

# SCIP Operational Processes

A frank discussion on SCIP compliance

Presented by:  
Bruce Calder



# Overview - Agenda - SCIP Operation Processes

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- Introduction
- SCIP
  - Timeline
- Simplified SCIP Notification (SSN)
  - Requirements
  - Distributors
  - Processes
- Creating a SCIP Declaration
  - Product and component templates
  - Output files
- New changes to SCIP
- The Miscellaneous Category
  - Spares and repairs
- Q&A



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

# Claigan - What do we need to quote?

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- **Laboratory testing**
  - Email us picture or weblink of product to [info@claigan.com](mailto:info@claigan.com)
- **Monthly / Quarterly Updates**
  - Email us at [info@claigan.com](mailto:info@claigan.com)
- **SCIP Web Demonstration and Templates**
  - Email us at [info@claigan.com](mailto:info@claigan.com)



Q&A

## (Formerly REACH SVHC Database)

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- **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 - Available
  - V0b Version - Updated August 2020. Released September 2020
  - V1 - End of October 2020

# SCIP Database - EU Deadline

- **Reminder**
- **Deadline**
  - January 5 2021
  - Less than 6 months away.



# Distributor Responsibility

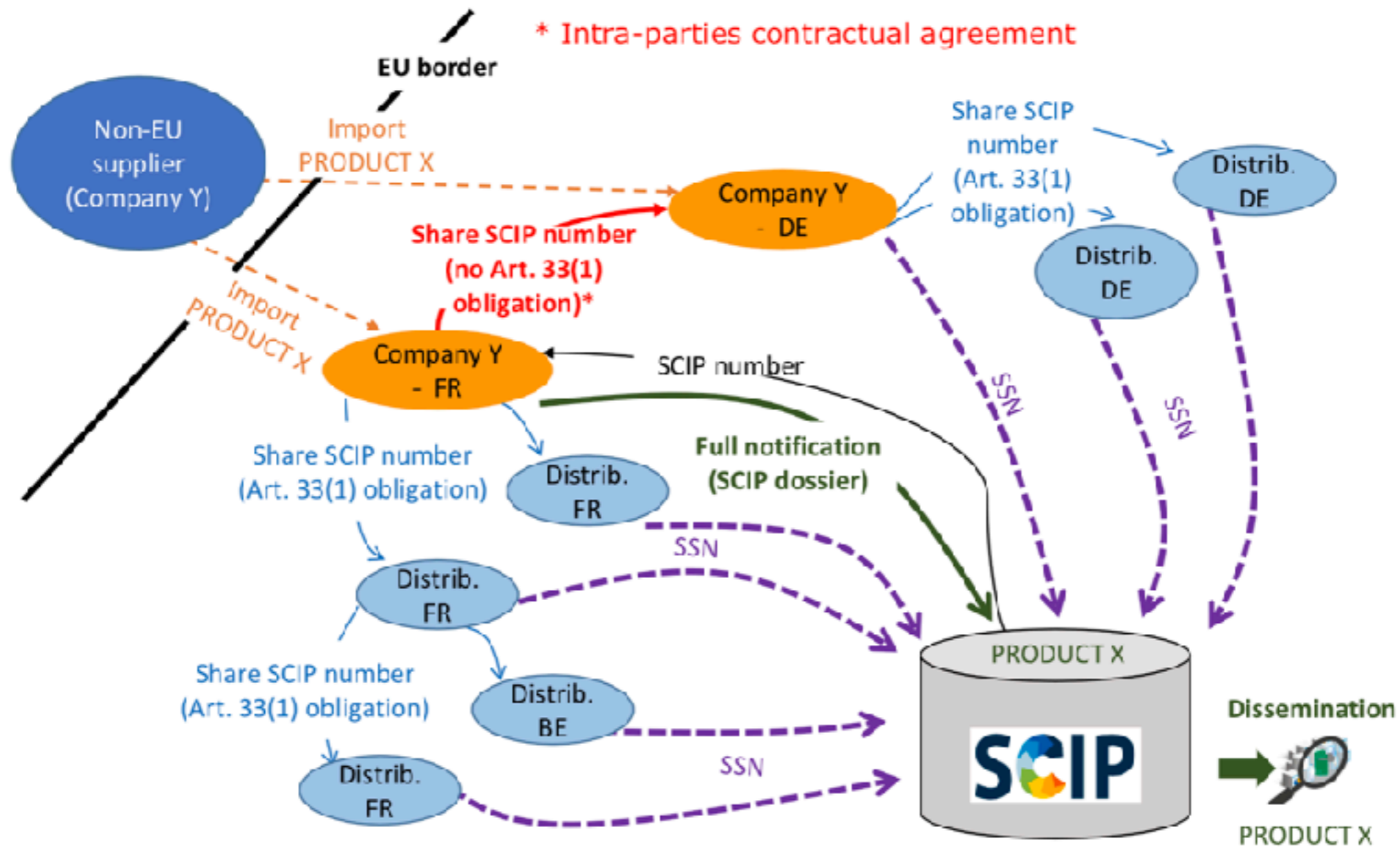
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- Simplified SCIP Notification (SSN)
  - Tools to refer to SCIP data already submitted to ECHA
- Providers of products in the EU that are not the original manufacturer or importer
  - Manufacturer is the brand owner of the product being placed on the market

# Distributor Responsibility



## Extension of the SSN (2)



For each SSN submission, a new SCIP number is issued

# SSN - Options

[Search](#) | [Upload & submit](#) | [Create dossier online](#) | [Simplified SCIP notification](#)

## Upload and submission of simplified SCIP notifications in bulk

Bulk Upload

Please upload information on the articles you wish to notify using an excel file including in each row

- A SCIP number (mandatory information)
- An Article name (optional)
- A Primary article identifier type (optional)
- A Primary article identifier value (optional)

ⓘ Please note that only Excel files are allowed to be uploaded and, currently, only simplified SCIP notifications can be submitted



Drop file to upload

or

Browse

Single Upload

## Individual submission of a simplified SCIP notification

Please enter the SCIP number of the article you wish to notify and click "Submit" to send your Simplified SCIP notification

