

EU SCIP Database

Information requirements for REACH SVHC Database

Presented by:
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VP Consulting Services



Overview - Agenda - REACH SVHC Database

- Introduction ('Don't Panic' section)
- SCIP Database
 - Information requirements
 - FAQ
 - Regulatory basis
 - Changes since 2018 information
- Example SCIP Submission (from Guidance)
- Example SCIP Submission (example product by Claigan)
- Preview of next Claigan Webinar
- Recap
- Q&A



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

Don't Panic

- We got this.
- We can help.

(Formerly REACH SVHC Database)

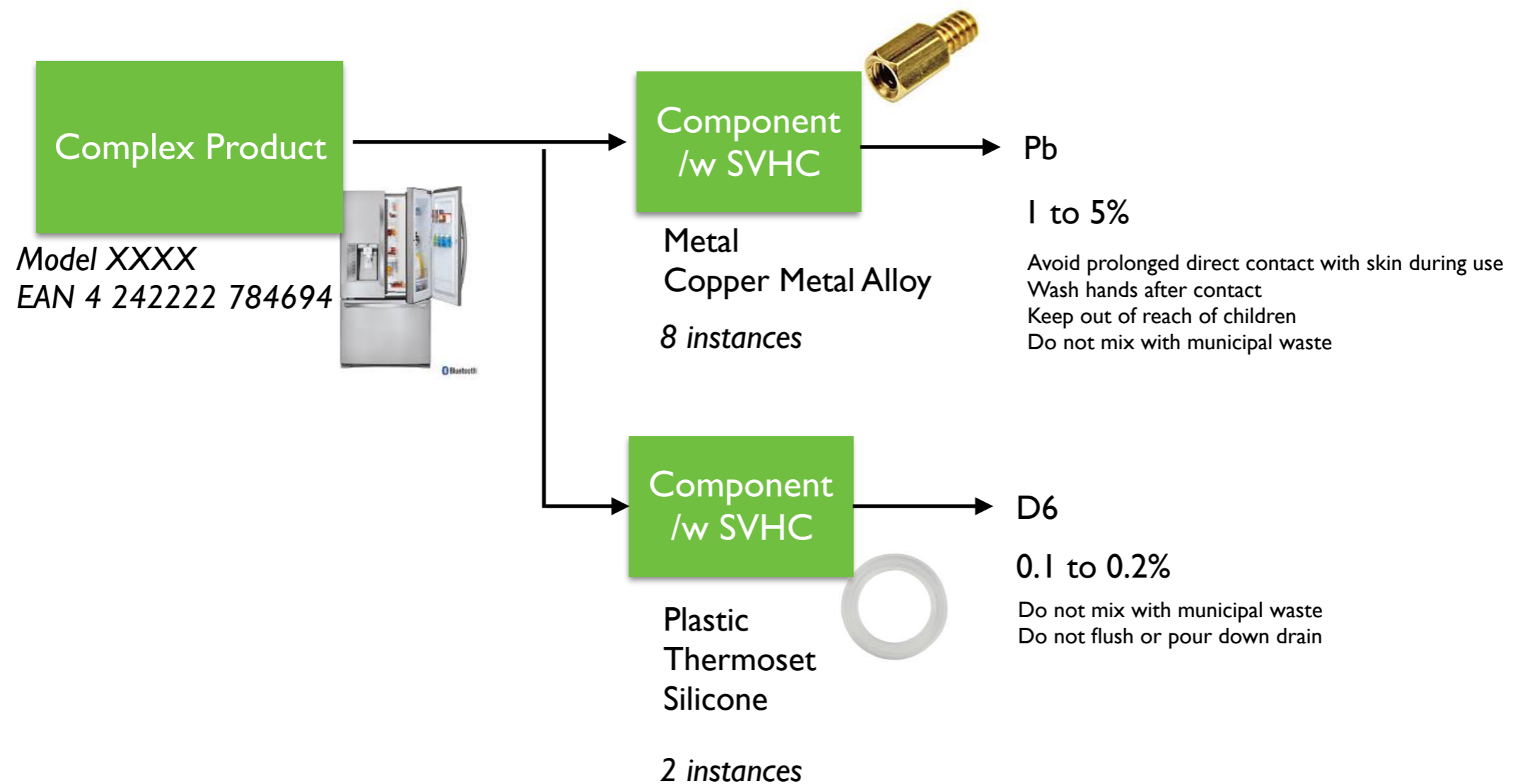
- **Substances of Concern In articles, as such or in complex objects (Products)**
- **Database**
 - Manufacturers to register products and their SVHCs in products in IUCLID by Jan 5 2021
- **Update**
 - Final information requirements released
 - https://www.echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf/9715c4b1-d5fb-b2de-bfb0-c216ee6a785d
 - FAQ released
 - <https://www.echa.europa.eu/support/qas-support/browse/-/qa/70Qx/view/topic/Waste+Framework+Directive+-+SCIP+database>

