

SCIP IT user group

6 February 2020





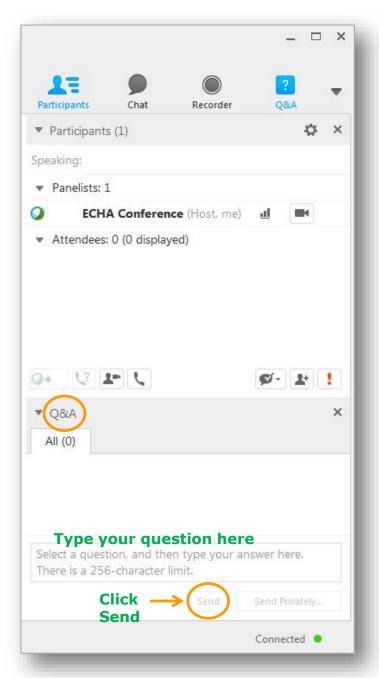
Opening remarks

- 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

Include on the subject: "SCIP IT user group"









- SCIP Trials feedback review
- Possible scenarios
- Next IT user group meetings



SCIP Trials feedback review

SCIP IT User group

6 February 2020

Clara Rueda

ECHA – SCIP Product Manager B4 Unit – Exposure and Supply Chain







Initial remarks

- Thank you for all your comments and questions that you send on this short period
- We aggregate all the comments received in order to address them in an efficient manner.
- Please click on the 'raise your hand' button to ask for the floor.

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Accessing IUCLID Beta instance in the ECHA Cloud Services

- Long time to open.
- System is not always available or stable.
- No problem. It has been very easy. Good trial instructions



- Start up takes 1-2 minutes.
- We have 24\7 support to monitor and try to resolve issues.
- There is no known issue at the moment.

We apologize for some instability in the last days.

If you have issues please use the

ECHA contact form



Identifiers

Primary Article Identifier: If the intention is to use the ECHA Article ID as 'Primary Article Identifier' it needs to entered manually. We assume that it is the automatically generated number below the article name. We believe it should be automatically populated when selected and it should not be possible to change it to avoid data inconsistencies



The implementation of the button to create a UUID is in our backlog. It is a free text field, the validation check the UUID format.

Which primary article identifier type to select?. Does ECHA have any advice how to make this decision?



No specific advice to make the decision.



Article category

We received different feedback regarding the difficulty to use the article category pick list.



As we provide in our previous meeting you have to **select the appropriate code previously** (and type it in the field)



Article category: How to find the CN/TARIC code

- SCIP Prototype: Annex I (**Combined Nomenclature**) to Council Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and on the Common Customs Tariff, as amended by
 - Regulation (EU) 2018/1602 of 11 October 2018
 - Autumn 2020 release: Annex I to Council Regulation (EEC) No 2658/87, as amended by Regulation (EU) 2019/1776 of 9 October 2019
- Published picklist on SCIP format webpage
- EU Trade helpdesk
- TARIC database



ECHA Combined Nomenclature



e-OJ

https://eur-lex.europa.eu/homepage.html

SCIP Prototype

COMMISSION IMPLEMENTING REGULATION (EU) 2018/1602

of 11 October 2018

amending Annex I to Council Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and on the Common Customs Tariff

October 2020 release

COMMISSION IMPLEMENTING REGULATION (EU) 2019/1776

of 9 October 2019

amending Annex I to Council Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and on the Common Customs Tariff

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ECHA Combined Nomenclature

ANNEX I

COMBINED NOMENCLATURE

SECTION VII

PLASTICS AND ARTICLES THEREOF; RUBBER AND ARTICLES THEREOF

CHAPTER 40

RUBBER AND ARTICLES THEREOF

CN code	Description			
1	2			
4016	Other articles of vulcanised rubber other than hard rubber:			
4016 10 00	- Of cellular rubber			
	- Other:			
4016 91 00	Floor coverings and mats			
4016 92 00	Erasers			
4016 93 00	Gaskets, washers and other seals			
4016 94 00	Boat or dock fenders, whether or not inflatable			
4016 95 00	Other inflatable articles			
4016 99	Other:			
I				



ECHA SCIP format webpage

WFD

Understanding WFD SCIP Database

Suppliers of articles

Waste operators

Consumers and SCIP

SCIP support

Tools

SCIP Format

Legislation

SCIP Format

The SCIP format structures the information on articles that contain Candidate List substances in a concentration above 0.1 % w/w that has to be submitted to ECHA.

