

Tools to refer to SCIP data already submitted to ECHA

August 2020

ABC

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Tools to reuse SCIP data submitted to ECHA

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Table of Contents

1. INTRODUCTION	4
2. SIMPLIFIED SCIP NOTIFICATION	7
2.1 How does a simplified SCIP notification work?	9
2.2 Submission of simplified SCIP notifications in bulk	13
3. 'REFERENCING' IN A SCIP NOTIFICATION	17
3.1 How 'referencing' works?	19

Table of Figures

Figure 1: Submission report for a SCIP notification	5
Figure 2: Simplified SCIP notification overview for the hypothetical bicycle (Bicycle A) example.	9
Figure 3: ECHA Submission Portal view and submission of a Simplified SCIP notification (SSN)	11
Figure 4: Submission report for a successful Simplified SCIP Notification (SSN)	12
Figure 5: 'Export to Excel' functionality in ECHA Submission Portal allows the export of SCIP numbers of many submissions, as well as other submission information.	13
Figure 6: View of the 'Simplified SCIP notification' section in the ECHA Submission Portal	14
Figure 7: Submitting a 'Simplified SCIP notification' in bulk the ECHA Submission Portal.....	15
Figure 8: Summary of the status of Simplified SCIP Notifications submitted in the ECHA Submission Portal.	16
Figure 10: Overview of 'referencing' in a SCIP notification for a hypothetical example (bicycle A)	19
Figure 11: Required data for the complex object component when using 'referencing'	21
Figure 12 : View of the 'Upload & submit' section on the ECHA Submission Portal	21

1. Introduction

The SCIP database is the database for information on Substances of Concern in articles as such or in complex objects (Products) established under the Waste Framework Directive (WFD). Article 9(1)(i) of the Waste framework Directive (WFD) requires any supplier of articles containing substances of very high concern (SVHCs) on the Candidate List in a concentration above 0.1% weight by weight (w/w) on the EU market to submit information, pursuant to REACH Article 33(1), on these articles or on complex objects incorporating such articles to ECHA, as from 5 January 2021. The required information is submitted to ECHA according to the SCIP format through the ECHA Submission Portal.

The information that needs to be included in a SCIP notification dossier is explained in detail in the SCIP information requirements document and in the data model document available on the dedicated [SCIP webpage](#) on ECHA website.

The SCIP notification obligation applies to articles as such containing a Candidate List substance above 0.1% w/w and to complex objects incorporating such articles.

This document describes technical solutions that can be used on a voluntary basis to make it possible for suppliers of articles (e.g. distributors, 'assemblers') to refer to data already submitted to ECHA by other duty holders. These tools facilitate the submission of SCIP notifications to ECHA, while keeping consistency on the information to be submitted, by avoiding multiple reporting of the same data and thereby limit unnecessary administrative burden for duty holders.

The two tools that can be used to refer to information already successfully submitted to the SCIP database are:

1. The simplified SCIP notification (SSN)
2. The 'referencing' in a SCIP notification dossier.

Section 2 of this document is focused on SSN, which has been primarily developed to be used by distributors (who are not importers), while section 3 focus on 'referencing', which has been primarily developed to be used by 'assemblers' who place complex objects on the EU market. An 'assembler' is an actor in the supply chain who makes complex objects (i.e. objects made up of more than one article).

SSN and 'referencing' are simplified solutions to submit on a voluntary basis SCIP notifications to ECHA, instead of submitting a *full* SCIP notification dossier including all the required information

In this document, the term '*full* SCIP notification' is used to refer to a SCIP notifications that contains a IUCLID dossier including all the required information for an article as such or a complex object.

The simplified SCIP notifications (SSN) do not require the submission of a IUCLID dossier.

The 'referencing' in a SCIP notification dossier allows the creation of a "*light-weight*" SCIP notification dossier as the information related with the complex object component(s) is only a reference to data already submitted to ECHA.

Suppliers of articles after submitting successfully a SCIP notification through the ECHA Submission Portal receive an alphanumeric identifier – the SCIP number – included in the submission report. The SCIP number is a unique identifier of the SCIP notification made by a submitter for an article as such or a complex object. It identifies the set of information submitted to ECHA by a submitter for an article or complex object under Article 9(1)(i) of the WFD.

The SCIP number remains the same in case the duty holder submits an update of the SCIP notification for an article as such or complex object, i.e. when an updated SCIP notification dossier is submitted to ECHA.



 The SCIP number is included in the submission report for a successful submission of a SCIP notification as shown in Figure 1.

Figure 1: Submission report for a SCIP notification

Submission status: Succeeded 			
Dossier type:	SCIP notification	Submitted by:	Company 1
Submission number:	RMH864896-90		
Submitted IUCLID version:	6_4		

Submission information		Submission events	
SCIP number	5b136626-b763-4238-8014-79e5e50f57b9	28/07/2020 01:07	Dossier submitted
Article name	Bicycle A	28/07/2020 01:07	Dossier passed validation checks
EAN (European Article...)	56#####1		
Dossier name	Bicycle A SCIP dossier		
Dossier UUID	160f1c43-c8ff-4c39-93e3-99cb970cb17e		
File name	160f1c43-c8ff-4c39-93e3-99cb970cb17e.i6z		
Notification type	Initial		

The SCIP number is not disseminated by ECHA. Both SSN and 'referencing' tools require the communication on a voluntary basis of the SCIP number of a notification for an article or complex object by the submitter to another duty holder, e.g., when relevant, together with the information communicated under REACH Art 33(1).

By providing the SCIP number of the submitted notification to ECHA to the recipients of the article as such or complex object, for instance as an element of the information to be communicated under REACH Article 33(1), a direct upstream supplier is contributing to facilitate the SCIP notification submission by its customers.

SSN and 'referencing' may only be used if the articles as such or complex objects subject to the SCIP notification including all required information (*full* SCIP notification) are the same as the article or complex object that are notified in the SSN or the referencing, i.e. it has the same chemical composition and physical form (shape, surface and design). Additionally, in the case of SSN, the reported identifiers in the *full* SCIP notification are required to be kept the same and made available as commercial identifiers to all downstream actors.

