

SCIP and Your Business

Implementing SCIP compliance in practice

Presented by:
Bruce Calder
VP Consulting Services



Overview - Agenda - SCIP Implementation into your business

- Introduction
- SCIP Database
- Questions
- Example product
- The plan
 - Product templates
 - Component templates
- The process
 - 8 steps
- Q&A



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

Claigan - SCIP Services

- **Product level REACH SVHC declarations**
 - Option 1: Testing, or
 - Option 2: Web or onsite engineering evaluation
- **Component Templates**
- **Educate and Support**
- *NEW - See handout section of control panel for Claigan flyer*

(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 and Your Business

- Up until now
 - Lots of information being put out
 - Lots of webinars
 - Lots of points of view
 - Basics have been explained

- **So - what is your plan?**

A Couple Questions First

- Do you want to teach all your stakeholders how to use IUCLID?
 - Well, no.
- Is everyone in your company going to become an expert on SCIP or REACH SVHCs?
 - Well, no.
- Do you have the time or resources to do it all yourself?
 - Well, no actually.
- Does the work still have to get done?
 - Well, yes.

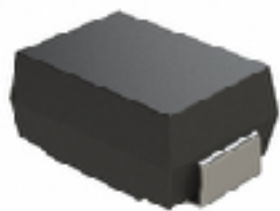
Substance of Concern Database - Claigan

Product Declaration

From April 1
Claigan webinar

Complex Product

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



Pb
2 instances
0.1% to 100%

Component
/w SVHC

Component
/w SVHC

Plastic - polyethylene foam
2 instances

Component
/w SVHC

Copper > Brass
1 instance

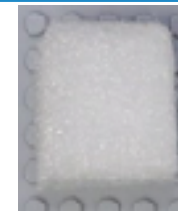
Component
/w SVHC

Plastic
Thermoset
Silicone
8 instances

ADCA

0.1 to 100%

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



Pb

1 to 10%

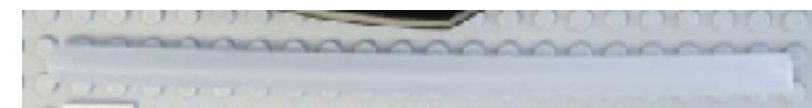
Avoid prolonged direct contact with skin during use
Wash hands after contact
Keep out of reach of children
Do not mix with municipal waste



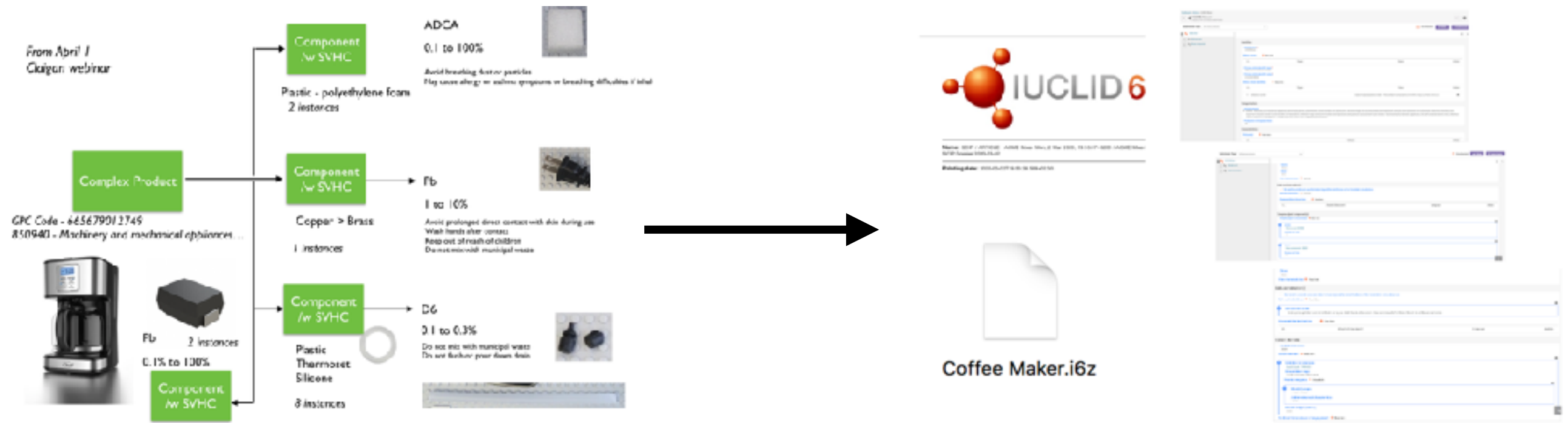
D6

0.1 to 0.3%

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



End Goal



Practical Plan

- Starting Point - Two (2) Templates
 - Product template (Excel)
 - Component templates (Excel and .i6z)

Product Template

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 than shown here.
<i>optional</i>	Model(s)	
<i>optional</i>	Image (filename)	
Linked article	Linked article 1	Brass Component
	# of occurrences of article 1	0
	Linked article 2	Closed cell foam
	# of occurrences of article 2	2
	Linked article 3	Silicone Component
	# of occurrences of article 3	5
	Linked article 4	Aluminum Component
	# of occurrences of article 4	0

Component Templates

- Aluminium Component - AC01 - 20200330.i6z
- Brass Component - BC01 - 20200330.i6z
- Button Cell Battery - BCB01 - 20200330.i6z
- Closed Cell Foam - F001 - 20200330.i6z
- External Plastic Component - PC01 - 20200330.i6z
- Flexible Circuit Board - PCB01 - 20200401.i6z
- Heatshrink - HS01 - 20200330.i6z
- High Temp Solder - HTS01 - 20200330.i6z
- Plastic Bag - PB01 - 20200401.i6z
- Polyimide Film - PID1 - 20200401.i6z

+

	A	B	C
Article Name	Closed Cell Foam	Silicone Component	
part number	F001	BC01	
Article Category	2903 - foams and expanded polystyrene foam + plates and sheets thereof + fragments thereof + pieces of foam + fragments of pieces of foam + fragments of pieces of foam	2903 - silicones, silicones and their salts	
Production in European Union	unfolding to disclose	unfolding to disclose	
Safe use instructions	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.	
Chemicals List Version	20091	20091	
Chemicals List Entry / Substance	Dioxane 1,2-dichloroethane (EC) (hexachlorocyclohexane) (HCH) (C6H10Cl2) (CAS# 107-06-6)	Hexamethylcyclotrisiloxane (HM) (C6H12Si3O3) (CAS# 107-06-6)	
Concentration range	> 1.0% w/w and < 100% w/w	> 0.1% w/w and < 0.1% w/w	
Material category	plastic (not polystyrene - polystyrene, high)	rubber and elastomers - silicone rubber	

Product Template

- Product template
 - Simple and non-technical excel sheet
 - Single column to complete per product

Product Template

A	B	C
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Primary Article Identifier Type	GPC (Universal Product Code)	665679012749
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Product IUCLID #	Product IUCLID ID	
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	# of occurrences of article 4	0

Product Template - Fields

- Fields
 - Product name
 - UPC code or serial number
 - Customs code
 - Manufacturer in EU (Y/N/Withheld)
 - Components
 - How many of each SVHC component template in the product
- Simple form without heavy technical requirements

Product Template

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Component Template

- Product template
 - Excel and i6z template for each component type with an SVHC
 - Highly technical
 - But only ~40 common SVHC declarable components
 - Easy to outsource to technical experts
 - Very re-usable