The format is XML-based and defined by taking into account the legal text of WFD Article 9(1)(i), REACH Article 33(1), Commission's "Non-paper on the implementation of articles 9(1)(i) and 9(2) of the revised Waste Framework Directive 2008/98/EC", and ECHA's Guidance on requirements for substances in articles (ECHA's SiA Guidance).

The SCIP format is compatible with IUCLID, a tool developed by ECHA in collaboration with the OECD, which promotes the harmonisation of chemicals data. You can find additional information about this tool on the IUCLID website.

Download

To help with the IT implementation of this format, the following is available:

- SCIP format: Version 1 published on 30 October 2019
 - Download from IUCLID website
- SCIP format annex Picklists: November 2019 version Note that the XML list of picklist values contains all IUCLID phrases, not only the ones relevant for SCIP.
 - Download [ZIP]



ECHA SCIP format webpage



SCIP Format Annex Pick List.xlsx



ECHA Trade Helpdesk



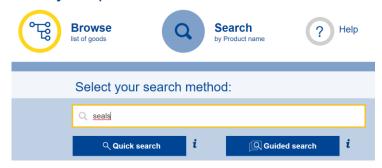
https://trade.ec.europa.eu/tradehelp

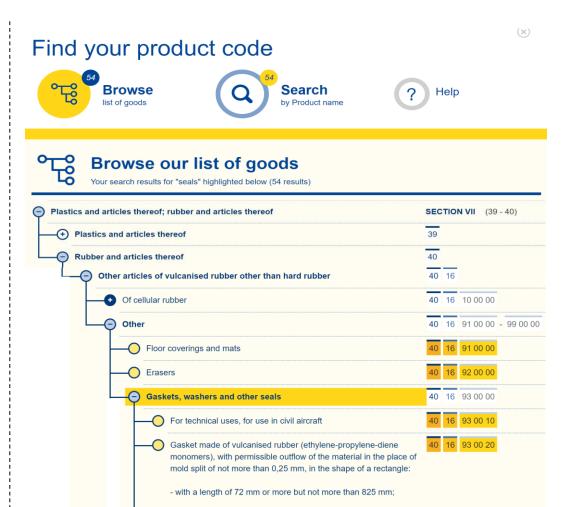




ECHA Trade Helpdesk

Find your product code





- with a width of 18 mm or more but not more than 155 mm

Other

40 16 93 00 90



ECHA TARIC Database

Legal Notice | Contact | Search | English (en)



TAXATION AND CUSTOMS UNION

European Commission > Taxation and Customs Union > Databases > TARIC > Measures

Contact TARIC | Contact QUOTA

User Guides, Information and Downloadable data: [Info]



Due to a technical issue the online database has not been updated since 03.02.2020