When a duty holder updates a SCIP notification that has been referred by other duty holders using SSN and 'referencing', all the referred notifications are updated too. Therefore, if the update submitted by the duty holder making the *full* notification is relevant for the duty holder using the SSN or referencing, the later does not need to update its SCIP notification. However, if this is not the case, the duty holder using the SSN or referencing will have to update its SCIP notification. If an update would be needed in certain situations, then in the case of SSN, it would require for instance the submission of a new SCIP notification including a SCIP notification dossier, and in the case of 'referencing', it would require for example the replacement of the SCIP number for the complex object component by another SCIP number or by inserting data for that complex object component in the SCIP notification dossier.

A duty holder is always responsible for the accuracy of the information submitted to ECHA and the compliance with the SCIP notification obligation. This obligation continues even when using SSN or 'referencing' tools, as reflected in chapter 3.2.1 of the [Guidance on requirements for substances in articles](#) which states the following concerning the communication obligations under

REACH Article 33: 'The communication obligations arise from the presence of the Candidate List substance in the article. These obligations apply regardless of whether or not the supplier is aware of the presence of the substances. Therefore, it is in the interests of the supplier to seek information on the presence of Candidate List substances.'

It is up to the individual actors in the supply chain, or otherwise, to enter into the necessary arrangements, if considered needed, to use these voluntary tools to fulfill the SCIP notification obligation.

2. Simplified SCIP Notification

The simplified SCIP notification (SSN) is a tool developed by ECHA to facilitate the fulfilment of the SCIP notification obligation without preparing a IUCLID dossier. It is a simplified solution to refer, on a voluntary basis, to information already submitted to ECHA by submitting the relevant SCIP number through the ECHA Submission portal.

The most common scenario of use of SSN is the case of a distributor making reference to the SCIP notification including all required information submitted by an actor in the supply chain that has the primary knowledge of the article.

Actors in the supply chain with a role of producer, importer or assembler of an article as such or complex object should have the primary knowledge of the necessary information to submit a SCIP notification dossier to ECHA including all required information. This is for example the case of:

- a producer of an article producing an article as such from a Candidate List substance or from a mixture containing in its composition a Candidate List substance,
- a producer or assembler that incorporates a Candidate List substance in one or more articles in a further processing step,
- or an assembler who incorporates components and subcomponents with articles as such containing a Candidate List substance.

It is also the case of importers, because they are the first actor in the supply chain having the obligation to gather all the necessary information to comply with their duties, namely the required information to be communicated down the supply chain under REACH Article 33(1) and to be submitted to ECHA in a SCIP notification dossier under Article 9(1)(i) of the WFD.

A duty holder who submits a simplified SCIP notification remains responsible for the information referred to in the submitted SSN.

A pre-condition to use SSN is to receive the SCIP number of the article as such or complex object's SCIP notification already submitted to ECHA.

The SSN may only be used if the article as such or the complex object subject to the SCIP notification including all required information (*full* SCIP notification) is the same as the article or complex object that is notified in the SSN.

- An article as such subject to the SCIP notification including all required information is the same as the article notified in the SSN if there is no change in the physical form (shape, surface and design) and in its chemical composition.
- The complex object subject to the SCIP notification including all required information is the same as the complex object notified in the SSN if:
 - o the articles as such incorporated in it have no change in the physical form and in their chemical composition;
 - o and its components and subcomponents (complex objects), incorporating those articles as such, are kept the same.

In addition to these criteria, the identification elements (identifiers), i.e. names, alphanumeric identifiers, and article category, of the article as such or complex object (product) supplied must be the same.

If those criteria are met, the supplier of the article or complex object can submit a simplified SCIP notification, by referring to the data successfully submitted to ECHA by other duty holder (e.g. an upstream supplier) through the submission in the ECHA Submission Portal of the SCIP

number received¹.

The main target users of the simplified SCIP notification (SSN) are **distributors**. However, other duty holders supplying articles or complex objects fulfilling the above mentioned criteria may also use this tool.

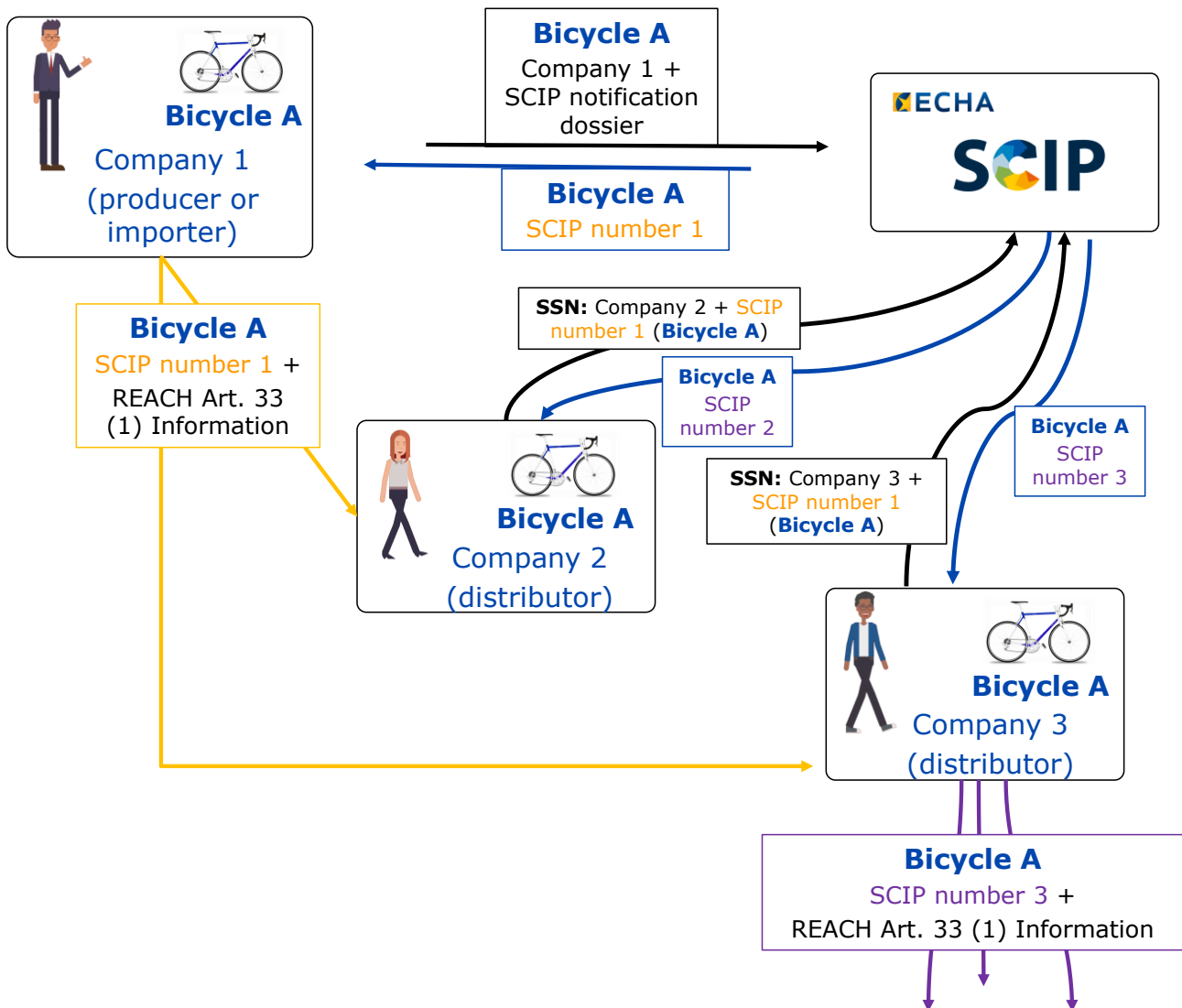
Submitted simplified SCIP notifications (SSNs) for a specific article or complex object do not impact the information disseminated by ECHA for that article or complex object.

