

# SCIP Year 2

Looking ahead to 2021

Presented by:  
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# Overview - Agenda - SCIP Registration

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- Introduction
- Deadlines
- Legal requirements
- Guidance
  - Product grouping
  - Quasi-identical components
  - One notification per article
- Plan for year 2 (2021)
  - Keeping your options open
  - Updating declarations
- 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**
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Q&A

# Claigan Practical Version (SCIP Process)

Start

Phase 1  
Establishing the Basics

Main Project

Phase 2  
Building SCIP for all products

Registration

Phase 3  
Registration (October)

Web  
Demonstration

Product  
templates

Component  
Templates

IUCLID File

Claigan creates  
SCIP file

All Product Lines

Registration into  
IUCLID

Drag /  
Drop

+

SCIP Number  
Tracking

SCIP # per  
product

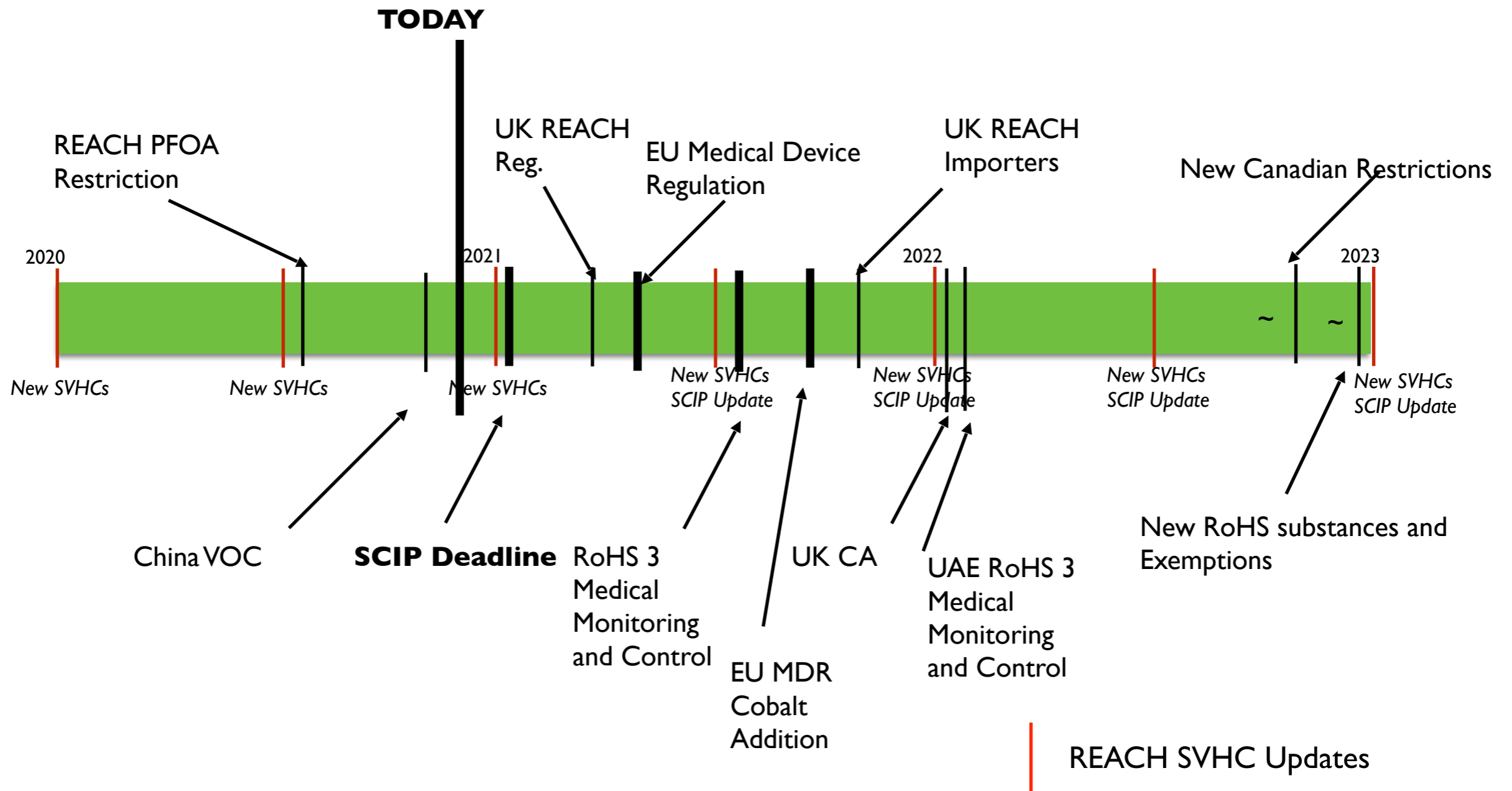
We show you how to do it

We complete the IUCLID  
files for all of your products

You submit your products  
Collect your SCIP numbers

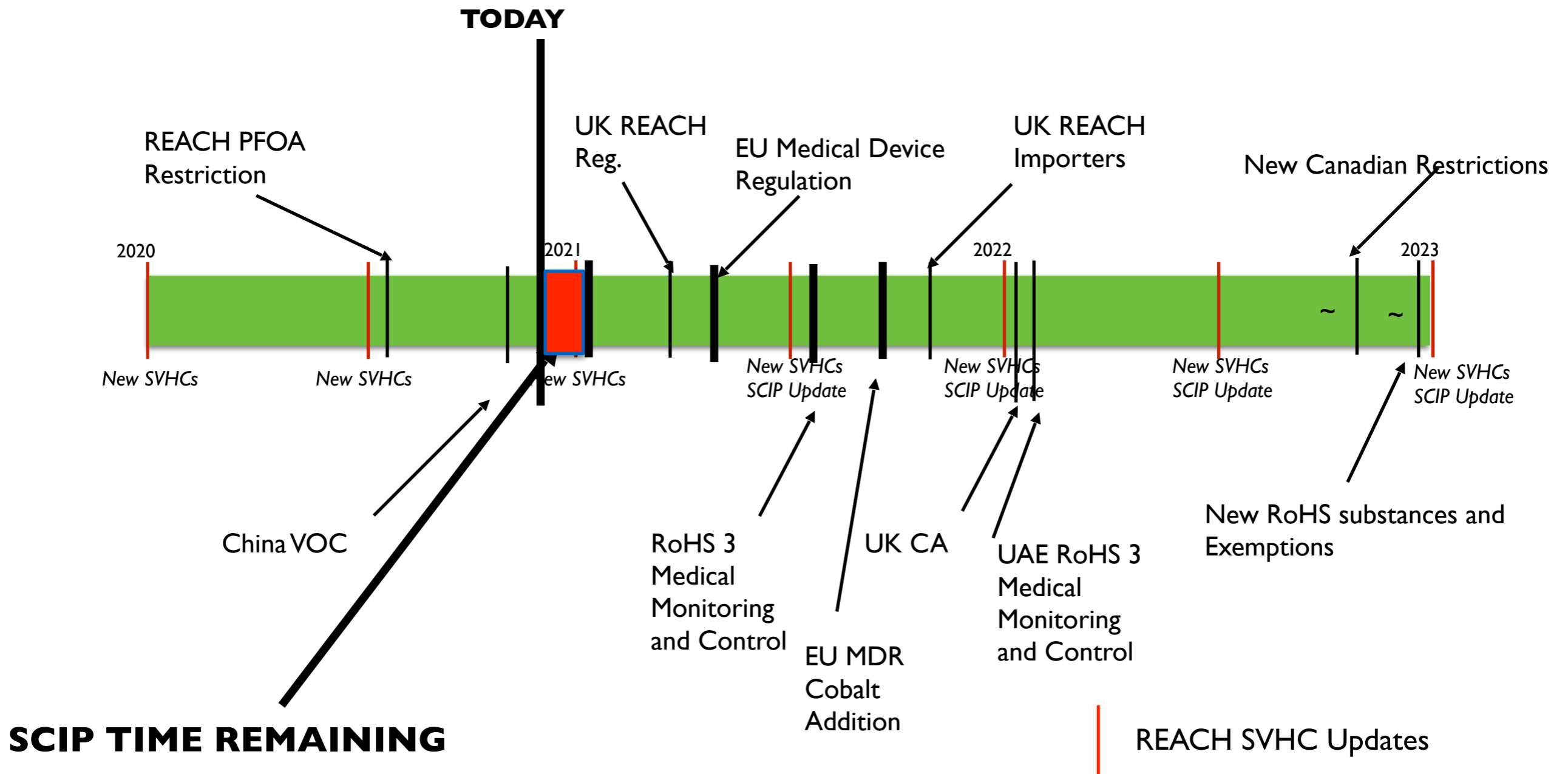
# Restricted Materials

## Upcoming Deadlines



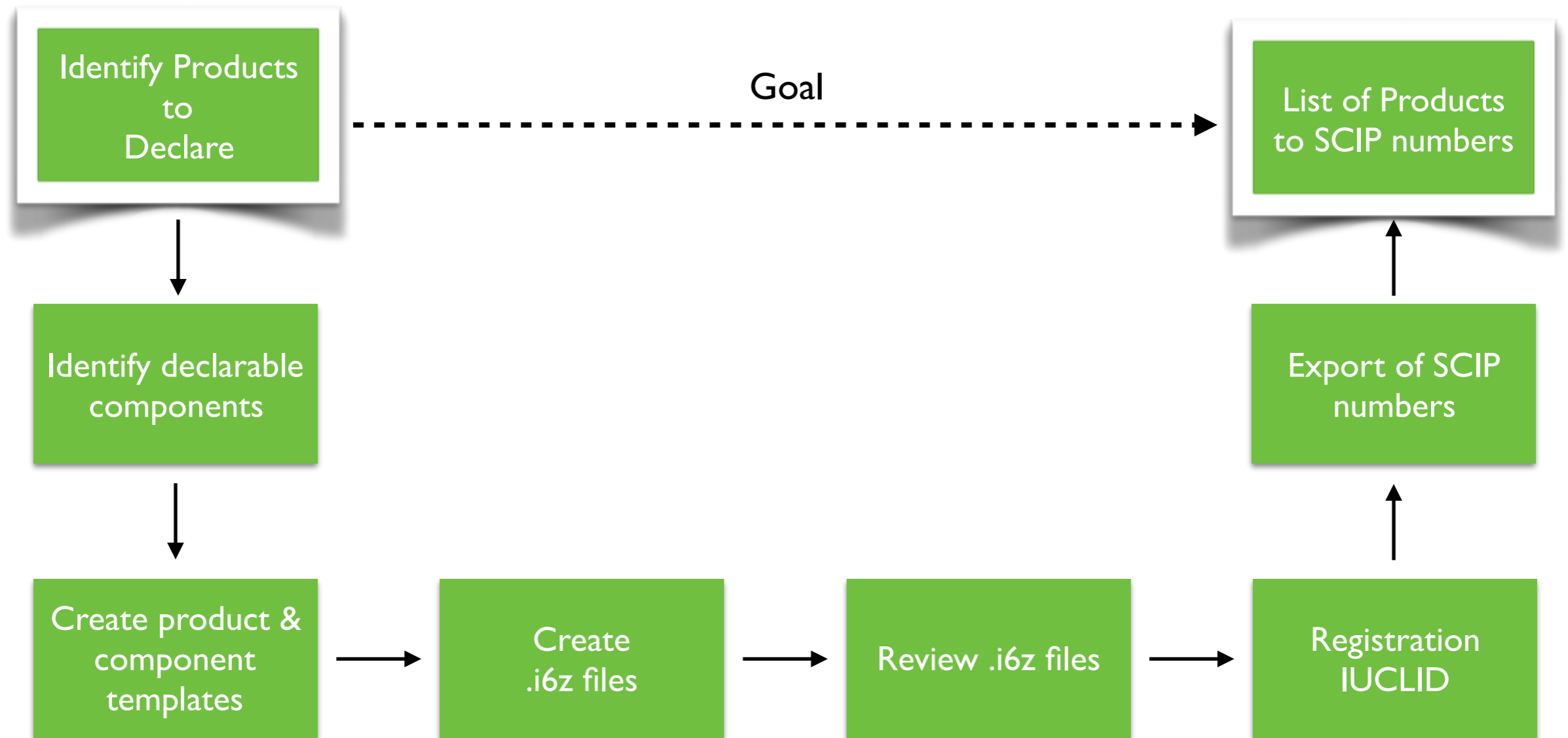
... not to mention REACH SVHC updates every six months and Prop 65 every year.