Component Templates

Aluminium Component - AC01 - 20200330.i6z
Brass Component - BC01 - 20200330.i6z
Button Cell Battery - BCB01 - 20200330.i6z
Closed Cell Foam - FO01 - 20200330.i6z
External Plastic Component - PC01 - 20200330.i6z
Flexible Circuit Board - PCB01 - 20200401.i6z
Heatshrink - HS01 - 20200330.i6z
High Temp Solder - HTS01 - 20200330.6z
Plastic Bag - PB01 - 20200401.i6z
Polyimide Film - PD1 - 20200401.i6z

Article Name	Closed Cell Foam	Silicone Component
part number	FO01	SC
Article Category	plastic - closed cell foam (polyurethane foam) + plastic and elastomer (polyurethane foam) + plastic and elastomer (polyurethane foam) + plastic and elastomer (polyurethane foam)	silicone - silicon, silicon dioxide, silicon
Production in European Union	unfolding to declare	unfolding to declare
Safe use instructions	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.
Constance List Version	202001	202001
Constance List Entry / Substance	Diene 12-dithiocarbamate (E)-isothiocyanate (RCA)/EG 20-000-00-000-12-11-0	Diocetylthiodithiocarbamate (E)-isothiocyanate (RCA)/EG 20-000-00-000-12-11-0
Concentration range	> 1.0% w/w and < 100% w/w	> 0.1% w/w and < 0.2% w/w
Material category	plastic (not polymer) - unfilled/thermo. high	rubber and elastomers - silicone rubber

Component Template

Identifiers	Article Name	Silicone Component	Brass Component
Product IUCLID #			
Primary Article Identifier Type	reference number ▼	SI01	BC01
Other Article Identifier Type	other: ▼	silicone washers, gaskets, seals, tubes, wires, o-rings, and similar silicone components	brass stand offs, connectors, tubing, prongs, and other brass components
	Article Category	39100000 - Plastics and articles thereof; rubber and articles thereof > Plastics and articles thereof > Silicones in primary forms	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 ▼	unwilling to disclose ▼
Safe Use Instructions	Safe use instruction (s)	Do not mix with municipal waste Keep out of water supplies and sewers	Avoid prolonged direct contact with skin during use Wash hands after contact Keep out of reach of children Do not swallow Do not mix with municipal waste
Concern Element	Candidate List Version	2020/01 ▼	2020/01 ▼
	Candidate List Entry / Substance	Dodecamethylcyclohexasiloxane EC# 208-762-8 CAS# 540-97-6 ▼	Lead EC# 231-100-4 CAS# 7439-92-1 ▼
	Concentration range	> 0.1% w/w and < 0.3% w/w; ▼	≥ 1.0% w/w and < 10.0% w/w; ▼
	Material category	rubber and elastomers - silicone rubber ▼	metal - brass ▼

Likely not needed in next version of IUCLID (Candidate List Version)

Repeat - Practical Plan

- Starting Point - Two (2) Templates
 - Product template (Excel)
 - Component templates (Excel and .i6z)

Product Template

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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.
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	Linked article 4	Aluminum Component
	# of occurrences of article 4	0

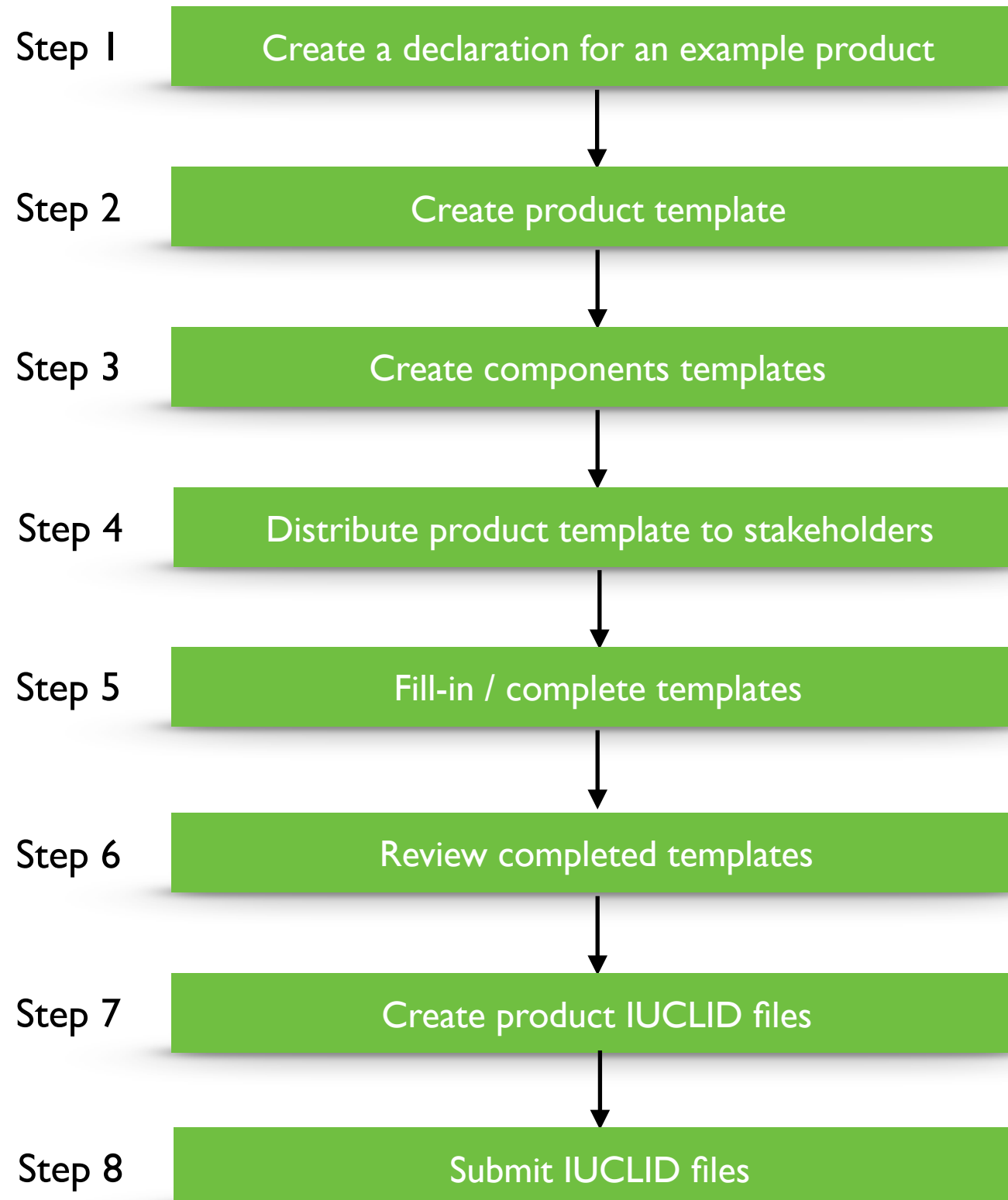
Component Templates

- Aluminium Component - AC01 - 20200330.i6z
- Brass Component - BC01 - 20200330.i6z
- Button Cell Battery - BCB01 - 20200330.i6z
- Closed Cell Foam - F001 - 20200330.i6z
- External Plastic Component - PC01 - 20200330.i6z
- Flexible Circuit Board - PCB01 - 20200401.i6z
- Heatshrink - HS01 - 20200330.i6z
- High Temp Solder - HTS01 - 20200330.i6z
- Plastic Bag - PB01 - 20200401.i6z
- Polyimide Film - PID1 - 20200401.i6z

