

IUCLID Web Interface

SCIP Declarations into Prototype interface

Presented by:
Bruce Calder
VP Consulting Services



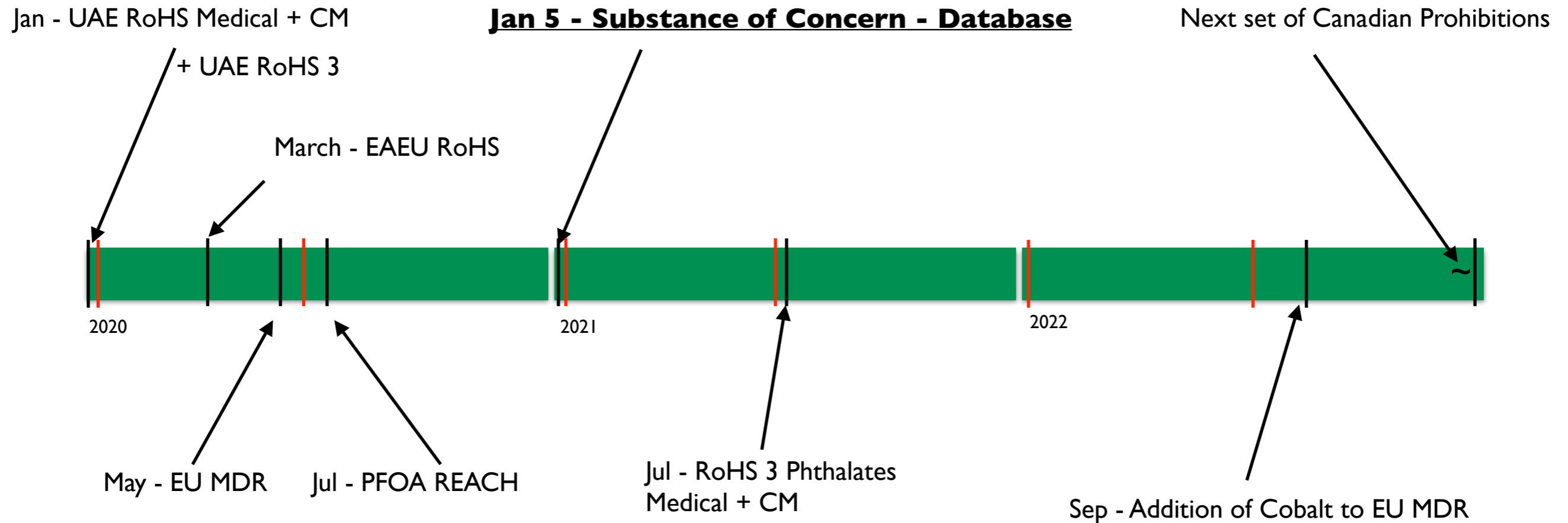
Overview - Agenda - REACH SVHC Database (IUCLID Prototype)

- Introduction
- Restricted materials 2020 - 2022 Deadlines
- SCIP Database
 - Interface options
 - Structure
 - Excel worksheet (Claigan)
 - IUCLID example submission
 - Dossier
 - Distribution of effort / work
- Practical approaches
 - Component level declarations
 - Engineering evaluation
 - Testing
 - Cloning
- Q&A



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

Upcoming Regulatory Deadlines



REACH SVHC Updates

Claigan - SCIP Services

- Creation of product level REACH SVHC declarations
 - Testing, or
 - Onsite engineering evaluation (/w education)
 - i.e. SVHC is not there most of the time
- Creation of SCIP Excel File
 - Creation of working file (excel) of SCIP declarations
- IUCLID Submissions
 - Dossier creation

(Formerly REACH SVHC Database)