# SCIP Deadline - Time Remaining

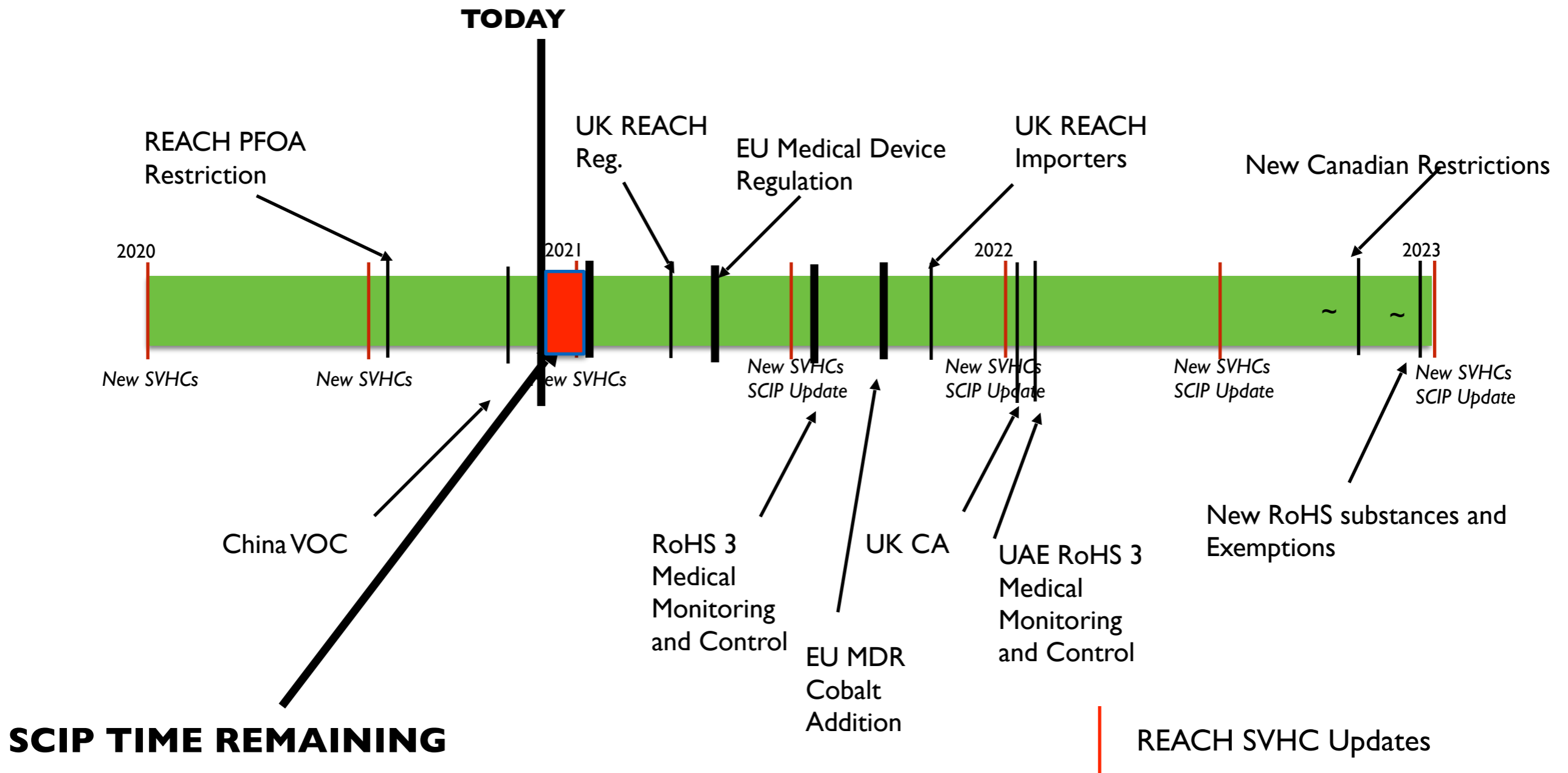


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# SCIP Outputs (Simplified)



# SCIP Deadline - Time Remaining



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# Key Requirements of SCIP Compliance

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- **Legal Requirement**
- For products with SVHCs over 0.1%
  - Product registered in IUCLID with SCIP number including
    - Components that contain SVHCs over 0.1% w/w
    - SVHCs (and related information) in those components
    - Safe use instructions
- Further refinements can be made in year 2,
  - but the immediate focus needs to be on the requirements above

# ECHA Guidance

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- ECHA Guidance on SCIP has many useful sections
  - Grouping
  - Quasi-Identical Components
  - One notification per article not per individual unit
- Key note on guidance
  - ECHA is not the enforcing entity for SCIP
  - Any definitions subject to interpretation by individual member states with final decision by the European Court of Justice



## Product Grouping

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- Products can be grouped together as long as they meet specific rules
  - Also called the 'representative article' approach
- Key rules
  - Description applies to all products in the group
  - Declaration has the worst case SVHC / components listed
  - Same customs code

# Quasi-Identical Articles


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- Quasi-Identical Articles
  - The concept that similar articles can be grouped together
  - Examples -
    - Brass components, epdm o-rings, silicone components
- Rules
  - Description applies to all components in the grouping
  - Same customs code
  - Same materials code
  - Same SVHC and SVHC concentration range
  - Same safe use instructions

## One Notification Per Article

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- ECHA strongly encourage one notification per article not per unit
