

# SCIP IT user group

24 Nov 2020



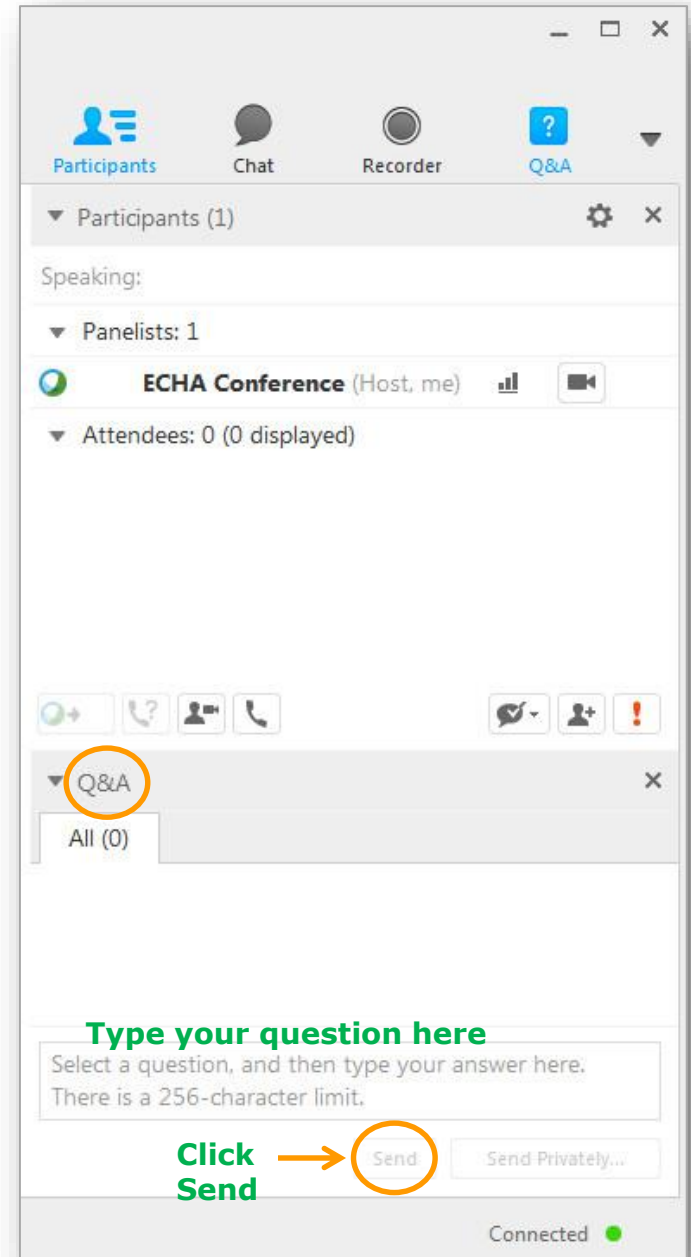
# Opening remarks

- Practicalities
  - Webex instructions
    - For the floor, raise your hand
    - To ask a question: use the **Q&A panel** at any time.
  - Audio recording to support minutes

Additional comments and questions:

[scip@europa.echa.eu](mailto:scip@europa.echa.eu)

Include on the subject: " SCIP IT user group"



Participants Chat Recorder Q&A

Participants (1)

Speaking:

Panelists: 1

ECHA Conference (Host, me)

Attendees: 0 (0 displayed)

Q&A

All (0)

Type your question here

Select a question, and then type your answer here.  
There is a 256-character limit.

Click Send → Send Send Privately...

Connected

## Today's agenda

- Share your experience
- SCIP Next phase
- Additional topics:
  - Lead substances (e.g. lead oxide) in glass for electronic components (e.g. in resistors)
  - Specific topic for S2S users (Import files in IUCLID)

Updated slide to include the topics seen on the meeting

# Share your experience

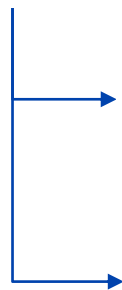
Clara Rueda



# 1. What is the highest number of articles as such containing Candidate List substance reported in your notifications are?