¹ It is up to the individual actors in the supply chain, or otherwise, to enter into the necessary arrangements, if considered needed, to use these voluntary tools to fulfill the SCIP notification obligation.

2.1 How does a simplified SCIP notification work?

To better understand how the simplified SCIP notification (SSN) may work in practice, sequential steps are listed and explained in detail below with the support of an hypothetical example (bicycle) as shown in Figure 2.


Figure 2: Simplified SCIP notification overview for the hypothetical bicycle (Bicycle A) example.



1. Company 1 (e.g. 'assembler' or importer of Bicycle A) places on the EU market Bicycle A, which incorporates at least one article as such containing a Candidate List substance in a concentration above 0.1% w/w. Company 1 submits a SCIP notification dossier for Bicycle A in the ECHA Submission Portal. As a result of a successful submission, Company 1 receives from ECHA, in the submission report (see Figure 1), the SCIP number 1 for the notification of 'Bicycle A'. The submission report includes, among others:
 - o the status of the notification;
 - o the attributed SCIP number of the notification (for Bicycle A);
 - o the submission number;

- the name, primary article identifier type and value of the Bicycle A;
- the notification type (Initial or Update);
- and the submission events.

If Company 1 submits an updated SCIP dossier for 'Bicycle A' to ECHA, the SCIP number 1 for the updated SCIP notification remains the same in the submission report. However, another submission number is attributed to that update and the notification type appears as 'Update'.

 Additional information on how to create a dossier is available on the document "SCIP Notification Format - Preparing a SCIP dossier" and on the document "SCIP Database Notifications - How to prepare and submit a SCIP notification" available at the dedicated [SCIP webpage](#) on ECHA website.

2. Company 1 (e.g. 'assembler' or importer of Bicycle A) provides the SCIP number 1, received in the SCIP notification report, to customers, Company 2 and Company 3, the next recipients of Bicycle A in the supply chain. The SCIP number 1 is communicated on a voluntary basis by Company 1 to these companies, e.g. together with the information communicated down the supply chain under REACH Art. 33(1). It makes it possible for Company 2 and Company 3 to submit a SSN, in case they supply the same Bicycle A further down in the supply chain (e.g. if they are distributors).
3. Company 2 and Company 3, which are distributors, need to submit a SCIP notification for Bicycle A to ECHA. Since they received the SCIP number 1 from Company 1, corresponding to its notification to ECHA of a SCIP notification dossier with all the necessary information for Bicycle A, and are supplying further down in the supply chain the same Bicycle A received, they can submit a SSN. Therefore, Company 2 and Company 3 submit a simplified SCIP notification (SSN) by submitting the SCIP number 1 received from the supplier (Company 1) in the ECHA Submission Portal. Companies 2 and 3 do not need to prepare and submit an IUCLID dossier with the information for Bicycle A, because that information has been already submitted to ECHA by Company 1.

By submitting an SSN to ECHA, Company 2 and Company 3 are referring to the data included in the successfully submitted SCIP notification to ECHA by Company 1, their upstream supplier. These companies are still responsible for the information submitted to ECHA and by complying with the SCIP notification obligation.


 Figure 3 shows how to make an individual submission of a simplified SCIP notification (SSN) in the ECHA Submission Portal: (1) go to the dedicated section identified as 'Simplified SCIP notification'; (2) insert the SCIP number (UUID format) communicated by the upstream supplier in the 'SCIP number' field and click 'Submit'.

Figure 3: ECHA Submission Portal view and submission of a Simplified SCIP notification (SSN)

The image shows two screenshots of the ECHA Submission Portal. The top screenshot displays a search results page for 'Simplified SCIP notification'. A red box highlights the 'Simplified SCIP notification' link in the navigation bar, with a red circle containing the number '1' and an arrow pointing to it. The search results table lists three entries:

SCIP number	item number	Dossier type	SCIP notification
4c0ef0c3-85b9-4782-bbf8-25c702b20bb4	O-ring 15x2.0B-15x2.0G-20x3.5B-20x3.5G-20x5.0B-...	SCIP notification	SCIP
b4293bb5-779d-470b-bded-59de8fdb1c13	Vehicle Identific... 1X8GD09ABKX000122	SCIP notification	SCIP
03569c17-51d6-4260-9ee9-f3ac4a3ea6bc	catalogue number CAT456	SCIP notification	SCIP

The bottom screenshot shows the 'Individual submission of a simplified SCIP notification' form. A red box highlights the 'SCIP number' input field and the 'Submit' button, with a red circle containing the number '2' and an arrow pointing to the 'Submit' button. The input field contains the value '94683f5a-1d60-4c19-b6c0-e4dabc3c0040'.