  - ie. similar component grouping is recommended

 The WFD requires one notification per article and not per individual unit.

 The submission of the same data multiple times to the SCIP database for complex object units which fulfil the criteria of *quasi-identical* complex object, as listed above, must be avoided. The WFD requires one notification per article and not per unit. Therefore, if a complex object has the same composition, in terms of components and subcomponents with the same articles as such containing the same Candidate List substances, only one SCIP notification must be submitted for all units with that same composition, according to the criteria set out above for *quasi-identical* complex objects, provided that all the necessary identification requirements are included (e.g. primary article identifier and potentially others).

# Location of Declarable Components

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- Area of greatest argument
- Not required
  - No legal requirements
  - No concrete rules or requirements in guidance
  - Quasi-identical article guidance removes need for location
- Jan 5 2021
  - Get your products into SCIP with the declarable components and SVHCs
  - Re-visit location and hierarchy in 2021 as guidance and practices evolve

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# ECHA / Industry Bickering

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- Last SCIP IT working group meeting
  - November 24 2020
- Short summary
  - 2 hours of bickering over rules and guidance
  - Many companies (or their service providers) are making life far too difficult for themselves



# ECHA News Releases

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## **SCIP database launch successful - already over 50 000 notifications**

In addition, some companies submit dossiers of disproportionate size. ECHA strongly recommends including a maximum of 1 000 components within one dossier, as bigger dossiers will be very complex to understand for waste operators and consumers.