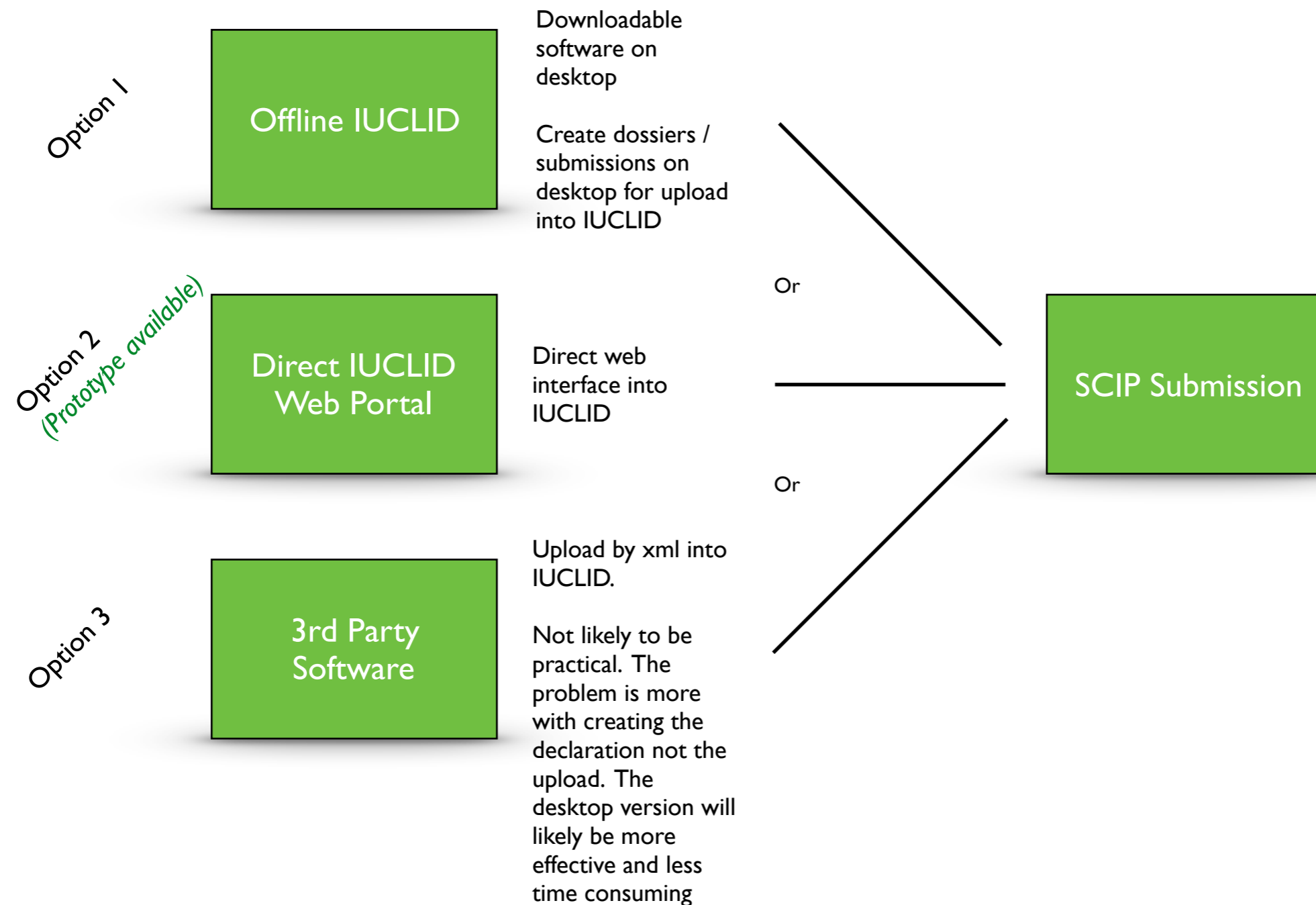
- **Substances of Concern** In articles, as such or in complex objects (**P**roducts)
- Database
 - Manufacturers to register products and their SVHCs in products in IUCLID by Jan 5 2021
- Update
 - V0 Version - Start of 2020
 - V1 Version - October 2020

SCIP Database

- IUCLID prototype
 - Web version released in February
 - Downloadable version to be available in April
- Final versions available in October 2020

