

SCIP IT user group

29 November 2022

European Chemicals Agency



Opening remarks

- → Practicalities
 - For the floor, raise your hand

- Use the Chat:
 - Questions and comments related with the topic of the presentation.
 - To: all panellists



→ Meeting is being recorded for internal use



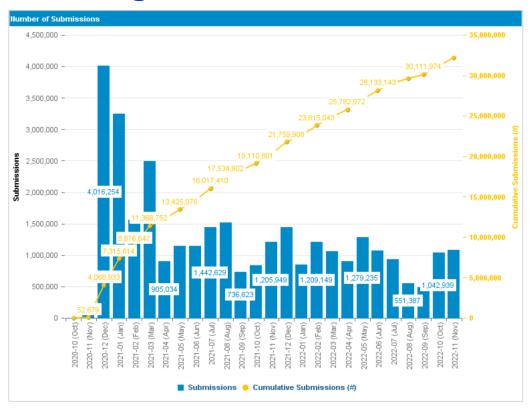


- → IT tools State of play and 2023 plans
- → Simplified SCIP notifications
- → Catalogue of borderline cases of substances in articles assessments
- → Additional comments from participants
- → Next SCIP events



IT tools state of play & 2023 plans

SCIP Figures

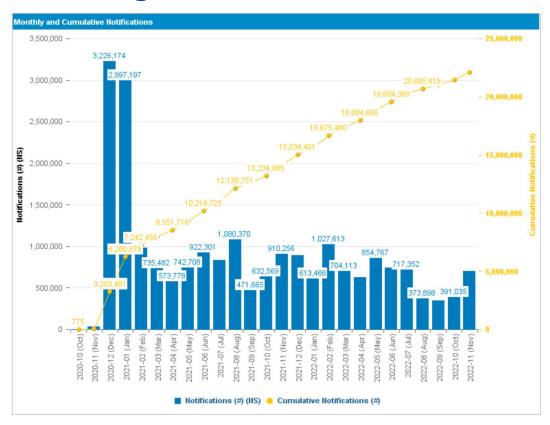


Number of submissions (volumes)

32 mill
Cumulative number of submissions



SCIP Figures

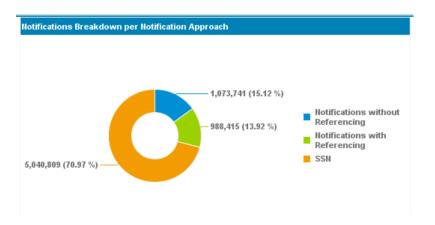


Number of notifications
(1 SCIP number=notification)

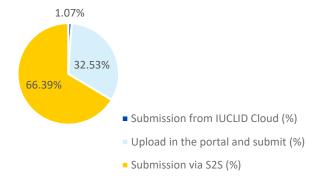
22 mill
Cumulative number of notifications



SCIP Figures



Notification approach



Submission channel



ECHA submission portal & Data submission

ECHA Submission portal

Released in summer 2022

- → New function to support SSN bulk submitters to avoid submissions of duplicate SCIP numbers
- → New permission Submission Portal Manager Restricted to allow companies to increase confidentiality for SCIP notifiers by restricted users access (e.g only to see own submissions)

Released in Nov-2022

→ Possibility to receiving SCIP notifications from EEA countries (Iceland, Lichtenstein, Norway)



System 2 System (S2S) update

- → v4 released in July-2022
- → At the moment we don't foresee a v5, however, should the need arise, we will communicate in advance

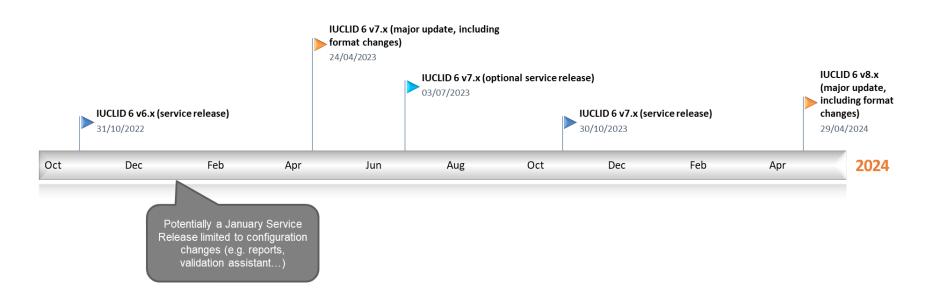
 → To stay up to date around S2S join our <u>LinkedIn</u> group / <u>subscribe to our</u> S2S news







