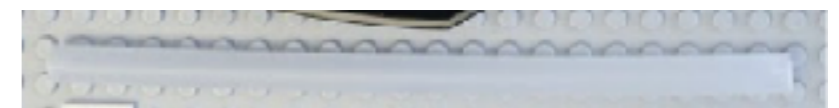
Plastic
Thermoset
Silicone

5 instances

D6

0.1 to 0.3%

Do not mix with municipal waste
Do not flush or pour down drain



SCIP Entry Example

ECHA Cloud Services - Product



Claigan
Claigan Environmental Inc.

Dashboard > Articles > Stainless Steel Coffee Maker, 12-Cu...

Stainless Steel Coffee Maker, 12-Cup

edc0d544-bac3-4631-8286-e2e7bbafabd5



Submission Type:

View Dossiers

Validate

Create dossier

Stainless Steel Coffee Maker, 12-Cup

Closed Cell Foam

Silicone Component

Identifiers

Article name*

Stainless Steel Coffee Maker, 12-Cup

Other names [+ New item](#)

#	Type	Name	Action
---	------	------	--------

Primary article identifier type*

GPC (Universal Product Code)

Primary article identifier value*

665679012749

Other article identifiers [+ New item](#)

#	Type	Value	Action
---	------	-------	--------

Categorisation

Article category

- ✓ 851671 - Machinery and mechanical appliances; electrical equipment; parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles > Electrical machinery and equipment and parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles > Electric instantaneous or storage water heaters and immersion heaters; electric space-heating apparatus and soil-heating apparatus; electrothermic hairdressing

SCIP Entry Example

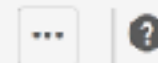
ECHA Cloud Services - Product



Dashboard > ARTICLES > STAINLESS STEEL COFFEE MAKER, 12-CUP...

Stainless Steel Coffee Maker, 12-Cup

edc0d544-bac3-4601-828d-e2c4bbafabd5



Submission Type: Please select

[View Dossiers](#) [Validate](#) [Create dossier](#)

- Stainless Steel Coffee Maker, 12-Cup
- Closed Cell Foam
- Silicone Component

Safe use instruction(s)

No need to provide safe use information beyond the identification of the Candidate List substance

Safe use instructions [+ New item](#)

Disassembling instructions [+ New item](#)

#	Attached document	Language	Action
---	-------------------	----------	--------

Complex object component(s)

Complex object component(s) [+ New item](#)

1 Article
Closed Cell Foam | F001
Number of units
2

2 Article
Silicone Component | SI01
Number of units
5



Save

SCIP Entry Example

ECHA Cloud Services - Component



Dashboard > Articles > Stainless Steel Coffee Maker, 12-Cu...

Stainless Steel Coffee Maker, 12-Cup

edc0d544-bac9-4601-828d-e2e4bbefabd5



Submission Type:

[View Dossiers](#) [Validate](#) [Create dossier](#)

Stainless Steel Coffee Maker, 12-Cup

Closed Cell Foam

Silicone Component

Identifiers

Article name*

Closed Cell Foam

Other names [+ New item](#)

#	Type	Name	Action
---	------	------	--------

Primary article identifier type*

part number

Primary article identifier value*

F001

Other article identifiers [+ New item](#)

#	Type	Value	Action
---	------	-------	--------

Categorisation

Article category

✓ 390110 - Plastics and articles thereof; rubber and articles thereof > Plastics and articles thereof > Polymers of ethylene, in primary forms > Polyethylene having a specific gravity of less than 0,94

Production in European Union

unwilling to disclose

SCIP Entry Example

ECHA Cloud Services - Component



Dashboard > Articles > Stainless Steel Coffee Maker, 12-Cu...

Stainless Steel Coffee Maker, 12-Cup

edc0d544-bac3-4601-828d-e2e4bbefabd5



Submission Type:

[View Dossiers](#) [Validate](#) [Create dossier](#)

- Stainless Steel Coffee Maker, 12-Cup
- Closed Cell Foam
- Silicone Component

[Safe use instructions](#) + New item

1 [Safe use instruction](#)
Avoid breathing dust or particles May cause allergy or asthma symptoms or breathing difficulties if inhaled.

[Disassembling instructions](#) + New Item

#	Attached document	Language	Action
---	-------------------	----------	--------

Concern elements

[Candidate list version](#)
2020/1

[Concern element](#) + New item

1 [Candidate list substance](#)
Diazene-1,2-dicarboxamide (C,C'-azodi(formamide)) ... | Diazene-1,2-dicarboxamide (C,C'-azodi(formamide)) ... | 123-77-3