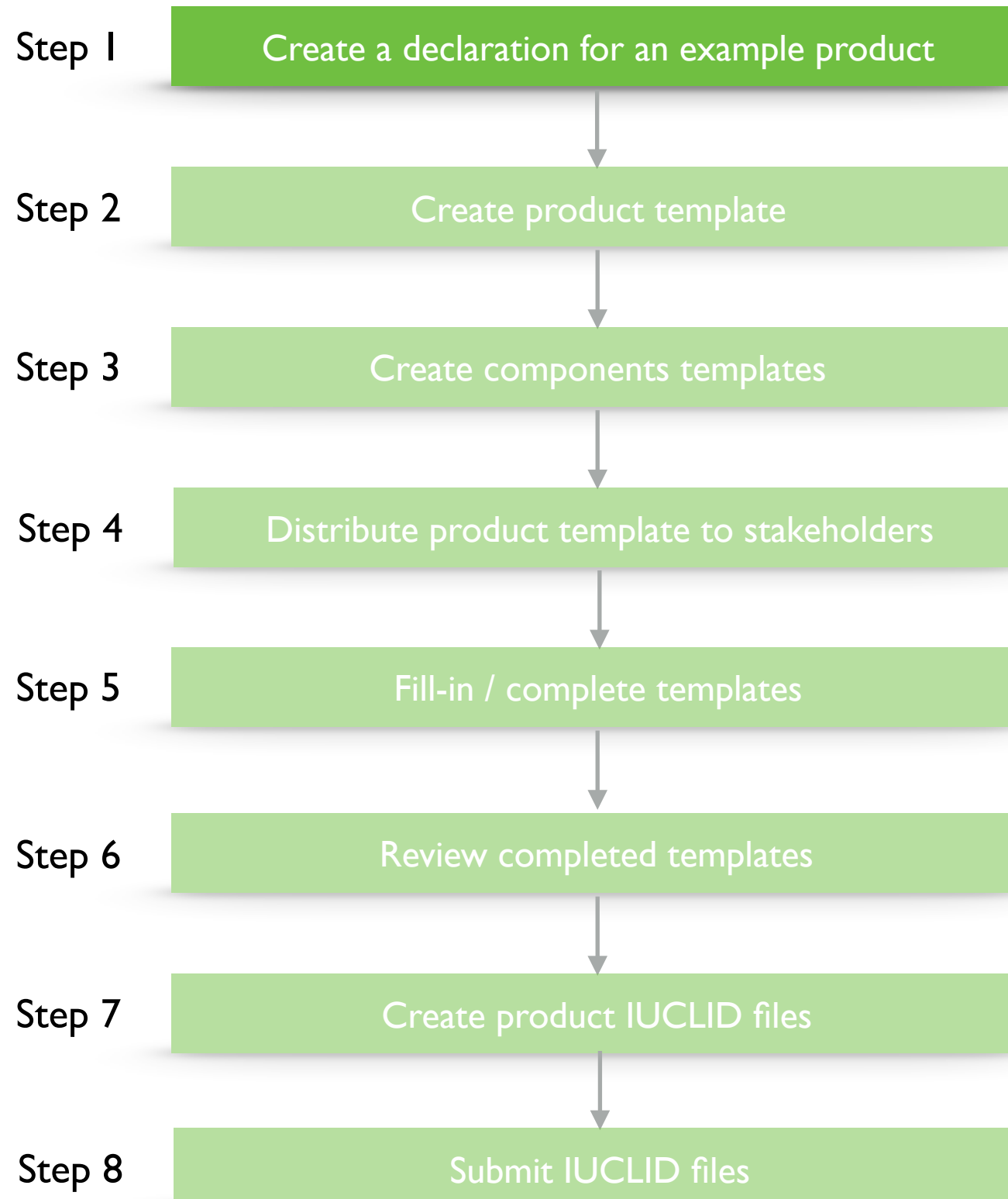


	A	B	C
Article Name	Closed Cell Foam	Silicone Component	
part number	F001	BC01	
Article Category	2905 - foams and cellular material, upper cell content based on plastic and other thermoplastic polymers of ethylene, in primary forms + Polyethylene having a specific gravity of less than 0.94	2905 - silicones, silicones and their salts	
Production in European Union	unfolding to disclose	unfolding to disclose	
Safe use instructions	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.	
Candidate List Version	20051	20051	
Chemicals List Entry / Substance	Dioxane 1,2-dioxane (EC) (hexahydro-1,3,4-dioxin) (CAS) (ECHA) (2005-09-08 CAS) (2005-09-08)	Dodecamethylcyclotrisiloxane (EC) (2005-09-08 CAS) (2005-09-08)	
Concentration range	> 1.0% w/w and < 100% w/w	> 0.1% w/w and < 0.1% w/w	
Material category	plastic (not polymer) - unfilled/other high	rubber and elastomers - silicone rubber	