- 1-50
- 51-200
- 201-500
- >501

Complex object A



Component A (article as such containing Candidate List substance 1)

component B

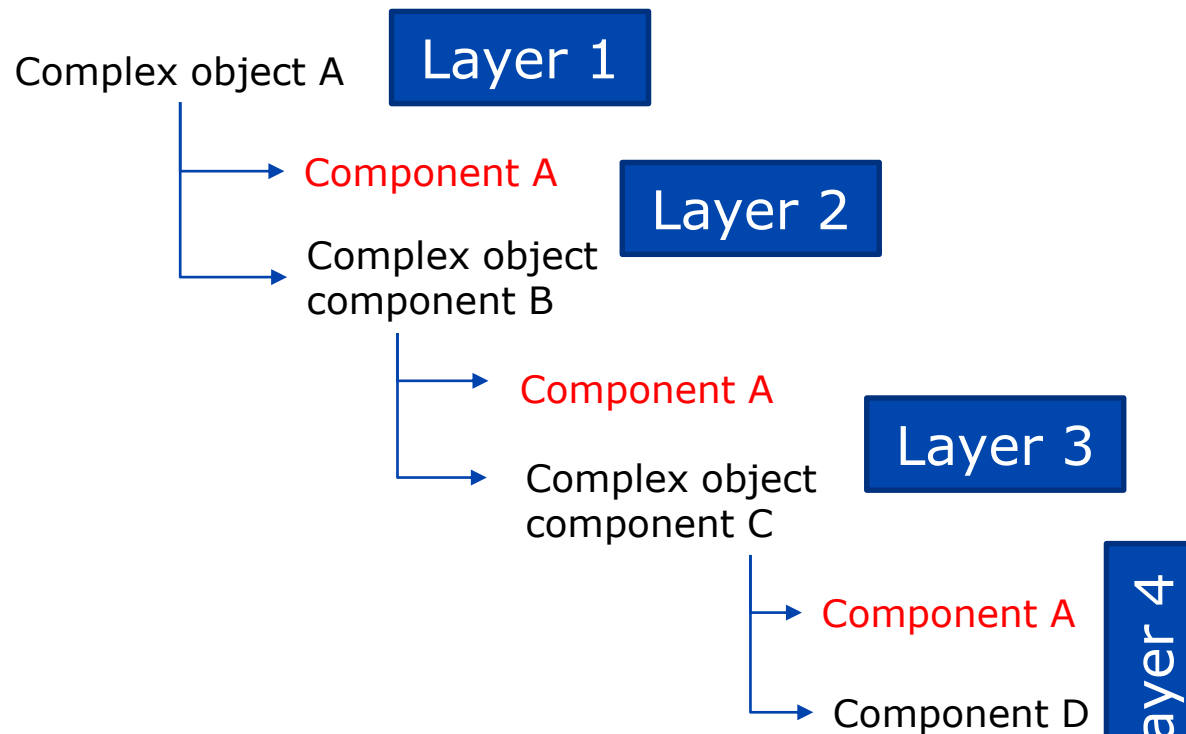


Component C (article as such containing Candidate List substance 2)

2 articles as such containing Candidate List substance

## 2. What is the average number of layers reported in your notifications?

- 1-2 layers
- 3-5 layers
- >5 layers



## **3. Use of referencing to information previously submitted**

- Are you using or planning to use referencing to your supplier's notifications?
- Are you planning to share the SCIP number with your customers?
- Are you using or planning to use referencing to your own notifications?
- Referencing is not useful for you and why?

## Use of simplified SCIP notifications

- Are you using or planning to use SSN to your supplier's notification?
- Are you planning to share the SCIP number with your customers (distributors)?
- Are you using or planning to use SSN between different Legal entity of your own company?
- SSN is not useful for you, why?



## Use of grouping

- Are you using or planning to use grouping following ECHA recommendations?
- IF not, Are you planning to implement some approach to avoid the submission of the same data multiple times(e.g. serial number notifications)?