TARIC Consultation

https://ec.europa.eu/taxation_customs/dds2/taric/taric_consultation.jsp?Lang=en

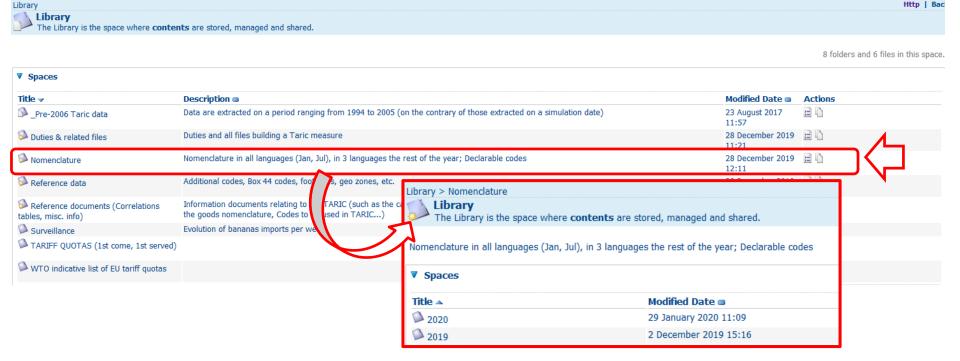


ECHA TARIC Database



EUROPA > European Commission > CIRCABC > Taxation & Customs Union > Taric and Quota Data & Information

- User Guides, Information and Downloadable data: CIRCABC
 - Path: /CircaBC/Taxation & Customs Union/Taric and Quota Data & Information/Library



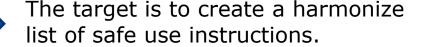
Browse url: https://circabc.europa.eu/w/browse/90dd4b94-39dd-45f4-8f33ec9ef9820016

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Safe use information

- Safe Use Instructions in different languages are not (yet) supported on the UI.
- No option to upload manual or sheet.



When adding multiple SUIs. New Safe Use Instructions are always added on top, not as could have been expected at the bottom of the list.



At this moment the tool is built that the new field appears at the beginning to help the user to find the new field.

 It should be more clear that this field requires a mandatory action



Taken into account for possible improvement



Complex object components section

The UI only uses the right side of the screen. When creating an article tree, it becomes after 3 nodes confusing where you are in your own "article structure". Navigation tree on the right would be nice to have.



Taken into account for possible improvement



Candidate List in SCIP Context

Why are all reference substances installed by default? (positive and negative comments)



The Candidate List package for SCIP will provide different options to import the substances:

- Individual reference substance datasets
- Master dataset

Master dataset is presented as an "Article" while it is a configuration package for creating the Reference Substances, Why?



It is a practical way to import big number of reference substance dataset in one go.

Once you imported it, you can delete the article.

Alternative use individual ref. substance datasets.

A screenshot on where to import the package would have been helpful



Taken into account for the supporting materials under development



Candidate List in SCIP Context

In the list of reference substances included in the Candidate List package there are duplicate rows for the same ECHA Substance ID



The duplication of the ECHA substance ID is for instance due to one EC number and two CAS numbers as identifiers in the official list (e.g anhydrous & hydrated forms)

Substance name 🗘	EC No. 0	CAS No. 0	Date of inclusion 🗢
Hydrazine	206-114-9	302-01-2,	20/06/2011
EC number: 206-114-9		7803-57-8	

We have try to create a list of reference substances easy to use and search, in case of doubt the <u>Official Candidate List</u> prevails, or contact us using the <u>ECHA contact form</u>.



Concern element section

The pick list of the version is confusing as it includes version in the future.



Additional guidance to find the right material/mixture codes would be useful.



Threshold is not allowed for concentration equal to 0.1



The pick list for the CL version is part of the IUCLID format that can be updated just once a year. The Official Candidate List can be updated more than one time a year. Current pick list include future values in order to be prepared for new Official updates of the Candidate List.

We will take into account when preparing support material

The legal duty starts when an article contain a Candidate List substance in a concentration **above** 0,1 % weight by weight (w/w)



Candidate list substance no longer present

We received some comments regarding the use of this field



This field allow the user to inform that the product used to contain a substance but at that moment the substance is no longer present

If a substance has been maintained as being no longer present, it is still showing in the tree in exactly the same way as the other CL substances are displayed



Taken into account for possible improvement



Validation

Primary Article Identifier: The uniqueness of a Primary Article Identifier within one legal entity is currently not checked. It was possible to create a complex article, containing an article with the same primary identifier. The validation was successful. In our understanding the use of the same primary identifier should not be allowed.



