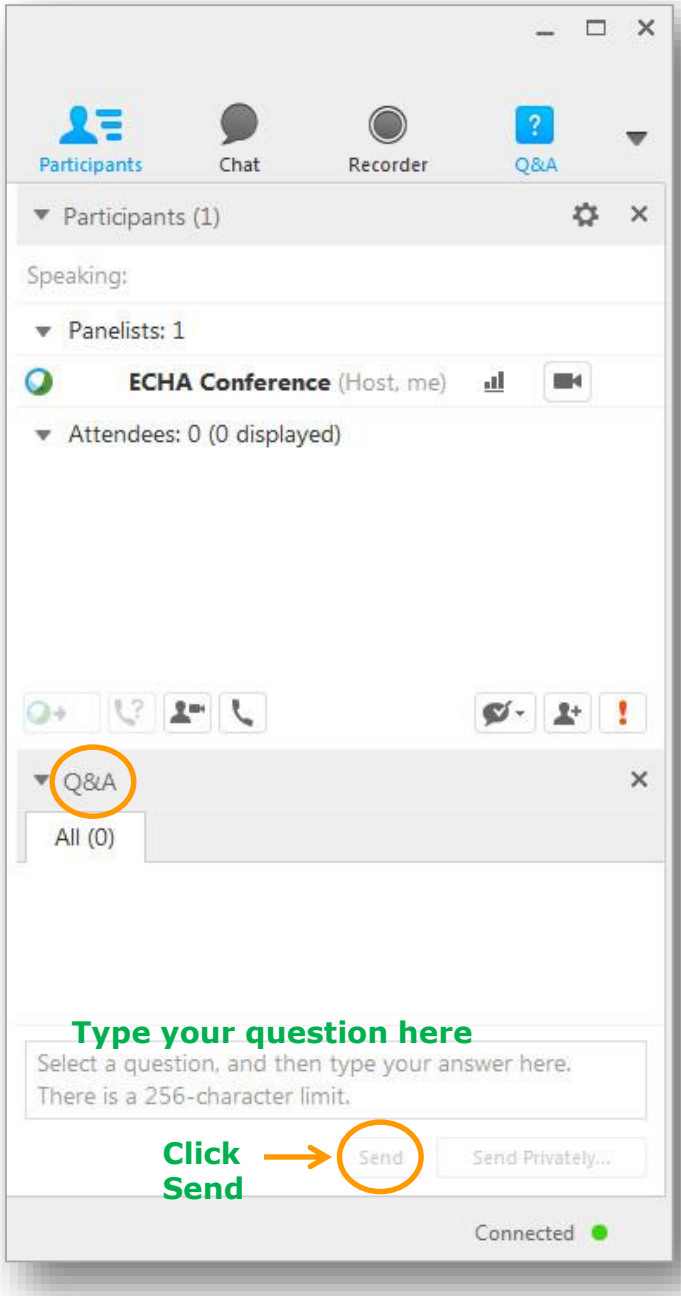
SCIP IT user group

17 June 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"



Today's agenda

- How to get prepared
- System to system
- Reviewing questions received

How to get prepared

How to get prepared

HOW TO PREPARE FOR SCIP?

1. Find out whether you need to submit a SCIP notification
2. Know and understand the information requirements
3. Know your portfolio of articles
4. Adapt your data
5. Prepare your submission
6. Submit your notification

ECHA-20-P-03-EN - ED-03-20-213-EN-N - ISBN:978-92-9481-409-8 - DOI:10.2823/12327

Tracking hazardous chemicals in articles and products

SCIP Database

What you need to know

Find out more:
https://echa.europa.eu/scip-database

Find support:
echa.europa.eu/scip-support

echa.europa.eu

European Chemicals Agency
Telakkakatu 6
P.O. Box 400
FI-00121 Helsinki, Finland

ECHA
EUROPEAN CHEMICALS AGENCY

ECHA
EUROPEAN CHEMICALS AGENCY

DO YOUR ARTICLES CONTAIN SUBSTANCES OF VERY HIGH CONCERN (SVHCs)?

DO YOU PLACE THEM ON THE EU MARKET?

If the articles you produce, assemble, import or distribute contain SVHCs on ECHA's Candidate List in a concentration above 0.1 % weight by weight:
➡ You need to notify them to the SCIP database.

If you are a retailer and only supply your articles to consumers, you don't need to notify.

The SCIP notification obligation for companies applies from January 2021.

WHAT IS AN ARTICLE?

An article is an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition.