4. After submitting a successful Simplified SCIP notification (SSN), Company 2 and Company 3 receive their own SCIP numbers in their submission reports, the SCIP number 2 and the SCIP number 3 respectively. No data for Bicycle A is being submitted by these companies in their SSNs, they are just referring to the data included in the successfully SCIP notification submitted to ECHA by Company 1.



The submission report of a SSN includes, among others:

- the status of the notification
- the attributed SCIP number of the notification
- the SCIP number used to submit the SSN (Referenced SCIP number)
- The name, primary article identifier type and value of the article that the notifier has referred to.

SSN submitters, companies 2 and 3 are recommended to confirm the identifiers, including the names, included in the submission report to cross-check that this information is the same to the information provided by their upstream supplier, company 1 under REACH Article 33(1).





 The dissemination of SCIP data is foreseen for early 2021. Until then, submitters have to rely on the information received, e.g. from their upstream suppliers.


Figure 4: Submission report for a successful Simplified SCIP Notification (SSN)

Submission status: Succeeded 			
Dossier type:	SCIP notification	Submitted by:	Test_Company2
Submission number:	RMH148726-13		
Submitted IUCLID version:	N/A		
Submission information		Submission events	
SCIP number	<u>1ac20926-89bd-4023-8d9a-f5ea6290d27d</u> 	29/07/2020 18:45	Dossier submitted
Referenced SCIP num...	5b136626-b763-4238-8014-79e5e50f57b9	29/07/2020 18:45	Dossier passed validation checks
Article name	Bicycle A		
EAN (European Article...	56#####1		
File name			
Notification type	Initial		

- Company 2 and Company 3 may provide respectively the SCIP number 2 and the SCIP number 3, received in their SCIP notification reports concerning their SSNs for Bicycle A, to their customers, i.e. the next recipients of Bicycle A in the supply chain, as illustrated in Figure 2 for Company 3. The SCIP number 2 or 3 are communicated respectively on a voluntary basis by Company 2 or Company 3 to their customers e.g. together with the information communicated down the supply chain under REACH Art. 33(1) to those customers to make use of the SSN, in case they supply the same Bicycle A further down in the supply chain (e.g. if they are distributors).

 ECHA strongly discourages communicating or disclosing inadvertently SCIP numbers others than those provided to duty holders in their own submission reports of their SCIP notifications or Simplified SCIP Notifications.

- The customers of Company 2 and Company 3 which are for instance distributors provide respectively the SCIP numbers they received in their SCIP notification reports concerning their SSNs for Bicycle A, to their customers, i.e. the next recipients of Bicycle A in the supply chain, to make it possible for them to use the SSN, and so on.

 In the example illustrated in Figure 2, if Company 1 updates its notification for Bicycle A, Companies 2 and 3 and all other duty holders down the supply chain that submitted a Simplified SCIP Notification do not need to re-submit or update their notifications, as long as the update is relevant for them. However, Company 1 should communicate the changes in the updated dossier submitted to ECHA for instance as part of the information communicated under REACH Article 33(1) to Companies 2 and 3. These companies should pass on this information to the next actors in the supply chain, and so on.

2.2 Submission of simplified SCIP notifications in bulk

A supplier of articles as such or complex objects may often place on the EU market several articles or complex objects subject to the SCIP notification obligation. When a supplier has submitted multiple SCIP notifications corresponding to those articles or complex objects, this actor can export relevant submission information for one or several SCIP notifications to an excel file in the ECHA Submission Portal, as shown in Figure 5.

Figure 5: 'Export to Excel' functionality in ECHA Submission Portal allows the export of SCIP numbers of many submissions, as well as other submission information.

The screenshot shows the ECHA Submission Portal search interface. At the top, there are navigation links: Search | Upload & submit | Create dossier online | Simplified SCIP notification. Below this is a search criteria section with several input fields and dropdown menus:

- Search criteria (dropdown)
- Submission number:
- Submission status:
- Dossier type:
- Submission date: from to
- SCIP number:
- Notification type:
- Primary identifier:
- I am looking for:
- Names:

At the bottom of the search criteria section, there are 'Search' and 'Clear' buttons. A blue box highlights the 'Export to Excel' button in the top right corner. A callout box points to this button with the text: "Export to an excel file submission information, e.g. SCIP number(s), for one or more SCIP notifications."

Below the search criteria, it says "Page 1 of 15 results". There are two search results shown:

RMH563993-00	13/07/2020 18:31
SCIP number	b657d351-d95a-4b6f-959b-985b9f2918b7
catalogue number	8d14b4b8-d068-45ea-b764-d257547c7426
Names	Dossier 1, Bicycle RR 367
Dossier type	SCIP notification
	SCIP
RMH110117-39	13/07/2020 18:20

The submission information exported to the excel file from the ECHA Submission Portal includes for example the SCIP number, the name of the article or complex object, the primary article identifier type and value, the submission number, the submission date and the submission type.

A supplier of articles as such or complex objects (e.g. producer, importer, assembler, distributor) can provide, on a voluntary basis, the SCIP numbers of those articles or complex objects to its customers, the recipients of the articles or complex objects, e.g. as part or together with the information communicated down the supply chain under REACH Art. 33(1). The SCIP numbers and other relevant submission information associated to each of those numbers, such as the name of the article or complex object, the primary article identifier type and value, included in the excel file generated by using the 'Export to Excel' functionality can be provided in bulk to customers.

Actors in the supply chain who receive several SCIP numbers for articles as such or complex objects which have been supplied to them, and who can submit simplified SCIP notifications (SSN) (see section 2.1), for instance distributors, can upload an excel file including many SCIP numbers at once and submit SSNs in bulk.