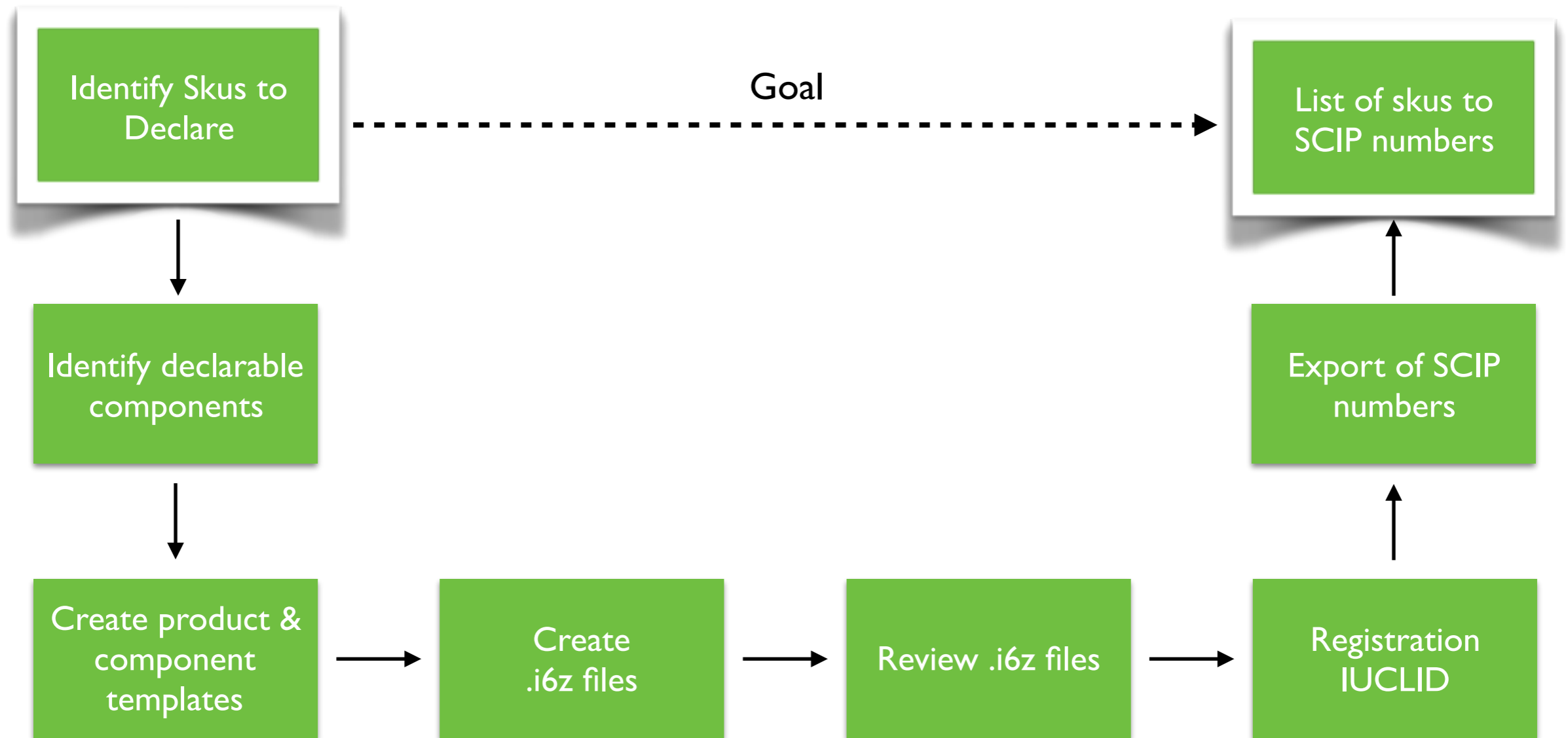
ⓘ Only one SCIP number can be submitted at a time.

SCIP number

Submit



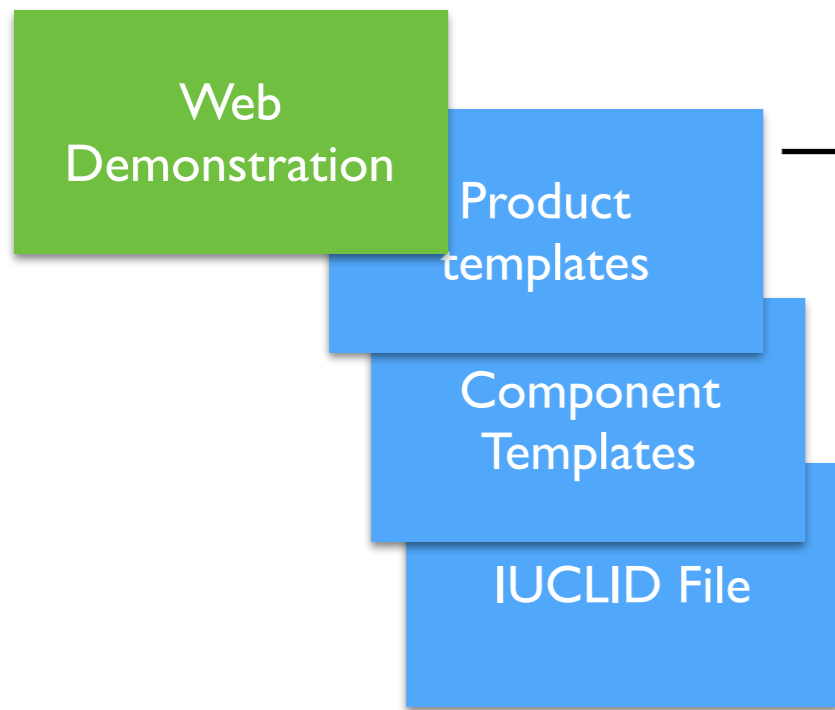
# SCIP Outputs (Simplified)