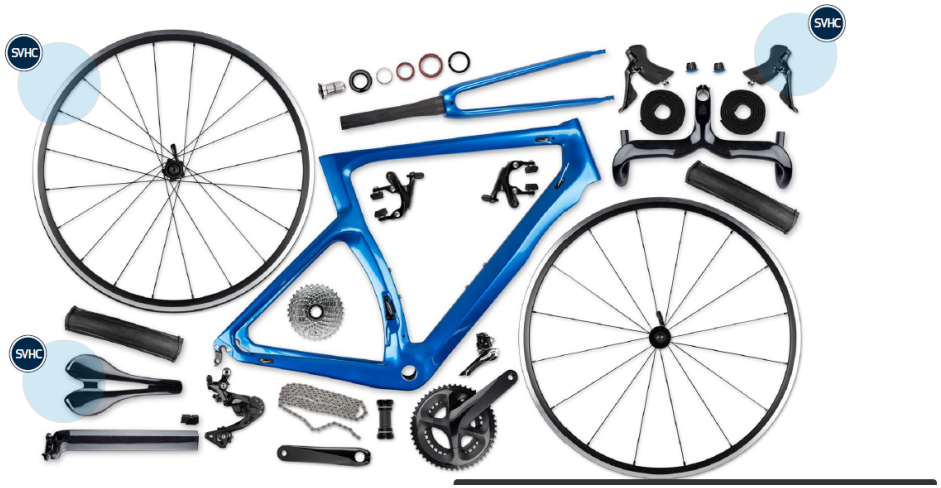
WHAT DO YOU NEED TO DO?

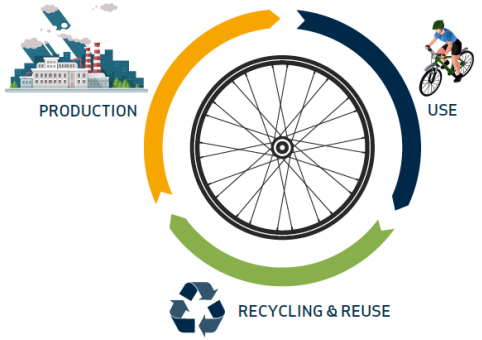
You need to submit the following information to ECHA:

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

The information in the SCIP database is made publicly available, in particular to waste operators and consumers.

ECHA ensures the protection of sensitive information, for example, the links between actors in the same supply chain.





WHAT IS THE AIM?

The SCIP database aims to increase the knowledge of hazardous chemicals in articles and products throughout their whole lifecycle – including at the waste stage.

It also:

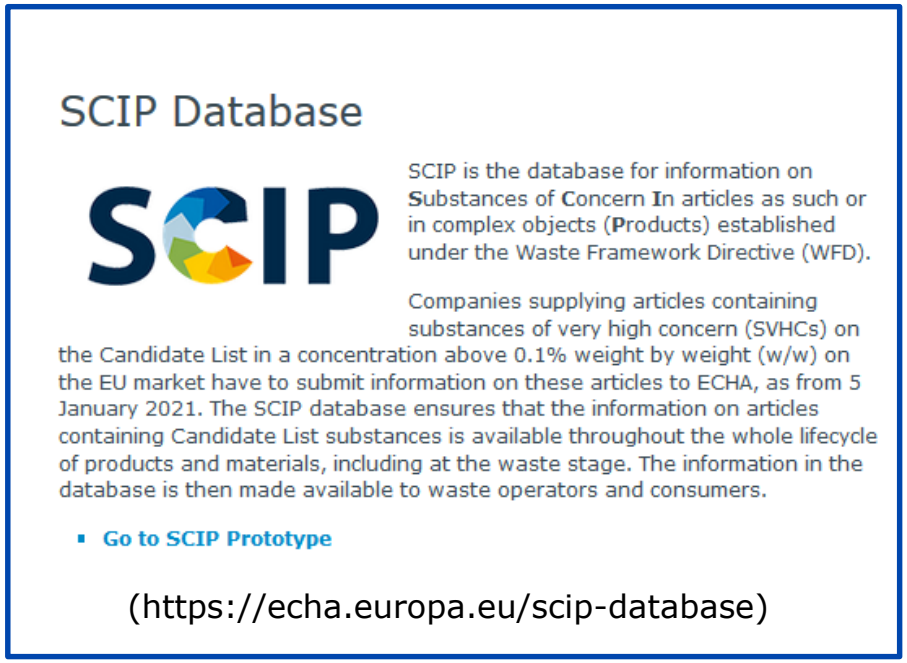
- aims to reduce hazardous substances in waste;
- encourages substitution of those substances with safer alternatives; and
- contributes to a better circular economy.