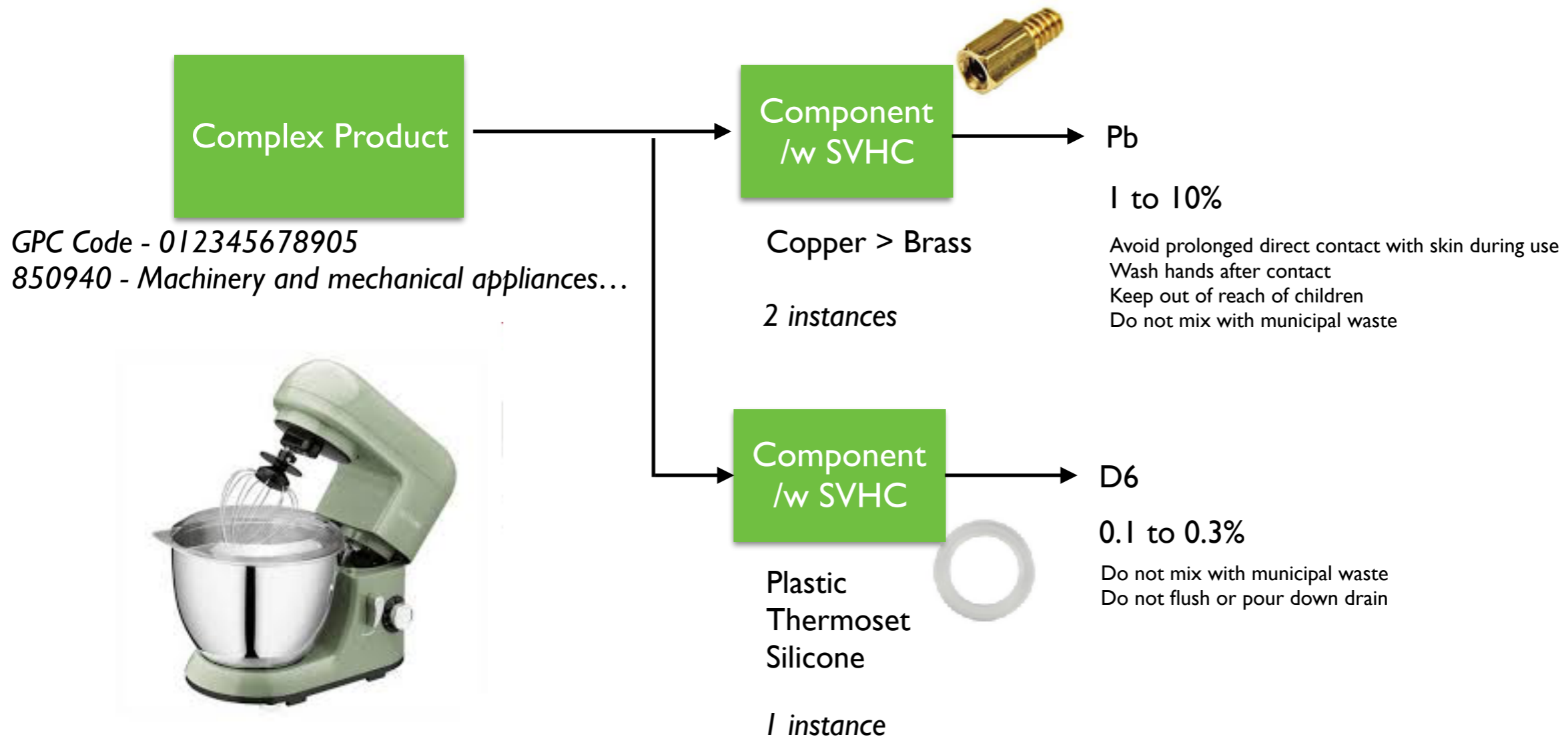
Submission into the SCIP Database

- Three (3) options



Substance of Concern Database - Claigan

Example Structure



Complex Article Example Spreadsheet



Identifiers	Article Name	ACME Mixer
Company	IUCLID ID	
Product IUCLID #		
	GPC Code	012345678905
	Article Category	850940 - 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 > Electromechanical domestic appliances, with self-contained electric motor, other than vacuum cleaners of heading 8508 > Food grinders and mixers, fruit or vegetable juice extractors
	Production in European Union	No ▼
Safe Use Instruction	Safe use instruction (s)	See component safe use instructions
<i>optional</i>	Brand	
<i>optional</i>	Other Characteristics	Details for representative model. The number of components with SVHCs may vary from unit to unit.
<i>optional</i>	image (filename)	
Linked article	Linked article 1	<u>Brass Component</u>
	# of occurrences of article 1	2
	Linked article 2	<u>Silicone Seal</u>
	# of occurrences of article 2	1
	Linked article 3	<u>PZT Buzzer</u>
	# of occurrences of article 3	0
	Linked article 4	<u>Twist Tie</u>
	# of occurrences of article 4	0
	Linked article 5	<u>Silicone Seal</u>
	# of occurrences of article 5	0
	Linked article 6	<u>Polyimide film</u>
	# of occurrences of article 6	0
	Linked article 7	<u>High temp solder</u>
	# of occurrences of article 7	0
	Linked article 8	<u>External Plastic Component</u>

Sub-Article Examples (Components)

Identifiers	Article Name	Brass Component	Silicone Seal
Product IUCLID #			
	Part number	BC001	BC002
	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	85318000: Electric-sound or visual signalling apparatus (for example, bells, sirens, indicator panels, burglar or fire alarms), other than those of heading 8512 or 8530 - Other apparatus
	Production in European Union	unwilling to disclose ▼	unwilling to disclose ▼
Safe Use Instruction	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	Do not mix with municipal waste Do not flush or pour down drain
Concern Element	Candidate List Version	2020/01 ▼	2020/01 ▼
	Candidate List Entry / Substance	Lead EC# 231-100-4 CAS# 7439-92-1 ▼	Dodecamethylcyclohexasiloxane EC# 208-762-8 CAS# 540-97-6 ▼
	Concentration range	≥ 1.0% w/w and < 10.0% w/w; ▼	> 0.1% w/w and < 0.3% w/w; ▼
	Material category	Metal > brass	Plastic > Thermoset > Silicone Rubber

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

ACME Mixer

Identifiers

Article name*
ACME Mixer

Other names + New item

#	Type	Name	Action
1	Primary identifier type*	Primary identifier value*	
2	Other name		

Classification

Article category
 070000 - 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 - Technical machinery and equipment not parts in formal sense of the word "equipment" (except for parts of the machinery and equipment of motor vehicles) - Other machinery and electrical apparatus, and parts and accessories thereof

Characteristics

Picture() + New item

#	Type	Picture	Action
1	Picture		

Safe use instructions

Safe use instructions*
 No need to provide safe use instructions beyond the identifier of the substance list substance

Safe use instructions + New item

Disassembling instructions + New item

#	Attached document	Language	Action
1			

Complex object components

Complex object component() + New item

#	Name	Number of units
1	Article	1
2	Article	1

Other characteristics + New item

Safe use instructions

Has need to provide safe use instructions beyond the identifier of the substance list substance

Safe use instructions + New item

Safe use instruction
 Avoid prolonged direct contact with skin during use. Wash hands after contact. Keep out of reach of children. Do not use with mechanical parts.

Disassembling instructions + New item

#	Attached document	Language	Action
1			

CONCENTRATED

Classification version
 00001

Concentration + New item

#	Concentration for substance	Level (CAS#)	Concentration range	Miscible categories + New item
1	Concentration for substance	Level (CAS#)	Concentration range	Miscible categories

Miscible category
 00001

Additional material characteristics
 00001

Miscible category (BSP-CE)
 None

Conditions for substance to longer present + New item

Web Interface (Prototype)

- Three (3) options

Option 1



Downloadable software on desktop
Create dossiers / submissions on desktop for upload into IUCLID

Option 2
(Prototype available)



Direct web interface into IUCLID

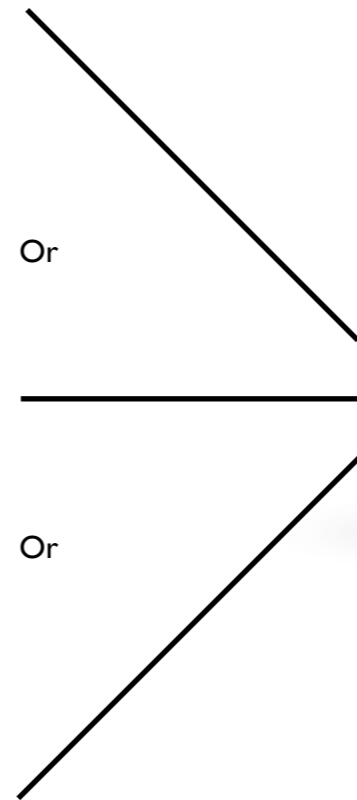
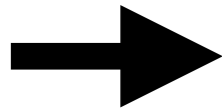
Option 3



