Webinar: Introducing the SCIP database prototype

Questions and answers transcript

ECHA organised a webinar on 17 March 2020 on the SCIP database prototype. It gave an update on the latest and upcoming developments for notifying articles containing Candidate List substances and included a demo on how to create and submit a SCIP notification, following the launch of the SCIP database prototype in 17 February 2020.[1]

SCIP is a database for information on substances of concern in articles as such or in complex objects (products) established under the Waste Framework Directive. Companies supplying 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 have to submit information on these articles to ECHA, as of 5 January 2021.

Find our SCIP database webpage at echa.europa.eu/scip-database.

[1] Towards circular economy: test our database to track harmful chemicals in products (ECHA/NR/20/05): https://echa.europa.eu/-/substances-of-concern-in-products-database-try-out-the-prototy-1

This document compiles the questions and answers from the webinar. Many answers were drafted, revised or further elaborated after the webinar to further support companies in complying with the SCIP notification obligation. Some questions were similar or focused on the same topic, therefore many answers are repeated. The document will not be updated.

Disclaimer: These Q&As were submitted and addressed during the live SCIP Webinar Q&A session on 17 March 2020, and as such, some answers may not be fully clear or may not have been answered in full. Many answers were however drafted, revised or further elaborated after the webinar. The answers represent the opinion of the authors and are not an official position of the European Chemicals Agency (ECHA). ECHA accepts no responsibility or liability whatsoever arising out of, or in connection with, the use of these answers. If you require any further clarification then please contact ECHA as normal via the contact forms.

#	Question	Answer
1	Who or what mechanism will be put in place to ensure products are entered in SCIP before being sold?	The power to enforce the legal duties stemming from SCIP lies with the Member States. Their inspectors can enforce these obligations for products on the market. Please see Q&A 1611 (https://echa.europa.eu/support/qas-support/qas)
2	Will there be guidance documents produced on the 'foreign user' concept?	For more information on the 'foreign user', please consult Q&A 960 (https://echa.europa.eu/support/qas-support/qas) and the ECHA Accounts Manual (https://echa.europa.eu/manuals).
3	For companies that manage their substance of concern information in a less sophisticated way than IMDS, how does System to System notification work is it connected to product life cycle management systems?	For more information about System to system notification please see: https://echa.europa.eu/scip-prototype , there is a specific section for Service to service with supporting materials. Please be aware that the SCIP database only covers articles as they are placed on the market at a given point in time, it does not follow their service life (except if the notification is updated, because it is legally required or on a voluntary basis).
4	As an assembler are you supposed to wait until the supplier creates the SCIP dossier which you can use? Or does the assembler has to create their own submissions for each part that they buy?	This is left up to the supply chains to decide and agree. You may wait for your supplier to make the notification and then simply refer to their data or to enter the data yourself. If a SCIP notification dossier is not created (or has not yet been created) by the supplier, the obligation to notify still would apply to a duty holder with obligations to submit a notification to the SCIP database, e.g. an EU assembler. If your supplier agrees to share his dataset with you for the component (containing a SVHC substance on the candidate list at a concentration above 0,1% w/w), then you can wait for it to incorporate the complex object component in your notification (dataset). ECHA is currently working on a 'referencing' model to allow to refer to articles already notified when incorporated into a complex object. If your supplier is unable to provide the required data to you to then you will need to determine what data needs to go in the SCIP notification that needs to be generated. ECHA is assessing and implementing simplification mechanisms (e.g. simplified SCIP notification and referencing) which are being assessed and implemented which could be used by the actors in the supply chain, as presented briefly in the webinar. These are voluntary approaches. The supplier will need to inform the recipient about the SCIP number of his notification, on a voluntary basis as part of his approach to best support their costumers (by allowing them to use those mechanisms), e.g. simplified SCIP notification and referencing, as presented briefly in the webinar - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). How to use this SCIP number (online and offline) will be made available when the analysis has been finalised.
5	Are we no longer required to choose "Candidate List Version"? I saw it was crossed out in the presentation.	ECHA has re-evaluated this issue due to the confusion this field has caused, despite the requests from several stakeholders to include it. Most likely that field will be deleted from the SCIP information requirements document (available at https://echa.europa.eu/scip-support) and removed from the format (https://echa.europa.eu/scip-format) in their next update. Please see the presentation 'Planned IUCLID format changes' (https://echa.europa.eu/documents/10162/28639054/planned_iuclid_format_changes_en.pdf) presented in the SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). However, please consult periodically the SCIP webpage for an official confirmation.
6	ons is fixed and the requirement for ECHA to have a DB is fixed, the actual format for industry to submit	When there is a legal duty to submit data to an EU database, it is clear that the format of the database has to be followed. Furthermore, ECHA has the responsibility to **establish a database for the data to be submitted to it** by duty holders (pursuant to REACH Article 33(1)) and maintain it (Article 9(2) of the Waste Framework Directive). The

	notifications is not & therefore industry can submit (quite legally) in any format. It is not legally required for industry to POPULATE the ECHA DB?	ownership of the data belongs to the submitter (https://echa.europa.eu/legal-notice), i.e. ECHA cannot extract and/or structure (or even 'interpret') unstructured bulk information submitted in any format or document by all duty holders. The information submitted to the (SCIP) database is made available by ECHA to waste treatment operators and consumers as received, i.e. as submitted by the duty holder, in order to ensure that the information about the presence of substances of very high concern **is available** throughout the whole life cycle of products and materials, including at the waste stage (recital 38 of Directive (EU) 2018/851).
7	Where can I find article category list and safe use instructions?	The safe use instructions are provided as 'free' text. You can insert one or several instructions to allow the safe use of the article at all life cycle stages, including at the waste stage. For more information please consult Chapter 3.4.1. of the Guidance on requirements for substance in articles (https://echa.europa.eu/documents/10162/23036412/articles_en.pdf). For the article category, please see the presentation (slides 8-18) made on the IT User Group meeting of 6 February, available on the SCIP support webpage (https://echa.europa.eu/documents/10162/28213971/SCIP_Trials_feedback_%28I%29.pdf)
8	Will ECHA govern the Primary article number format?	Primary article identifier is a numerical or alphanumerical identifier assigned to the article as such or the complex object and identification of its type. Each notifier selects the most appropriate identifier. Type options: e.g. European Article Number (EAN); Global Trade Item Number (GTIN); Universal Product Code (GPC); Catalogue number; ECHA Article ID, part number. The SCIP database recognises that a submission is an update of a previously submitted notification based on the following elements: primary article identifier type, primary article identifier values and legal entity (LE). Therefore, the primary article identifier (type and value) is key to manage SCIP submissions and updates.
9	What should O-RING manufacturer submit?	Please find an (hypothetical) examples on the presentation of the IT user meeting of 21 January 2020 under the SCIP support webpage: 'SCIP project milestones, Tool Demo, SCIP Trials' - Link: https://echa.europa.eu/documents/10162/28213971/SCIP_IT_User_group_21_Jan_revised.pdf , and on the presentation of the IT user meeting of 20 March 2020 under the SCIP support webpage: 'SCIP IT user group 20 Mar - EXAMPLES' - Link: https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf .
10	Should Car manufacturer, Engine manufacturer and O-ring manufacturer submit same data of O-ring?	Yes. However, each one of these actors in the supply chain must also submit the information on the 'product' containing the O-ring that they are placing on the market. ECHA is working on an approach to facilitate the reference to data already submitted by the supplier of each component or subcomponent, the so called 'referencing' approach presented briefly in the webinar. However, it only works if the supplier provides voluntarily the recipient with an identifier provided by ECHA (e.g. in submission report). This is a voluntary approach. The supplier will need to inform the recipient about the SCIP number of his notification, on a voluntary basis as part of his approach to best support their costumer (by allowing them to use the simplification mechanisms which are being assessed and implemented by ECHA, e.g. referencing - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). How to use this number (online and offline) will be made available when the analysis has been finalised.
11	How do you know when no additional safe use information is needed?	The information required to be submitted to the SCIP database must already be communicated throughout the supply chain under REACH Article 33(1). The Guidance on requirements for substances in its subchapter 3.2.1 states that "If no particular information is necessary to allow safe use of the article containing a Candidate List substance, e.g. when exposure can be excluded at all life cycle stages of the article including disposal, as a minimum the name of the substance in question has to be communicated to the recipients of the article or to consumers." From this, there is no need to specify any safe use instructions (beyond the identification of the SVHC), when exposure can be excluded at all life cycle stages of the article including waste stage, but some discretion is left to the duty holder to evaluate whether safe use instructions are needed to ensure the safe use of the article as a result of the presence of