# Claigan Practical Version (SCIP Process)

**TODAY**

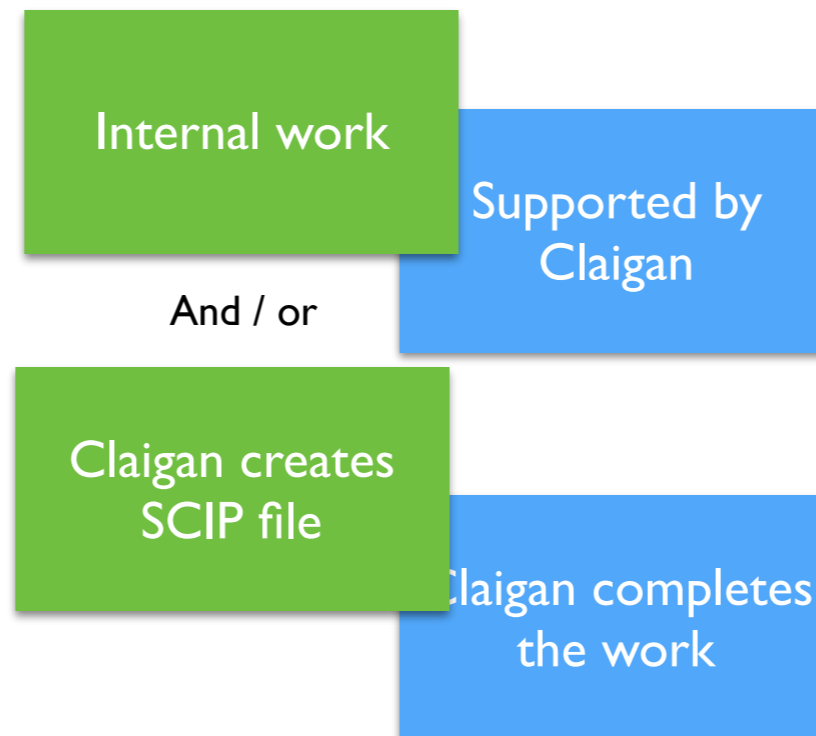
**Phase 1**  
Establishing the Basics



We show you how to do it

**Next Steps**

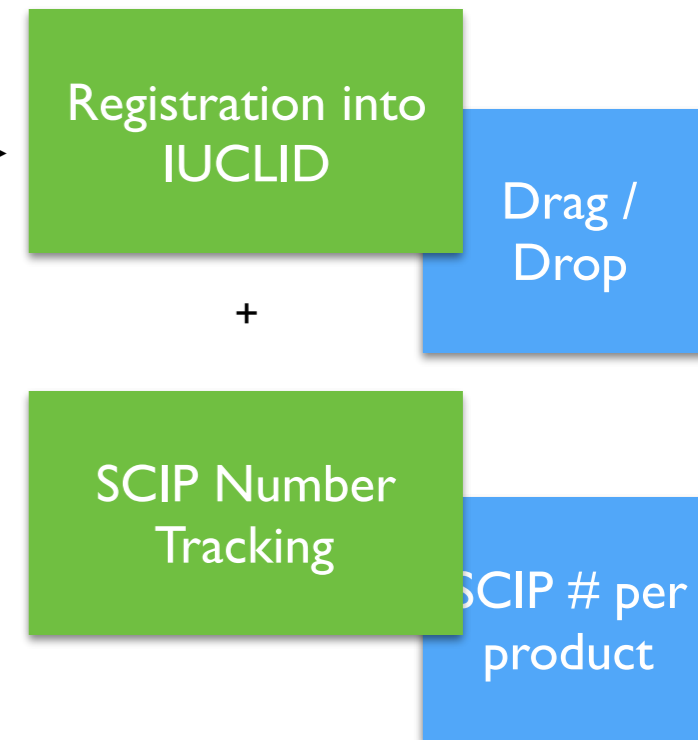
**Phase 2**  
Building SCIP for all products



We complete the IUCLID files for all of your products

**October**

**Phase 3**  
Registration (October)



You submit your products  
Collect your SCIP numbers

# Substance of Concern Database - Clairgan

## Product Declaration



Complex Product

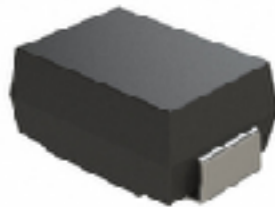


Component /w SVHC

metal - lead (and alloys of) - lead alloy  
24 instances

Pb  
0.1% to 100%

Do not take apart  
Do not mix with municipal waste



Component /w SVHC

Metal - brass  
30 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

Rubber and elastomers - silicone rubber  
15 instances

D6  
0.1 to 0.3%

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



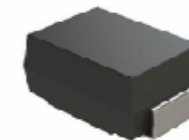
- Other declarables
- + Pb (Al)
  - + EGDME (Battery)
  - + Decl+ (Heat shrink)
  - + Pb (Steel)
  - + Cd (Relays)
  - + Moca (PU)
  - + PbO (Pots)
  - + TNPP (Film)
  - + UV-328 (LCD)

# SCIP - Templates - Building Blocks

## Product Template



4	3	2
Material	Wood Frame	Stainless Steel Coffee Maker, 12-Cup
Primary Author	ABC (General Product Code)	MM110 07113
Material Type		
Company	KLINGE 0	
Product UIC ID	Product UIC ID 0	
	Material Group	05011 - 10000: Barrels, Tanks or Oil, Metals, Metals
	Production in Business Unit	01
Self-use Instruction	See use instruction 03	See component self-use instructions
Supplier	Manufacturer	Distributor/Container Item is in the list of ADM's suppliers. Distribution Unit may have more or less of each RUC if S/C components from other base.
System	Material	
System	Image 3D view 1	
Linear article	Linear article 1	Steel Component
	# of occurrences of article 1	2
	Linear article 2	Cast Lead Base
	# of occurrences of article 2	2
	Linear article 3	Black Soldered
	# of occurrences of article 3	4
	Linear article 4	Mercury Component
	# of occurrences of article 4	0



Pb in Steel

Dechlorane Plus in Heat Shrink

EGMDE in Button Cell Batteries

Pb in High Temp Solder

Pb in Brass

## Component Templates

# Product Template

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

**Product Template**

A	B	C
<b>Identifiers</b>	Article Name	Stainless Steel Coffee Maker, 12-Cup
<b>Primary Article Identifier Type</b>	GPC (Universal Product Code)	885679012749
<b>Company</b>	IUCLID ID	
<b>Product IUCLID #</b>	Product IUCLID ID	
	Article Category	851671 - Electro-thermic coffee or tea makers, domestic
	Production in European Union	No
<b>Safe Use Instruction</b>	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)	
<b>Linked article</b>	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

# Component Template

- Component template
  - Excel and i6z template for each component type with an SVHC
  - Highly technical
  - But only ~35 **common** SVHC declarable components
  - Easy to outsource to technical experts
  - Very re-usable

A	B	C	D	
Identifiers	Article Name	Closed Cell Foam	Silicone Component	Br
Product IUCLID #				
Primary Article Identifier Type	part number	FO01	SI01	Br
	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	40169940 - 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 Kc Dr Dr
Concern Element	Candidate List Version	2020/01	2020/01	
	Candidate List Entry / Substance	Diazene-1,2-dicarboxamide (C,C'-azodi(formamide)) (ADCA) EC# 204-650-6 CAS# 123-77-3	Dodecamethylcyclohexasiloxane EC# 208-782-6 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	mi



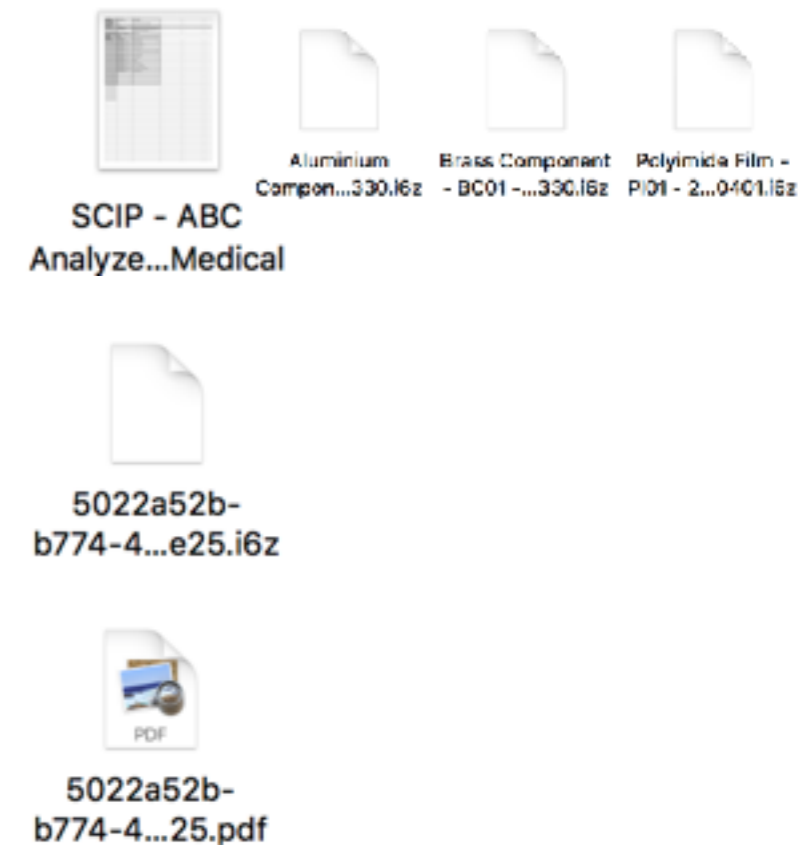
## Component Templates

- 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.i6z
- Plastic Bag - PB01 - 20200401.i6z
- Polyimide Film - PID1 - 20200401.i6z