SCIP Database - EU

- Combination of
 - Waste Framework Directive Article 9 (Database)
 - REACH Regulation Article 33 (REACH SVHC)
- Deadline
 - Database to open by Jan 2020
 - Manufacturers to register products and their SVHCs in products in IUCLID by Jan 5 2021
- Scope
 - All products

Substance of Concern Database - ClaiGAN

Example - with safe use



Changes

- As previously described in early publication with the following changes
 - Must report number of instances of each component with SVHCs
 - Option to report SVHC concentration as 0.1% to 100%
- Otherwise identical to previously described

REACH SVHC Declaration

- Article 33 of REACH Regulation (1907/2006)
 - Suppliers of articles must communicate REACH Substances of Very High Concern (SVHC) > 0.1% w/w in an article they provide to their customer
 - Suppliers of consumer products to the end consumer only need to supply a declaration within 45 days of a consumer request
 - Sales to retailers do not benefit from the 45 days
- Based on the decision by the European Court of Justice (ECJ)
 - Component articles of complex articles are articles and require declaration

Current REACH SVHC Declaration vs ECHA Database

- Database is
 - Centralized electronic version of what is already required
 - Should be very little difference between the two except format
 - The main difference is that the database ensures that companies actually meet their legal requirements under Article 33 of REACH Regulation
 - And the data is better available to waste processors and to consumers

Re: REACH Substances of Very High Concern (SVHC)

Jan 16 2019

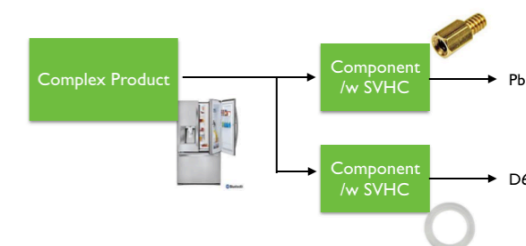
Under Article 33 of EU REACH Regulation (1907/2006), ACME Co. has a duty to communicate to our customers the presence of SVHCs in excess of 0.1% by weight of articles (as defined by Court of Justice of the European Union Case C-106/14) contained in our products.

ACME Co. reviewed its products for the presence of the one hundred and ninety-seven (197) SVHC substances on the EU SVHC Candidate List as of 15 January 2019.

No SVHCs were found to be present in ACME Co. products in excess of 0.1% except as noted below. This determination is based on engineering evaluation, testing and supplier declarations and is correct to the best of ACME Co.'s knowledge.