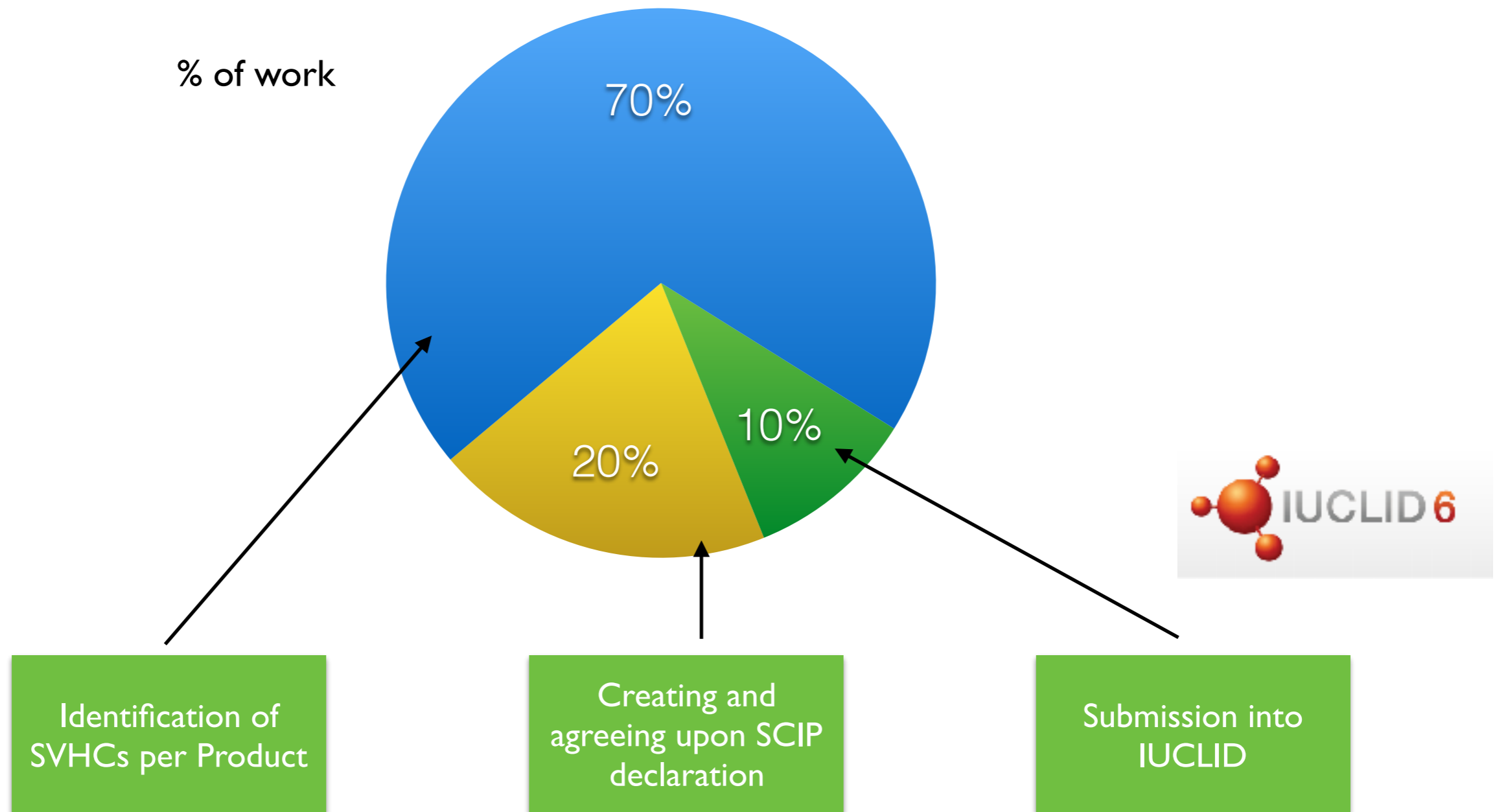
[Concentration range](#)
> 0.1% w/w and ≤ 100% w/w

[Material categories](#) + New item

1 [Material category](#)
plastic (and polymers) > polyethylene, low density (ldpe)



SCIP Work Breakdown



- Identifying declarable SVHC in each product

- Creation of SCIP declaration
- Determining product categories
- Agreeing on safe use instructions
- Communicating to business units

- At the UPC / unique product level
- Similar products can be cloned but need unique listings
- Repair part obligations unclear

Two Options

- **Option 1: Product Testing**
 - Testing of a product for REACH SVHC
- **Option 2: Engineering Evaluation**
 - Engineering evaluation
 - Declaration primarily based evaluation of risks for materials
 - Leveraging available part data

The Next Challenge

- Organizing and tracking product progress
 - Which products have SVHCs?
 - Which SCIP model for each product?
 - Is the product in IUCLID?
- Organizing the work
 - How to enable business units and stakeholders
 - How to track progress
 - How to communicate to the executive

Typical Tracking Sheet

SKU	Product	Owner	SVHCs	SCIP Model	IUCLID ID
12564934	12 cup coffee machine	Small Appliances	Yes	12 cup machine	
12564935	8 cup coffee machine	Small Appliances	Yes	12 cup machine	
12565001	12 cup Carafe	Small Appliances	No	n/a	n/a
12565002	8 cup Carafe	Small Appliances	No	n/a	n/a
12566002	Replacement tube	Small Appliances	Yes	Saleable silicone component	

Claigan - SCIP Services

- Creation of product level REACH SVHC declarations
 - **Option 1: Testing, or**
 - **Option 2: Web or onsite engineering evaluation**
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- IUCLID Submissions
 - Dossier creation

Q&A