8 Steps - SCIP Compliance



Step 1 - Create Declaration for an Example Product

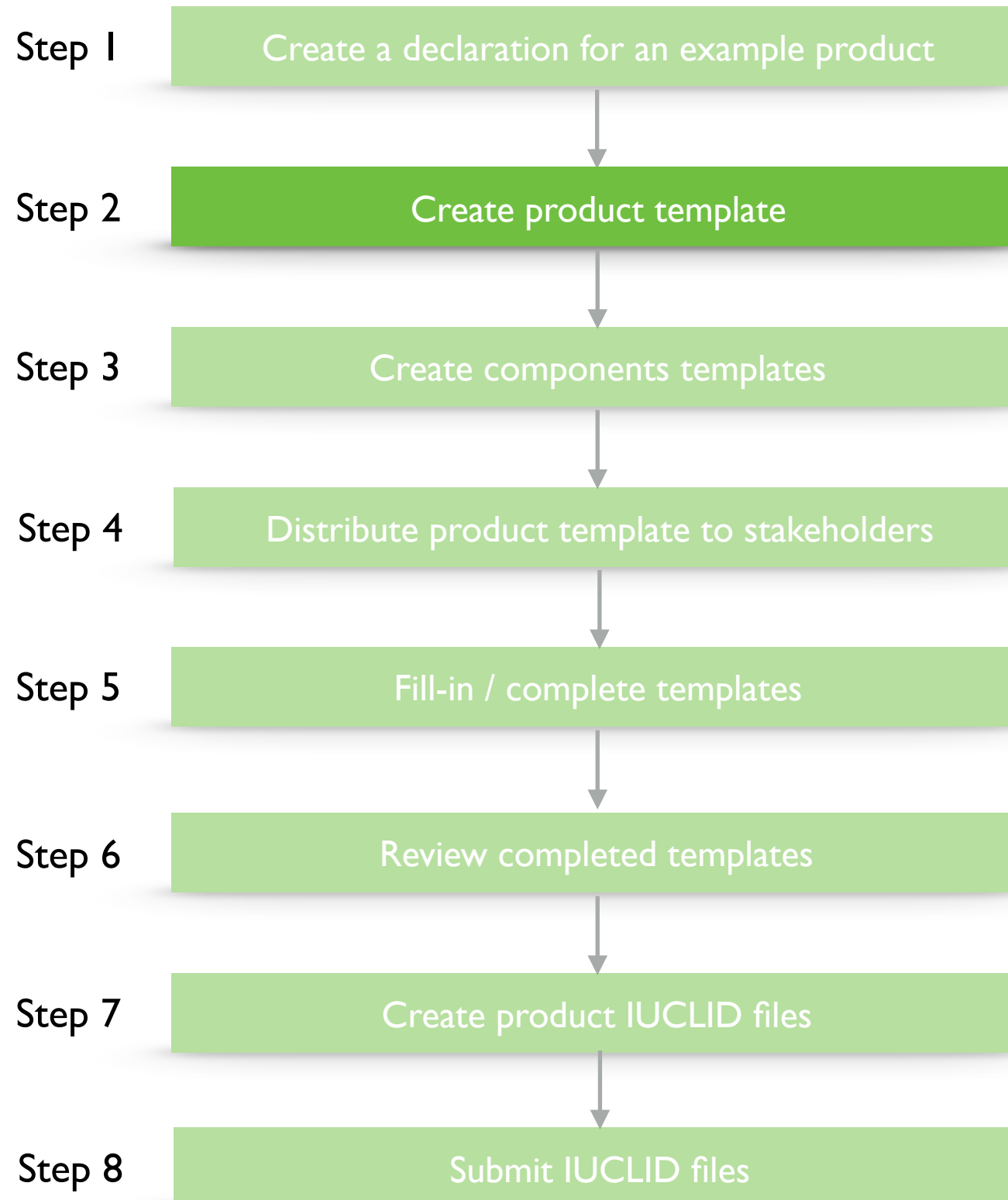


Step 1 -

Create a Declaration for a Product

- Start with one product
 - Create the declaration for that product
 - Learn from that process
- Build from that experience
 - Create templates
 - Create a process
 - Creates goals and milestones
- Will work better if you leverage an experienced entity such as Claigan

Step 2 - Create Product Template



Step 2 -

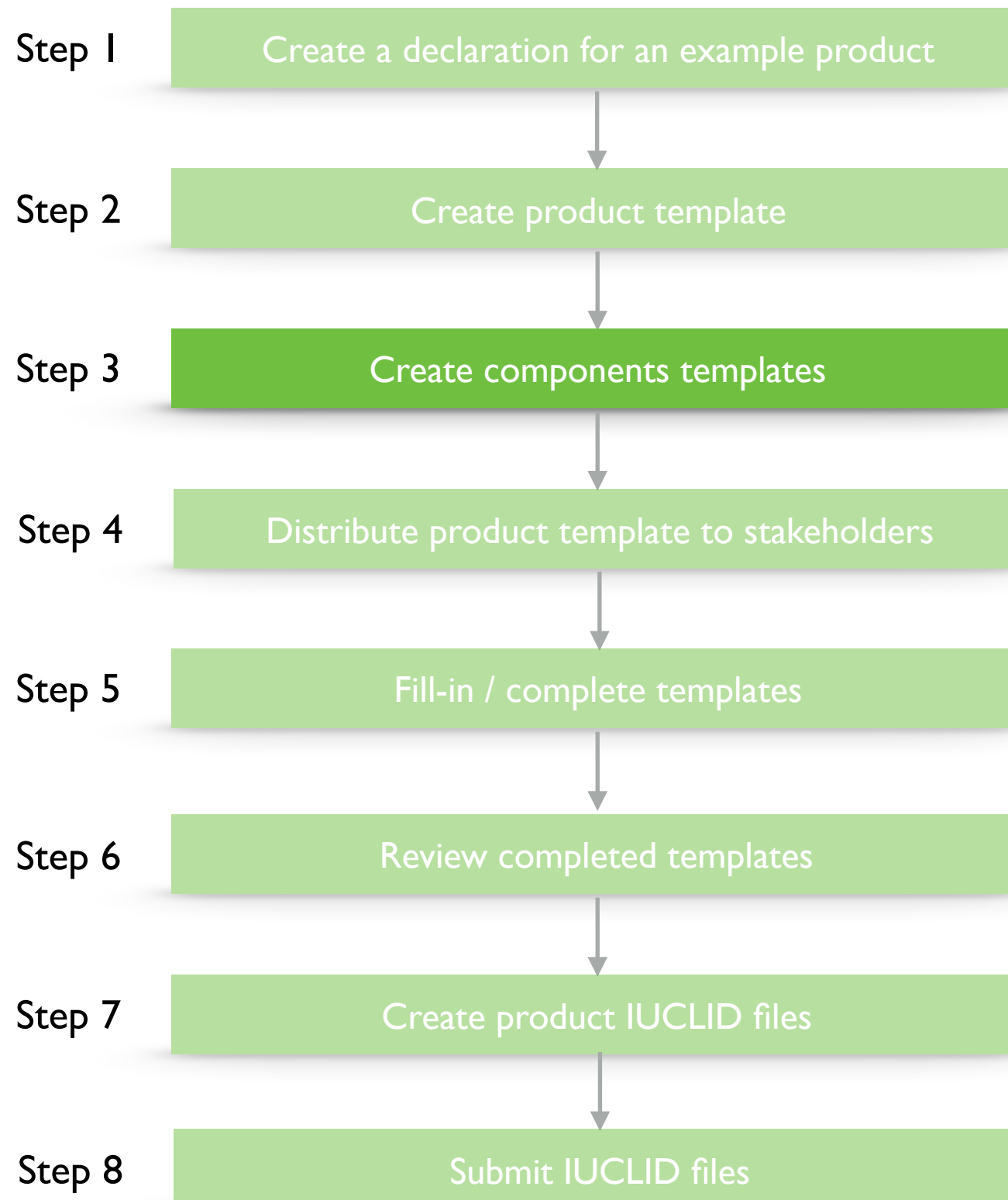
Create a product template

- Create a template in excel to fill out for a product
 - Simple spreadsheet with required fields
 - That you can provide or explain to others
- Purposes
 - Creates a focus and output to achieve for each product
 - Simple and non-technical
- Technical elements in the component templates

Product Template

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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)	
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	# 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

Step 3 - Create Components Templates



Step 3 -

Create component templates

- Create component templates to be referenced in product templates
 - Generic component templates that can be referenced by product templates
- Highly technical
 - Keep the SVHC, safe use instructions, and other technical elements in the component templates
 - Highly specialized
- Normally requires specialized help such as Claigan

Component Template

- Product template
 - Excel and i6z template for each component type with an SVHC
 - Highly technical
 - But only ~40 common SVHC declarable components
 - Easy to outsource to technical experts
 - Very re-usable

Component Templates

Aluminium Component - AC01 - 20200330.i6z
Brass Component - BC01 - 20200330.i6z
Button Cell Battery - BCB01 - 20200330.i6z
Closed Cell Foam - FO01 - 20200330.i6z
External Plastic Component - PC01 - 20200330.i6z
Flexible Circuit Board - PCB01 - 20200401.i6z
Heatshrink - HS01 - 20200330.i6z
High Temp Solder - HTS01 - 20200330.6z
Plastic Bag - PB01 - 20200401.i6z
Polyimide Film - PD1 - 20200401.i6z