- ie. Focus on getting products into database
  - ECHA wishes to promote number of entries
  - Do not get carried away

# Plan for Jan 5 and for 2021

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- Jan 5 2021 - Deadline
  - Register your products
  - Ensure that the components containing SVHCs are included
  - Provide SVHC and related details for each component
  
- Year 2 (2021)
  - Adjust your SCIP registrations based on
    - Common practices
    - National authority guidances
    - Customer feedback
    - Public feedback

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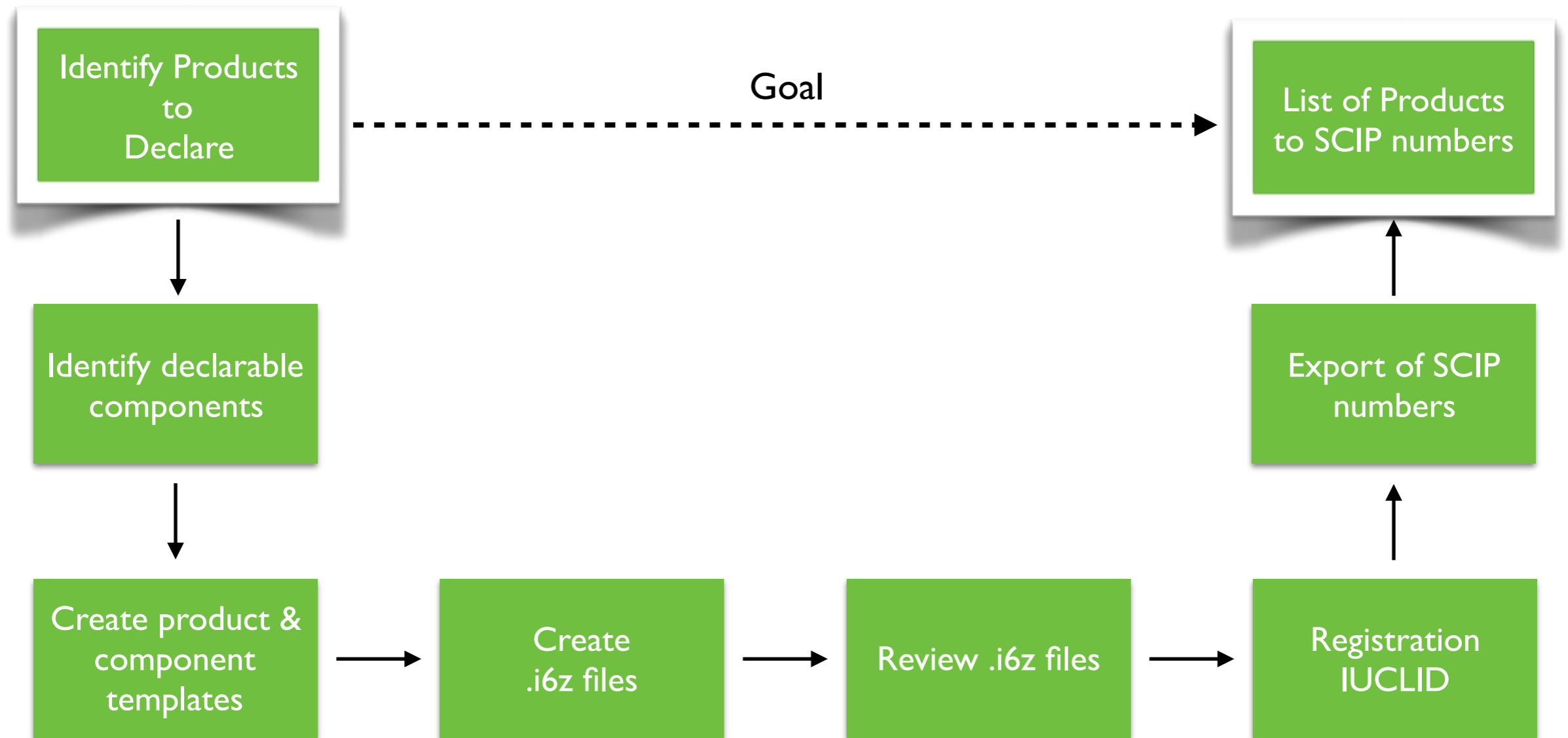