		Candidate List substances in it, or the safe use of complex objects (products) incorporating those articles as components. In this context, we also invite you to consult subchapter 3.4.1 of above mentioned Guidance. When preparing a SCIP notification, the safe use instructions as 'free' text can be inserted to allow the safe use of the article at all life cycle stages, including at the waste stage. For further details, please refer to "How to prepare and submit a SCIP Notification Dossier" document (https://echa.europa.eu/documents/10162/28213971/SCIP_Database_Notifications.pdf). The above mentioned Guidance is available at https://echa.europa.eu/guidance-documents/guidance-on-reach?panel=guidance-on-requirements-for-substances-in-articles#guidance-on-requirements-for-substances-in-articles
12	How can I import the Reference list into the ICLUID Cloud?	Please see slides 25-27 of the document 'How to prepare and submit a SCIP Notification Dossier' available on the SCIP support webpage (https://echa.europa.eu/documents/10162/28213971/SCIP_Database_Notifications.pdf)
13	Which format needed for import to ICLUID	For more information please read https://echa.europa.eu/scip-format
14	Is there a definition of "Production in EU"?	In this field, you are required to answer the question 'is the article produced or assembled in the EU?' If you produce or assemble an article in the EU you are an EU producer. If you also place the produced article on the EU market, you are an EU supplier.
15	Long live Material, built 20 years ago needs to be recycled, too. For this kind of material we won't have any information regarding legacy chemicals. Is there a plan to get the information for old materials too?	Unfortunately there is no easy way to deal with 'legacy products', but this should not stop us from starting now with better tracking of hazardous substances in products for the future. The SCIP database only covers articles (on their own or in complex objects) that are placed on the market from 5 January 2021. We allow and recommend suppliers of articles to update their notification (or submit a new one) on a voluntary basis if they are not supplying an article anymore on 5 January 2021 or later (legacy article or product), but they are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles they supplied previously, in particular if they foresee a high probability of the articles are still in use (based on an estimated time for the service life).
16	CL version is not required anymore?	ECHA has re-evaluated this issue due to the confusion this field has caused, despite the requests from several stakeholders to include it. Most likely that field will be deleted from the SCIP information requirements document (available at https://echa.europa.eu/scip-support) and removed from the format (https://echa.europa.eu/scip-format) in their next update. Please see the presentation 'Planned IUCLID format changes' (https://echa.europa.eu/documents/10162/28639054/planned_iuclid_format_changes_en.pdf) presented in the SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). However, please consult periodically the SCIP webpage for an official confirmation.
17	How will you be handling product families - If a company say produces a range of clothing - say jackets, the jacket contains an SVHC on a patch, the jacket is sold in multiple sizes - I would assume a single product declaration and use other ids for sizes	You need to provide enough information that allow the user of the database to be able to identify the 'location' of the article containing the Candidate List substance. The supplier is responsible for complying with the SCIP notification obligation (and with communication obligation under REACH Article 33(1)) and should take into consideration how to best support their costumers (by allowing them to use the simplification mechanisms which are being assessed and implemented by ECHA, as presented briefly in the webinar, e.g. simplified SCIP notification and referencing - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). ECHA would like to further discuss approaches with Stakeholders. ECHA invites you to submit to us your approach and real examples for further consideration on your case and more generally further discussion with stakeholders using our contact forms:

		echa.europa.eu/contact. We also invite you to look at the presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group).
18	The SCIP DB will not solve any of these problems. No recycler will be able to check the detailed info for each item he processes, neither for simple articles nor for complex objects	It is a legal requirement to submit information at the article level as explained in Q&A 1613 on our website (https://echa.europa.eu/support/qas-support/qas). The information to be submitted to ECHA must allow the user of the database to be able to identify the 'location' of the article containing the Candidate List substance (see the SCIP information requirements document available at https://echa.europa.eu/scip-support and Q&A 1612 on our website). We also invite you to look at the presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which was presented in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). The level of granularity and structure of the SCIP data needed seems to be different depending on the specific user group or subgroup under consideration, considering their specific needs.
19	Can you submit to the database with only mandatory information?	We recommend that you submit as much information as possible, if available to you. A successful submission does not necessarily mean a compliant submission of a SCIP notification. The information requirements are available on ECHA's website: 'Detailed Information Requirements for the SCIP database' document (https://echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf). Please see also Q&A 1612 (https://echa.europa.eu/support/qas-support/qas). In the coming weeks, we are planning to update the information requirements document with further clarifications about the mandatory, required and voluntary requirements, as briefly presented in the webinar (https://echa.europa.eu/-/introducing-the-scip-database-prototype). In order to prepare and submit a compliant notification, you should consider the legal text of both REACH and the Waste Framework Directive, the case law of the Court of Justice (case C-106/14), and the ECHA guidance on requirements for substances in articles, as agreed with Member States (regarding REACH Article 33(1)): https://echa.europa.eu/documents/10162/23036412/articles_en.pdf
20	Will ECHA be providing a checklist of information requirements? This would help a lot because we can provide it to companies who need to notify.	The information requirements are available on ECHA's website: 'Detailed Information Requirements for the SCIP database' document (https://echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf). Please see also Q&A 1612 (https://echa.europa.eu/support/qas-support/qas). In the coming weeks, we are planning to update the information requirements document with further clarifications about the mandatory, required and voluntary requirements, as briefly presented in the webinar (https://echa.europa.eu/-/introducing-the-scip-database-prototype). Please see also the document 'How to prepare and submit a SCIP Notification Dossier' available on the SCIP support webpage (https://echa.europa.eu/documents/10162/28213971/SCIP_Database_Notifications.pdf), which contains guidelines on how to fill in each data field.
21	We use internal only the 8-digits "Statistics Warennummer" not the 10-digits Taric. Can we use this 8 digits number?	The SCIP format accepts the selection of declarable CN/TARIC codes (and descriptions) with 6 digits (CN code), 8 digits (CN code) or 10 digits (TARIC code). The article category ensures a harmonised way to understand which category/family of product (article as such or complex object) is being submitted based on its function/use, which cannot be ensured by the article name on its own (free text field, submissions in different languages, meaningless names attributed for a user of the database).
22	What choices are used for origin when a product is produced in and outside Europe (a company have more the one production sight)?	Further SCIP Tool enhancements and further guidance is under preparation based on user feedback and will be available later in the year, it will include an additional option (Both EU produced and imported) on the field Production in European Union. Please see the presentation 'Planned IUCLID format changes' (https://echa.europa.eu/documents/10162/28639054/planned_iuclid_format_changes_en.pdf) presented in the SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group).The information requirements are available on ECHA's website: 'Detailed Information Requirements for the SCIP database' document