BENEFITS FOR WASTE OPERATORS AND CONSUMERS

The information in the SCIP database helps waste operators improve waste management practices and promotes the use of waste as a resource.

Consumers benefit from increased knowledge about hazardous chemicals in products. This will help them make better informed choices when buying products and promote their 'right to ask'.

How to prepare for SCIP?



Contact ECHA

System to System

S2S in short

System to system (S2S)

S2S interface is intended to facilitate data submission by:

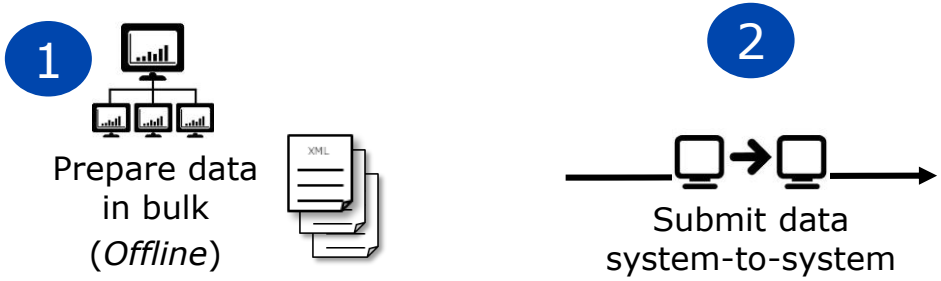
- Providing an alternative to **create and submit** dossiers manually
- Allowing **automation** of the notification processes

S2S might be interesting for you when:

- You have **a lot of notifications** to submit and you consider that the manual notification process is not feasible
- You need to **frequently update** your data

- Already have an existing **system** to manage your products and articles that you can improve

System to system



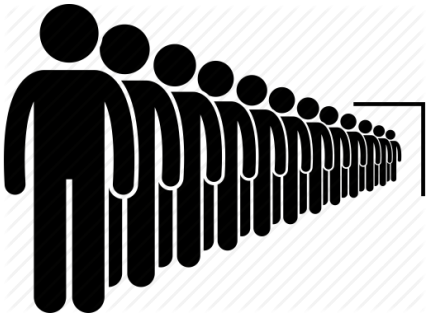
1. Companies invest in IT to prepare dossiers (in IUCLID format) from data in existing systems

2. Interaction between companies' own IT systems and ECHA submission portal is performed using pre-defined interfaces

3. Submitted data is validated as with manual submissions and outcome can be accessed both via submitting system and manually

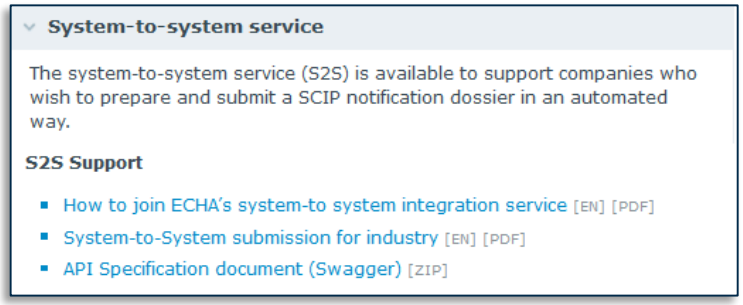
Notification management setup

- Notifications are queued while waiting to be processed
- Standard setup estimated to be able to process 10 000 dossiers / hour
- Test mode for S2S with Batch identification to ensure a higher success rate on first real submission