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 Entry Example

ECHA Cloud Services - Product



Dashboard > Articles > ACME Mixer

ACME Mixer
734b95a-7977-4c74-85e4-2bd007154664

Submission Type: sub-article notifications

View Dossiers Validate Create dossier

ACME Mixer

- Silicone mat
- Brass component

Identifiers

Article name*
ACME Mixer

Other names + New item

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

Primary article identifier type*
GPE (Universal Product Code)

Primary article identifier value*
012345678906

Other article identifiers + New item

#	Type	Value	Action
1	reference number	Details for representative model. The number of components with SVHCs may vary from unit to unit.	X

Categorisation

Article category
✓ 850940 - 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 > Electromechanical domestic appliances, with self-contained electric motor, other than vacuum cleaners of heading 8508 > Food grinders and mixers, fruit or vegetable juice extractors

Production in European Union
no

Characteristics

Picture(s) + New item

#	Picture	Action
---	---------	--------

SCIP Entry Example

ECHA Cloud Services - Hierarchy



Dashboard > Articles > ACME Mixer

ACME Mixer
734b95a-7977-4c74-85e4-2bd007154664

Submission Type: sub-article notification

View Dossiers Validate Create dossier

ACME Mixer

- Silicone seal
- Brass component

Identifiers

Article name*
ACME Mixer

Other names + New item

Name	Action
Value	Action
...tive model. The number of components with SVHCs may vary from unit to unit.	X

Categorisation

Article category
✓ 850940 - 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 > Electromechanical domestic appliances, with self-contained electric motor, other than vacuum cleaners of heading 8508 > Food grinders and mixers, fruit or vegetable juice extractors

Production in European Union
no

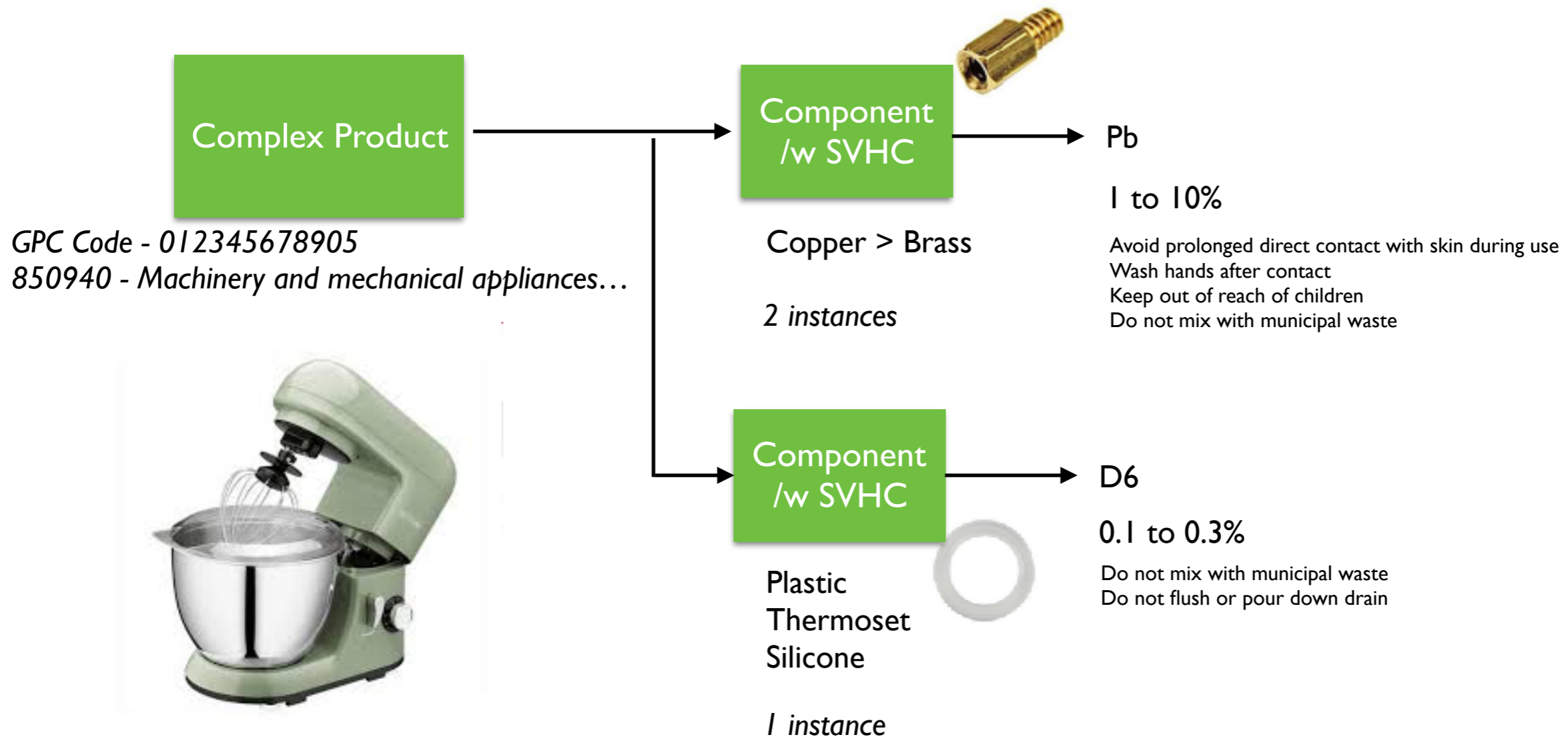
Characteristics

Picture(s) + New item

Picture	Action

Substance of Concern Database - Claigan

Example Structure



SCIP Entry Example

ECHA Cloud Services - Product



Identifiers

Article name*
ACME Mixer

Other names + New item

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

Primary article identifier type*
GPC (Universal Product Code)

