UNIFE SCIP factsheet

April 2024

About UNIFE

UNIFE, the *European Rail Supply Industry Association*, has operated in Brussels since 1992, representing European train builders and rail equipment suppliers. The association advocates for more than 120 of Europe's leading rail supply companies – from SMEs to major industrial champions – active in designing, manufacturing, maintaining and refurbishing rail transport systems (trains, metros, trams, freight wagons), subsystems and related equipment. UNIFE also brings together national rail industry associations from 13 European countries.

The Chemical Risks Topical Group (CR TG) leads UNIFE's policy on the management of chemicals and hazardous substances at the global and European levels, including the *European Chemicals Agency* (ECHA) activities, but not limited to them. It focuses on batteries, F-Gases (fluorinated gases), OHS (occupational health and safety), PFAS (Per- and polyfluoroalkyl substances), REACH (Registration, Evaluation, Authorisation and restriction of Chemicals), RoHS (Restriction of Hazardous Substances), SCIP (substances of concern in products), and WEEE (waste electrical and electronic equipment). It updates the Rail Industry Substance List (RISL), the UNIFE Material and Substance Declaration Template and Product-Related Chemicals Regulations.

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About the Substances of Concern in Products Database

As required by *Directive 2008/98/EC (Waste Framework Directive)*, the European Chemicals Agency (ECHA) has launched the SCIP Database, which can be accessed at https://echa.europa.eu/scip-database.

The SCIP database, **Substances of Concern in Products**, is an online database with notification obligations for the industry listing "Articles containing **substances of very high concern** (SVHCs) on the Candidate List at a concentration above 0.1% weight by weight (w/w) placed on the EU market notified according to Article 9(1)(i) of the Waste Framework Directive 2008/98/EC".

The SCIP format can be accessed at https://echa.europa.eu/scip-format.

The database requires manufacturers, importers and suppliers of articles that contain >0.1% of an SVHC (in a simple article) to provide the following mandatory information:

- Article name;
- Primary article identifier (this refers to the article in which the SVHC is present);
- Article category;
- Production in the 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 recommendations

UNIFE members have investigated the extent to which rail products, large-scale fixed installations, and large-scale stationary industrial tools contain SVHCs and need to be reported to the SCIP database.

"**Large-scale Fixed Installation**" means a large combination of several types of apparatus and, where applicable, other devices assembled and installed by professionals. It is intended to be used permanently in a pre-defined and dedicated location and 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.

SVHCs contained in purchased parts can be reported only up to the manufacturer's 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;
- large-scale stationary industrial tools.

A grouping approach should be applied using the "sameness" approach developed by ECHA, as described in the following document: *SCIP database update for the joint meeting of the Waste and CARACAL Expert Groups on 9 July 2020, Doc. CA-JM/02/2020, 25 June 2020*.

Similarly, this would be possible for quasi-identical articles that are identical from the chemical content point of view, allowing the grouping of such articles into one SCIP notification. As recommended by ECHA, UNIFE considers it crucial 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, or both;
- 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 the logical consequence of the previous two criteria.

Suggested reporting scope for the rail industry

A company should declare at least the Product (usually the complex article) and the Purchase part (with SVHC). Then, the company ends up at the Purchase part level as suppliers already report to the SCIP database.

Reporting examples:

Product	Main assembly	Purchased part (with SVHC)
Vehicle	Seats and tables	Passenger seat (e.g. armrest)
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 1 – reporting examples

UNIFE tips

SCIP notification number

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

Management of Legal Entity

To avoid complex management of the Legal Entity (in the sense of IUCLID[1]) to proceed on notification, UNIFE recommends creating a parent Legal Entity that covers several manufacturing sites.

TARIC code for the railway industry

Based on the TARIC code category, the following category can be used for complex objects:

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

The IUCLID database has a limitation on the number of notification levels. The number of levels cannot exceed 1000 to favour a simple structure.

If you have a similar article to create, you can use the clone function to make a copy of the selected article. To link an article to a supplier's SCIP number, in the new article window, select “SCIP number” in the field “Primary Article Identifier type” and enter the SCIP number in the field “Primary Article Identifier”.

[1] **IUCLID: International Uniform ChemicaL Information Database**
IUCLID is software that records, stores, maintains, and exchanges data on chemical substances' intrinsic and hazardous properties. ECHA co-developed the software with the OECD. Under REACH, information submitted to ECHA must be in IUCLID format.