→ Release plan







- → Minor changes planned for April 2023
 - Update of EU PCS list (Material category list)
 - Update of the "Article category" picklist
 - Based on the January update of each year of the TARIC database, by the European Commission (DG TAXUD), in CIRCABC
 - Many codes will become obsolete to avoid SCIP submissions with article categories of items that aren't articles
- → Technical update (XML validation)
 - Documents creation date to be made mandatory

<xs:element ref="pm:creationDate" minOccurs="1" />





- Documentation of the format will be available on the ECHA and IUCLID websites
 - For now: consultation on the harmonised parts
 - December: draft format information package
- → Test version with new format to be shared early 2023

https://iuclid6.echa.europa.eu/format

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

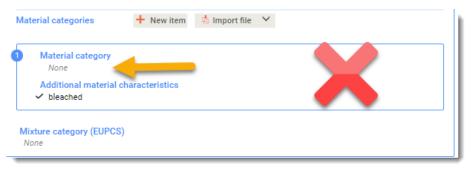




Validation rules update

Planned improvements for April 2023:

BR734 *new* If 'Additional material characteristics' are included then 'Material category' should be included as well.

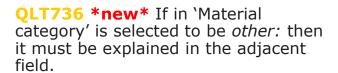


If you are using this type of reporting you need to resubmit!!!

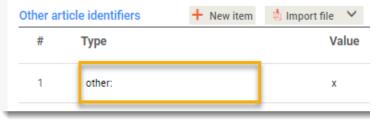


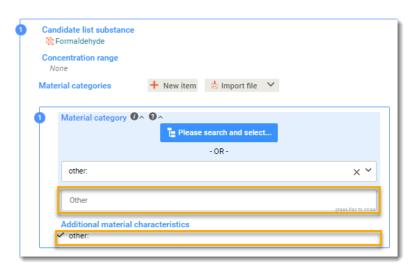
Validation rules update

QLT735 *new* If in 'Other article identifiers' 'Type' is selected to be *other:* then it must be explained in the adjacent field.



QLT737 *new* If in 'Additional material characteristics' is selected to be *other:* then it must be explained in the adjacent field.





Making data available

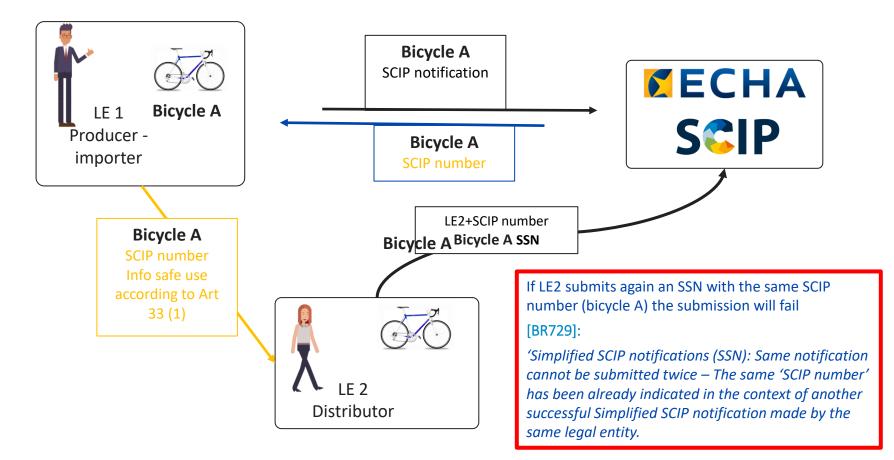


Making data available

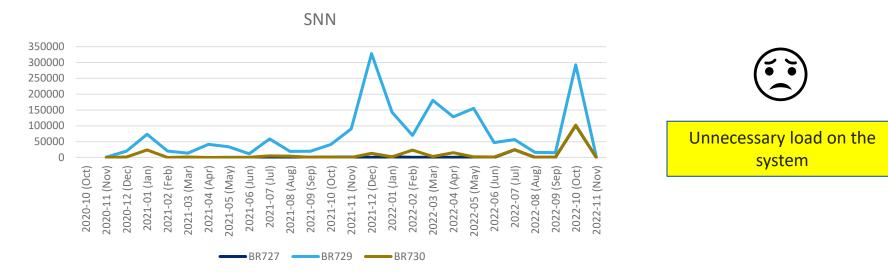
- Improvements in the stability/ performance of the system
- Searches using identifiers included in submissions that have been updated will not provide results

Simplified SCIP notification

Simplified SCIP notification (SSN)



SCIP fail submissions related with SSN



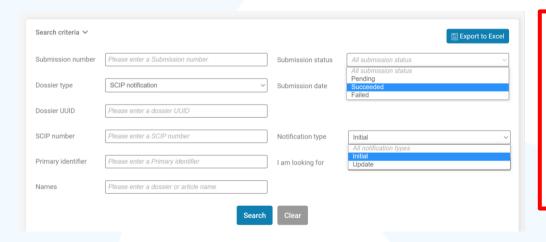
- → Some S2S companies keep submitting high failure volumes in the year.
- → Some actors using bulk SSN submissions with excels create high failure volumes.