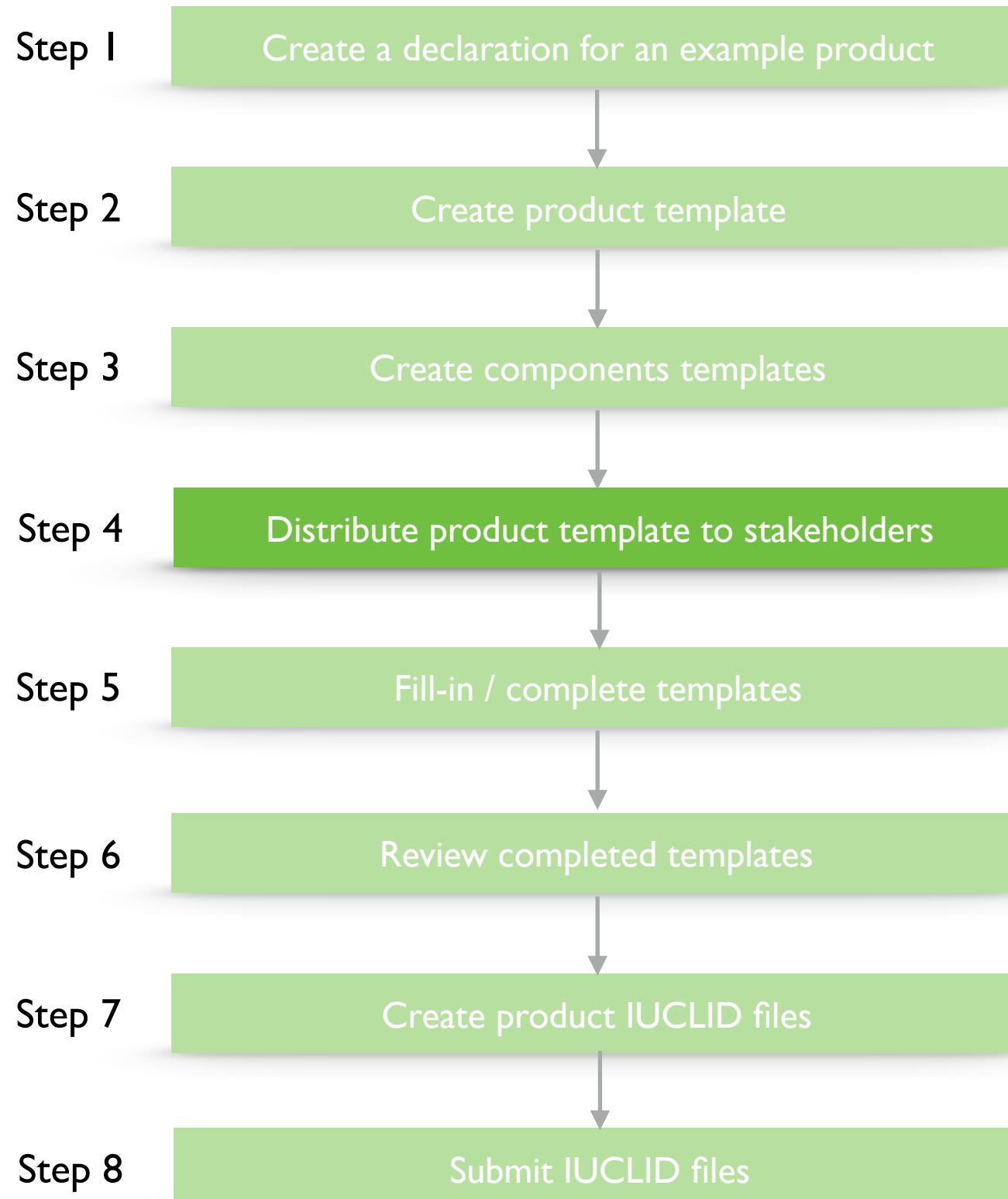
Article Name	Closed Cell Foam	Silicone Component
part number	FO01	SC
Article Category	plastic - closed cell foam (polyurethane foam) + plastic and elastomer (polyurethane foam) + plastic and elastomer (polyurethane foam) + plastic and elastomer (polyurethane foam)	silicone - silicon, water and other resin
Production in European Union	unfolding to declare	unfolding to declare
Safe use instructions	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.
Candidate List Version	202001	202001
Chemicals List Entry / Substance	Diisocyanate (2,4-toluene diisocyanate) (TDI) (EC) 206-988-8 CAS# 124-11-9	Diorganopolysiloxane (DOP) (EC) 208-102-6 CAS# 63091-9
Concentration range	> 1.0% w/w and < 100% w/w	> 0.1% w/w and < 0.2% w/w
Material category	plastic (hard polymer) - unfilled/thermo. high	rubber and elastomers - silicone rubber

Component Template

Identifiers	Article Name	Silicone Component	Brass Component
Product IUCLID #			
Primary Article Identifier Type	reference number ▼	SI01	BC01
Other Article Identifier Type	other: ▼	silicone washers, gaskets, seals, tubes, wires, o-rings, and similar silicone components	brass stand offs, connectors, tubing, prongs, and other brass components
	Article Category	39100000 - Plastics and articles thereof; rubber and articles thereof > Plastics and articles thereof > Silicones in primary forms	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 ▼	unwilling to disclose ▼
Safe Use Instructions	Safe use instruction (s)	Do not mix with municipal waste Keep out of water supplies and sewers	Avoid prolonged direct contact with skin during use Wash hands after contact Keep out of reach of children Do not swallow Do not mix with municipal waste
Concern Element	Candidate List Version	2020/01 ▼	2020/01 ▼
	Candidate List Entry / Substance	Dodecamethylcyclohexasiloxane EC# 208-762-8 CAS# 540-97-6 ▼	Lead EC# 231-100-4 CAS# 7439-92-1 ▼
	Concentration range	> 0.1% w/w and < 0.3% w/w; ▼	≥ 1.0% w/w and < 10.0% w/w; ▼
	Material category	rubber and elastomers - silicone rubber ▼	metal - brass ▼

Likely not needed in next version of IUCLID (Candidate List Version)

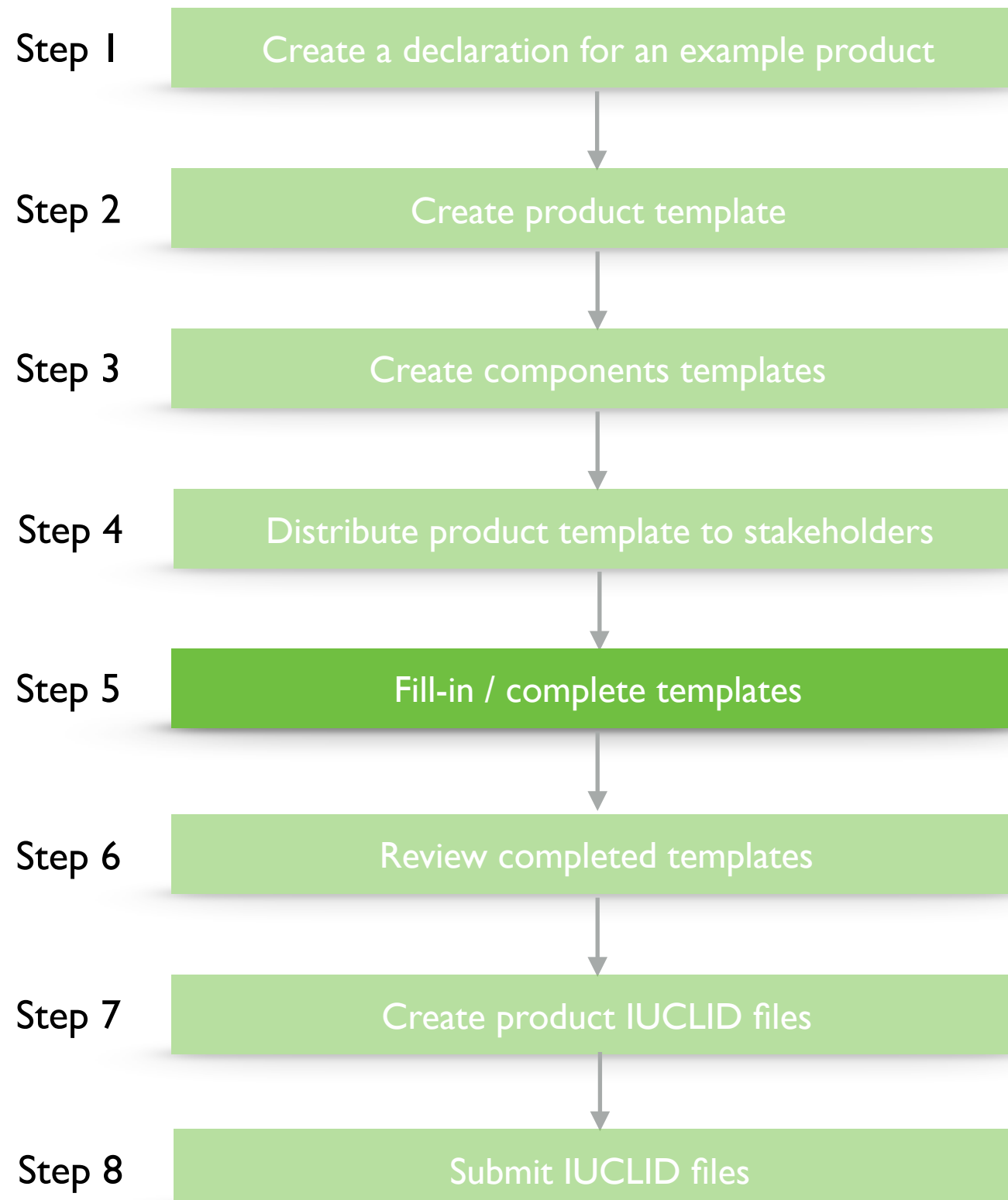
Step 4 - Distribute product template to stakeholders