		(https://echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf). Please see also Q&A 1612 (https://echa.europa.eu/support/qas-support/qas). In the coming weeks, we are planning to update the information requirements document with further clarifications about the mandatory, required and voluntary requirements, as briefly presented in the webinar (https://echa.europa.eu/-/introducing-the-scip-database-prototype).
23	The burden can be simplified by respecting only what article "3 of REACH is requiring and what we already apply !!!	Thank you for your comment. Please see Q&A 1612 (https://echa.europa.eu/support/qas-support/qas) and the 'Detailed Information Requirements for the SCIP database' document (https://echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf) on ECHA's website. The information to be submitted should also allow all operators in the supply chain and consumers 'to make a supply choice in full knowledge of the properties of the products, including those of articles forming part of their composition' (judgement of the Court of Justice in case C-106/14, - paragraphs 77 to 79 - http://curia.europa.eu/juris/liste.jsf?language=en&td=ALL&num=C-106/14). A duty holder should consider the legal text (and the objectives) of both REACH and the Waste Framework Directive, the case law of the Court of Justice (case C-106/14), and the ECHA guidance on requirements for substances in articles, as agreed with Member States (regarding REACH Article 33(1)), when preparing a SCIP notification. We invite you to see the Questions and Answers which were published on the ECHA website (https://echa.europa.eu/support/qas-support/browse/-/qa/70Qx/view/topic/Waste+Framework+Directive+-+SCIP+database). A number of Q&As were provided by the European Commission to bring clarification on the scope of application of the legal duties related to Articles 9(1)(i) and 9(2) of the WFD (Commission non-paper on the implementation of articles 9(1)(i) and 9(2) of the revised Waste Framework Directive 2008/98/EC, distributed to the CARACAL and Waste Expert Group in June 2019, ref. Ares(2019)3936110).Following feedback received from stakeholders, and as briefly explained in the webinar, ECHA is planning to introduce some changes in the SCIP format and to further clarify the difference between mandatory data fields and those where an answer is "required". For those that are required, the requirement can be "waived" if data is not available (e.g. "no data"). For example, it is recommended that the appropriate concentration range must be selected when this information is available to the duty holder because it is relevant information to ensure the safe use of the article and its proper treatment at the waste stage, but if that information is not available the range >0.1% to 100% w/w can be selected. We also invite you to look at presentations: - 'Planned IUCLID format changes' https://echa.europa.eu/documents/10162/28639054/planned_iuclid_format_changes_en.pdf)- 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf) presented in the SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). In this context, we also invite you to consult subchapters 3.2.1 and 3.4.1 (including example 12) of the Guidance on requirements for substances in articles available on ECHA's website (https://echa.europa.eu/guidance-documents/guidance-on-reach?panel=guidance-on-requirements-for-substances-in-articles#guidance-on-requirements-for-substances-in-articles), as well as e.g. Appendix 5; Appendix 6, example 23. We also would like to invite you to take a look to the Forum's Final report on the Forum Pilot Project on Substances in Articles to check how enforcement actions are being implemented in Member States for REACH Article 33 (For SCIP enforcement see Q&A 1611) - https://echa.europa.eu/-/companies-need-to-improve-communication-of-hazardous-substances-in-products
24	Could you please confirm that the data submitted in the SCIP will only be made available only to waste	ECHA will publish the data submitted to the SCIP database and it will be publicly available and therefore readily available to waste operators to bridge the current gap in the information flow. ECHA will publish the information, as received, on its website. The quality of the data remains the responsibility of each duty holder. ECHA will not establish

	treatment operators and to consumer upon request? there is a false information circulating saying that all the data would also be made available to public	controls to access the submitted information. Please see also Q&A 1614 (https://echa.europa.eu/support/qas-support/qas). ECHA will ensure the protection of confidential business information where justified. For example, the required mandatory data that allow to establish links between actors in the same supply chain will not be made publicly available. Detailed information can be found in the presentation "Confidential business information & SCIP" (IT user group meeting of 5 November 2019) available at: https://echa.europa.eu/scip-it-user-group; and in the presentation "How to make the data available, ECHA view and protection of CBI" at the SCIP workshop of 12 November 2019 available at https://echa.europa.eu/-/scip-workshop-12-november-2019 (link: https://echa.europa.eu/documents/10162/28534369/6_scip_en.pdf) In conclusion, ECHA plans to make all submitted data available, except: a) the link between the notification and its submitter (Legal Entity); b) specific names (e.g. brand, model) or identifiers of components (of complex objects). Concerning point b), ONLY identifiers and names of articles as such or identifiers of top level articles (complex objects) will be disclosed. If you have specific concerns not addressed by the rules above, please submit them to us for further analysis using our contact forms: echa.europa.eu/contact.
25	What can I do if my supplier does not notify his simple article that contain the SVHC? How can I report my complex article?	This obligation (SCIP notification) like the communication down the supply chain (under REACH Art. 33(1)) applies regardless of whether or not you are aware of the presence of the Candidate List substances. It is in your interest to seek for all information you need from your supplier by all means possible. Otherwise you may be not compliant. Please see Chapter 5 of the Guidance on requirements for substances in articles available on ECHA website. The SCIP notification obligation under the Waste Framework Directive complements the already existing communication and notification obligations related to the "Candidate List substances" in articles, under Articles 33 and 7(2) of the REACH Regulation and should reinforce compliance with these obligations. It does not replace them. After 5 January 2021, companies are still required to comply with their communication and notification obligations under Articles 33 and 7(2) of the REACH Regulation. A supplier needs to communicate down the information to costumers (according to REACH Art. 33(1)) and also needs to submit a SCIP notification to ECHA. The mentioned Guidance is available at https://echa.europa.eu/guidance-documents/guidance-on-reach?panel=guidance-on-requirements-for-substances-in-articles#guidance-on-requirements-for-substances-in-articles. We also would like to invite you to take a look to the Forum's Final report on the Forum Pilot Project on Substances in Articles to check how enforcement actions are being implemented in Member States for REACH Article 33 (For SCIP enforcement see Q&A 1611) - https://echa.europa.eu/-/companies-need-to-improve-communication-of-hazardous-substances-in-products ECHA is currently working on several simplification mechanisms to prepare and submit SCIP notifications, such as the 'referencing' feature and we foresee it to be released at the end of October 2020 (next SCIP database version). This approach can only be used when your supplier provides voluntarily to you with an identifier provided by ECHA (e.g. in submission report). This is a voluntary approach that can be adopted by suppliers to support their customers in facilitating their work to submit SCIP notifications. Therefore, the implementation of the 'referencing' mechanism needs to necessarily follow the article in the supply chain since it is produced until it is incorporated in subcomponents and components and then being incorporated in the final complex object placed on the market to be installed and/or used. We also invite you to look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). More information on this will be made available later in the year.
26	After Validation I got a Warning, what does it mean? "The identifiers of the Candidate List substance are not correctly related. SCIP Database will use the 'ECHA Substance ID' in first	Please see our "Candidate List Package" webpage at https://echa.europa.eu/candidate-list-package It includes further details on how to provide the identification of the Candidate List substances in SCIP notifications. The information on Candidate List substances is provided in SCIP notifications by using a IUCLID reference substance entity. A reference substance is an entity in IUCLID that is used to identify a substance, in such a way that it may be re-used. A reference substance can be created in IUCLID, but we recommend you, as a SCIP notification submitter, to use the Candidate List reference substances package provided by ECHA for your SCIP notifications and to import it into your own IUCLID