In the ECHA Submission Portal, under the section 'Simplified SCIP notification' (see Figure 6), a company (e.g. distributor) that submits simplified SCIP notifications for several articles as such or complex objects has two possible ways of submitting the simplified SCIP notifications:

1. submit simplified SCIP notifications in bulk by uploading an excel file;
2. submit an individual simplified SCIP notification for each article or complex object at a time, by inserting a single SCIP number in the respective field.

Figure 6: View of the 'Simplified SCIP notification' section in the ECHA Submission Portal

The screenshot shows the ECHA Submission Portal interface. At the top left is the ECHA Submission portal logo. At the top right are icons for help, notifications, and a user profile labeled 'Test_Company1'. Below the navigation bar, there are links for 'Search', 'Upload & submit', 'Create dossier online', and 'Simplified SCIP notification'. The main content area is divided into two sections:

Upload and submission of simplified SCIP notifications in bulk

Please upload information on the articles you wish to notify using an excel file including in each row

- A SCIP number (mandatory information)
- An Article name (optional)
- A Primary article identifier type (optional)
- A Primary article identifier value (optional)

! Please note that only Excel files are allowed to be uploaded and, currently, only simplified SCIP notifications can be submitted

Drop file to upload or Browse

Individual submission of a simplified SCIP notification

Please enter the SCIP number of the article you wish to notify and click "Submit" to send your Simplified SCIP notification

! Only one SCIP number can be submitted at a time.

SCIP number

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The excel file to be uploaded to submit simplified SCIP notifications in bulk contains at least in each row the SCIP numbers received of the articles or complex objects notified that are being referred. It is also possible to include in each row, the name of the article or complex object, the primary article identifier type and the primary article identifier value, but including this information is optional. After the upload of the file, as shown in Figure 7 (number 1), the content of uploaded excel file is shown in the ECHA Submission Portal window. If the information displayed is correct, the user can click on submit. After submitting the Simplified SCIP Notifications in bulk, a list of submission numbers are displayed in the ECHA Submission Portal window as shown in the same Figure (number 2).

In order to know whether the submissions in bulk were successfully submitted and to find the SCIP numbers attributed to the successfully submitted simplified SCIP notifications, the submitter should go to the submission report of each SSN or to the 'Search' section (landing page) of the ECHA Submission Portal as shown in Figure 8. From that section, the submitter can also access to the submission report concerning each SSN submitted, i.e. for each article or complex object notified to ECHA.



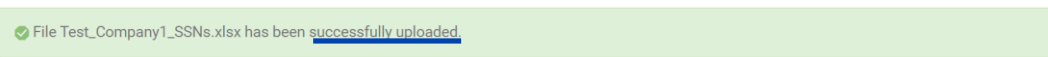
 The dissemination of SCIP data is foreseen for early 2021. Until then, submitters have to rely on the information received, e.g. from their upstream suppliers.

Figure 7: Submitting a 'Simplified SCIP notification' in bulk the ECHA Submission Portal

1  ECHA Submission portal

Search | Upload & submit | Create dossier online | Simplified SCIP notification

 File Test_Company1_SSNs.xlsx has been successfully uploaded.


5 records found

SCIP number	Article name	Primary article identifier type	Primary article identifier value
b657d351-d95a-4b6f-959b-985b9f2918b7	Bicycle A	catalogue number	8d14b4b8-d068-45ea-b764-d257547c7426
1ac20926-89bd-4023-8d9a-f5ea6290d27d	Bicycle RR	catalogue number	B-RR-123
c365b157-048e-4a35-983c-8723ab7a2c68	Wheel	EAN (European Article Number)	96#####3
a565a608-acd4-4b8d-acf0-6c06e8f33d58	Tyre 367	part number	123456aa
f83a5f59-c6c1-4430-b2d2-8d69b638106c	Tyre 366	part number	234567ab

Cancel Click "Submit" to send your submission(s). **Submit**

The portal displays the records uploaded from the excel file. If the list includes the correct values click on 'Submit'.

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2  ECHA Submission portal

Search | Upload & submit | Create dossier online | Simplified SCIP notification

5 out of 5 records submitted

Submission number	SCIP number	Article name	Primary article identifier type	Primary article identifier value
RMH103943-24	b657d351-d95a-4b6f-959b-985b9f2918b7	Bicycle A	catalogue number	8d14b4b8-d068-45ea-b764-d257547c7426
RMH553864-07	1ac20926-89bd-4023-8d9a-f5ea6290d27d	Bicycle RR	catalogue number	B-RR-123
RMH336945-09	c365b157-048e-4a35-983c-8723ab7a2c68	Wheel	EAN (European Article Number)	96#####3
RMH680592-07	a565a608-acd4-4b8d-acf0-6c06e8f33d58	Tyre 367	part number	123456aa
RMH734962-04	f83a5f59-c6c1-4430-b2d2-8d69b638106c	Tyre 366	part number	234567ab

[New Submission](#)

Following submission, a 'Submission number' is assigned to each set of data in each row uploaded (i.e. for each article or complex object notified).

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Figure 8: Summary of the status of Simplified SCIP Notifications submitted in the ECHA Submission Portal.

(The dashed square highlights a failed SSN submission marked as **✘**).

The screenshot shows the ECHA Submission Portal interface. At the top left is the ECHA logo and 'Submission portal' text. On the top right are icons for help, notifications, and a user profile labeled 'Test_Company1'. Below the navigation bar, there are links for 'Search', 'Upload & submit', 'Create dossier online', and 'Simplified SCIP notification'. The 'Search' link is circled in red. The main content area displays search results for 'Simplified SCIP notification'. It includes a search criteria dropdown, an 'Export to Excel' button, and a 'Sort by' dropdown set to 'Newer first'. The results list three entries:

Notification ID	Status	Submission Date
RMH734962-04	✓	31/07/2020 22:29
RMH680592-07	✓	31/07/2020 22:29
RMH336945-09	✘	31/07/2020 22:29

The entry for RMH336945-09 is highlighted with a dashed red square. Below the notification ID, the following details are visible:

SCIP number	fe4cb340-d944-4648-abfa-0ca6d86adcc5	part number	
Names	Tyre 366	Dossier type	SCIP notification

For the failed entry (RMH336945-09), the following details are visible:

SCIP number	56f078ab-2ac0-401c-a15b-674963db0c78	Dossier type	SCIP notification
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3. 'Referencing' in a SCIP Notification

ECHA also developed a tool to make it possible for certain suppliers of complex objects, i.e. objects made up of more than one article, to refer, for one or several components in the complex object, to data already submitted to ECHA. This is dubbed "referencing".

