

UNIFE Statement on Scope of SVHC-Reporting in the SCIP-Database in the context of Waste Framework Directive 2008/98/EC

As required by Directive 2008/98/EC the European Chemicals Agency (ECHA) has launched a SCIP (Substances of Concern in Products) database with notification obligations for the industry. Detailed information on what will be required has been published¹ which include the mandatory information that will need to be entered in the database as well as the optional additional information.

The database will require manufacturers, importers and suppliers of articles that contain >0.1% of an SVHC (in a simple article) to provide information. The required mandatory information is as follows:

- Article name.
- Primary article identifier (this refers to the article in which the SVHC is present).
- Article category.
- Production in European Union.
- Safe use instructions.
- Linked articles.
- Number of units (in the complex article).
- Candidate List version.
- Candidate List Substance.
- Concentration range (> 0.1% w/w and ≤ 100% w/w).
- Material category.
- Mixture category.

UNIFE position

UNIFE members have investigated the extent to which Rail Products, Large Scale Fixed Installations and Large Scale Stationary Industrial Tools contain SVHCs and would need to be reported to the SCIP database.

- **SVHCs contained in purchased parts can be reported but only up to the manufacturers purchase level and without disclosing the vehicle structure or suppliers. This concerns products that fall into one (or more) of the following product categories:**
 - ✓ Means of Transport for Persons and Goods,
 - ✓ Large Scale Fixed Installations and
 - ✓ Large Scale Stationary Industrial Tools.

A grouping approach should be applied using the 'sameness' approach developed by ECHA. As described in the Joint meeting of the Waste and CARACAL Expert Groups – 9 July 2020 (Doc. CA-JM/02/2020).

¹ <https://echa.europa.eu/scip-format>

Similarly, this would be possible for quasi-identical articles which are fully identical from the chemical content point of view, which would allow grouping such articles into one SCIP notification. As recommended by ECHA UNIFE considers it useful that also articles as such can be submitted in the same notification if the criteria below are fulfilled:

- The articles have the same function/use;
- They contain the same Candidate List substance;
- The material that the article is made of is the same;
- The safe use instructions are the same, which is a logical consequence of the previous two criteria

Example:

Suggested Reporting-Scope for rail industry:

We declare at least the Product (usually the complex article) and the Purchase part (with SVHC). We end up at Purchase part level as suppliers are already reporting to the SCIP database.

Reporting-Examples:

Product	Main assembly	Purchased part (with SVHC)
Vehicle	Seats, Tables	Passenger seat (e.g. arm rest)
Vehicle	HVAC	Air Conditioning unit (e.g. fan)
Vehicle	Exterior doors	Exterior door (e.g. door grip)
Cabinet	Mounting rack	Switching unit (e.g. screw)
Backup Battery system Ni-Cd	Battery rack	Single battery cell



Figure 01 - Reporting

Definitions:

- "Large-scale Fixed Installation" means a large size combination of several types of apparatus and, where applicable, other devices, which are assembled, installed by professionals and intended to be used permanently in a pre-defined and dedicated location, and to be de-installed by professionals.
- "Large-scale Stationary Industrial Tools" means a large size assembly of machines, equipment, and/or components, functioning together for a specific application, permanently installed and de-installed by professionals at a given place, and used and maintained by professionals in an industrial manufacturing facility or research and development facility.

UNIFE recommendations

- SCIP notification number

To facilitate the notification of the product placed on the market, we recommend to provide the SCIP notification number along the supply chain. In this way, the information is reliable from the original manufacturer to the last link of the supply chain. The providing of the SCIP notification number ensures complete information and allows up to date declaration of the presence of SVHC.

- Management of Legal Entity

To avoid a complex management of Legal Entity (in the sense of IUCLID) to proceed on notification, we recommend to create a parent Legal Entity that covers several manufacturing sites.

- TARIC code for railway industry

Based on the TARIC code category the following category can be used at complex object:

Category	TARIC Code
Locomotive Powered from an external source of electricity	8601100000
Locomotive Powered by electric accumulators	8601200000
Locomotive Diesel-electric	8602100000
Locomotive other	8602900000
Rolling stock Powered from an external source of electricity	8603100000
Rolling stock other	8603900000
Signalling	8608000000

- IUCLID tips
 - Attention point, the IUCLID database has a limitation on the number of level for a notification. The number of level cannot exceeded 1000 in order to favorite simple structure.
 - If you have similar article to create you can use the clone function to create a copy of a selected article.
 - To link an article to a SCIP number from a supplier: in the new article window select "SCIP number" in the field "Primary Article Identifier type" and put the SCIP number in the field "Primary Article Identifier".