System to system
Getting started

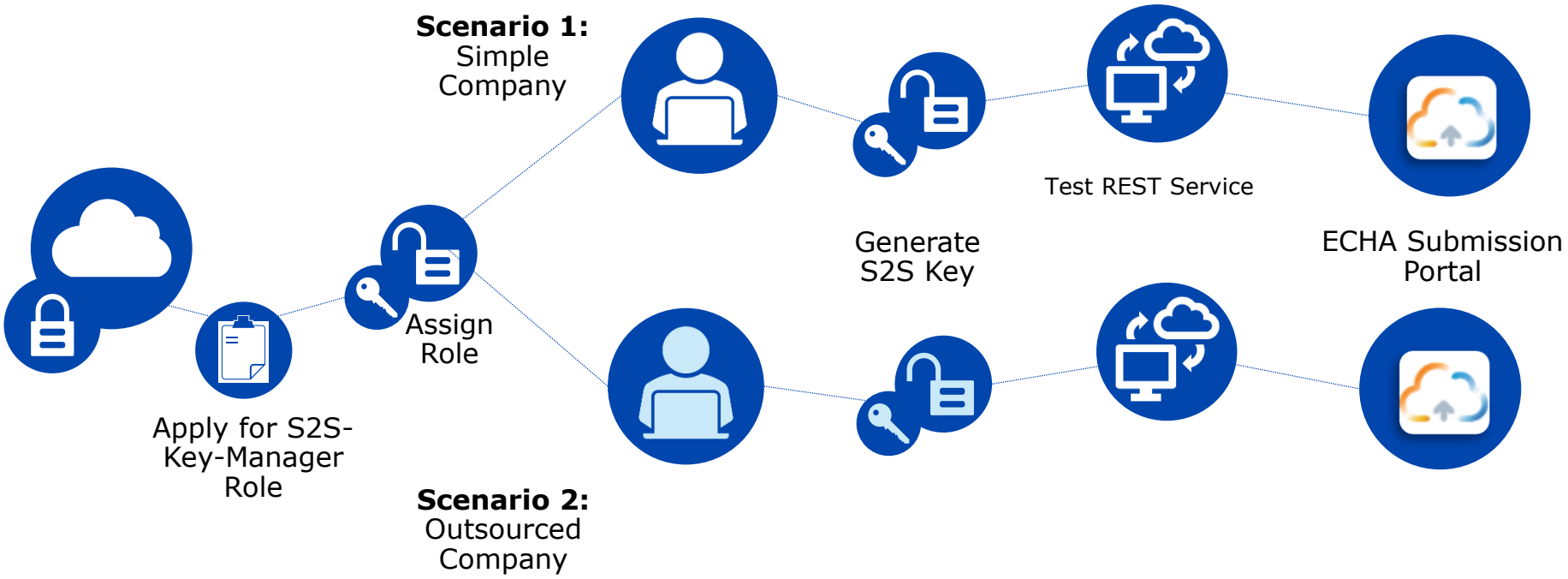
1. Consult documentation on:
   - Preparing data in IUCLID format
   - Accessing S2S
   - Using S2S



2. Focus first on data preparation as this is more complex than data submission

3. Once SCIP notification dossiers are ready, they can be verified for correctness with IUCLID or by using the test mode in the S2S interface

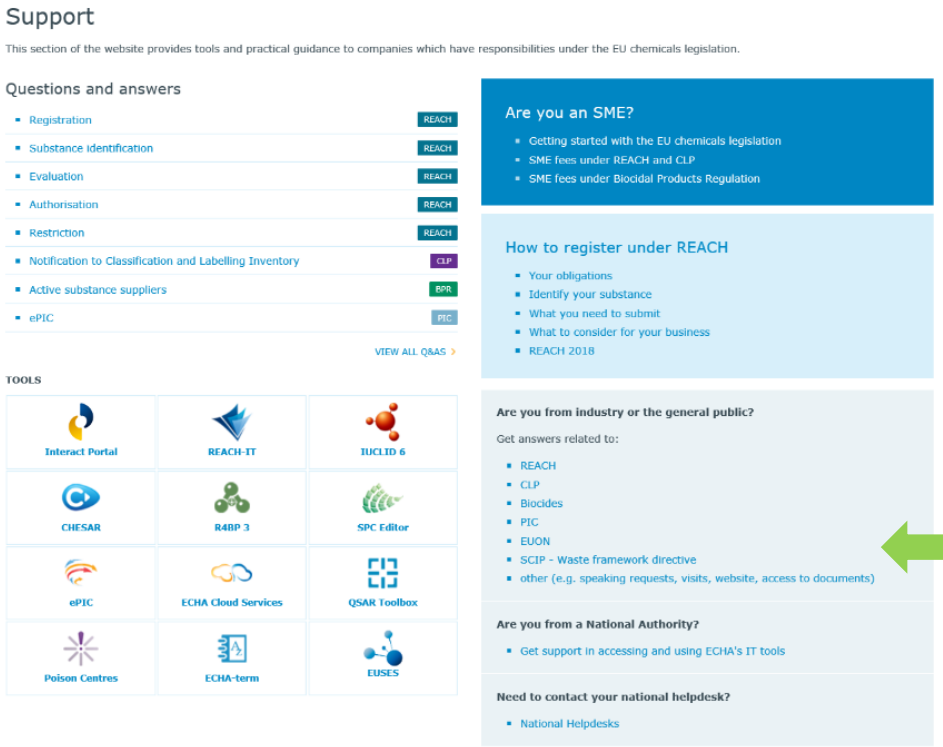
How to **submit** Notification - Overview