This tool developed by ECHA aims at facilitating the management of data concerning the components (either articles as such or complex objects) of a complex object on the creation of an IUCLID dossier to submit a SCIP notification for the complex objects. For example, a bicycle is a complex object with several components such as a wheel (complex object) and the handlebar grips (articles as such). The main target users of 'referencing' are assemblers or complex object producers that make complex objects and place them on the EU market.

For example, 'referencing' in a SCIP notification makes it possible for an assembler, on a voluntary basis, to refer to information on the complex object components (either articles as such or complex objects) already submitted to ECHA by an upstream supplier or by the duty holder itself, in the SCIP notification of its assembled complex object.

An assembler using 'referencing' can create a "light-weight" SCIP notification dossier of a complex object, where the complex object component information can be incorporated in the dossier by just inserting the SCIP number referring to the data already submitted to ECHA for that complex object component.

Further details are explained in the document 'SCIP Notification Format - Preparing a SCIP dossier' and on the document "SCIP Database Notifications - How to prepare and submit a SCIP notification" available at the dedicated [SCIP webpage](#) on ECHA website.

When submitting through the ECHA Submission Portal a SCIP notification dossier for a complex object using 'referencing' for one or more components of that complex object to data already submitted to ECHA, the duty holder (e.g. assembler) is still responsible for the information submitted to ECHA within that dossier and the compliance with the SCIP notification obligation, namely for the information referred to by using 'referencing'.

A pre-condition to use 'referencing' in a SCIP notification for an assembled complex object is to receive the SCIP number of the complex object component's SCIP notification already submitted to ECHA. For instance the SCIP number can be provided by the upstream supplier as an element of the information to be provided under REACH Art. 33(1)².

'Referencing' is only applicable if the component (article as such or complex object) to which the referencing is done is the same as the component for which the referencing is used. This is not the case, for example, where the component for which the referencing is used underwent any changes when incorporated in the complex object.

The most common scenario of use of the 'referencing' is the case of an assembler incorporating an article as such or a complex object into a complex object and referring to the data submitted in a SCIP notification by its upstream supplier for the incorporated article as such or complex object. In this case 'Referencing' is only applicable if the supplied article remains the same as a component in the assembled complex object, i.e. it does not undergo any changes when incorporated in the complex object.

- An article as such received is the same as the article incorporated in the assembled complex object if there is no change in the physical form (shape, surface and design) and in its chemical composition.

² It is up to the individual actors in the supply chain, or otherwise, to enter into the necessary arrangements, if considered needed, to use these voluntary tools to fulfill the SCIP notification obligation.

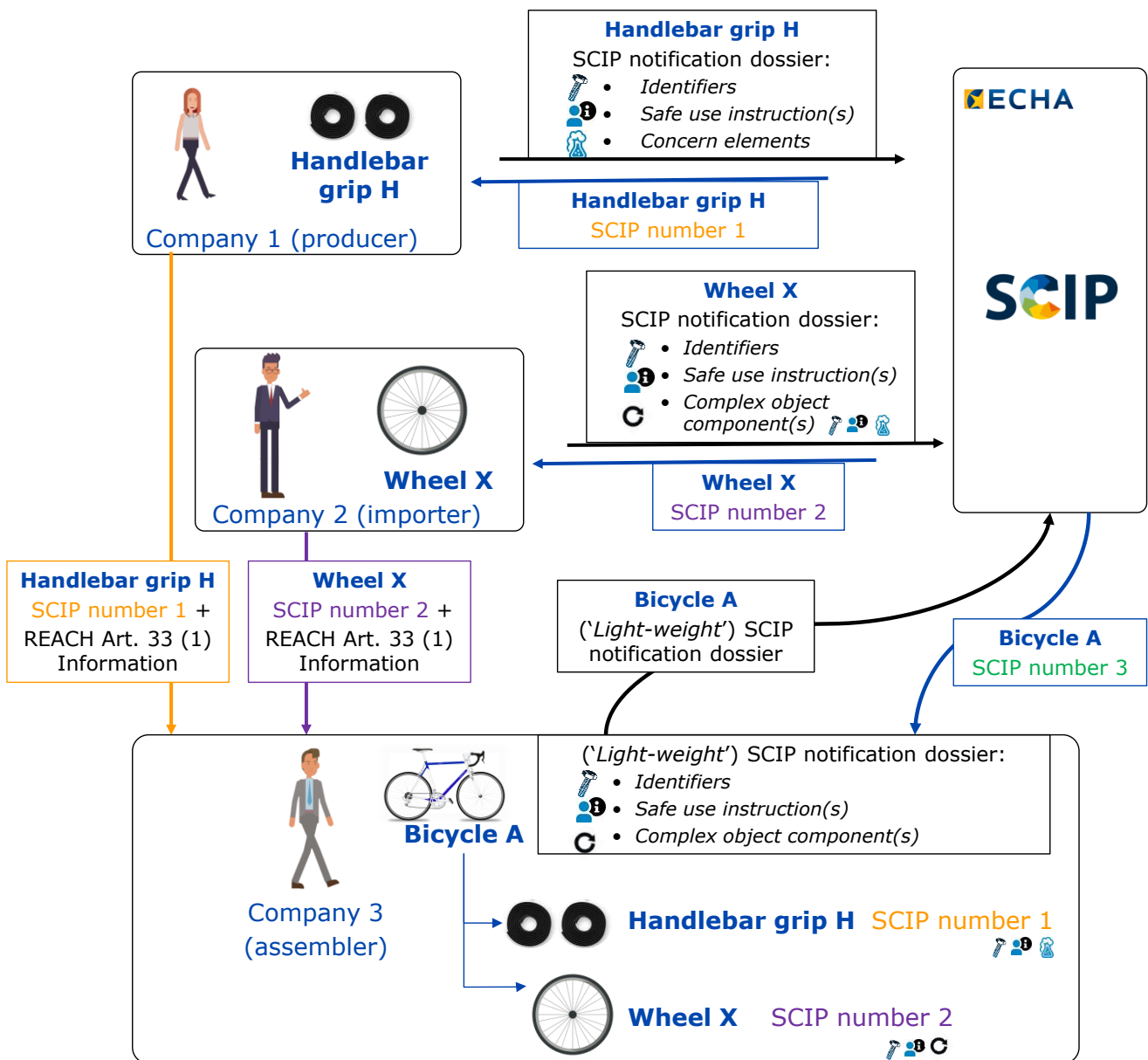
- A complex object (A) received is the same as the one incorporated in the assembled complex (B) if:
 - .5 there is no change on the physical form nor composition of any article in the complex object (A) used as a component when assembling complex object (B); and
 - .6 the components, subcomponents and articles in the complex object (A) used as a component in the assembled complex (B) are kept the same when assembling complex object (B).