	place to identify the Candidate List substance. "	instances: that the reported relevant identifiers are same in the ref. substance reported in the IUCLID compared how the substance is identified in Candidate list. (EC number, CAS number, IUPAC name and ECHA Substance ID are according to Candidate list). Therefore we recommend to download the official package of SCIP reference substances (which is created based on the Candidate list entries) and not to create the ref. substances on your own. However we did have a bug in the rule in the first IUCLID version and empty fields in some cases caused this rule to fail unnecessarily. This bug will be corrected in the next version of IUCLID.
27	Could you please elaborate on the answer on "product grouping" If the same type of products have different part numbers, how can they be grouped?	Grouping of variants into one article (one notification) is technically possible but obviously care needs be taken that this grouping does not undermine the purpose of the notification, i.e. enable safe use of the article, including at the waste stage. ECHA would like to further discuss approaches with Stakeholders. It is up to the duty holder to decide the best approach to submit a SCIP notification which is compliant with the obligation set out in the Waste Framework Directive and to support their costumers (by allowing them to use the simplification mechanisms which are being assessed and implemented by ECHA, as presented briefly in the webinar, e.g. simplified SCIP notification and referencing - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). ECHA would like to further discuss approaches with Stakeholders. Due to the diversity of articles as such and complex objects (incorporating articles), ECHA has developed the (IUCLID) SCIP format as a one-size-fits-all solution to cover all possible articles/products and has kept any constraints that would fail a submission to a minimum. This 'flexibility' provides a lot of discretion to duty holders on how to report data to the SCIP database, and allows different possibilities 'grouping'. A compliant level of reporting by a duty holder should consider the legal text of both REACH and the Waste Framework Directive, the case law of the Court of Justice (case C-106/14), and the ECHA guidance on requirements for substances in articles, as agreed with Member States (regarding REACH Article 33(1)): https://echa.europa.eu/documents/10162/23036412/articles_en.pdf The supplier is responsible for complying with the SCIP notification obligation (and with communication obligation under REACH Article 33(1)). There is no specific guideline at this moment other than to follow the above mentioned Guidance, which describes how to identify what information is necessary to compile and communicate to allow the safe use of an article (chapters 2 and 3; e.g. example 12; Appendix 5; Appendix 6, example 23). We also invite you to look at presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). Recommendations on how to use 'grouping' may have to be agreed with the Member states and the European Commission. However, ECHA invites you to submit us your approach and real examples for further consideration on your case and more generally for further discussion with stakeholders using our contact forms: echa.europa.eu/contact.
28	Will it be possible to extract data from the SCIP database - i.e. when one wants to search the SCIP database for already existing entries, e.g. from suppliers upstream of the supply chain? If yes, will it also be possible through the S2S approach?	The data is expected to flow down the supply chain, i.e. your supplier will need to share data with you. If you can refer to his submission you can also do this in S2S
29	If an old article is sent outside the EU for reparation and is then sent back to EU, do we need to register it?	If you are importing the article to place on the market then as the EU-importer you will need to make a SCIP notification. In this specific case, we recommend you to investigate in legal terms if this operation fulfils the definition of import under REACH.

30	Companies selling from abroad into EU market will be required to appoint a "responsible person" to accomplish this duty accordingly to regulation 2019/1020 ?	No, it does not work as under REACH regarding 'only representatives' or perhaps as provided in the mentioned Regulation. Responsibility for fulfilling the obligation of providing information to ECHA lies with the EU importers. Companies outside of the EU are not subject to this obligation and are not allowed to submit SCIP notifications. Please see Q&A 1610 (https://echa.europa.eu/support/qas-support/qas)
31	How much time would you estimate to fill in the required data for one article / subarticle?	Attending only to a particular notification, it varies greatly depending on the complexity of the article notified and whether you use referencing, i.e. a link to already notified information. The time taken to complete a notification will vary with experience and the complexity of the article or complex object. However, as articles are inputted, these 'components/sub-components' entries can be reused in subsequent complex objects that contain those exact same article/components.
32	When is it allowed to click the box "no need to provide safe use information"?	The information required to be submitted to the SCIP database must already be communicated throughout the supply chain under REACH Article 33(1). The Guidance on requirements for substances in its subchapter 3.2.1 states that "If no particular information is necessary to allow safe use of the article containing a Candidate List substance, e.g. when exposure can be excluded at all life cycle stages of the article including disposal, as a minimum the name of the substance in question has to be communicated to the recipients of the article or to consumers." From this, there is no need to specify any safe use instructions (beyond the identification of the SVHC), when exposure can be excluded at all life cycle stages of the article including waste stage, but some discretion is left to the duty holder to evaluate whether safe use instructions to ensure the safe use of the article as a result of the presence of Candidate List substances in it, or the safe use of complex objects (products) incorporating those articles as components should be provided on the SCIP notification. In this context, we also invite you to consult subchapter 3.4.1 of above mentioned Guidance. Based on your evaluation, if there is no need to provide or communicate safe use instructions to ensure the safe use of the article or product, then you can tick the box to declare that there is 'no need to provide safe use information beyond the identification of the Candidate List substance".
33	Is there a full list of the Taric code available, you would apply? Is it the import (10 digit) or export code (8 digit)?	The SCIP format accepts the selection of declarable CN/TARIC codes (and descriptions) with 6 digits (CN code), 8 digits (CN code) or 10 digits (TARIC code). The article category ensures an harmonised way to understand which category/family of product (article as such or complex object) is being submitted based on its function/use, which cannot be ensured by the article name on its own (free text field, submissions in different languages, meaningless names attributed for a user of the database). You can find all the lists of the IUCLID format in the SCIP Webpage/tools/SCIP format: SCIP format annex – Picklists: October 2019. (https://echa.europa.eu/scip-format).
34	We have one manufacturing entity in Europe and 26 sales entities. Do all sales entities have to register in the database and submit the same information or just a reference to all products that are already registered by the manufacturer?	The idea we are currently implementing, 'simplified SCIP notification' as presented briefly in the webinar, would allow the 26 sales entities (suppliers of articles/duty holders) to just notify that they also supplying the same articles, without submission of new data. We also invite you to look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group).
35	Showing as demo the concern element into an article is the easiest part. What about a demo regarding Complex Objects?	We will produce demo examples for complex objects as well. To be published later. We also invite you to look at presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group).
36	What happens if a business that notified an article to SCIP is sold to another legal entity?	ECHA is analysing this issue. At this moment in time, change of the legal entity will need a new submission of the SCIP notifications.