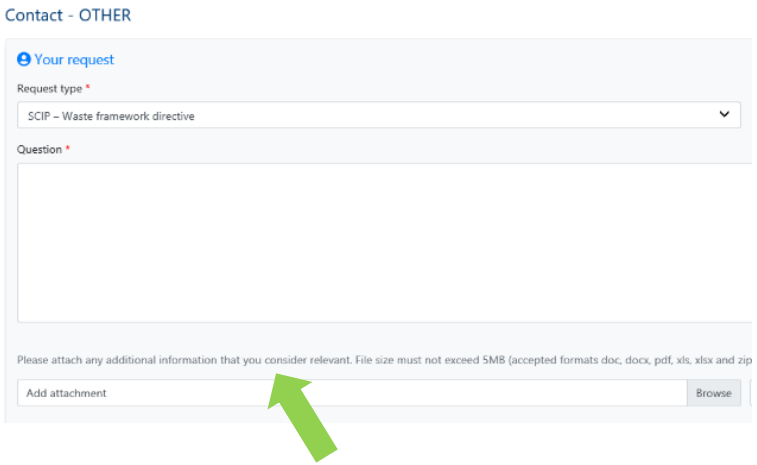


S2S how to apply

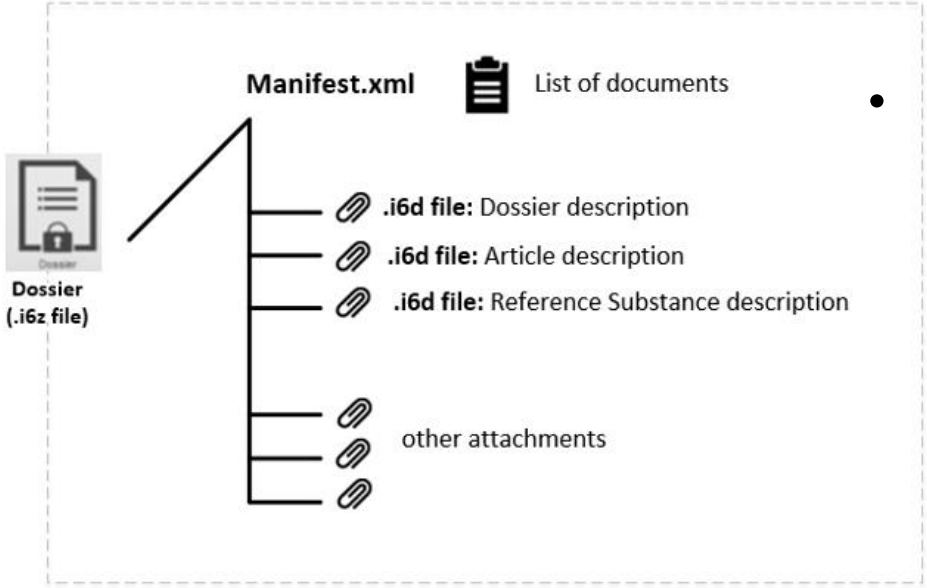
Requesting access or information via ECHA website

https://echa.europa.eu/support





How to **create** an SCIP dossier

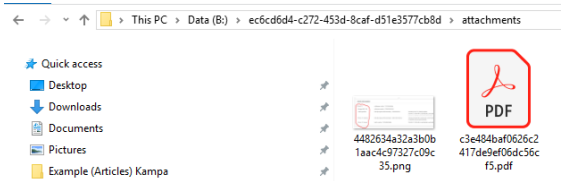


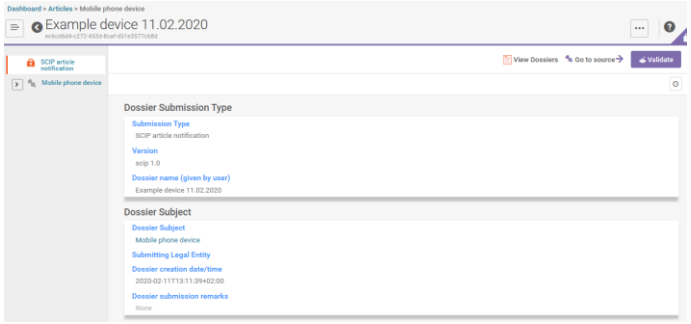
- SCIP dossier includes various (.i6d) files including the n article.i6d and x reference.i6d files which define the SCIP notification.