Primary article identifier value*
012345678905

Other article identifiers + New item

#...	Type	Value	Action
1	reference number	Details for representative model. The number of components with SVHCs may vary from unit to unit.	X

Categorisation

Article category
✓ 850940 · 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 > Electromechanical domestic appliances, with self-contained electric motor, other than vacuum cleaners of heading 8508 > Food grinders and mixers; fruit or vegetable juice extractors

Production in European Union
no

Characteristics

Picture(s) + New item

#...	Picture	Action
------	---------	--------

SCIP Entry Example

ECHA Cloud Services - Product



Volume
None

Colour
None

Other characteristics [+ New item](#)

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](#)

- Article
Silicone seal | BC002
Number of units
1
- Article
Brass component | BC001
Number of units
2

↑ TOP

SCIP Entry Example

ECHA Cloud Services - Component



Identifiers

Article name*
Brass component

Other names [+ New item](#)

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

Primary article identifier type*
part number

Primary article identifier value*
BC001

Other article identifiers [+ New item](#)

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

Categorisation

Article category
✓ 741999 - Base metals and articles of base metal > Copper and articles thereof > Other articles of copper > Other > Other

Production in European Union
unwilling to disclose

Characteristics

Picture(s) [+ New item](#)

#..	Picture	Action
-----	---------	--------

SCIP Entry Example



ECHA Cloud Services - 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](#)

1 Safe use instruction

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

Disassembling instructions [+ New item](#)

#...

Attached document

Language

Action

Concern elements

Candidate list version

2020/1

Concern element [+ New item](#)

1 Candidate list substance

Lead | Lead | 7439-92-1

Concentration range

≥ 1.0% w/w and < 10.0% w/w

Material categories [+ New item](#)

1 Material category

metal > brass

Additional material characteristics

None

Mixture category (EUPCS)

None

Candidate list substance no longer present [+ New item](#)

↑ TOP

SCIP Entry Example Published Dossier



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

SCIP Entry Example Published Dossier



References

ARTICLE: ACME Mixer

UUID: 734ab96a-7977-4c74-86e4-2bd007f54684

Dossier UUID: af2ed8bc-5a83-4d41-9b6f-94439dc6ee88

Author: romanhumeniuk

Date: 2020-03-02T19:53:07.231+02:00

Remarks:

Identifiers

Article name
ACME Mixer

Other names

Primary article identifier type
GPC (Universal Product Code)

Primary article identifier value
012345678905

Other article identifiers

Type

reference number

Value

Details for representative model. The number of components with SVHCs may vary from unit to unit.

Categorisation

Article category

850940 - 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 > Electromechanical domestic appliances, with self-contained electric motor, other than vacuum cleaners of heading 8508 > Food grinders and mixers; fruit or vegetable juice extractors

Production in European Union

no

Complex object component(s)

Complex object component(s)