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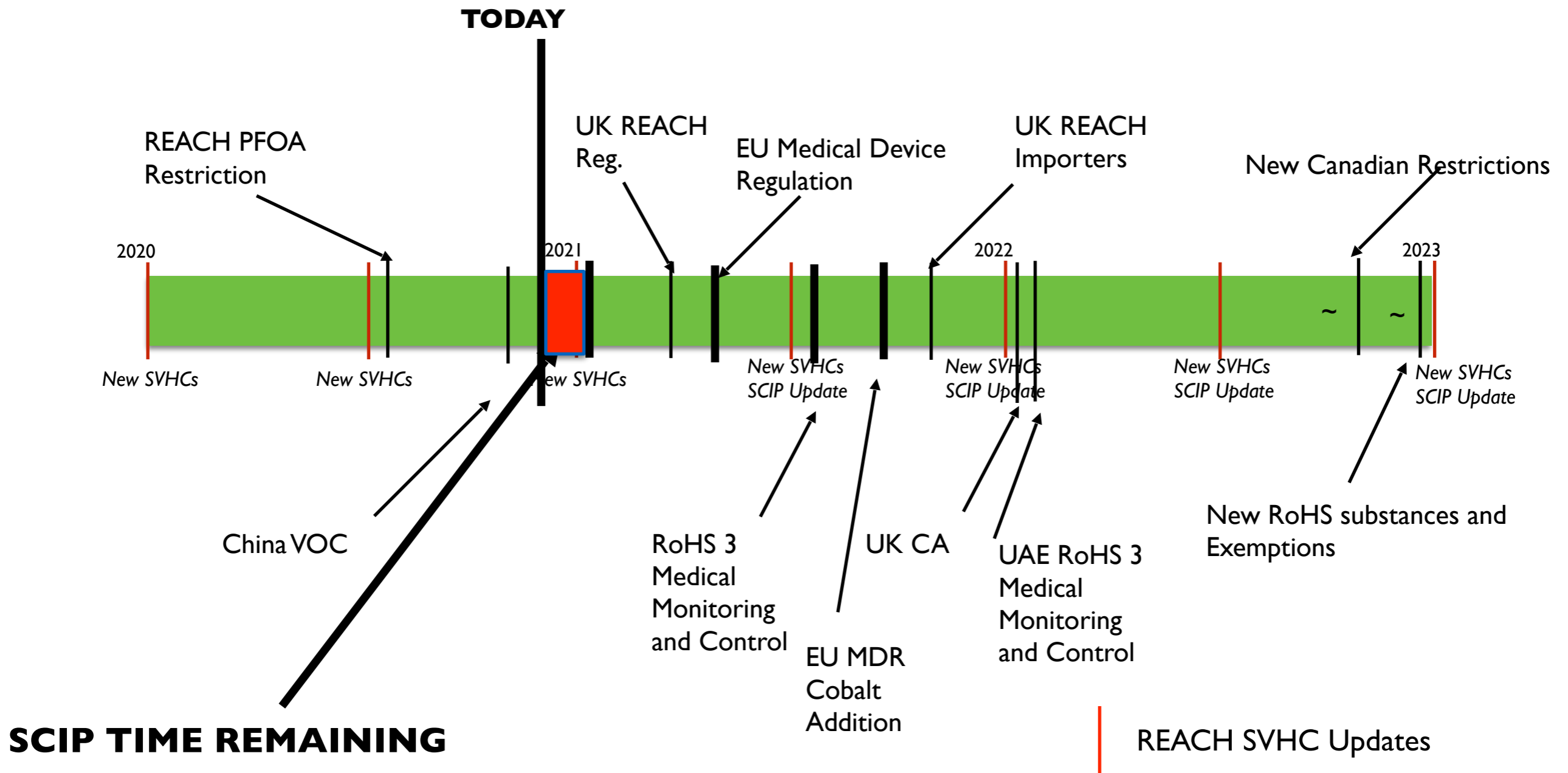


# Claigan Focus

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- Focus for Jan 5
  - Registering your products of time
  - Build your declarations honestly and accurately
  - Use component templates to leverage across products lines
- Claigan declarations
  - Accurate
  - Easy to modify and update
  - Not stuck down a path of 'no return'
  - Cost efficient

# SCIP Deadline - Time Remaining



... not to mention REACH SVHC updates every six months and Prop 65 every year.