Step 4 - Distribute product template

- Distribute product template to stakeholders
 - Document to complete for each product
- Stakeholder work
 - Completion of templates for each product
 - Supported by internal or external experts
- Creates the goal to complete for
 - Stakeholders
 - Summarizing to management (gives a tangible goal to report on to management)

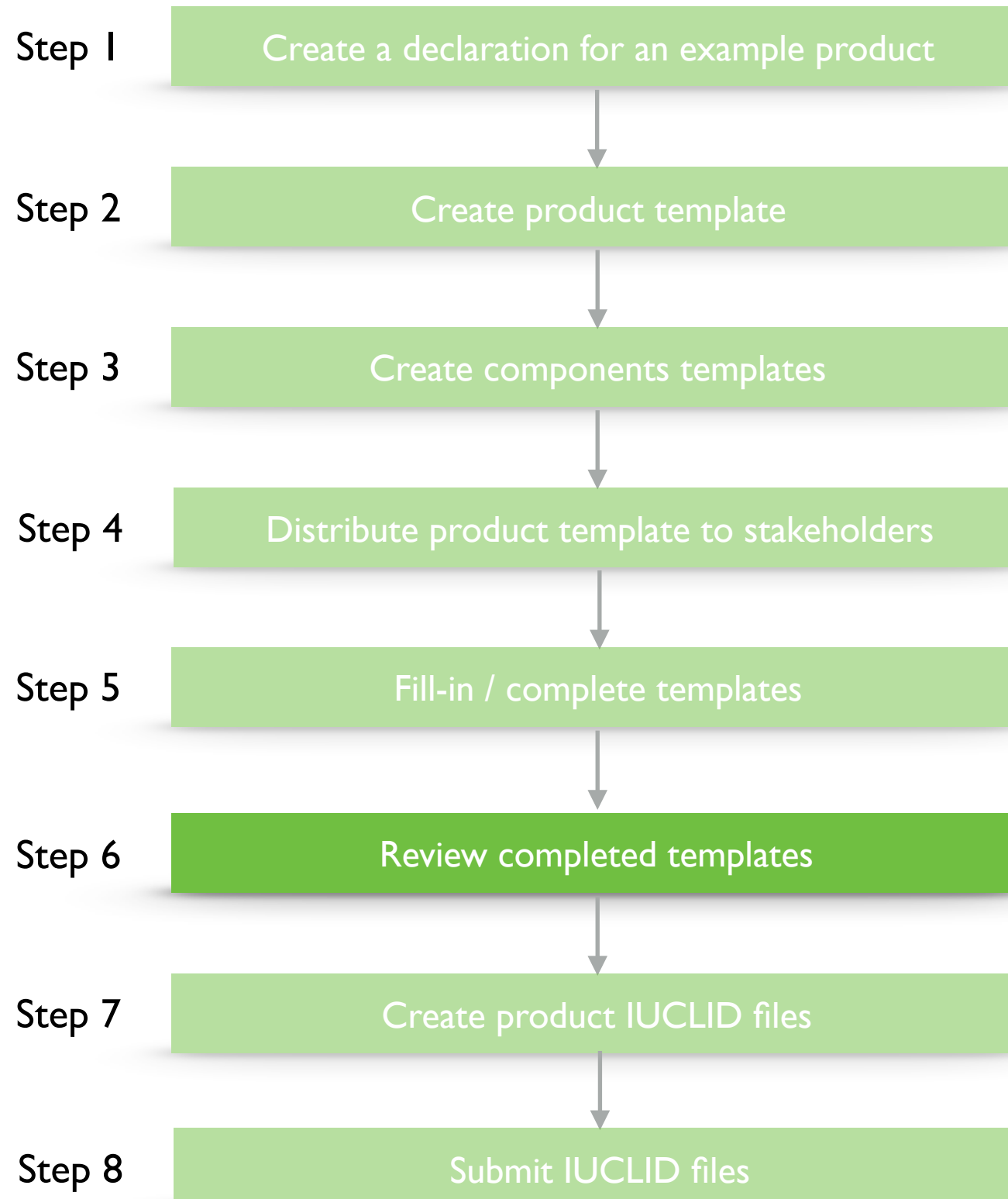
Step 5 - Fill-in / complete templates



Step 5 - Fill-in / Complete templates

- Fill-in or complete product templates
 - Stakeholders complete product templates for each product
- Completing templates
 - Responsibility of designated stakeholder
 - Good measure of completeness
- Support by internal or external experts
 - For questions
 - Options for product families (especially for professional products)