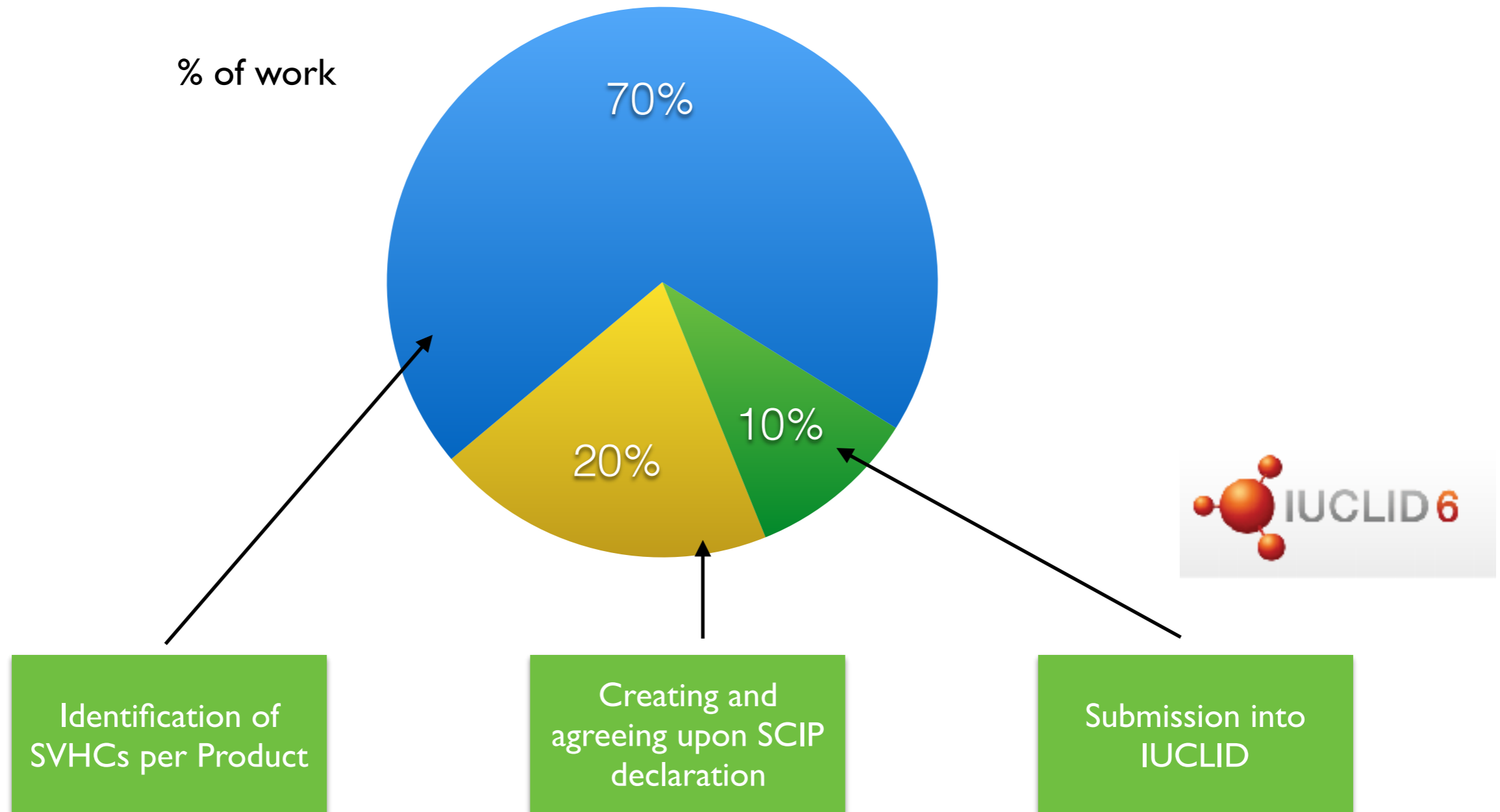
Article
Silicone seal

Number of units
1

Article
Brass component

Number of units
2

SCIP Work Breakdown



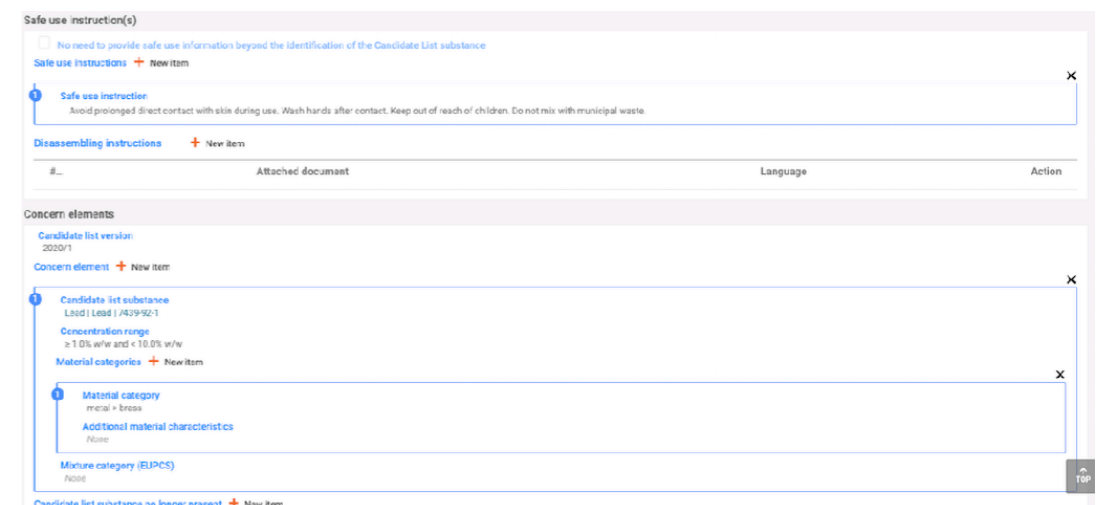
- Identifying declarable SVHC in each product

- 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

SVHCs at the Component Level

- Why SVHCs at the generic component level?
 - The sub-article is the declarable level
 - Simpler while still being accurate / truthful
 - Generic descriptions are more useful for the user and consumer
 - When the SVHC list is updated, the updates can be made at the generic component level. The update will automatically propagate to the associated final products
 - Update one to update many



The screenshot shows a web-based interface for managing SVHCs. It is divided into several sections:

- Safe use instruction(s):** Includes a checkbox for "No need to provide safe use information beyond the identification of the Candidate List substance". Below it, there is a "Safe use instructions" section with a "New item" button and a text input field containing the instruction: "Avoid prolonged direct contact with skin during use. Wash hands after contact. Keep out of reach of children. Do not mix with municipal waste."
- Disassembling instructions:** Includes a "New item" button and a table with columns for "#...", "Attached document", "Language", and "Action".
- Concern elements:** Includes a "Candidate list version" (2020/1) and a "Concern element" section with a "New item" button. It contains a "Candidate list substance" section with details for Lead (CAS 14329-92-1), a concentration range of ≥ 1.0% w/w and < 10.0% w/w, and a "Material category" section with "metal - brass" and "Additional material characteristics" set to "None".
- Mixture category (EIPCS):** Set to "None".
- Footer:** A note stating "Candidate list substance no longer present" with a "New item" button.