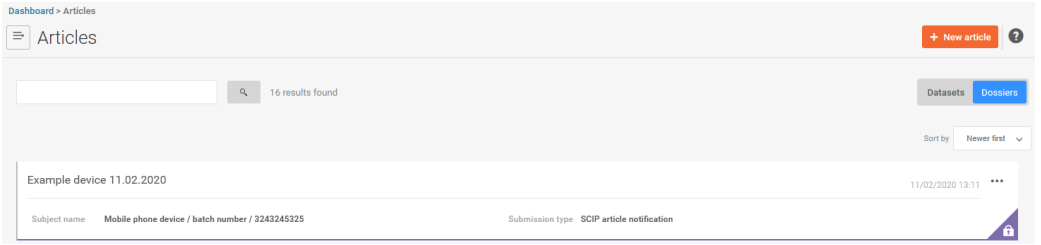
- In the following slides we will concentrate on directives, guidelines and / or suggestions to construct the file and its links.

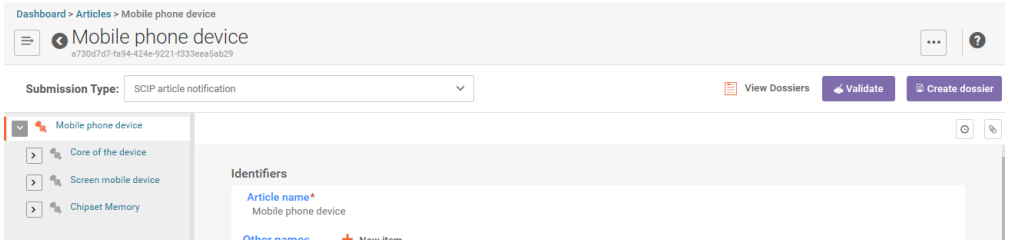
How to **build & submit** your first dossier example

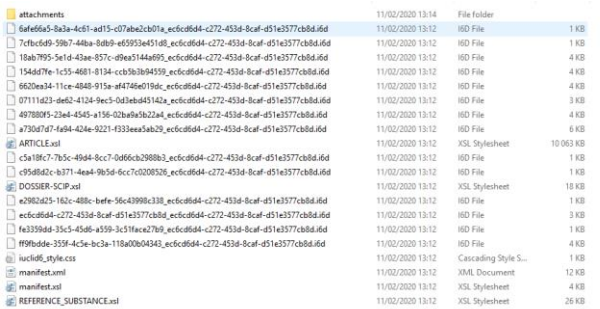
- Use IUCLID
- Extract i6z file and review the package
- Ask ECHA for additional examples