We recommend to not use same identifiers but technically we can not block it because maybe it is need.

Please note that upon creation of an article with the same Primary identifier there is a warning about duplication.

Confusing workflow after the validation process



In general SCIP tool has been created reusing previous IUCLID features.

We will take into account when preparing support material



General comments

We would appreciate if you can send your suggestions for improvements in those cases you find big difficulties.

We need your expertise: We would appreciate if you can send your examples of how the hierarchy or a SCIP notification can be built in your sector or how are you planning to create the notifications.

We encourage to share all the supporting documents we provide to all the participants that are using the SCIP tool. Please remember that all the presentations are available at our webpage. https://echa.europa.eu/scip-support



Specific questions about how to create a dossier:

- It is not unusual to encounter the situation where an SVHC is incorporated at into a higher-level complex object (e.g. as an adhesive or coating, etc) and that it also contains a lower-level article as such that includes an SVHC or to have SVHCs incorporated at multiple levels within the hierarchy.
- Complex Object containing two articles: Article 1 containing a Candidate List substance and Article 2 without any Candidate List substance joint by a "mixture" with a Candidate List substance?

How can them be reported in a SCIP notification?

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Possible scenarios

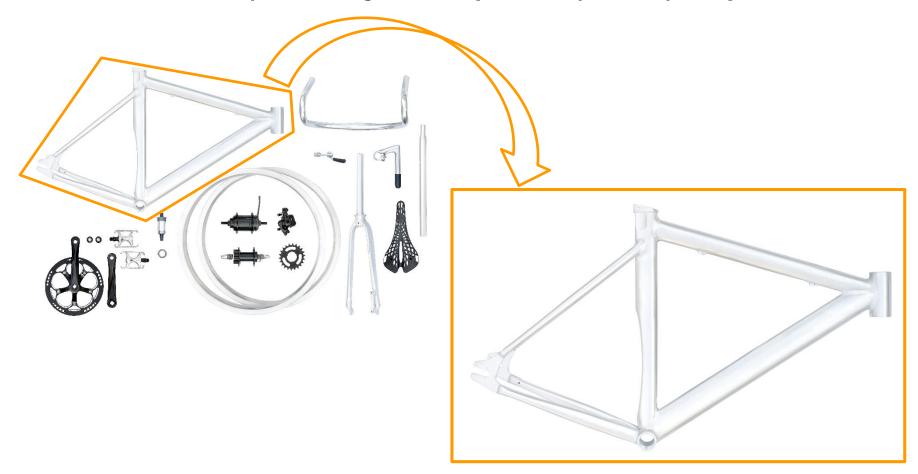
(They are not recommendations)





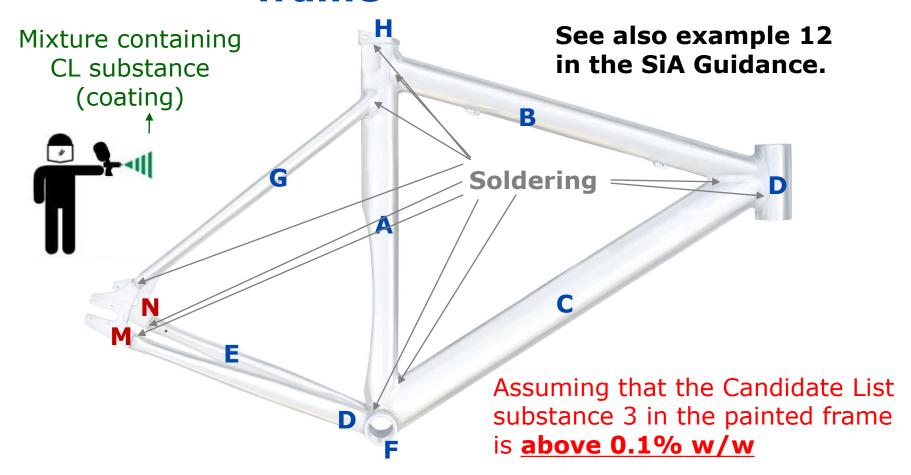
Complex Objects

Articles remain articles when incorporated in "complex objects" ("O5A principle")