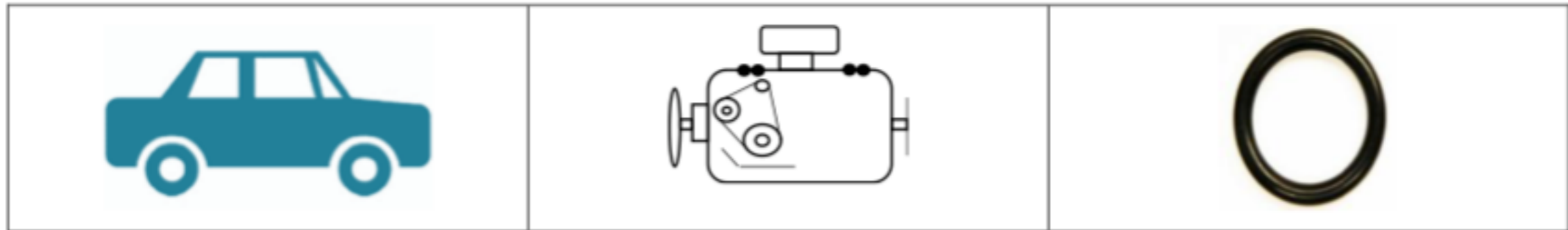
Notes –

1. Internal, external cables and/or wires may contain Bis (2-ethylhexyl) phthalate (DEHP) (EC# 204-211-0) > 0.1% w/w.
2. Silicone components and materials may contain Dodecamethylcyclohexasiloxane (D6) (EC# 208-762-8) Decamethylcyclopentasiloxane (D5) (EC# 208-764-9) Octamethylcyclotrisiloxane (D4) (EC# 209-136-7) >0.1%
3. Brass, aluminum, and steel components contain Lead >0.1% (EC# 231-100-4)
4. EVA foam may contain Diazene-1,2-dicarboxamide (C,C'-azodi(formamide)) (EC# 204-250-0)




Specific Example from Guidance

- EPDM washer with REACH SVHC in the engine of a car




Specific Example from Guidance

Example 1: O-ring			
Identifiers	Article name	O-ring	
	Other names	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) [TARIC/CN code and description]	E.g. 4016 93 00: Other articles of vulcanised rubber other than hard rubber; - Other; -- Gaskets, washers and other seals. 4008 29 00: Plates, sheets, strip, rods and profile shapes, of vulcanised rubber other than hard rubber; - Of non-cellular rubber; -- Other	
Production in European Union	yes		
Picture			
Characteristics	Diameter	0.050	m
	Weight	0.005	kg
Safe use instruction (s)	Safe use instruction(s)	[Specific instructions]	
Concern Element	Candidate List version	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	Rubbbers and elastomers > Ethylene-propylene-non-conjugated diene rubber (EPDM); Vulcanised	

Blue - mandatory
Green - optional

Specific Example from Guidance

Example 2: Vehicle				
Identifiers	Article name	Motor vehicle (passengers)		
	Other names	Brand	Trade mark Y	
		Model	Model AAA	
		Type	Type ZXCV	
	Primary Article Identifier	EAN/bar code	558101011110	
	Other article identifier	Universal product Code (GPC)	770300000	
		Reference number	AAA111X000	
	Article category (name and code) [TARIC/CN code and description]	E.g. 8703 22 10: Motor cars and other motor vehicles principally designed for the transport of persons (other than those of heading 8702), including station wagons and racing cars; - Other vehicles, with only spark-ignition internal combustion reciprocating piston engine; -- Of a cylinder capacity exceeding 1 000 cm ³ but not exceeding 1 500 cm ³ ; --- New		
Production in European Union	No			
Picture				
Characteristics	Height	1.8	m	
	Width	1.95	m	
	Length	4.0	m	
	Weight	1100	kg	
	Colour	Red		
	Number of doors	3		
	Engine type	Combustion		
	Cubic capacity	1100	cm ³	
	Safe use instruction (s)	Safe use instruction(s)	[Specific instructions]	
	Disassembling instructions	Disassembling instructions AAA-ZXCV.pdf		
Number of units	1			