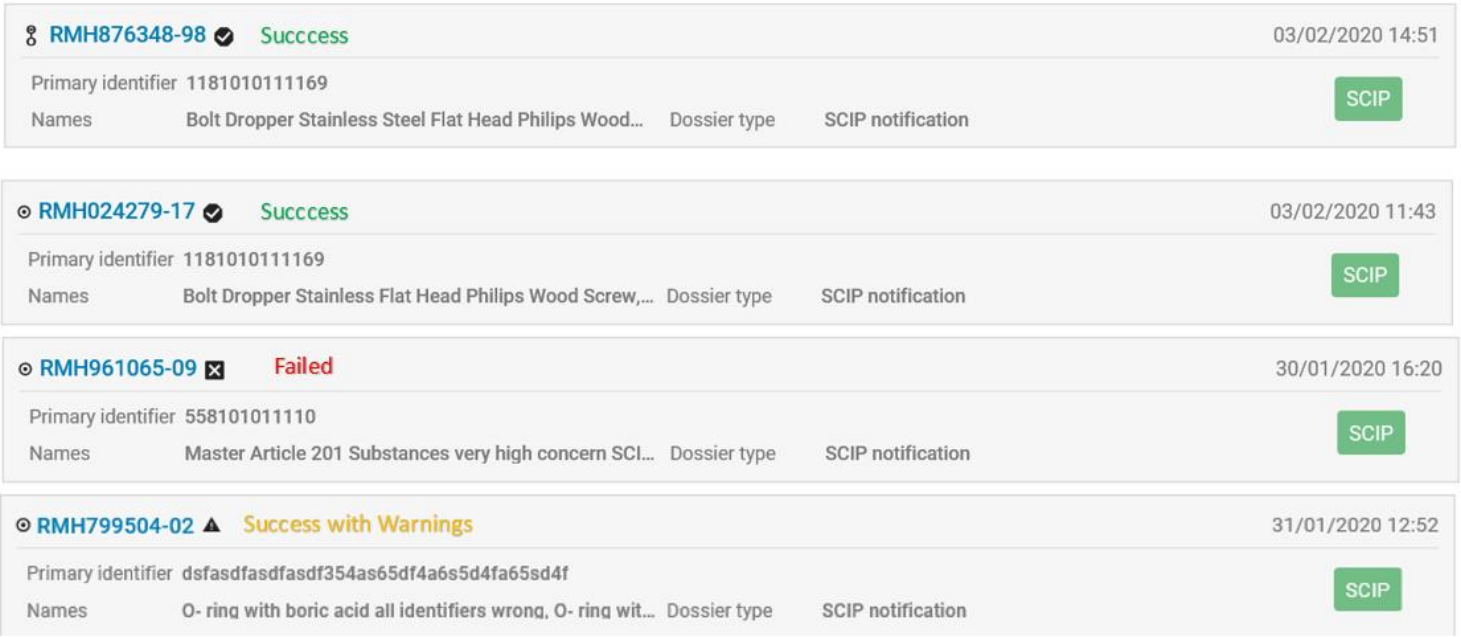
How to **submit** via S2S interface (I)

```
curl -s --location --upload-file $file
--request POST 'https://api.ecs.echa.europa.eu/submission' \
--header 'Content-Type: application/vnd.iuclid6.archive;
filename='$(file)'' \
--header 'Accept: application/json, text/plain, */*' \
--header 'X-ECHA-Mode: test' \
--header 'X-ECHA-Test-Run: trial' \
--header 'Authorization: Bearer
eyJhbGciOiJIUzI1NiIsInR5cCI6IkpXVCJ9.eyJ4LWVjaGEtcGFydHkiOiJFQ0hBLTI1MDM
xOGQ0LWU1YTEtNGIyOS1hNDM4LTY3ODg3ZDY5NjFmYyJ9.UG8vbrZ3aK8cX8ExJKpUeraTfo
l1                ')
```

X-ECHA-Mode	X-ECHA-Test-Run	Testing phase/purpose
test	(absent)	Connectivity tests - no actual processing of the submitted file - dummy responses
test	(absent)	Authentication and authorisation tests - no actual processing of the submitted file - dummy responses
test	mycompanyid-001 (example)	Integration tests - actual processing of the submitted file - actual response
(absent)	(absent)	Production mode - actual processing of the submitted file - actual response - valid dossiers are dispatched - valid dossiers become available in Remote Access portal

```
{
"submissionNumber":"RMH655298-97"
"statusUrl":"https://api.ecs.echa.europa.eu/submission/RMH655298-97"
"reportUrl":"https://test-trial.ecs.echa.europa.eu/cloud/submissions/RMH655298-97"
}
```

How to **validate** Submission portal



Reviewing questions received

S2S SCIP Dossier Submission Questions: General

- At what frequency/ times of year are changes to be expected in following areas and how would the changes be communicated?
- Reference Substance i6d files (Twice a year to match REACH Candidate?)

IUCLID format/schema changes

- Can the SCIP format picklists be provided as a S2S API?
- Apart from validating the dossier contents against the XSD and the validation rules captured on SCIP site, are there any additional schema validations performed during import. If so, we could validate during dossier creation prior to submission?
- We understand the XSL files are not required to be included within the dossier i6z. Is it required to still reference the XSL file within the manifest xml and the i6d files?
- CandidateListVersion and NumberOfUnits are still mandatory fields for Dossier submission. When will they no longer be required in the Test Submission system?

- Update Submission
- If we identify that an update submission is required, a dossier will be created just like a new submission and we will let ECHA identify it as an update based on Primary Identifier Type/ Value and Legal Entity UUID match and return identical SCIP number. Is the understanding correct?
- Is there any information in an update submission other than the Primary Identifier and Legal Entity UUID that will identify it as an update to a previous submission? For example – Does creation Date of update submission need to match up to original submission with a new modification Date?
- If an update submission is required, we plan to recreate all the Article and Dossier i6d files with new creation timestamps and newly generated UUIDs. Request to confirm that is fine.
-
- Manifest XML file
- Is there a default title value that is required for the manifest XML file?
- What legislations are needed to be included in the <legislations-info> section? Confirm if the values listed below are correct. Where could we retrieve the legislation id and version from? How do we get communication when the versions need to be updated?