The information disseminated by ECHA concerning a complex object SCIP notification dossier using 'referencing' for one or more components of that complex object includes the information contained in the dossiers already submitted to the SCIP database for those components that the dossier is referring to.

3.1 How 'referencing' works?

To better understand how 'referencing' in a SCIP notification may work in practice, sequential steps are listed and explained in detail below with the support of an hypothetical example (bicycle) as shown in Figure 10.


Figure 9: Overview of 'referencing' in a SCIP notification for a hypothetical example (bicycle A)



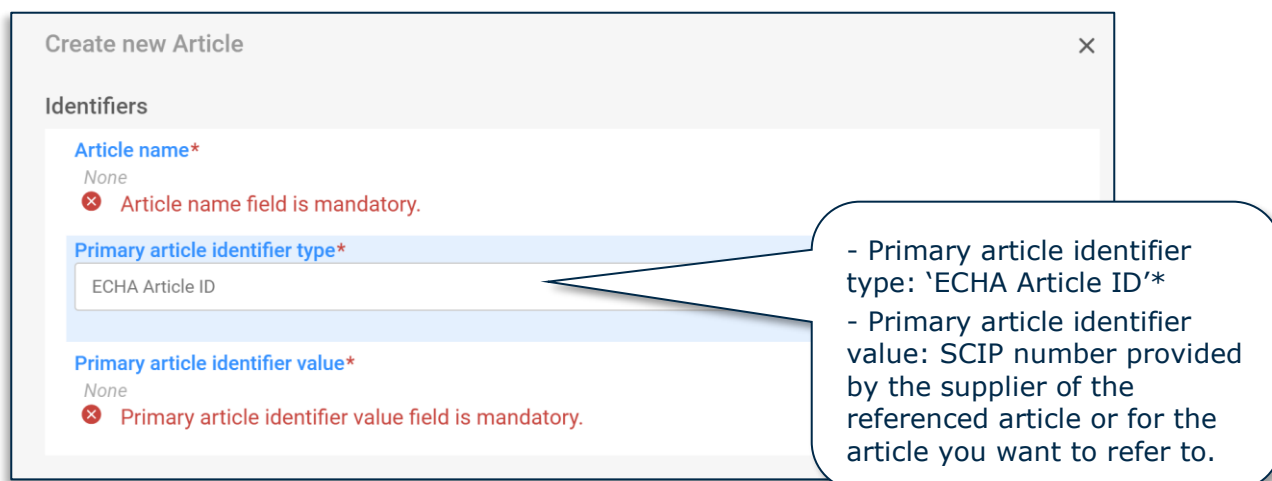
1. Company 1 produces handlebar grips, articles as such containing a Candidate List substance in a concentration above 0.1% w/w, and supplies them to Company 3 to be incorporated in a bicycle. Company 1 submits a SCIP notification dossier to ECHA for the handlebar grip H. As a result of the submission process Company 1 receives from ECHA a SCIP number 1 in the submission report (see Figure 2). The SCIP number remains the same in case Company 1 submits an update of this SCIP notification.

2. Company 2 imports Wheels, which incorporate at least one article as such containing a Candidate List substance in a concentration above 0.1% w/w, and supplies them to Company 3 to be incorporated in a bicycle. Company 2 submits a SCIP notification dossier to ECHA for the Wheel X. As a result of the submission process Company 2 receives from ECHA a SCIP number 2 in the submission report (see Figure 2). The SCIP number remains the same in case Company 2 submits an update of this SCIP notification.
3. Company 1 (producer of Handlebar grip H) and Company 2 (importer of Wheel X) provide respectively the SCIP number 1 and the SCIP number 2, received in the SCIP notification report, to customers, namely Company 3, the next recipients of the Handlebar grip H and the Wheel X in the supply chain. The SCIP number 1 and SCIP number 2 are communicated on a voluntary basis by Company 1 and Company 2 to Company 3 ('assembler' of Bicycle A), e.g. together with the information communicated down the supply chain under REACH Art. 33(1), to make it possible for Company 3 to prepare, using 'referencing', a SCIP notification dossier for Bicycle A.
4. Company 3, the assembler and supplier of Bicycle A, needs to submit a SCIP notification for Bicycle A to ECHA. Since Company 3 received the SCIP numbers 1 and 2 from Company 1 and Company 2, respectively, concerning their SCIP notifications to ECHA by submitting a SCIP dossier with all the necessary information for Handlebar grip H and Wheel X, it can prepare using 'referencing', a ' SCIP notification dossier for Bicycle A.

The preparation of a SCIP notification dossier for Bicycle A is done by creating an article dataset in IUCLID as explained in the document "SCIP Database Notifications - How to prepare and submit a SCIP notification. When using 'referencing' for Bicycle A SCIP notification dossier, Company 3, instead of inserting all the information concerning the Bicycle A components (Handlebar grip H and Wheel X) under the complex object component(s) section, reports only the SCIP numbers 1 and 2 for these components received from Company 1 and Company 2, respectively, as shown in Figures 10 and 11, and explained in the above mentioned document.

 Figure 11 shows the data that must be inserted for a complex object component when using 'referencing' in IUCLID. The duty holder must include:

- the article name for the complex object component (meaningful name for the company preparing the data, Company 3),
- select as primary article identifier type "ECHA Article ID"*,
- and include the SCIP number provided by the upstream supplier of the complex object component under the 'Primary article identifier value' field.