Based on SiA Guidance's example 23: bicycle's metal frame



Link to the Guidance on requirements for substances in articles (SiA Guidance): https://echa.europa.eu/documents/10162/23036412/articles_en.pdf/cc2e3f93-8391-4944-88e4-efed5fb5112c



Based on SiA Guidance's example 23: bicycle's metal frame

Approach 1 (accepted by SCIP):





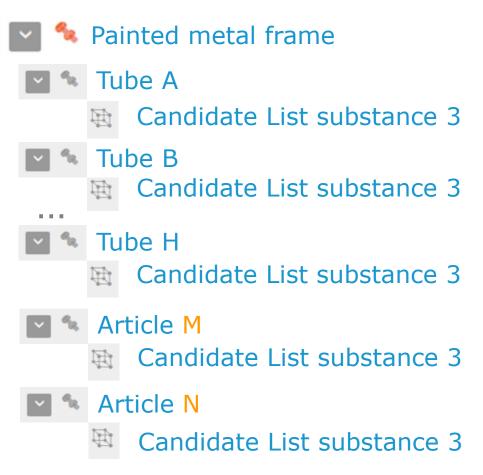
<u>SiA Guidance subchapter 3.2.3.1</u>: "the approaches for the scenarios of articles incorporated into complex objects and of partially coated articles are driven by practical considerations, in order to overcome the specific challenges of calculating the concentration in these particular cases, while ensuring that the main principles and objectives of the substance in articles provisions are fulfilled</u>. It should be noted that the **determination of the concentration of a Candidate List substance in an article must always be done on a case-by-case basis**".

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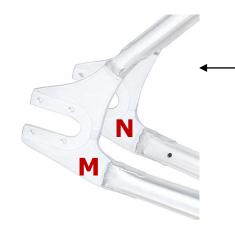
Based on SiA Guidance's example 23: bicycle's metal frame

Approach 2 (accepted by SCIP):





Bicycle's metal frame: additional scenario 1



 Assuming that Articles M and N contains a Candidate List substance 4 above 0.1 % w/w



ECHA Bicycle's metal frame: additional scenario 1

Approach 1 (accepted by SCIP):





Avoid "circularity" (same article cannot be used)!

- Maybe not use the same article name?
- Maybe not use the same primary identifier?



ECHA Bicycle's metal frame: additional scenario 1

Approach 2 (accepted by SCIP):

Painted metal frame Tube A Candidate List substance 3 Tube B Candidate List substance 3 Tube H Candidate List substance 3 Article M Candidate List substance 3 Candidate List substance 4 Article N Candidate List substance 3 Candidate List substance 4

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SCIP notifications trial phase

SCIP IT user group

Clara Rueda

ECHA – SCIP Product Manager B4 Unit – Exposure and Supply Chain



Trial phase SCIP IT User group







User interface Create an article (IUCLID Beta environment)

→ Review feedback

→ Review feedback

System to system
Trial







IT User group next meetings

SCIP IT user group



Next meetings

13 February 2020

15:00 - 16:30 Helsinki time.

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Thank you for your participation!

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Additional material

SCIP IT user group





Import Candidate List substances package

Source file:

https://echa.europa.eu/scip-format



SCIP Format

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Download

- Candidate List reference substance package SCIP context:
 - Version 2019/2:
 - Candidate List Substances Version 2019/2 [CSV] [TXT] [XLSX]
 - Individual 296 substances dataset [ZIP]
 - Master article dataset (2 substances) [I6Z]
 - README SCIP Candidate List 2019-02 [TXT]



Import Candidate List substances package





ECHA List of reference substances