Blue - mandatory
Green - optional

Specific Example from Guidance

Complex object component (article)	Identifiers	<table border="1"> <tr> <td>Article name</td> <td colspan="3">Combustion engine</td> </tr> <tr> <td rowspan="3">Other names</td> <td>Brand</td> <td colspan="2">B Motors</td> </tr> <tr> <td>Model</td> <td colspan="2">Model B-1100</td> </tr> <tr> <td>Type</td> <td colspan="2">Type Combustion</td> </tr> <tr> <td>Primary Article Identifier</td> <td>EAN/bar code</td> <td colspan="2">558101011110</td> </tr> <tr> <td>Other article identifier</td> <td>Reference number</td> <td colspan="2">A1100C001</td> </tr> <tr> <td>Article category (name and code) <i>[TARIC/CN code and description]</i></td> <td colspan="3"> E.g. 8407 34 10: Spark-ignition reciprocating or rotary internal combustion piston engines; - Reciprocating piston engines of a kind used for the propulsion of vehicles of Chapter 87; -- 8407 34:Of a cylinder capacity exceeding 1000 cm³; --- For the industrial assembly of: pedestrian-controlled tractors of subheading 870110; motor vehicles of heading 8703; motor vehicles of heading 8704 with an engine of a cylinder capacity of less than 2800 cm³; motor vehicles of heading 8705 </td> </tr> <tr> <td>Production in European Union</td> <td colspan="3">No</td> </tr> </table>			Article name	Combustion engine			Other names	Brand	B Motors		Model	Model B-1100		Type	Type Combustion		Primary Article Identifier	EAN/bar code	558101011110		Other article identifier	Reference number	A1100C001		Article category (name and code) <i>[TARIC/CN code and description]</i>	E.g. 8407 34 10: Spark-ignition reciprocating or rotary internal combustion piston engines; - Reciprocating piston engines of a kind used for the propulsion of vehicles of Chapter 87; -- 8407 34:Of a cylinder capacity exceeding 1000 cm ³ ; --- For the industrial assembly of: pedestrian-controlled tractors of subheading 870110; motor vehicles of heading 8703 ; motor vehicles of heading 8704 with an engine of a cylinder capacity of less than 2800 cm ³ ; motor vehicles of heading 8705			Production in European Union	No		
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Characteristics	<table border="1"> <tr> <td>Weight</td> <td>100</td> <td>kg</td> </tr> <tr> <td>Engine type</td> <td colspan="2">Combustion</td> </tr> <tr> <td>Cubic capacity</td> <td>1100</td> <td>cm3</td> </tr> </table>			Weight	100	kg	Engine type	Combustion		Cubic capacity	1100	cm3																						
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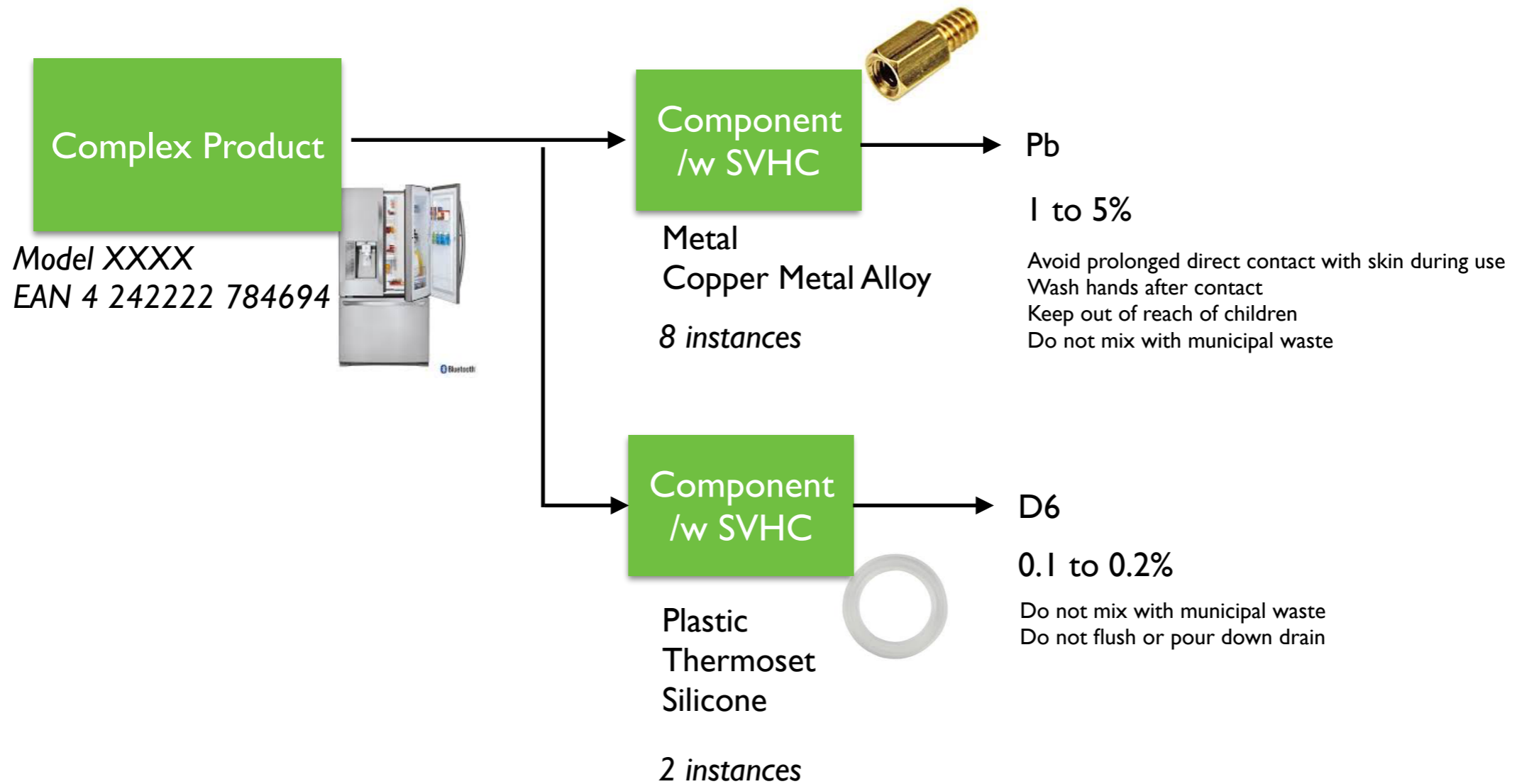
Blue - mandatory
Green - optional