37	How can you see difference on old and new articles, where the SVHC substances has been removed, when you are using the same identification names and numbers for the article?	You can always update your notification after 5 January 2021, on a voluntary basis, if there are changes to the information already submitted, e.g. if you remove a Candidate List substance from a previously notified (component) article, for instance due to successful substitution effort, to indicate that the substance is no longer present. We allow and recommend suppliers of articles to update their notification (or submit a new one) on a voluntary basis if they are not supplying an article anymore on 5 January 2021 or later (legacy article or product), but they are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles they supplied previously, in particular if they foresee a high probability of the articles are still in use (based on an estimated time for the service life). The old notification itself will remain in the system, in order that dismantlers and waste sector operators can access the (historical) data. The SCIP database recognises that a submission is an update of a previously submitted notification based on the following elements: primary article identifier type, primary article identifier values and legal entity (LE). However, you are required to update your notification if (1) a substance present in an article already notified is included in the Candidate List after 5 January 2021; (2) that Candidate List substance is present in a (component) article of a complex object already notified (due e.g. to the presence of other component containing other Candidate List substance); In this case you need to identify the new components or subcomponents where this new Candidate List substance is present; (3) an already listed SVHC on the Candidate List substance is incorporated in one of the component articles, due to e.g. a change in production or you become aware of the presence of that substance. In these cases, the update has to be done at the time of any supply or placement on the market of the covered articles to any costumer or as a result of an import (from 5 January 2021 onwards). See also Q&A 1617 on our website (https://echa.europa.eu/support/qas-support/qas).
38	Please provide an example of a complex object with several CL substances in several subcomponents	A possible example of a complex object with several Candidate List substances in several subcomponents is a bicycle, as shown in slide 9 of the Webinar presentation (available at: https://echa.europa.eu/documents/10162/29143218/160320_webinar_introducing_SCIP_database_en.pdf/4aaccffb-2a34-14cb-6d60-a3492a4b0189). You may also wish to look at example 23 in Appendix 6 (p. 101-108) of the Guidance on requirements for substances in articles (https://echa.europa.eu/documents/10162/23036412/articles_en.pdf/cc2e3f93-8391-4944-88e4-efed5fb5112c). Another hypothetical example is also shown in slide 20 (for a vehicle) of the presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group).
39	Can you please again elaborate on the obligation to update existing notification?	You can always update your notification after 5 January 2021, on a voluntary basis, if there are changes on the information already submitted. You are required to update your notification if (1) a substance present in an article already notified is included in the Candidate List after 5 January 2021; (2) that Candidate List substance is present in a (component) article of a complex object already notified (due e.g. to the presence of other component containing other Candidate List substance); In this case you need to identify the new components or subcomponents where this new Candidate List substance is present; (3) an already listed SVHC on the Candidate List substance is incorporated in one of the component articles, due to e.g. a change in production or you become aware of the presence of that substance. In these cases, the update has to be done at the time of any supply or placement on the market of the covered articles to any costumer or as a result of an import (from 5 January 2021 onwards). See also Q&A 1617 on our website (https://echa.europa.eu/support/qas-support/qas). As said previously, you can update your notification whenever you wish, e.g. if you remove a Candidate List substance from a previously notified (component) article, e.g. due to successful substitution effort, to indicate that the substance is no longer present. We allow and recommend suppliers of articles to update their notification (or submit a new one) on a voluntary basis if they are not supplying an article anymore on 5 January 2021 or later (legacy article or product),

		but they are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles they supplied previously, in particular if they foresee a high probability of the articles are still in use (based on an estimated time for the service life). If you no longer produce and place certain articles on the market then their notification dossiers do not need to be updated. The old notification itself will remain in the system however in order that dismantlers and waste sector operators can access the (historical) data.
40	How the information notified must be maintained?	When something changes with your article (CL substance to be added, CL substance to be removed, etc...) you need to submit a new notification using the same primary identifier in order to update your notification. You can always update your notification after 5 January 2021, on a voluntary basis, if there are changes on the information already submitted, e.g. if you remove a Candidate List substance from a previously notified (component) article, for instance due to successful substitution effort, to indicate that the substance is no longer present. We allow and recommend suppliers of articles to update their notification (or submit a new one) on a voluntary basis if they are not supplying an article anymore on 5 January 2021 or later (legacy article or product), but they are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles they supplied previously, in particular if they foresee a high probability of the articles are still in use (based on an estimated time for the service life). The old notification itself will remain in the system, in order that dismantlers and waste sector operators can access the (historical) data. The SCIP database recognises that a submission is an update of a previously submitted notification based on the following elements: primary article identifier type, primary article identifier values and legal entity (LE). However, you are required to update your notification if (1) a substance present in an article already notified is included in the Candidate List after 5 January 2021; (2) that Candidate List substance is present in a (component) article of a complex object already notified (due e.g. to the presence of other component containing other Candidate List substance); In this case you need to identify the new components or subcomponents where this new Candidate List substance is present; (3) an already listed SVHC on the Candidate List substance is incorporated in one of the component articles, due to e.g. a change in production or you become aware of the presence of that substance. In these cases, the update has to be done at the time of any supply or placement on the market of the covered articles to any costumer or as a result of an import (from 5 January 2021 onwards). See also Q&A 1617 on our website (https://echa.europa.eu/support/qas-support/qas).
41	Where can I download the official package of SCIP reference substances?	The official Candidate List is available at https://echa.europa.eu/candidate-list-table In the SCIP context, ECHA provide a Candidate List package to support the preparation of SCIP notifications (it is not an official list). The Candidate List package is available (to download) at: https://echa.europa.eu/candidate-list-package
42	Does submitting notifications to SCIP database mean that we are compliant with REACH article 33? Meaning, no other activities will be needed after January 5th 2021?	No. They are different obligations. After 5 January 2021, companies are still required to comply with their communication and notification obligations under Articles 33 and 7(2) of the REACH Regulation. A supplier need to communicate down the information to their costumers (according to REACH Art. 33(1)) and also needs to submit a SCIP notification to ECHA. The SCIP notification obligation under the Waste Framework Directive complements these already existing communication and notification obligations related to the "Candidate List substances" in articles, under Articles 33 and 7(2) of the REACH Regulation and should reinforce compliance with these obligations. It does not replace them. The main aims of the SCIP notification are - improving the availability of relevant information on articles containing Candidate List substances to waste treatment operators and consumers (https://echa.europa.eu/-/scip-database-will-improve-transparency-on-hazardous-substances-in-articles ; https://newsletter.echa.europa.eu/home/-/newsletter/entry/scip-database-improving-product-safety-and-reducing-hazardous-waste), in order that it is available throughout the whole lifecycle of products and materials, including at the waste stage;- reducing the generation of waste containing Candidate List substances;- and promote substitution of these substances in articles by safer alternatives. For more information see Q&A 1605 (https://echa.europa.eu/support/qas-support/qas) on ECHA's website and the video: https://youtu.be/Ixiq71L_G-o The aim of Article 33 is to ensure that sufficient information is communicated down the supply chain to allow the safe use of articles by end-users including consumers. The