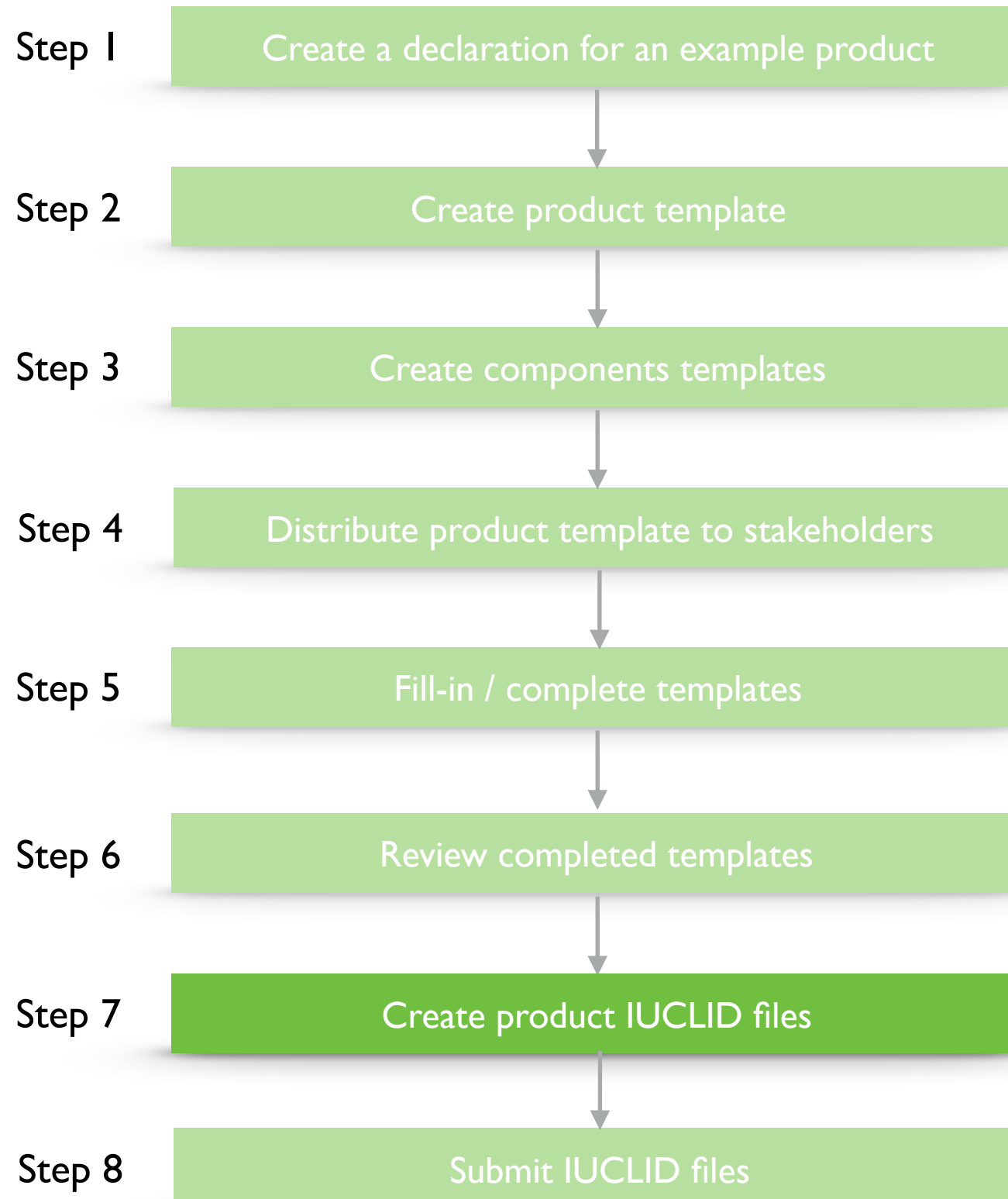
Step 6 - Review completed templates



Step 6 - Review completed templates

- It would be awesome if everyone understood exactly what they had to do
 - And filled in their templates exactly as needed.
- And I appreciated positive thinking
- But -
 - You should plan for reviewing and correcting the completed templates as part of the work plan