SSN failures - Main reasons

- → Same LE submits the same SCIP number twice
- → SSN notification in bulk includes redundant data (SCIP numbers already notified (BR729), as well as invalid SCIP numbers)
- → Causes knock-on issues downstream e.g. BR727 failures (a (valid) SCIP No does not exist) e.g.:
 - BR729 failures Same LE + same SCIP No -> fail
 - Upstream supplier <u>exports ALL submissions</u> to xls indiscriminately i.e. including failures and then supplies it downstream
 - BR727 failures Downstream user attempts bulk SSN with supplied xls
 - BR727 failures (a (valid) SCIP No does not exist) caused by upstream party exporting whole portfolio indiscriminately (i.e. including fails)

How to share data – review your strategy



- ✓ Review before submitting if you have already submitted an SSN for a SCIP number
- ✓ Review the <u>excel</u> to be used for <u>SSN notifications **in bulk**</u>:
 - Before sharing with your customers: Ensure it does not include duplicate rows related to the same SCIP number or any failures
 - Review your previous SSN submission (extract a list of your Successful SSN submissions and compare them with the new excel you are planning to use)



Special attention if submitting SSN for many LEs in one step

Reference number	Names	Identifiers Identifiers	Dossier UUID	Dossier type	Submissior Sub	bmission sta	Submission date	Submission typ
fc1b8912-e06f-401d-ae3b-ff7ed88a7112	Test T1 12345678	batch num 23568746465	1e0a1c52-9e6d-41ec-8	SCIP notification	RMH0510Csuc	cceeded	18/08/2022	initial
c69a3292-cfda-4a45-9b42-54188a03e2b5	Test T2 98765432	batch num 28049999	aba1f07f-65c7-4366-b	c SCIP notification	RMH96283 suc	cceeded	28/06/2022	initial
bfe6c07a-c141-4b5c-85bf-c7afee6ff450	Test T2a 8585858	batch num 456456456	f90c6f44-220f-4920-b5	SCIP notification	RMH75823fail	led	26/09/2022	initial
b61342c4-f62b-4cdc-bd1f-68ba98261fc6	Test T3 234234234	part numb 1410629999	53e80ca9-3010-45b1-8	8 SCIP notification	RMH69637suc	cceeded	28/06/2022	initial
Reference number	Names	Identifiers Identifiers	Dossier UUID	Dossier type	Submissior Subr	mission staSi	ubmission date S	ubmission type
fc1b8912-e06f-401d-ae3b-ff7ed88a7112	Test T1 12345678	batch num 23568746465	1e0a1c52-9e6d-41ec-8		RMH0510C succ		18/08/2022 ii	
c69a3292-cfda-4a45-9b42-54188a03e2b5	Test T2 98765432	batch num 28049999	aba1f07f-65c7-4366-bc	SCIP notification	RMH96283 succ	eeded	28/06/2022 ii	nitial
b61342c4-f62b-4cdc-bd1f-68ba98261fc6	Test T3 234234234	part numb 1410629999	53e80ca9-3010-45b1-8	SCIP notification	RMH69637succ	eeded	28/06/2022 is	nitial





Catalogue of borderline cases of substances in articles assessments

Borderline Working Group - background

- established in March 2021
- under HelpNet Steering Group
- Purpose:
 - Discuss difficult questions received by NHDs and ECHA on substances in articles
 - ✓ Coherent application of the principles in the <u>Guidance on substance in articles</u>
 - Publish a catalogue on <u>ECHA</u> <u>Helpnet page</u>

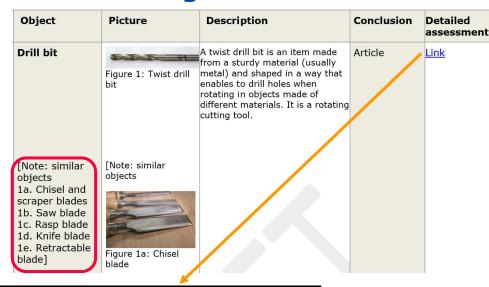
Obligations for **substances in articles**:

- Communication duties in the supply chain according to Article 33 of REACH
- SiA notification duty according to Article 7(2) of REACH
- Poison Centres Notification (PCN): pyrotechnic articles
- SCIP notification according to the Waste Framework Directive



Borderline cases assessment - catalogue

- → Consists of ~20 agreed cases
- → Overview of agreed cases, detailed assessment annexed
- Cases related to each other are clustered
- Enables extending the reasoning for other similar cases



Object	Step 1: Identify the function of the object	Step 2: Are shape/surface/design more relevant for the function of the object than the chemical composition?	Step 3	Step 4	Step 5	Step 6	Conclusion
Coated electronic wax candle	The main function is decoration.	Yes. The wax is shaped in the form of the candle and the coating is completely incorporated in the shaped article (see case 3). It is a coated article (see scenarios III-A) and III-B) in table 5 of the SiA Guidance)	na.	Na	D.a.	na	Article
Coated conventional candle	The candle is lit to sustain a flame. The wick does not sustain the flame, it carries the molten wax to the centre of the flame, the burning of the wick is a secondary effect.	No. A conventional wax candle is combination of article and a substance / mixture. Therefore. a coated wax candle is a combination of article and a mixture. In this case, the article is the wick. (The coating and the wax are either: - 2 different mixtures.	n.a.	D.a.	n.a.	n.a	Combination of an article (wick) and a mixture (wax and coating)



Additional comments from the participants

Be always updated!

 Annual basis SCIP IT user group meeting: Next meeting, June 2023

 Please follow our website for updates

- S2S community
 - New System-to-system submission service webpage

System-to-system submission service



ECHA's system-to-system (S2S) submission service is available for companies that want to use their own IT systems to submit regulatory

The service opens a public 'application programming interface' (API) to ECHA's submission module. Companies, software developers and providers can use the latest version of the API to build or adopt an IT solution that integrates their IT systems with ECHA's submission systems, such as the ECHA Submission portal or REACH-IT.

Once companies have integrated their IT systems with the S2S submission service, they can automate the submission of their dossiers, and even submit in bulk. Using their own IT systems, companies can also integrate other databases, such as IUCLID. to create IUCLID dossiers. It is recommended to use the latest version of the legislative formats.

For more information on how to prepare dossiers in this way, check the IUCLID Developers' Guide and specific regulatory formats/technical documentation.

To stay up to date about new releases of the API, maintenance breaks, and S2S activities as well as news in general join 'ECHA's S2S submission support network in LinkedIn and subscribe to S2S related news.

How to start using the S2S submission service

If you want to use the S2S submission service, you must:

- read and accept the Terms and Conditions of ECHA submission portal;
- familiarise vourself with ECHA's S2S submission service manual;
- request access through ECHA's contact form;
- develop the necessary software to use the Submission API and periodically update it to use the most recent version of the Submission API and IUCLID format:

KEY DOCUMENTS

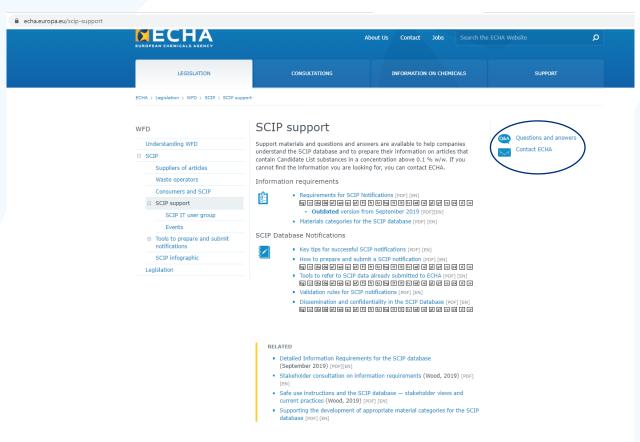
- System-to-System submission service manual [PDF]
- Terms and Conditions of ECHA Submission portal in all languages
- Submission API specification document [ZIP]
- Developer's Guide to the IUCLID Format [PDF]

NEED HELP?

- Subscribe to S2S news
- Take a look at the ECHA Accounts
- · Contact form request access and support for S2S
- Join 'S2S submission support network' in LinkedIn



Provide your feedback!



Thank you

scip@echa.europa.eu echa.europa.eu/subscribe



Connect with us



echa.europa.eu/podcasts



in European Chemicals Agency



@one_healthenv_eu



@EU_ECHA



@EUECHA



EUchemicals