		information flow along the supply chain enables all operators to take, at their stage of the use of the article, the appropriate risk management measures to guarantee the safe use of articles containing Candidate List substances. The information should also allow the operators in the supply chain and consumers to make informed purchase choices on the articles they buy. Finally, the notification obligation of importers and producers of articles under Article 7(2) of REACH aims at providing ECHA and the Member State competent authorities with information on the presence of Candidate List substances in articles, which may be used to identify a need for initiating regulatory risk management procedures under REACH (authorisation and restriction) or under other EU legislation. Of course, the SCIP database will also support these objectives by improving transparency on the presence of Candidate List substances in articles, but the main additional value of the database is that the SCIP data is also available to support waste operators to improve their waste separation and recycling techniques and processes over time (https://echa.europa.eu/waste-operators). ECHA is currently investigating how the SCIP database could be adapted or used by suppliers to comply with their duties under Article 33 and 7(2) of REACH. This will be further clarified in due time. However, suggestions from duty holders to streamline and find ways to gain efficiencies in complying with these obligations in an integrated way are welcomed. They can be provided to us via our contact form: echa.europa.eu/contact.
43	I noticed earlier we do not need to provide exact %, and instead a range from >0.1 to 100. Is this correct or will we need the exact weights?	You have to select an option (different concentration ranges) on the picklist of this field. When the information is available to you, we recommend you to report the most accurate concentration range that covers your case. If the information is not available to you at the time you are submitting the notification, the concentration range >0.1% w/w and ≤ 100% w/w can be selected. However, we recommend you to update your notification if you get more accurate information on the concentration, or if that information is made available to you.
44	In case of complex article, we can use the "referencing notification". As a complex article producer, do I have the possibility within UICLID to get my supplier article identifier (i.e. by using a search function within IUCLID ?)	ECHA is working on an approach to facilitate the reference to data already submitted by the supplier of each component or subcomponent, the so called 'referencing' approach presented in the webinar. However, it only works if the supplier provides voluntarily the recipient with an identifier provided by ECHA (e.g. in submission report). This is a voluntary approach that can be adopted by suppliers to support their customers in facilitating their work to submit SCIP notifications. Due to security reasons, it is not possible to get the identifier from a central system. We also invite you to look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). More information on this will be made available later in the year.
45	Can you add an IDIS 2 datasheet for cars, to describe the safe disassembly information?	The disassembling instructions have to be provided in pdf format. Data sheets from the IDIS 2 (International Dismantling Information System) of the global car industry which helps car dismantlers to treat end-of-life vehicles (ELVs) (pre-treatment and dismantling information relating to almost all of the world's vehicles). If suitable to your complex object (product), you can add the relevant documents from IDIS 2 in a pdf format and attach it to your notification to provide disassembling instructions regarding the presence of components with Candidate List substances. When preparing such documents, please be aware that you are not inserting information that could be considered sensitive. For further information on Confidential Business Information, please see https://echa.europa.eu/documents/10162/28534369/6_scip_en.pdf/2a53e093-7445-1bd0-169c-63f781b61fe5
46	Is the date submitted in the automotive industry via IMDS sufficient?	Any integrations between the SCIP format and existing industry systems (e.g. IMDS, BomCheck, etc.) are the responsibility of those actors owning these solutions.
47	According to WFD only waste operators should have access to the database and (European) consumers upon request. How do you ensure that the detailed technical information	ECHA will publish the data submitted to the SCIP database. In relation to confidential business information the notifications submitted to the SCIP database will be publicly available and therefore readily available to waste operators to bridge the current gap in the information flow. ECHA will publish the information, as received, on its website. The quality of the data remains the responsibility of each duty holder. At the same time, ECHA will ensure the protection of confidential business information where justified. For example, the required mandatory data that allow to establish links between actors in the same supply chain will not be made publicly available. Detailed information can be found in the

	are not accessible for foreign competitors?	presentation "Confidential business information & SCIP" (IT user group meeting of 5 November 2019) available at: https://echa.europa.eu/scip-it-user-group ; and in the presentation "How to make the data available, ECHA view and protection of CBI" at the SCIP workshop of 12 November 2019 available at https://echa.europa.eu/-/scip-workshop-12-november-2019 (link: https://echa.europa.eu/documents/10162/28534369/6_scip_en.pdf) In conclusion, ECHA plans to make all submitted data available, except: a) the link between the notification and it's submitter (Legal Entity); b) specific names (e.g. brand, model) or identifiers of components (of complex objects). Concerning point b), ONLY identifiers and names of articles as such or identifiers of top level articles (complex objects) will be disclosed.If you have specific concerns not addressed by the rules above, please submit them to us for further analysis using our contact forms: echa.europa.eu/contact.
48	Where can we find the list of article and material categories?	You can find all the lists of the IUCLID format in the SCIP Webpage/tools/SCIP format (https://echa.europa.eu/scip-format): SCIP format annex – Picklists: October 2019. For the article category, please see the presentation (slides 8 to 17) made on the IT User Group meeting of 6 February, available on the SCIP support webpage (echa.europa.eu/documents/10162/28213971/SCIP_Trials_feedback_%28I%29.pdf). The EU Trade Helpdesk is a useful tool to find CN/TARIC codes, which is kept by European Commission (DG TRADE) available at https://trade.ec.europa.eu/tradehelp . Concerning the material categories, besides the excel file available (picklists of the SCIP format), we are planning to make a word document available on our website in the coming weeks.
49	What´s your advice for the preparation of data sets at a number of more than 10000 complex objects?	Our advice is to start looking into the IUCLID format and figure out how you can prepare the notification dossiers out from the IT systems you have currently. Then figure out if you can submit them using system to system. ECHA invites you to submit us your approach and real examples for further consideration on your case and more generally for further discussion with stakeholders using our contact forms: echa.europa.eu/contact.
50	You wrote: "There is indeed no tonnage trigger and we are aware of the large impact, but the legal duty does not apply to retailers or suppliers who only sell to consumers". Reply: "Many of these SME sell also to commercial enterprises (e.g. a local B&B)!!	ECHA is planning to implement simplification mechanisms for SCIP notifications which may help assemblers and distributors. Such mechanisms are being assessed and implemented by ECHA, as presented briefly in the webinar, e.g. 'referencing' and 'simplified SCIP notification' - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). These are voluntary approaches, i.e. the supplier will need to provide to the recipient of the article or product an identifier provided by ECHA (e.g. in submission report of his notification) on a voluntary basis as part of his approach to best support their customers in facilitating their work to submit SCIP notifications (by allowing them to use those mechanisms).
51	How to get access to already notified Complex Objects from my supplier? It is possible anyway?	Due to security reasons, not from a central system. The supplier can share the data with you or then later after he has notified he can share his SCIP number so that you can refer to it. As presented briefly in the webinar, ECHA is working on approaches to facilitate the reference to data already submitted by suppliers (the so called 'simplified SCIP notification' and 'referencing' approaches). However, They only work if the supplier provides voluntarily the recipient with an identifier provided by ECHA (e.g. in submission report). This is a voluntary approach that can be adopted by suppliers to support their customers in facilitating their work to submit SCIP notifications. We also invite you to look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). More information on this will be made available later in the year.