# Example Outputs - Engineering Evaluation

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- Outputs
  - Excel files /w component templates
  - IUCLID .i6z file
  - IUCLID .pdf

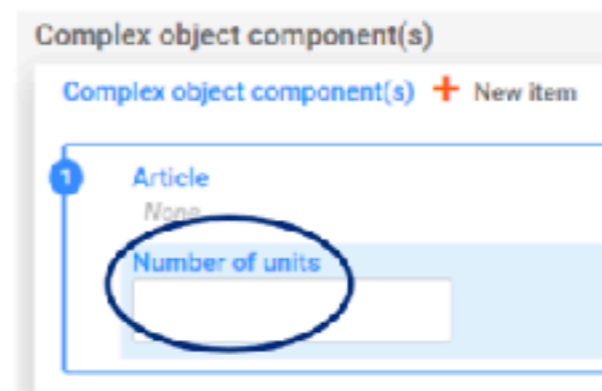


# Changes to SCIP

## Number of Units (Range of Units)



### Overview of format changes



#### Change on '**Number of units**'

- Aim: Allow the reporting of range of units.
- Change: from numeric field to numeric range field
  - The user can report one number by typing it in the left value field

v	5	v	
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- The user can also include a **range of units:** by selecting the operators (" $\geq$ " and " $\leq$ ") and by entering the lowest and highest number of the range.

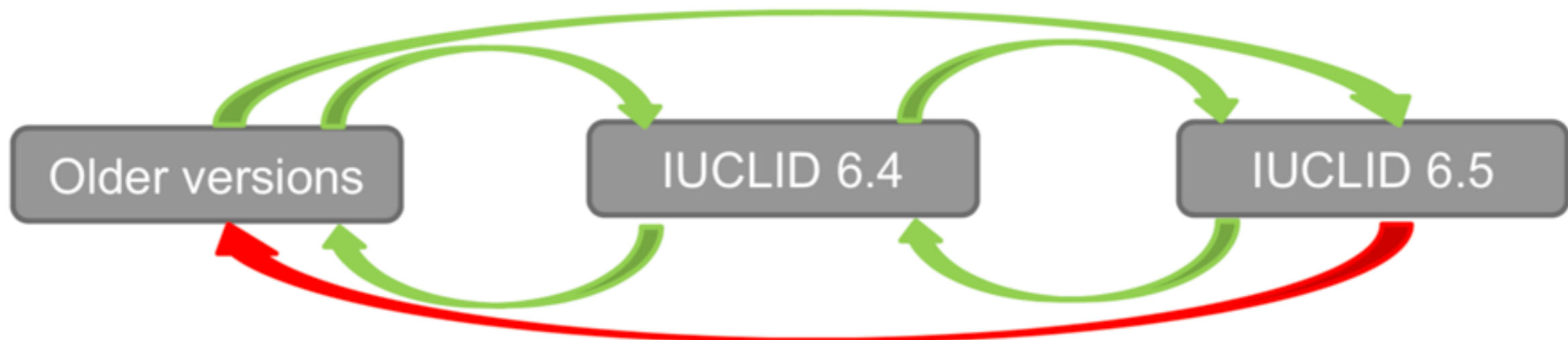
$\geq$ v	5	$\leq$ v	20
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# Backwards Compatibility

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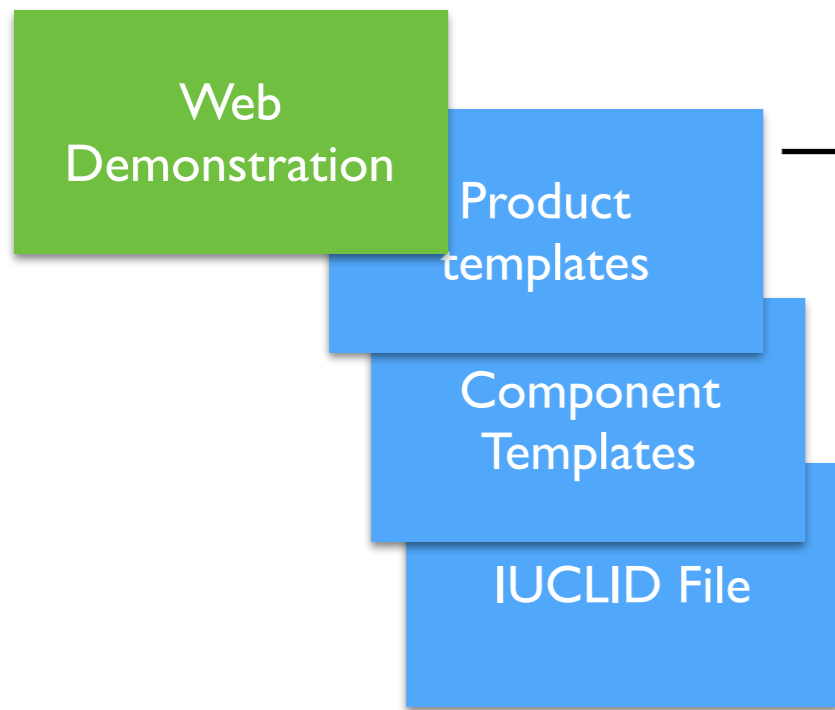
- Older files created on the current version of IUCLID
  - Can be uploaded and used in the updated software