Data Gathering and REACH SVHC Declarations

- Does data gathering work for REACH SVHC declarations
 - No.
- Claigan has worked with hundreds of companies on REACH SVHC
 - <2% can provide product level declarations based on component level data gathering
 - And those all almost exclusively food contacting products
-

Data Gathering and REACH SVHC Declarations

- Component level ‘after-the-fact’ large scale data gathering
 - Expensive waste of time for REACH SVHC
- Good approaches
 - Supplier specification (restricted materials)
 - Engineering evaluation
 - with selective data gathering on declarable parts
 - Testing
 - Most effective (as long as the lab has processes for complex products)

Claigan - SCIP Services

- Creation of product level REACH SVHC declarations
 - Testing, or
 - Onsite engineering evaluation (/w education)
 - i.e. SVHC is not there most of the time
- Creation of SCIP Excel File
 - Creation of working file (excel) of SCIP declarations
- IUCLID Submissions
 - Dossier creation

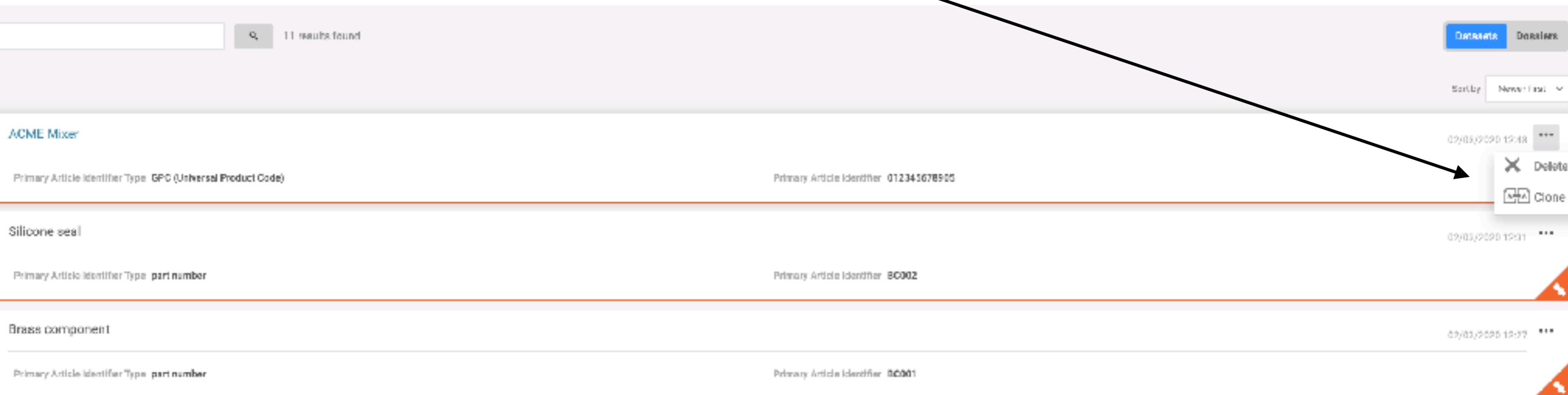
Cloning

(Cloning of declarations to other products)