52	Maybe I missed the information - but if a component article contains more than one SVHC substance is this entry possible and how?	If a component article contains more than one Candidate List substance, you need to create an additional concern element block (Candidate List substance, Concentration range, Material category/Mixture category) by clicking '+ New item' appearing next to 'Concern element' as shown in the webinar video after 44:19 (https://youtu.be/_VlKWD1ENy0). Please see also slides 41 to 45 in the document 'How to prepare and submit a SCIP Notification Dossier' (https://echa.europa.eu/scip-support). These slides explain on how to include a Candidate List substance and other concern elements. To add an additional Candidate List substance present in the article as such, please repeat the same procedure.
53	After January 05th 2021, should we maintain the information for all the products put on the market after that date? (After each REACH Candidate List update, for product we do not manufacture anymore)?	You can always update your notification after 5 January 2021, on a voluntary basis, if there are changes on the information already submitted. You are required to update your notification if (1) a substance present in an article already notified is included in the Candidate List after 5 January 2021; (2) that Candidate List substance is present in a (component) article of a complex object already notified (due e.g. to the presence of other component containing other Candidate List substance); In this case you need to identify the new components or subcomponents where this new Candidate List substance is present; (3) an already listed SVHC on the Candidate List substance is incorporated in one of the component articles, due to e.g. a change in production or you become aware of the presence of that substance. In these cases, the update has to be done at the time of any supply or placement on the market of the covered articles to any costumer or as a result of an import (from 5 January 2021 onwards). See also Q&A 1617 on our website (https://echa.europa.eu/support/qas-support/qas). As said previously, you can update your notification whenever you wish, e.g. if you remove a Candidate List substance from a previously notified (component) article, e.g. due to successful substitution effort, to indicate that the substance is no longer present. We allow and recommend suppliers of articles to update their notification (or submit a new one) on a voluntary basis if they are not supplying an article anymore on 5 January 2021 or later (legacy article or product), but they are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles they supplied previously, in particular if they foresee a high probability of the articles are still in use (based on an estimated time for the service life). If you no longer produce and place certain articles on the market then their notification dossiers do not need to be updated. The 'old' notification itself will remain in the system however in order that dismantlers and waste sector operators can access the (historical) data.
54	If I am a producer of a type approved product, am I expected to enter each VIN numbered article or is one entry for all products under that Type acceptable?	It is up to the duty holder to decide the best approach to submit a SCIP notification which is compliant with the obligation set out in the Waste Framework Directive and to support their costumers (by allowing them to use the simplification mechanisms which are being assessed and implemented by ECHA, e.g. simplified SCIP notification and referencing - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). ECHA would like to further discuss approaches with Stakeholders. Due to the diversity of articles as such and complex objects (incorporating articles), ECHA has developed the (IUCLID) SCIP format as a one-size-fits-all solution to cover all possible articles/products and has kept any constraints that would fail a submission to a minimum. This 'flexibility' provides a lot of discretion to duty holders on how to report data to the SCIP database, and allows different possibilities 'grouping'. A compliant level of reporting by a duty holder should consider the legal text of both REACH and the Waste Framework Directive, the case law of the Court of Justice (case C-106/14), and the ECHA guidance on requirements for substances in articles, as agreed with Member States (regarding REACH Article 33(1)): https://echa.europa.eu/documents/10162/23036412/articles_en.pdf The supplier is responsible for complying with the SCIP notification obligation (and with communication obligation under REACH Article 33(1)). There is no specific guideline at this moment other than to follow the above mentioned Guidance, which describes how to identify what information is necessary to compile and communicate to allow the safe use of an article (chapters 2 and 3; e.g. example 12; Appendix 5; Appendix 6, example 23). We also invite you to look at presentation 'SCIP IT user group 20 Mar - EXAMPLES'

		(https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). ECHA would like to work with the automotive sector to find a workable solution that potentially could avoid notifications for each vehicle unit placed on the market, i.e. submit SCIP notifications at the VIN (Vehicle Identification Number). Such solution may need to be agreed with the Member states and the European Commission. However, ECHA invites you to submit to us your approach and real examples for vehicles components (parts) to further analyse your cases and more generally to further discussions with stakeholders (automotive sector) using our contact forms: echa.europa.eu/contact.
55	There have been at least 5 different questions on product families where multiple part numbers share same SVHC & concentration range, and how to group them to a single notification. This is clearly a topic of interest for industry	It is up to the duty holder to decide the best approach to submit a SCIP notification which is compliant with the obligation set out in the Waste Framework Directive and to support their costumers (by allowing them to use the simplification mechanisms which are being assessed and implemented by ECHA, e.g. simplified SCIP notification and referencing - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). ECHA would like to further discuss approaches with Stakeholders. Due to the diversity of articles as such and complex objects (incorporating articles), ECHA has developed the (IUCLID) SCIP format as a one-size-fits-all solution to cover all possible articles/products and has kept any constraints that would fail a submission to a minimum. This 'flexibility' provides a lot of discretion to duty holders on how to report data to the SCIP database, and allows different possibilities 'grouping'. A compliant level of reporting by a duty holder should consider the legal text of both REACH and the Waste Framework Directive, the case law of the Court of Justice (case C-106/14), and the ECHA guidance on requirements for substances in articles, as agreed with Member States (regarding REACH Article 33(1)): https://echa.europa.eu/documents/10162/23036412/articles_en.pdf The supplier is responsible for complying with the SCIP notification obligation (and with communication obligation under REACH Article 33(1)). There is no specific guideline at this moment other than to follow the above mentioned Guidance, which describes how to identify what information is necessary to compile and communicate to allow the safe use of an article (chapters 2 and 3; e.g. example 12; Appendix 5; Appendix 6, example 23). We also invite you to look at presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). Recommendations on how to use 'grouping' may have to be agreed with the Member states and the European Commission. However, ECHA invites you to submit us your approach and real examples for further consideration on your case and more generally for further discussion with stakeholders using our contact forms: echa.europa.eu/contact.
56	Hi. I have a lot of questions. To whom can I address this bunch of questions at ECHA?	If you have many questions you can send them to ECHA using our contact form: echa.europa.eu/contact.
57	Hello, are cosmetic products or packaging contain SVHC substances subject to registration in the SCIP database?	Most cosmetic products are mixtures under REACH, so they are not covered by the scope of this obligation. However, the cosmetic's packages containing a Candidate List substance above 0.1% w/w are covered by the SCIP notification obligation. The packaging containing SVHC has to be notified to the SCIP database. The mixture include in the cosmetic product will be potentially covered by different obligations.
58	When an article has been notified by one of our supplier, how to find it and how to link it with our own complex article?	The possibility to reference an already notified article is under analysis/development with a target to be released in October 2020. We will supply more information about this during the year. In essence your supplier need to share his SCIP number with you. As presented briefly in the webinar, ECHA is working on approaches to facilitate the reference to data already submitted by suppliers (the so called 'simplified SCIP notification' and 'referencing' approaches).