# SCIP Next phase

Clara Rueda



Thanks to all of you that take a moment to provide your ideas on how the tools can be improved and to suggest other ideas that can make this project a success for all stakeholders involved.

We are analysing all of them.

## Some ideas suggested:

- New feature to allow to see the information reported in SCIP (No CBI) for a SCIP number.
- Feature to import data from excel to IUCLID
- Feature to allow upload list of articles names and other identifiers in IUCLID.
- New flag: No longer place on the market. The SCIP notification will not be updated when new SVHC is place on the Candidate List

# Additional topics



# Lead substances (e.g. lead oxide) in glass for electronic components (e.g. in resistors)

The assessment on whether an electronic component (e.g. resistor, capacitor, transistor) or its subcomponents are articles or not under REACH needs to be carried out on a case by case basis, as explained in Chapter 2, Appendix 3 and example 21 of appendix 5 of the [Guidance on requirements for substances in articles](#) (SiA Guidance).

It is a responsibility of the manufacturer/producer, importer, or other supplier (e.g. distributor) of an object to make a decision based on that assessment. Documenting such decision is strongly recommended (see e.g. chapter 2.6 of the SiA Guidance) as it facilitates demonstrating REACH-compliance to enforcement authorities.

We recommend to make that assessment in these cases using the principles and the advice in the SiA Guidance. In this context, we recommend you to consult for instance the worked example for a battery in Appendix 3 of the SiA Guidance and Q&A [1292](#): Is a permanent magnet a substance/mixture or an article under REACH?

If an electronic component or its subcomponents are considered not being an article, an importer or supplier of those objects incorporating a substance/mixture is also considered to be an importer or supplier of that substance/mixture. As such, the importer or supplier might also have obligations other than those of importers and suppliers of articles described in the SiA Guidance. This means that substances as such or in the mixture supplied within a complex object have to be registered, or be supplied with a safety data sheet. Labelling requirements under CLP Regulation may also be applicable if the necessary conditions are fulfilled. Importers and suppliers of a combination of articles and a substance/mixture, therefore have to separately check if obligations for the article apply and if obligations for the substance/mixture apply.

Concerning the use of lead substances in the Candidate List, such as lead oxide, in the production of glass objects for electronic components, we invite you to consult the Q&A [1218](#) (Do I need to notify and communicate information down the supply chain for certain boron substances included in the Candidate List, which are involved in the production of boron glass articles but not present as such in these articles?) which has been developed when certain boron substances are involved in the production of boron glass articles. Similarly to the case covered by this Q&A, certain lead substances (e.g. lead oxide) included in the Candidate List may be involved in processes leading to the production of articles containing a 'glass' substance. In these processes, the lead substances may be first chemically transformed into a manufactured glass substance. The glass substance is subsequently processed into articles. It remains the responsibility of companies to assess for their specific use of the Candidate List lead substances whether these are completely transformed into glass in the manufacture of the glass substance and are not present as such in the final glass article. If the lead substances (in the Candidate List) as such are not present in the final glass article, there is no obligation to submit a SCIP notification for that article, nor to communicate information down the supply chain under Art. 33 of REACH, because those obligations only apply to articles which contain Candidate List substances.

## Specific assessment

ECHA invites members of the group to provide full description of electronic components (e.g. resistor, capacitor, transistor, etc) and their subcomponents, including their specific function, and other information concerning the production process and composition that could help to make an assessment regarding the application of the REACH article definition.

## **Additional info for S2S users**





# Submission report modification

The article information will reduce its content.

It will include:

- The Identifier of the article notified
- The list of substances reported on the notification.