Manifest XML file

- Is there a default title value that is required for the manifest XML file?
- What legislations are needed to be included in the <legislations-info> section? Confirm if the values listed below are correct. Where could we retrieve the legislation id and version from? How do we get communication when the versions need to be updated?

```
<legislations-info>
        <legislation>
        <id>domain</id>
    <version>5.0</version>
        </legislation>
        <legislation>
        <id>scip</id>
    <version>1.0</version>
        </legislation>
</legislations-info>
```

In the <contained-documents><document> section, can the <first-modification-date> and <last-modification-date> for all documents be defaulted to the Dossier creation date? If not, what do these date fields signify?

i6d Files – Dossier/ Article/ Substance

- What should be the value of iuclid version in the section /i6c:Document/i6c:PlatformMetadata/ i6m:iuclidVersion? Dossiers created online have version 4.14.1. Developer guide has it as 4.2.1. Should this be read from somewhere?
- What should be the value of /i6c:Document/i6c:PlatformMetadata/i6m:definitionVersion (for Dossier and Article) and i6m:submissionTypeVersion (for Dossier). What is the source for these fields?
- In Platform Metadata section creationDate and lastModificationDate will be set as Dossier creation date. Is that fine?
- Are these fields required in Platform Metadata section for an Article i6d file? What should be the values?

i6m:parentDocumentKey

i6m:documentSubType

i6m:orderInSectionNo

i6m:submissionType

i6m:submissionTypeVersion

i6m:submittingLegalEntity

- If ECHA provided reference substance i6d files are used in a new dossier, is it sufficient to update document key with the dossier UUID? Are there any other changes required in the Reference Substance i6d file?

Dossier submission

- What is maximum time it would take to get a submission status back through a GET request after a POST request submission has been made? Trying to decide how many retries and at what intervals need to be made before quitting to get a submission status (If a submission gets into a Pending state for a long time)
- 2Do the S2S keys have a validity period? If JWT Header is generated without an expiry date, the understanding is that the Bearer header can be used for any number of API calls until the S2S keys are next reset. Please confirm.

- After submitting a dossier, how long should we wait for the file to be processed? i.e. when sending a GET request to api.ecs.echa.europa.eu/submission/<submission-number> how long until the status response will no longer be PENDING and will show either VALIDATION_SUCCEEDED or VALIDATION_FAILED as the response?
- Is there a limit, or do you have a preferred limit, to the number of dossier submissions per minute? i.e. If we were to submit 10,000 dossiers, how frequently would you like the POST requests to be made?
- Support of simplified submissions and referencing with SCIP numbers in complex objects in S2S processes.
- When will the SCIP number be available with regards to S2S processes?

- What mechanisms are planned to ensure consistency? Checking individual entries via the dissemination website doesn't seem feasible in the S2S context.
- Would it be possible for ECHA to provide a service that allows to check if a SCIP number that has been provided by a supplier is valid before submitting via S2S?
    - Ideally it would be possible to check for combination of SCIP number, Legal Entity and Primary Article ID (if all three values are provided)?
- In the last IT User Group Meeting, a new feature to retrieve events related to multiple submissions made by a company has been presented. What would you recommend to be the cut-off for using this, so would you recommend to use it all the time instead of the individual call, or would that put excessive load on the system?
- How are changes to picklists handled with regards to the IUCLID Format?
- How should a company manage obsolete picklist values with regards to dossier submission validation?

- Is a compatibility ensured also with regards to picklist values from previous versions?
- Would it be possible for a company to update dossiers with old picklist values?
- I need to know if there any obligation for using S2S like the organisation should be in Europe to can submit dossiers via S2S service?
- Is there any link URL beside that URL https://api.ecs.echa.europa.eu/submission to submit our dossiers?
- I need to know also if the API will take the features and fill the data automatically or we will prepare dossiers and then just submit dossiers?
- when we use that URL https://api.ecs.echa.europa.eu/submission , we faced a message "Authorization header must be a non-empty string" please we need with details what this message mean?
- Is there any criteria to know if my submission is delivered to the SCIP database?

Next SCIP events

SCIP IT user group

Next SCIP IT user group meeting

- **24 June 2020** (14:30 – 16:00 Helsinki time.)
- **15 July 2020** (14:30 – 16:00 Helsinki time.)
- **4 September 2020** (15:00 – 16:30 Helsinki time.)

Thank you for your participation!

scip@echa.europa.eu

Subscribe to our news at
echa.europa.eu/subscribe

Follow us on Twitter
@EU_ECHA

Follow us on Facebook
Facebook.com/EUECHA