Specific Example from Guidance

		Weight	0.005	kg
Safe use instruction (s)		Safe use instruction(s)	[Specific instructions]	
Concern Element	Candidate List version	ZZZZ/TT		
	Candidate List entry / Substance	Candidate List substance S; EC xxx-xxx-x; CAS yyyy-yy-y		
	Concentration range	≥ 20.0% w/w and < 100% w/w		
	Material category	Rubbers and elastomers > Ethylene-propylene-non-conjugated diene rubber (EPDM); Vulcanised		

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Refrigerator Re-visited



Refrigerator Complex Article - Example

Complex Object		
Identifiers	Article Name	ACME 2000 Refrigerator
	EAN/Bar Code	4 242222 784694
	Article Category	8418 21 00 90: Refrigerators; for household use, compression-type, electric or other, Having a refrigerated volume of 382 liters and over
	Production in European Union	No
Safe Use Instructions	Safe use instruction (s)	See component safe use instructions
Number of Units	Number of units	1
Linked article	Linked article 1	[IUCRID Article ID #1]
	# of occurrences of article 1	8
	Linked article 2	[IUCRID Article ID #2]
	# of occurrences of article 2	4



Refrigerator Complex Article Sub Article with SVHC

Complex Object Component		[IUCALID Article ID #1]
Identifiers	Article Name	O-ring
	Part number	OR
	Article Category	4016 93 90: OTHER ARTICLES OF VULCANISED RUBBER OTHER THAN HARD RUBBER - other - Gaskets, washers, and seals - other
	Production in European Union	No
Safe Use Instructions	Safe use instruction (s)	Do not mix with municipal waste Do not flush or pour down drain
Concern Element	Candidate List Version	2019/07
	Candidate List Entry / Substance	Dodecamethylcyclohexasiloxane; EC 208-762-8; CAS 540-97-6
	Concentration range	> 0.1% w/w and < 0.3% w/w;
	Material category	Rubbers and elastomers > Silicone rubber
Number of Units	Number of units	1



Refrigerator Complex Article

Sub Article with SVHC

Complex Object Component		[IUCRID Article ID #2]
Identifiers	Article Name	Brass component
	Part number	ST
	Article Category	7419 99 30: Other articles of copper [including chain and parts thereof under 7419 10 and other articles under 7419 99] but not including metal castings under 7419 91 00
	Production in European Union	No
Safe Use Instructions	Safe use instruction (s)	Avoid prolonged direct contact with skin during use Wash hands after contact Keep out of reach of children Do not mix with municipal waste
Concern Element	Candidate List Version	2019/07
	Candidate List Entry / Substance	Lead; EC 231-100-4; CAS 7439-92-1
	Concentration range	≥ 1.0% w/w and < 10.0% w/w;
	Material category	Metal > Copper Metal Alloy
Number of Units	Number of units	1



Preview

Next Webinar

- October 9 2019
- ~~What the bloody hell is in my plastics and why the heck is it there?~~
- Restricted materials (RoHS, REACH, Prop 65) and plastics
 - *What restricted materials could be present in plastics and why are they there?*