Figure 10: Required data for the complex object component when using 'referencing'

Create new Article

Identifiers

Article name*
None
Article name field is mandatory.

Primary article identifier type*
ECHA Article ID

Primary article identifier value*
None
Primary article identifier value field is mandatory.

- Primary article identifier type: 'ECHA Article ID'*
- Primary article identifier value: SCIP number provided by the supplier of the referenced article or for the article you want to refer to.

 *After October 2020 IUCLID release, the Primary article identifier type that needs to be selected is '**SCIP number**', which replaces 'ECHA Article ID' in the SCIP Prototype.

- Once the article dataset in IUCLID has been finalised for Bicycle A, i.e. all the required information has been inserted, including 'referencing' to the complex object components, Company 3 creates a SCIP notification dossier ('light-weight') for Bicycle A and submits it to ECHA in the ECHA Submission Portal (see Figure 12).


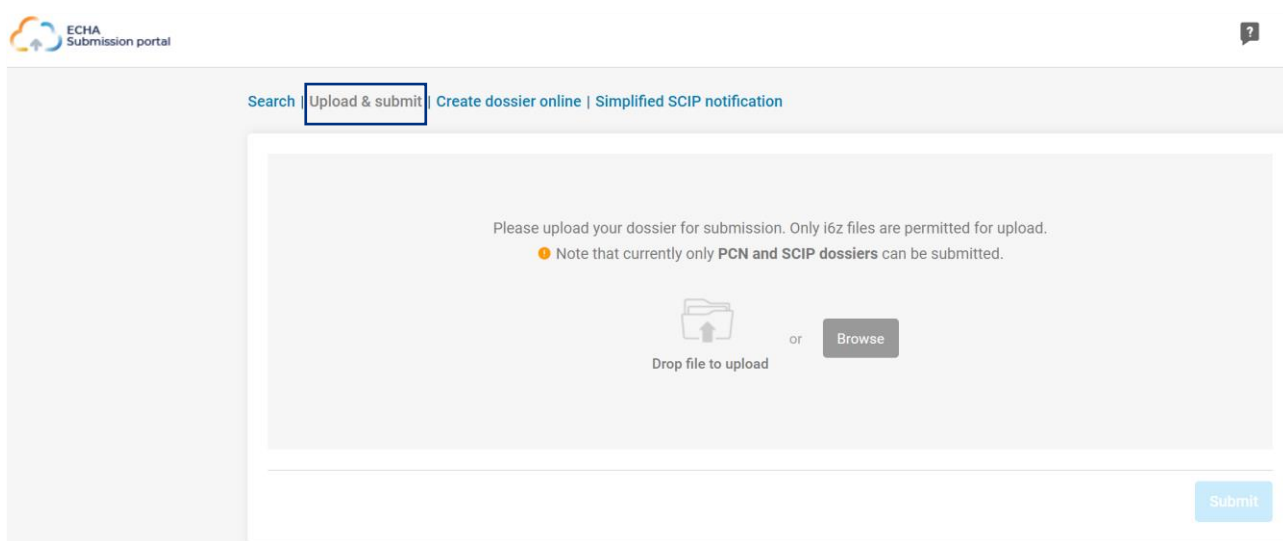
 Figure 12 shows the 'Upload & submit' section on the ECHA Submission Portal, where the submitter uploads and submits the created 'light-weight' SCIP notification dossier.

Figure 11 : View of the 'Upload & submit' section on the ECHA Submission Portal

ECHA Submission portal

Search | Upload & submit | Create dossier online | Simplified SCIP notification


Please upload your dossier for submission. Only i6z files are permitted for upload.


Note that currently only PCN and SCIP dossiers can be submitted.

Drop file to upload or Browse


Submit


6. After a successful submission of the SCIP notification dossier (*'light-weight'*) for Bicycle A in the ECHA Submission Portal, Company 3 receives from ECHA, in the submission report (see Figure 2), the SCIP number 3 for the notification of 'Bicycle A'. This submission report includes, among others:
- the status of the notification;
 - the attributed SCIP number of the notification (for Bicycle A);
 - the submission number;
 - the name, primary article identifier type and value of the Bicycle A;
 - the notification type (Initial or Update);
 - and the submission events.
 - Identifiers of the complex object components*


 It is recommended to submitters of a SCIP notification using 'referencing' (e.g. Company 3) to ensure that the **identifiers**, including the names, in the submission report of their notification (e.g. Bicycle A) for those components that the dossier is referring to are the same as those identifiers provided by the suppliers (e.g. Company 1 and Company 2) as part or together with the information communicated under REACH Article 33(1). The submitters of the dossier using 'referencing' are also expected to ensure that **the information referred to** when using 'referencing' is the same as or coherent with the information provided by the upstream supplier under REACH Article 33(1).

 *the inclusion of this information in the submission report is under construction.

7. After receiving from ECHA, in the submission report of a successful submission, the SCIP number 3 for the notification of 'Bicycle A', Company 3 can provide on a voluntary basis this SCIP number to customers, e.g. together with the information communicated down the supply chain under REACH Art. 33(1), to make it possible for them to make use of the simplified SCIP notification (SSN), in case they supply the same Bicycle A further down in the supply chain (e.g. if they are distributors), as explained in section 2 of this document.

 Additional information on how to create a dossier including 'referencing' is available on the document "SCIP Notification Format - Preparing a SCIP dossier" and on the document "SCIP Database Notifications - How to prepare and submit a SCIP notification" available at the dedicated [SCIP webpage](#) on ECHA website.

 In the example illustrated in Figure 10, if Company 1 updates its notification for handlebar grip H, Company 3 does not need to re-submit or update their notification, as long as the update is relevant for him. However, Company 1 should communicate the changes in the updated dossier submitted to ECHA for instance as part of the information communicated under REACH Article 33(1) to Company 3. These companies should pass on this information to the next actors in the supply chain, and so on.

 The dissemination of SCIP data is foreseen for early 2021. Until then, submitters have to rely on the information received, e.g. from the upstream supplier.

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