# Claigan Practical Version (SCIP Process)

**TODAY**

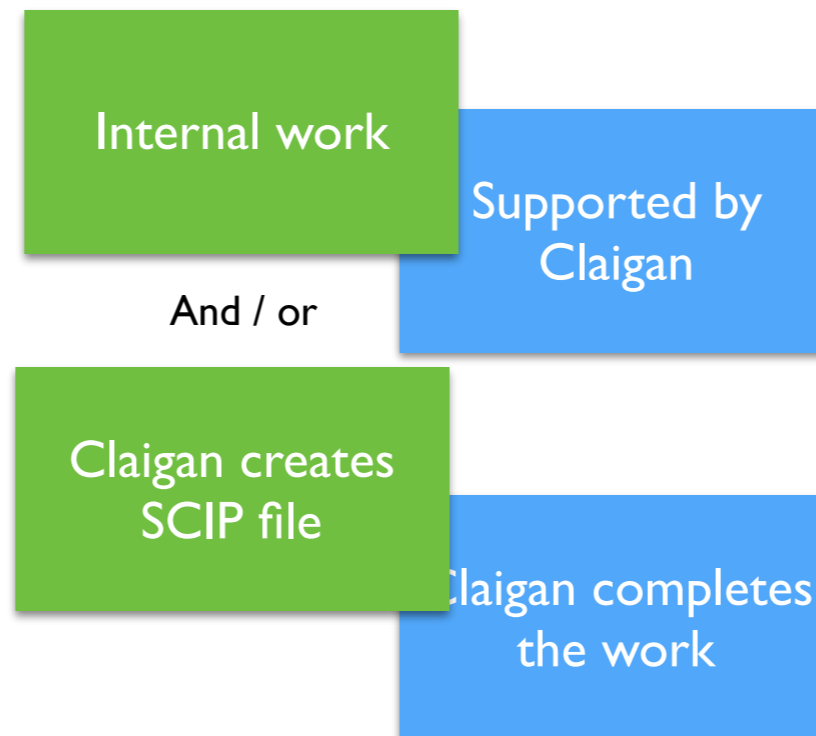
**Phase 1**  
Establishing the Basics



We show you how to do it

**Next Steps**

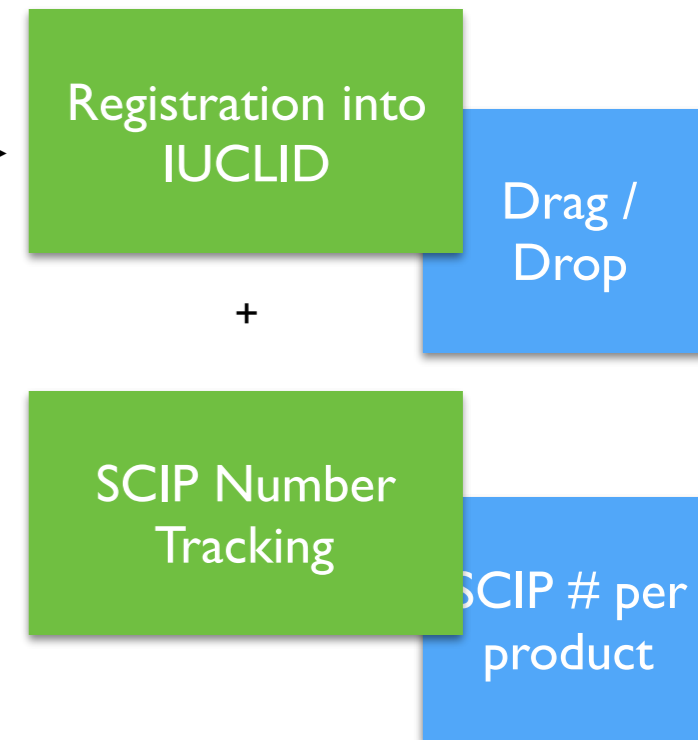
**Phase 2**  
Building SCIP for all products