[View Validation report](#)

Submission status: Succeeded ▲

Dossier type:	SCIP notification	Submitted by:	Clara Rueda
Submission number:	RMH859637-94		Pontejosfi
Submitted IUCLID version:	6_4		ECHA-2f9027ea-a3cc-4bb1-9269-d92733fe9428

Submission information		Submission events	
SCIP number	ac4800aa-7396-4880-b605-d1b599931398	14/10/2020 17:14	Dossier submitted
Article name	Tyre 1111	14/10/2020 17:14	Dossier passed validation checks
GTIN (Global Trade Item Number)	c2c07e81-e08e-4416-a17d-a4c9e001aee5		
Dossier name	V2		
Dossier UUID	31a24709-5dc6-4fc4-802e-bfc820d462d6		
File name	31a24709-5dc6-4fc4-802e-bfc820d462d6.i6z		
Notification type	Update		

**Article information**

▼ Tyre 1111  
 GTIN (Global Trade Item Number) : c2c07e81-e08e-4416-a17d-a4c9e001aee5  
 EC:211-765-7, CAS:693-98-1, 2-methylimidazole

Feedback from S2S users:  
The dossier owner can not see complexity submitted

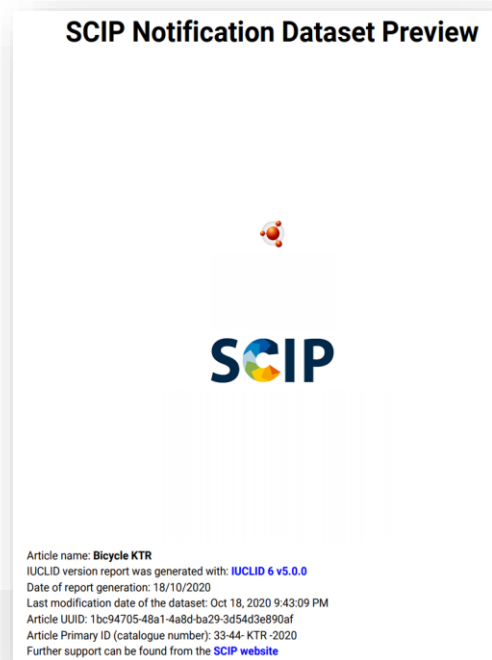
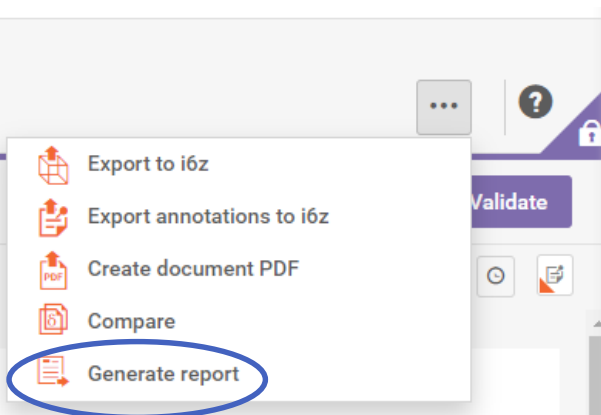
## Import files via S2S into IUCLID

- The S2S user could import the dossier into IUCLID using IUCLID API(<https://iuclid6.echa.europa.eu/public-api> ).
- By importing the file in IUCLID:
  - The user can see the hierarchy
  - The user can validate the data
  - The user can create a SCIP notification preview.
  - Modify datasets, validate, create dossier, export i6z files via the API.





IUCLID API needs to be used in the IUCLID standalone or server version.

# SCIP notification preview IUCLID 6



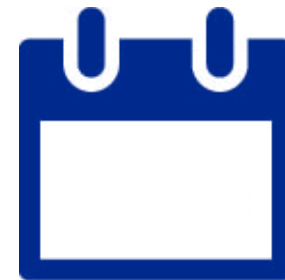
## Select the type of report

 SCIP Notification Preview report [PDF]

 SCIP Notification Preview without sensitive information [PDF]

# Next SCIP events





## Next SCIP IT user group meetings

**You are invited to submit topics to discuss in the coming months. With your input we will consider to have an additional SCIP IT User group meeting before Christmas.**

Next meeting 28 January 2021 (15-16.30 Helsinki time)

# Thank you for your participation!

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