## Year 2 (2021)

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- Year 2 (2021)
  - There is going to be more SCIP work in 2021
  - Expect to adjust your SCIP registrations based on
    - Common practices
    - National authority guidance
    - Customer feedback
    - Public feedback
    - **New products**
    - **New SVHCs**

# Updating Declarations in IUCLID

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- Short summary
  - IUCLID up-revisions previous registrations when you submit a new locked dossier based on the same dataset
    - But SCIP number stays unchanged
  - Addition of new products or new SVHCs will create declaration updates
  - Component changes are straight forward
    - If component templates are designed properly, you can change base component templates which will update the datasets of all the products using that component template.



# Claigan - SCIP

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- No SVHC data
  - Very common. We can create the SCIP files for you.
- Partial SVHC data
  - Very common. We can create the SCIP files for you.
- Lots of SVHC data
  - Less common. We can correct the supplier data and create the SCIP files for you.
- Super complex product
  - We have created SCIP files for virtually every product you could imagine

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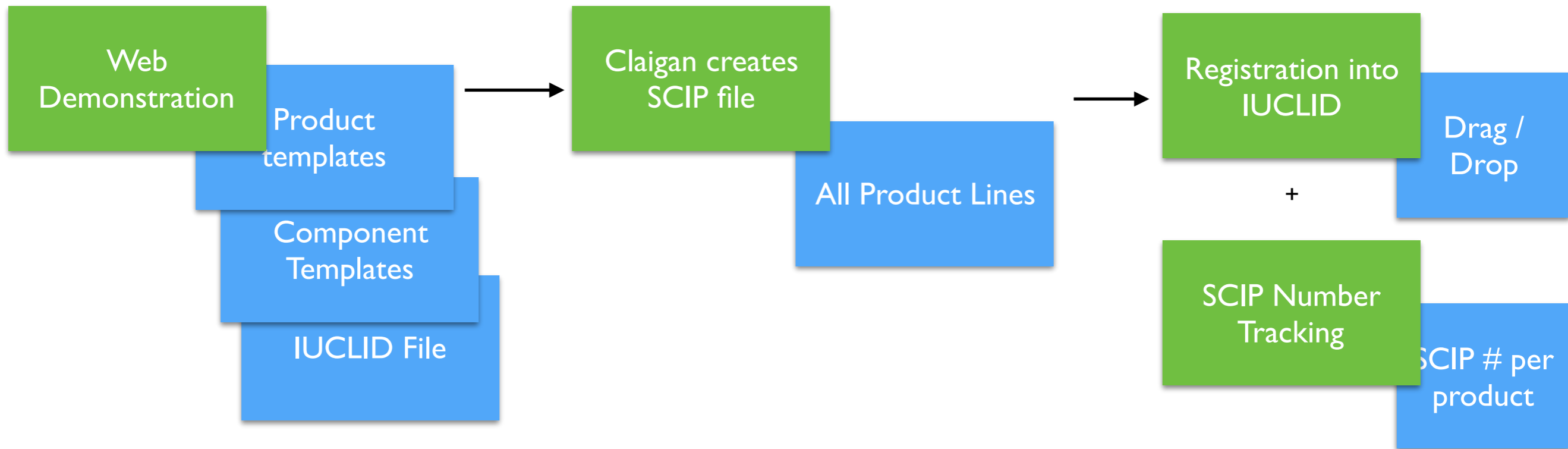
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