We complete the IUCLID files for all of your products

**October**

**Phase 3**  
Registration (October)

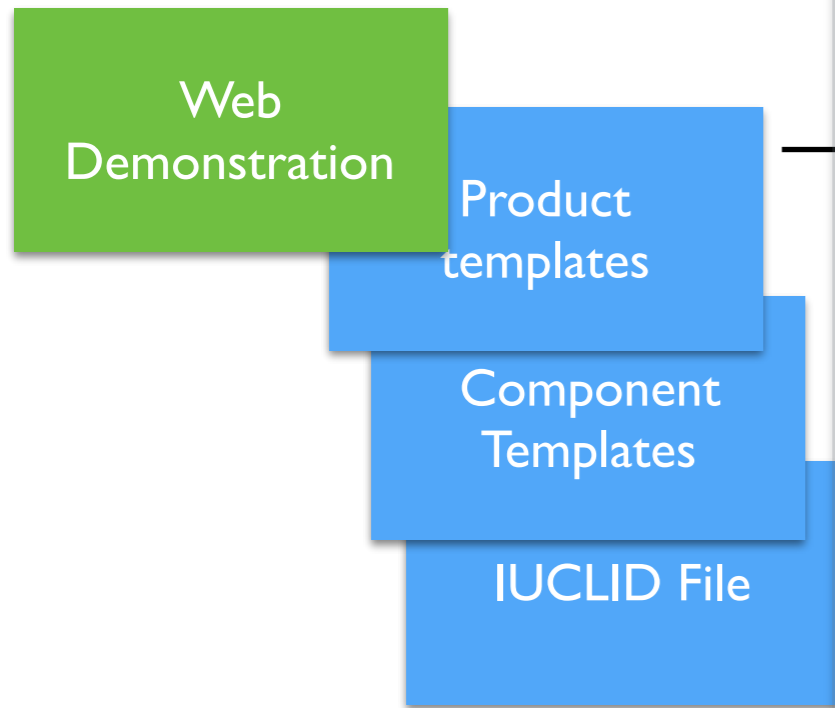


You submit your products  
Collect your SCIP numbers

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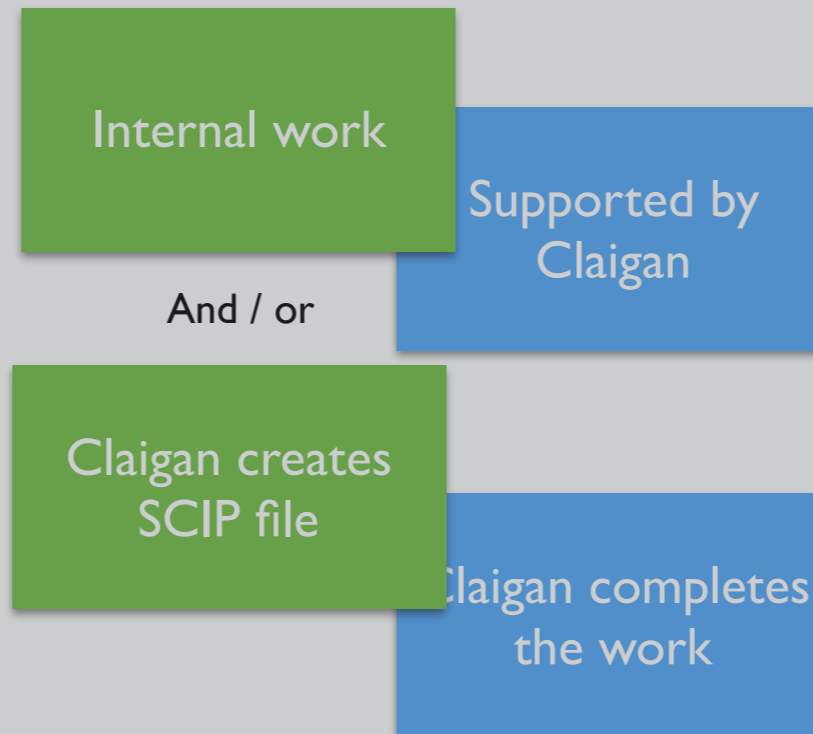
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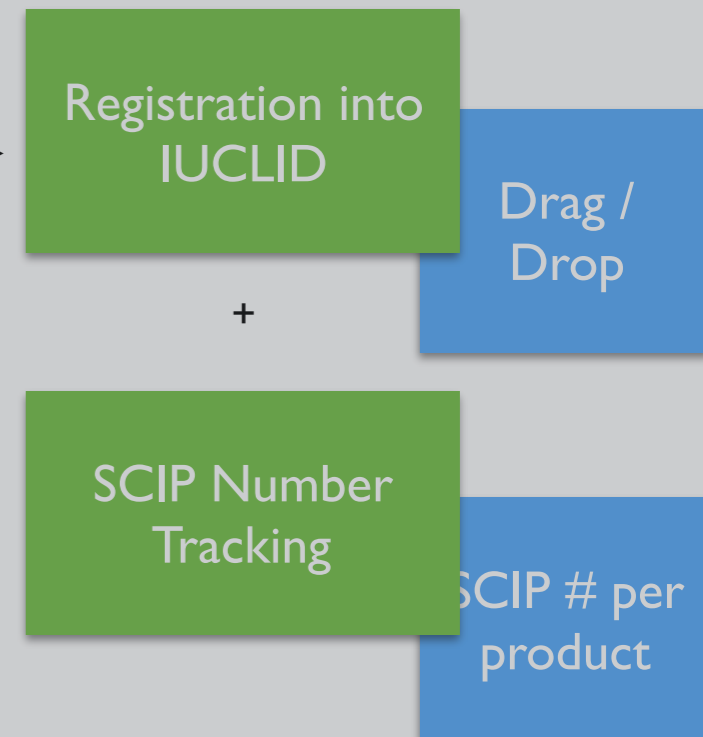
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**TODAY**

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Web  
Demonstration

Product  
templates

Component  
Templates

IUCLID File

We show you how to do it

**Next Steps**

**Phase 2**  
Building SCIP for all products

Internal work

Supported by  
Claigan

And / or

Claigan creates  
SCIP file

Claigan completes  
the work

We complete the IUCLID  
files for all of your products

**October**

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Registration (October)

Registration into  
IUCLID

Drag /  
Drop

+

SCIP Number  
Tracking

SCIP # per  
product

You submit your products

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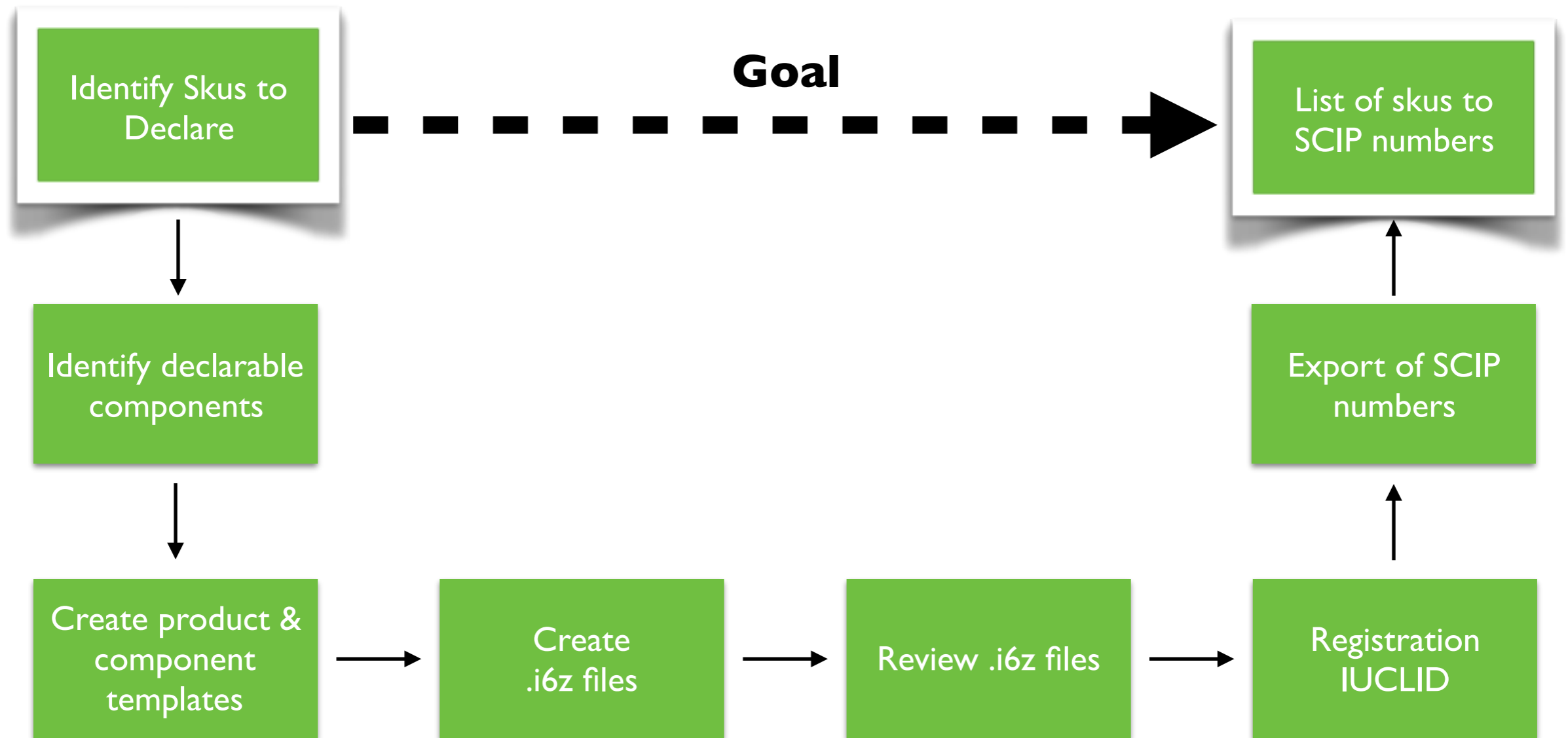
Collect your SCIP numbers