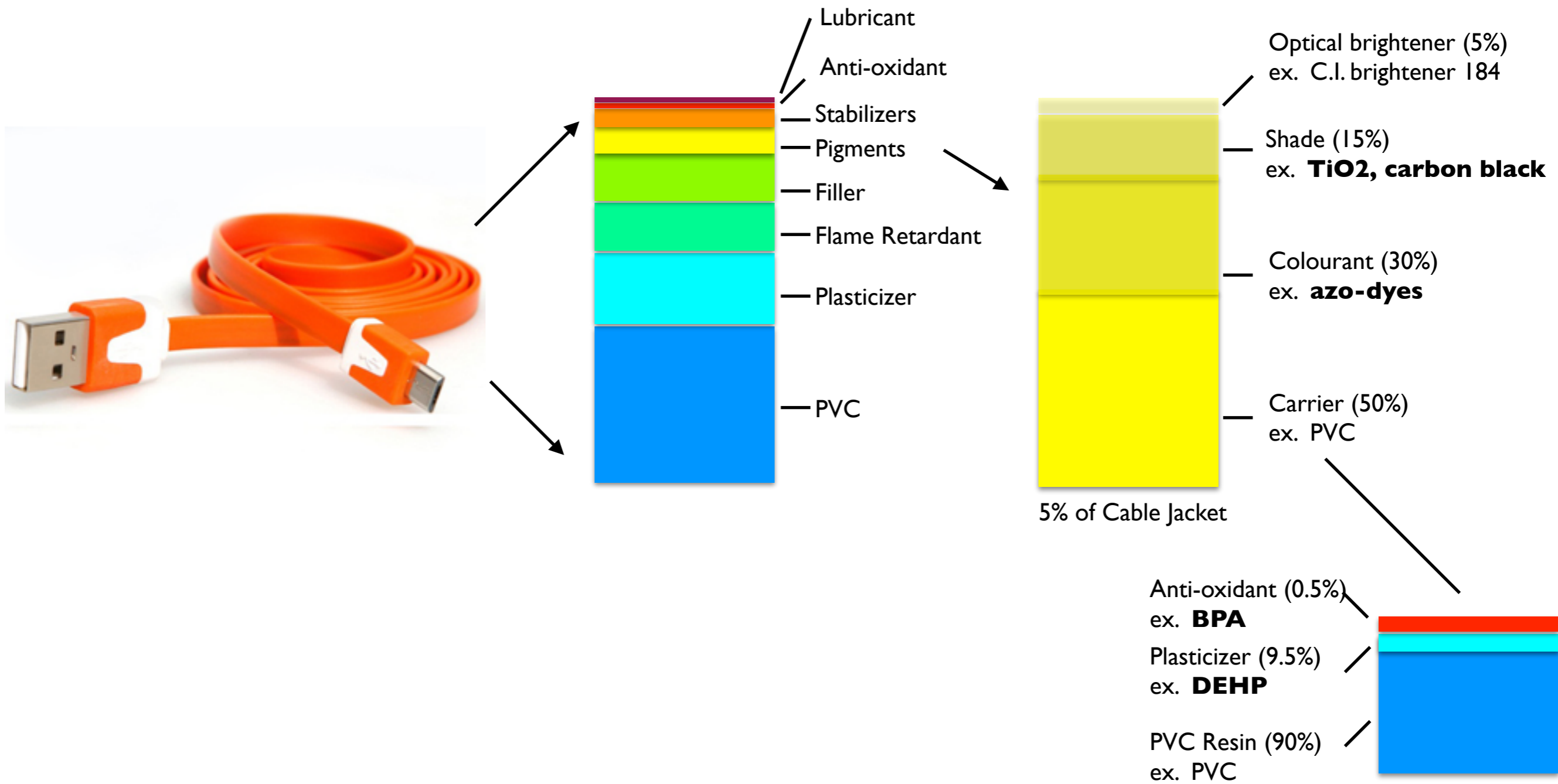
Plastics - Phthalates

- One of many questions to answer
 - Why are phthalates often found at
 - ~100,000 ppm,
 - ~2,000 ppm, or
 - ~300 ppm
- Phthalates have no practical use below 10,000 ppm.

Sample for Oct 9 Webinar

Restricted Materials & Plastics

- Pigments cont.



(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
 - Database to open by Jan 2020
- **Update**
 - Final information requirements released
 - https://www.echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf/9715c4b1-d5fb-b2de-bfb0-c216ee6a785d
 - FAQ released
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Remember - Don't Panic

- We got this.
- We can help.

SCIP Database

- Your situation
 - Single materials
 - Complex products
 - Diverse product lines
 - Electronics
 - Non-electronics
- Don't worry
 - We have you covered. Just contact us.
- But remember
 - Opens Jan 2020. Deadline Jan 2021. Only 16 months away

SCIP Database

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 - Single materials
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Q&A