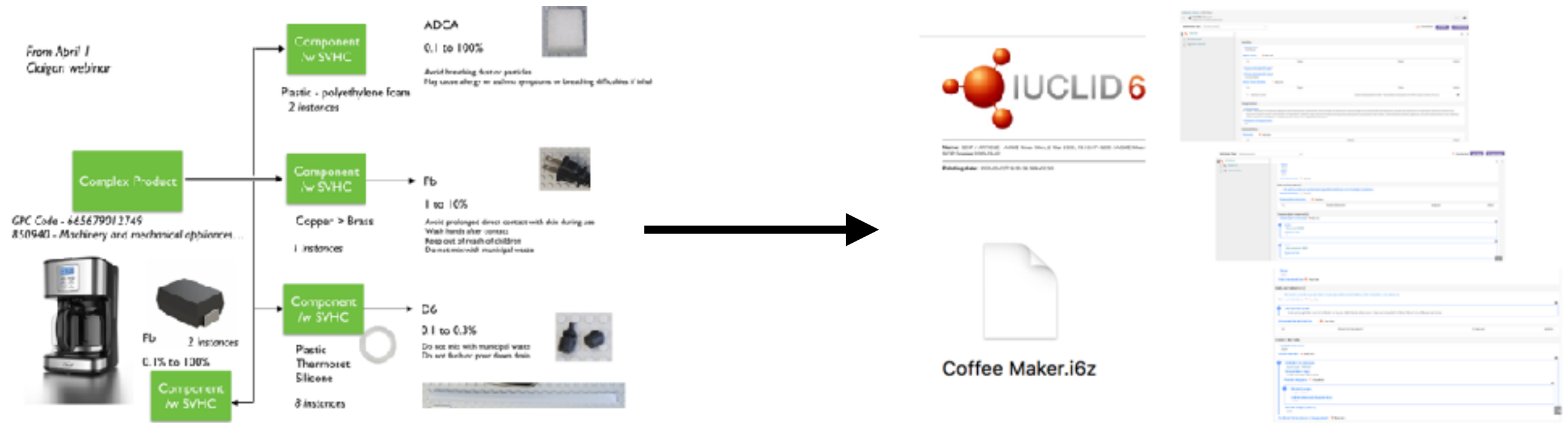
Step 7 - Create Product IUCLID Files



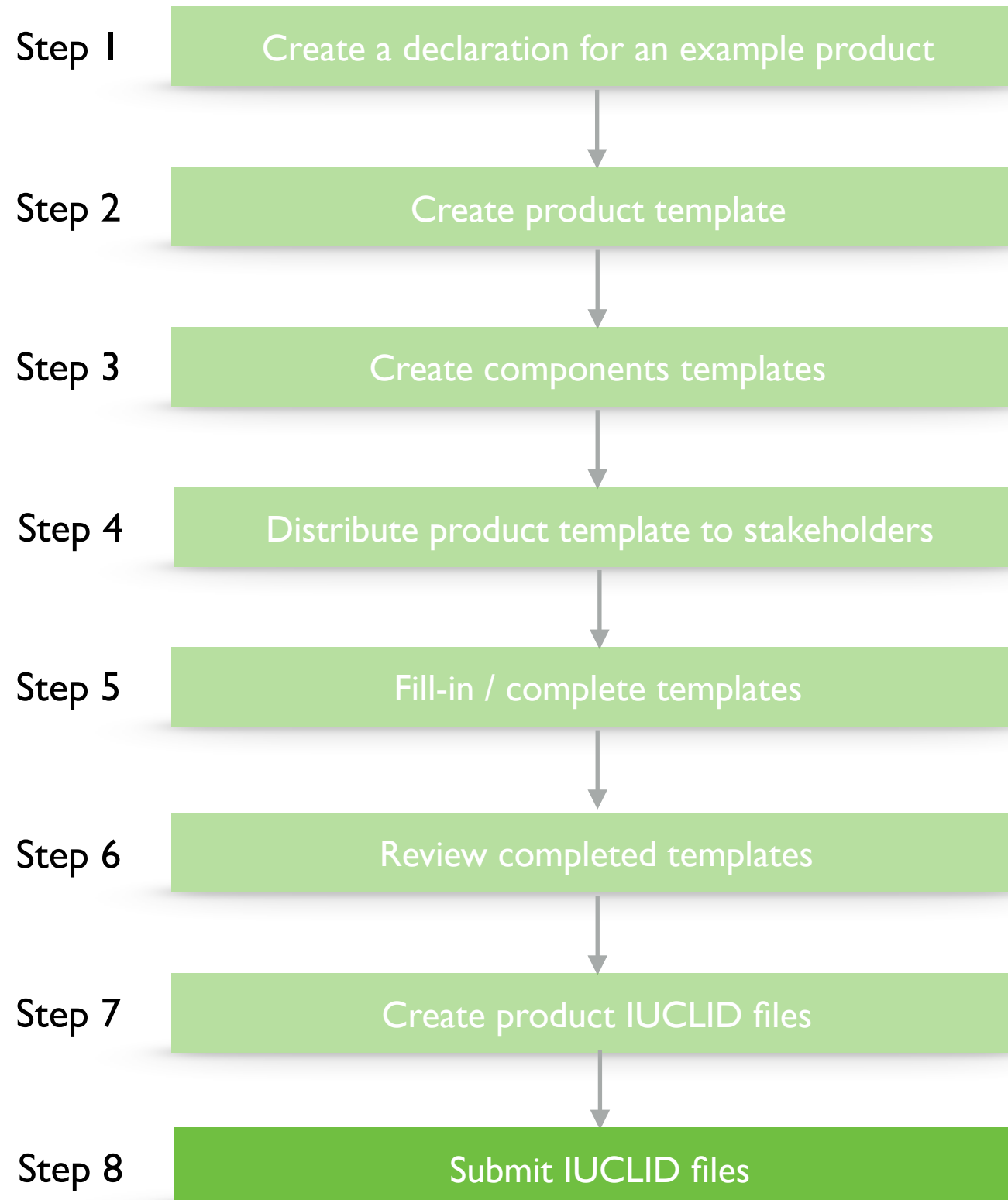
Step 7 - Create product IUCLID Files

- Create IUCLID files from completed product templates
 - Linking the products to the component templates
- Outputs
 - i6z files for each product

End Goal



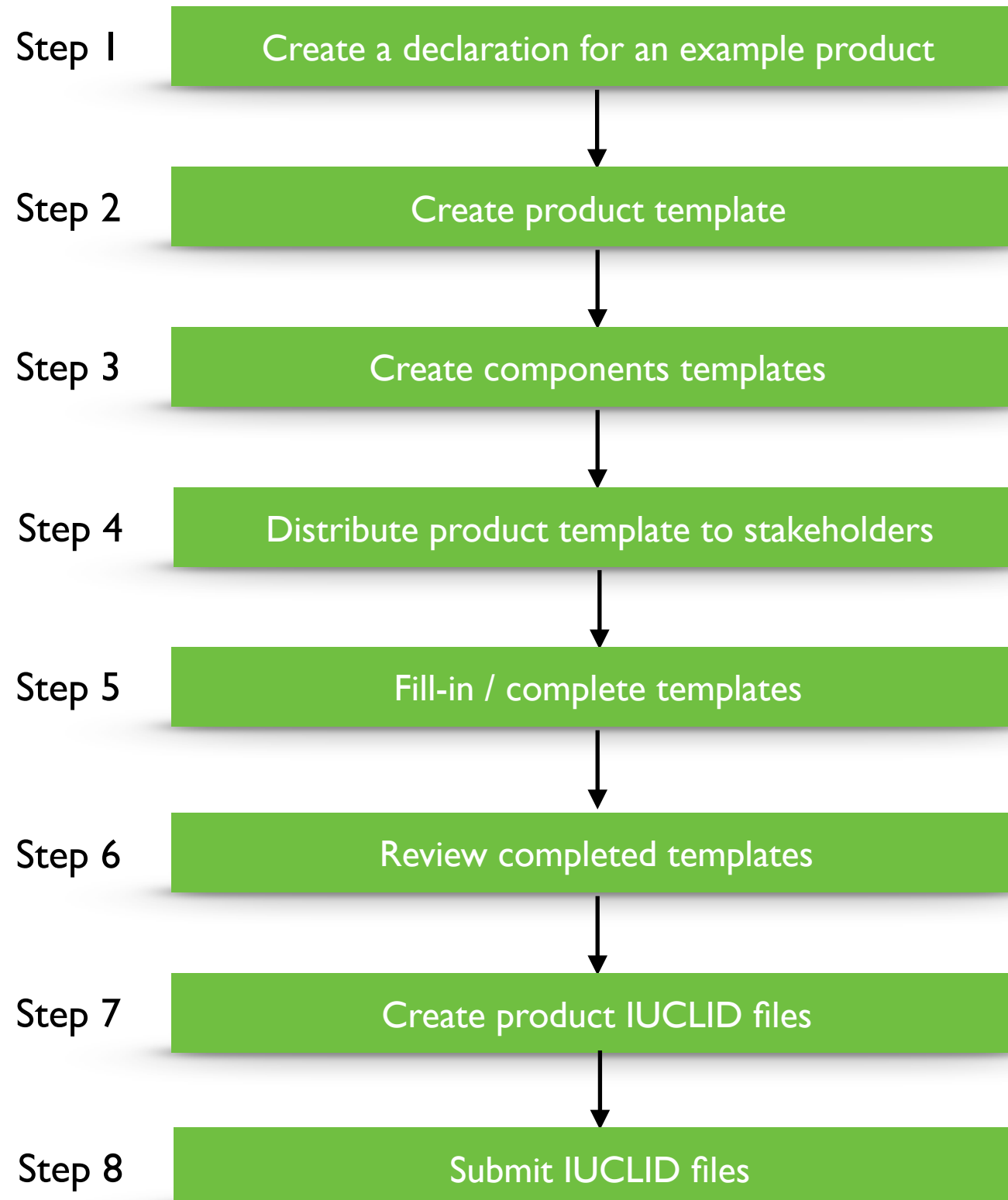
Step 8 - Submit IUCLID Files



Step 8 - Submit IUCLID Files

- Submit i6z files into IUCLID
 - Submission of the portable i6z files into the IUCLID system
- Simple activity
 - Drag drop or upload of completed files

8 Steps - SCIP Compliance



Practical Plan

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Product Template

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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.
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Component Templates

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- Heatshrink - HS01 - 20200330.i6z
- High Temp Solder - HTS01 - 20200330.i6z
- Plastic Bag - PB01 - 20200401.i6z
- Polyimide Film - PID1 - 20200401.i6z



	A	B	C
Article Name	Closed Cell Foam	Silicone Component	
part number	F001	BC01	
Article Category	2911 - foams and expanded metal, upper and lower grades + plates and sheets of + primary of others + primary of + polyurethane having a specific gravity of less than 0.04	2911 - foams, expanded and non expanded	
Production in European Union	unfolding to disclose	unfolding to disclose	
Safe use instructions	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.	
Candidate List Version	20091	20091	
Candidate List Entry (Substance)	Dioxane 1,2-dioxane (EC) (hexahydro-1,3,5-triazine) (CAS) (ECHA) (2009-09-16) (2009-09-16)	Diocanmethoxydihydroxylamine (ECHA) (2009-09-16) (2009-09-16)	
Concentration range	> 1.0% w/w and < 100% w/w	> 0.1% w/w and < 0.1% w/w	
Material category	plastic (not polymer) - unfilled/other high	rubber and elastomers - silicone rubber	

Claigan - SCIP Services

- **Product level REACH SVHC declarations**
 - Option 1: Testing, or
 - Option 2: Web or onsite engineering evaluation

- **Component Templates**

- **Educate and Support**

Q&A

- *See handout section of control panel for Claigan flyer*