## But there is more...

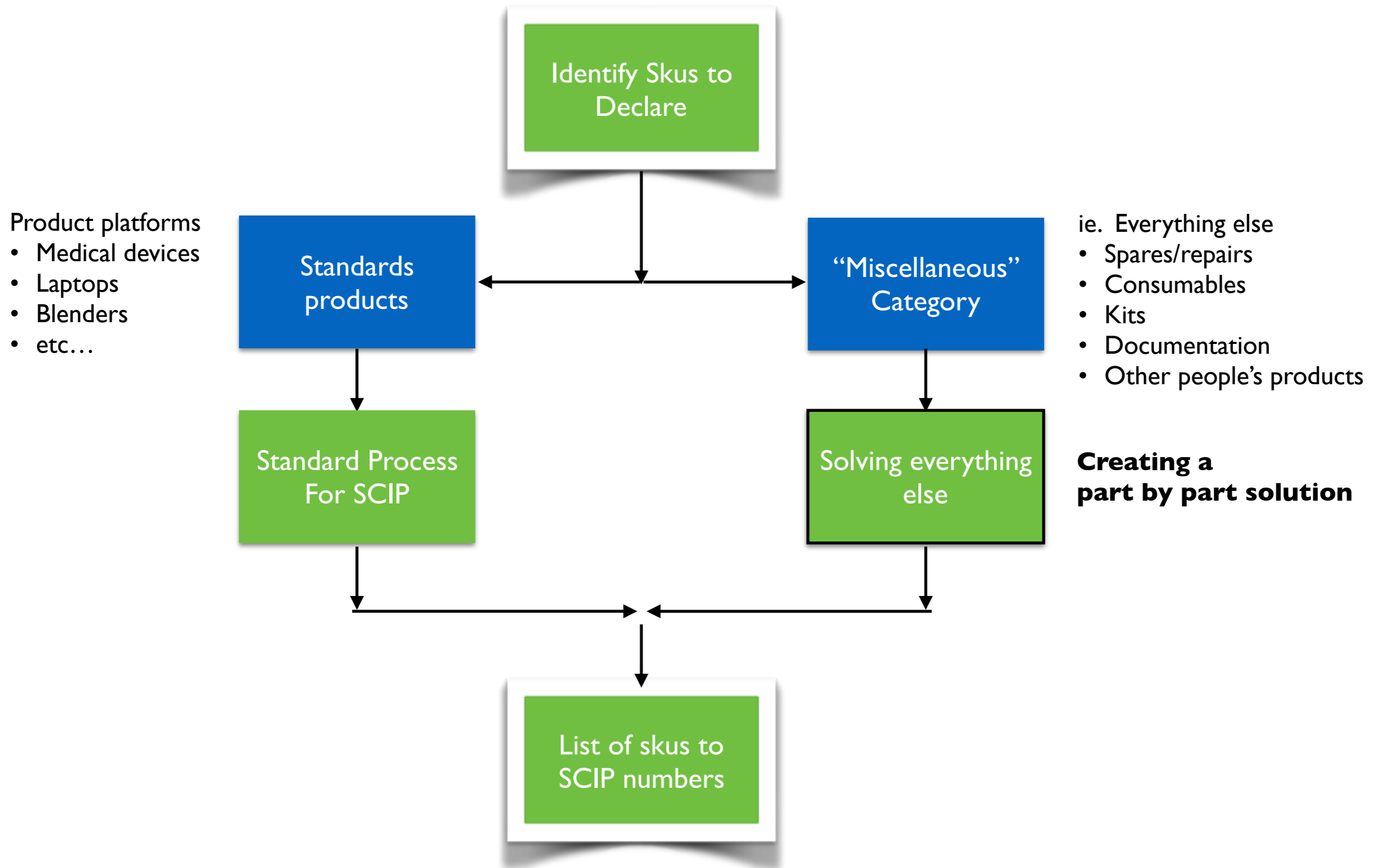
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- Claigan's process for creating files for SCIP is well understood
  - Claigan has created hundreds of declarations
- But that is only part of it
  - A very technical part of it, but just part of it

# Remember SCIP Outputs (Simplified)



# Remember SCIP Outputs (Simplified)





# Spares and Repairs

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- What about spares / repair parts?
  - They are parts on their own
- How do you solve all of those part numbers for SCIP?

# Spares and Repairs - Historical Products

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- Historical products
  - Spares and repairs for obsolete or other units placed on the market before Jan 5 2021
- General assumption
  - Repair parts have the compliance requirements of the products their are repairing
  - If the product they are repairing is not in scope of SCIP, then the parts that repair that product are out of scope

# Spares and Repairs - Historical Products

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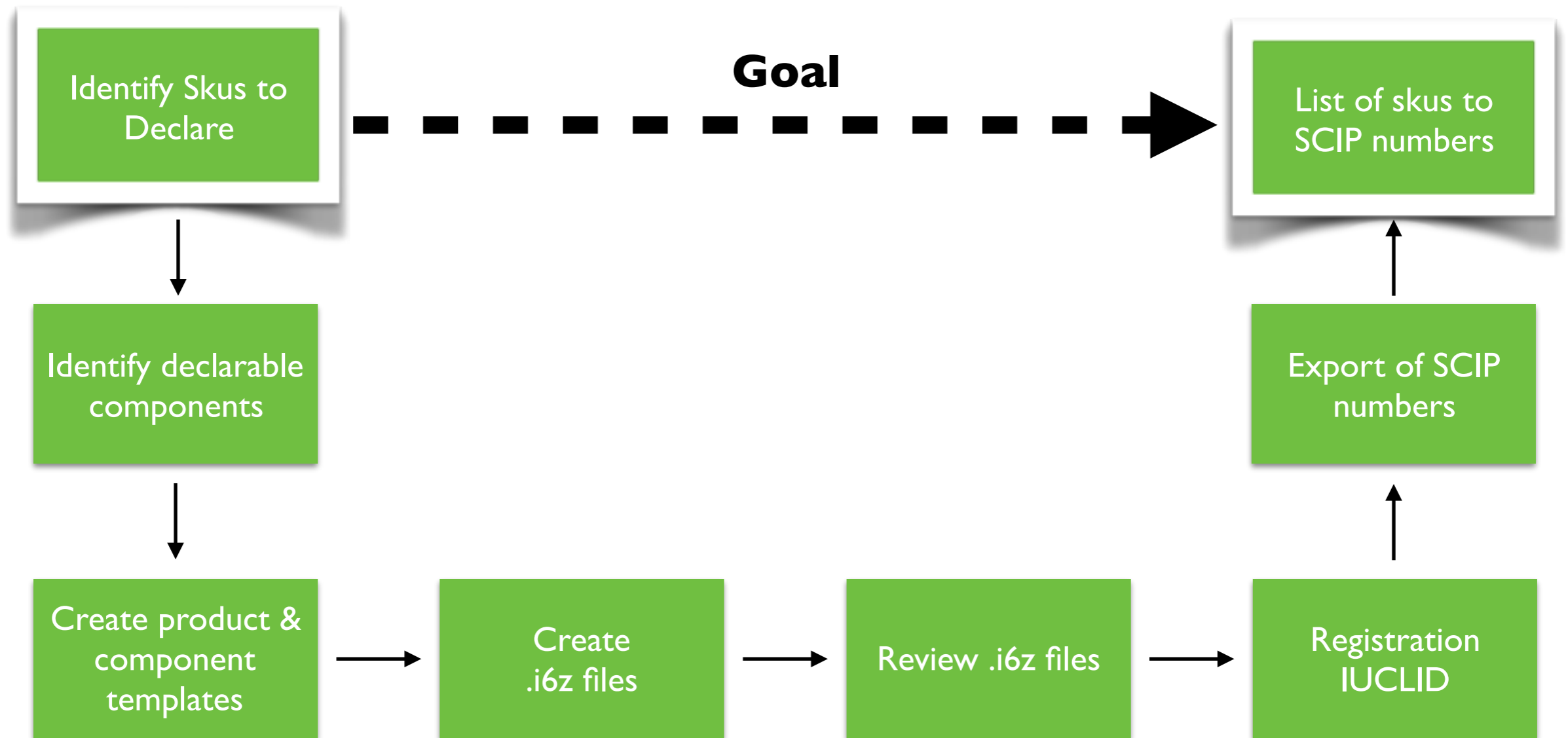
- Justification
  - Adding regulatory requirements to products already placed on the market is contradictory to the concept of the single market
  - The Waste Framework Directive (SCIP) has a strong goal in promoting repair of products
    - Creating a situation where it is easier to stop providing repair parts is contradictory to the WFD directive
- References
  - Not explicitly written anywhere, but expected to be the positive of the European Court of Justice (ECJ)