- Manual Cloning in the systems
 - Cloning a declaration into another product



- Method for quick creation of declaration for additional products

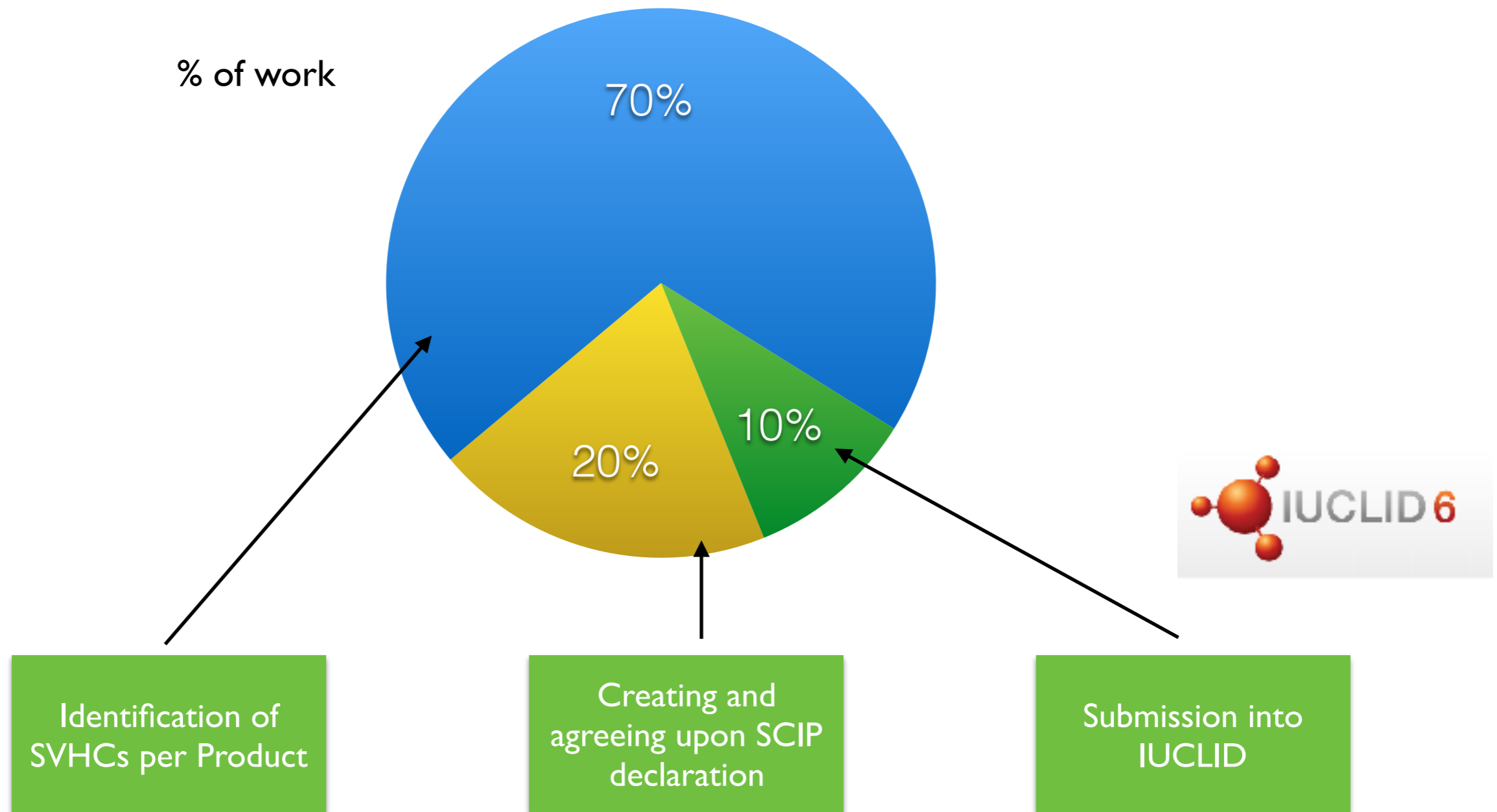


Product Name	Primary Article Identifier Type	Primary Article Identifier	Actions
ACME Mixer	GPC (Universal Product Code)	012345678905	09/09/2020 12:48 Delete Clone
Silicone seal	part number	8C002	09/09/2020 12:31
Brass component	part number	8C001	09/09/2020 12:37

Claigan - Mass Cloning

- Claigan capability in development for mass cloning
 - Cloning of declaration into spreadsheet lists of products
 - Based on representative products declarations
- Only really need for large numbers of very similar products
 - Manually cloning is generally sufficient for everything except the largest numbers of products.

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

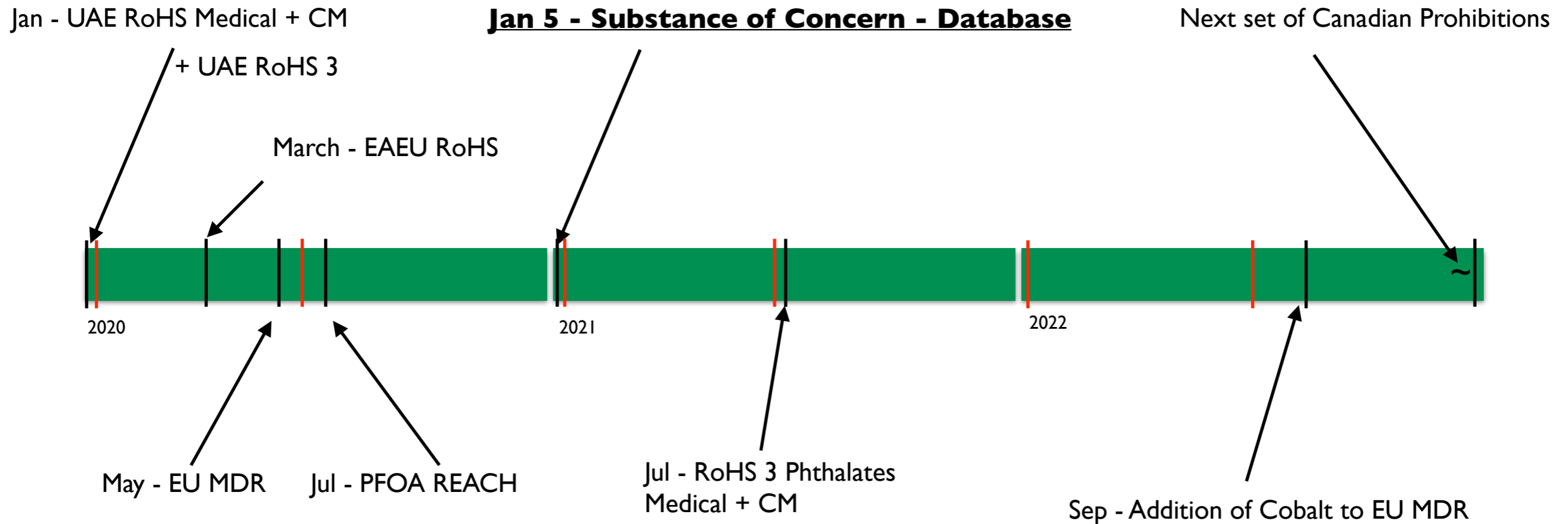
Phases of SCIP Compliance

- Phase 1 - Create SCIP declaration for one product
 - To learn the process and deliverables
 - Before making any 'big' plans
- Phase 2 - Develop REACH SVHC declarations for products
 - Testing or
 - Hands-on engineering review (legacy products)
- Phase 3 - Create Excel versions of declarations
 - Representative declarations with associations to products that use each excel declaration
- Phase 4 - Create SCIP dossiers for products

Claigan - SCIP Services

- Creation of product level REACH SVHC declarations
 - Testing, or
 - Onsite engineering evaluation (/w education)
 - i.e. SVHC is not there most of the time
- Creation of SCIP Excel File
 - Creation of working file (excel) of SCIP declarations
- IUCLID Submissions
 - Dossier creation

Upcoming Regulatory Deadlines



REACH SVHC Updates

Q&A