



knoell services for SCIP notification under EU Waste Framework Directive



Feel free to contact us for requesting support by sending an email to SCIP-EU@knoell.com

New requirement to notify ECHA about Candidate List substances in articles

As from 5 January 2021 any company supplying articles containing Substances of Very High Concern (SVHCs) on the REACH Candidate List in a concentration above 0.1% weight by weight (w/w) on the EU market has to submit information on these articles to the European Chemicals Agency (ECHA) to be collected into the SCIP (Substances of Concern in Products) database¹.

After 5 January 2021 SCIP notification has to be submitted before any article can be delivered for the first time. Therefore, it is recommended that companies consider submission of SCIP notifications before 5 January for those articles already part of their product portfolio to avoid delivery delays. Notifications can be submitted starting from October 2020.

What is the aim of the SCIP database?

The SCIP database ensures that the information on articles containing Candidate List substances is available throughout the whole lifecycle of products and materials, including at the waste stage. The information in the database is made available to waste operators and consumers².

What is an article?

"An object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition" according to Article 3(3) REACH.

Please note: Packaging is also considered as article under REACH according to the ECHA document "Guidance on requirements for substances in articles", June 2017, Version 4.0³.

What do I have to do?

According to Article 33(1) of REACH companies already have to identify articles containing Candidate List substances above 0.1% (w/w) in order to fulfil the obligation to inform their customers in the EU about their presence. As from 5 January 2021, companies have to submit the following information to ECHA directly under the Waste Framework Directive (WFD) **in addition** to the requirements for substances in articles under REACH:

- Name, concentration range and location of the Candidate List substances present in; and
- Other information that allows safe use of the article – notably information to ensure the article is properly managed once it becomes waste.

Please refer exclusively to the "Candidate List of substances of very high concern for Authorisation" officially published by ECHA: <https://echa.europa.eu/en/candidate-list-table>

How can knoell support you?

knoell offers companies a stepwise service concept to fulfil the requirements for articles under WFD:

- Portfolio assessment: Determination of products considered as articles or containing articles (definition according Article 3(3) REACH);
- Review of product information: Checking compliance statements, safety data sheets, test results, etc. to identify Candidate List substances in products;
- In case of missing information: preparation, performance, evaluation and documentation of supplier queries to request information on Candidate List substances in products;
- Recommendations for analytical testing for SVHC in articles (as last resort) to reduce test costs;
- SCIP notification: data preparation and dossier submission to ECHA.

Article 9(1)(i) of Directive (EU) 2018/851 amending Directive 2008/98/EC on waste (Waste Framework Directive, WFD), <https://echa.europa.eu/scip-database>
https://echa.europa.eu/documents/10162/23036412/articles_en.pdf