# Spares and Repairs - Current Products

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- No one good answer
  - A variety of approaches
- Common approaches
  - Reference the SCIP number of a product it is a spare/repair for,
  - Group them together into families and create risk assessments / SCIP declarations for the families, and/or
  - Justify spares in the first part of 2021 are for historical units and not yet in scope

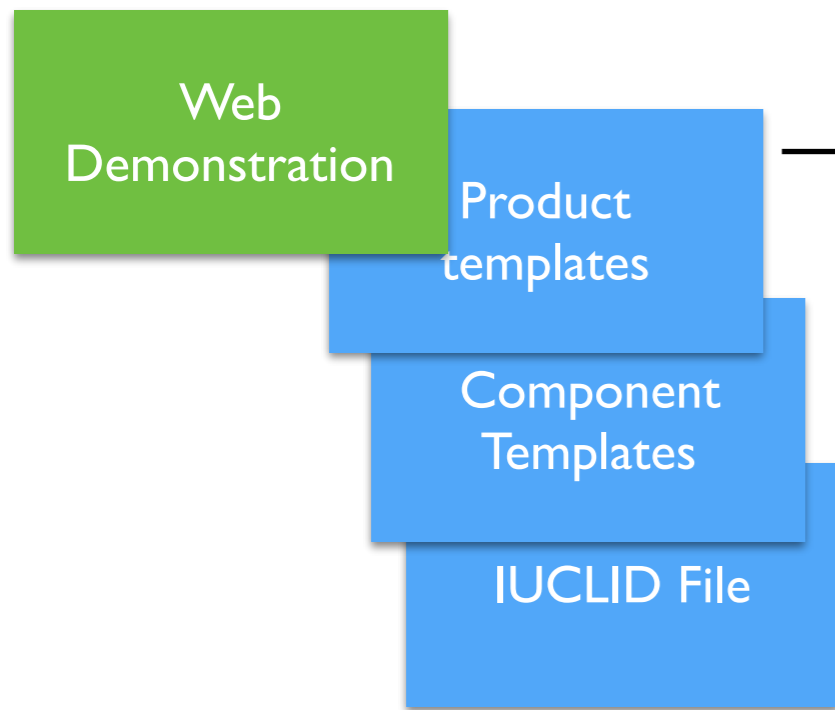
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# Claigan Practical Version (SCIP Process)

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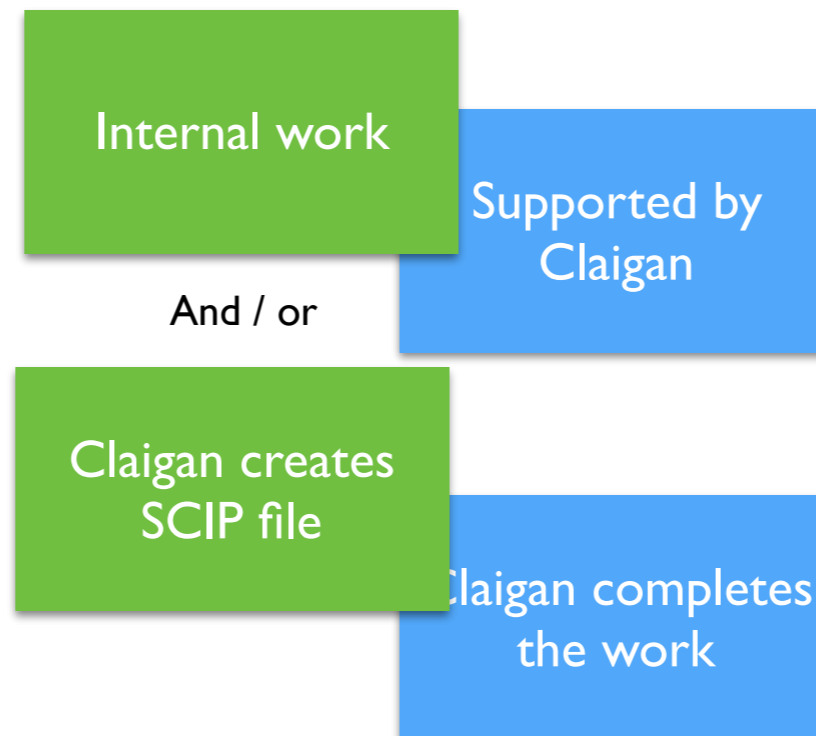
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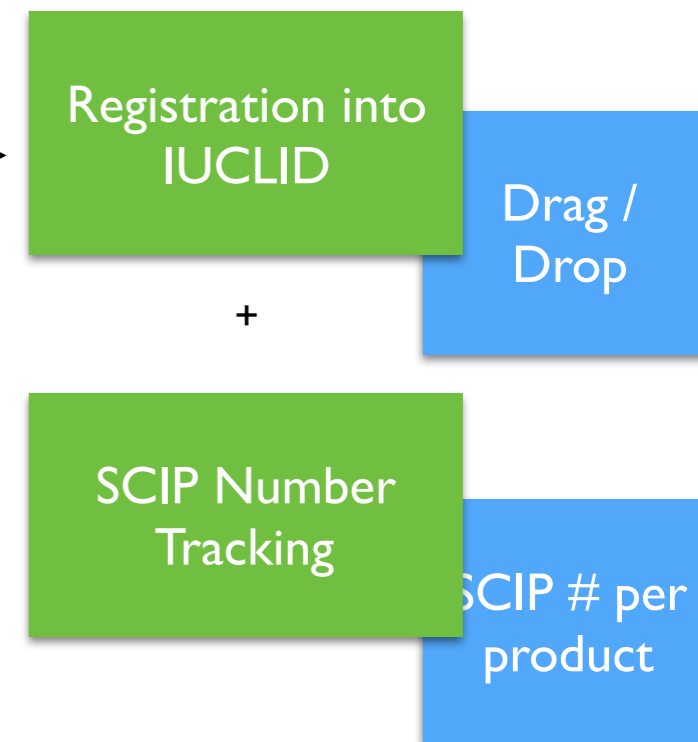
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