		However, they only works if the supplier provides voluntarily the recipient with an identifier provided by ECHA (e.g. in submission report). This is a voluntary approach that can be adopted by suppliers to support their customers in facilitating their work to submit SCIP notifications. We also invite you to look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pd f) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). More information on this will be made available later in the year.
59	Are we able to submit the data from anywhere, we are in Northern Ireland and have some uncertainty about Brexit.	The responsibility for fulfilling the obligation of providing information to ECHA lies with the EU importers. Companies outside of the EU are not subject to this obligation and are not allowed to submit SCIP notifications. This is subject to further clarification of the duties included under the Northern Ireland Protocol between the EU and the UK. However, you may be able to submit on behalf of an EU entity, using the foreign user concept. For more information, check the Q&A 960 and 1610 (https://echa.europa.eu/support/qas-support/qas) and the ECHA Accounts Manual (https://echa.europa.eu/manuals) on our website.
60	For manufacturers of parts (such as nuts, for example) that have multiple part numbers that would have the same notification information in terms of SVHC composition... will it be possible to submit a single notification with a list of part numbers?	It is up to the duty holder to decide the best approach to submit a SCIP notification which is compliant with the obligation set out in the Waste Framework Directive and to support their customers (by allowing them to use the simplification mechanisms which are being assessed and implemented by ECHA, e.g. simplified SCIP notification and referencing - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). ECHA would like to further discuss approaches with Stakeholders. Due to the diversity of articles as such and complex objects (incorporating articles), ECHA has developed the (IUCLID) SCIP format as a one-size-fits-all solution to cover all possible articles/products and has kept any constraints that would fail a submission to a minimum. This 'flexibility' provides a lot of discretion to duty holders on how to report data to the SCIP database, and allows different possibilities 'grouping'. A compliant level of reporting by a duty holder should consider the legal text of both REACH and the Waste Framework Directive, the case law of the Court of Justice (case C-106/14), and the ECHA guidance on requirements for substances in articles, as agreed with Member States (regarding REACH Article 33(1)): https://echa.europa.eu/documents/10162/23036412/articles_en.pdf The supplier is responsible for complying with the SCIP notification obligation (and with communication obligation under REACH Article 33(1)). There is no specific guideline at this moment other than to follow the above mentioned Guidance, which describes how to identify what information is necessary to compile and communicate to allow the safe use of an article (chapters 2 and 3; e.g. example 12; Appendix 5; Appendix 6, example 23). We also invite you to look at presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). Recommendations on how to use 'grouping' may have to be agreed with the Member states and the European Commission. However, ECHA invites you to submit us your approach and real examples for further consideration on your case and more generally for further discussion with stakeholders using our contact forms: echa.europa.eu/contact.
61	Is the SCIP Database also a legally approved tool to report substances in Electrical/Electronic Equipment according to Directive 2012/19/EU Art. 15?: producers of EEE in the form of manuals or by means of	No, the SCIP database only corresponds to the legal obligations stemming from the Waste Framework Directive

	electronic media (e.g. CD-ROM, online services).”	
62	Do you expect all distributors to notify a product that many sell but is produced by a single manufacturer?	Yes, all distributors down in the supply chain need to submit a SCIP notification for the products they place on the market. ECHA is working on an approach to facilitate the submission of SCIP notification, the so called ’simplified SCIP notification’. As presented briefly in the webinar, ECHA is working on an approach to facilitate the reference to data already submitted by suppliers for cases where complex objects (products) and articles received are the same as those supplied (no changes occur), the so called 'simplified SCIP notification'. However, it only works if the supplier voluntarily provides the recipient with an identifier provided by ECHA (e.g. in submission report). This is a voluntary approach that can be adopted by suppliers to support their customers in facilitating their work to submit SCIP notifications. We also invite you to look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). More information on this will be made available later in the year.
63	Dear Panellists, will the SCIP database it in some point in time cover the REACH Article 33(1) communication requirement, so that the industry will not have to entertain two processes in parallel? Thanks.	The information required to be submitted to the SCIP database must already be communicated throughout the supply chain under REACH Article 33(1). The SCIP notification duty complements the current communication obligations under REACH Article 33(1). It does not replace it. After 5 January 2021, companies are still required to comply with their communication and notification obligations under Articles 33 and 7(2) of the REACH Regulation. A supplier needs to communicate down the information to customers (according to REACH Art. 33(1)) and also needs to submit a SCIP notification to ECHA. It is up to each duty holder to decide how to better manage both obligations.
64	What is the difference between Simplified notification and referencing?	This was briefly covered in the webinar. 'Simplified SCIP notification' applies when supplying without modification - cases where complex objects (products) and articles received are the same as those supplied (no changes occur) - and no new data needs to be submitted to ECHA. If implemented by actors in the supply chain, certain actors such as distributors do not need to submit IUCLID dossiers, i.e. they just need to provide an identification of the article or complex object (product) they are supplying. 'Referencing' applies to components from others (suppliers) which are assembled to make a complex object (product). In other words, when using ‘referencing’, a duty holder identifies the complex object component through an identifier provided voluntarily by your supplier within the SCIP IUCLID dossier to be submitted to ECHA. These approaches only work if the supplier voluntarily provides the recipient with an identifier provided by ECHA (e.g. in submission report). This is a voluntary approach that can be adopted by suppliers to support their customers in facilitating their work to submit SCIP notifications. We also invite you to look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). More information on this will be made available later in the year.
65	When is the referencing option going to be implemented? There must be different phases for different actors in the chain to report the data in the database.	ECHA is currently working on the 'referencing' option and we foresee it to be released at the end of October 2020. This approach can only be used when your supplier voluntarily provides to you with an identifier provided by ECHA (e.g. in submission report). This is a voluntary approach that can be adopted by suppliers to support their customers in facilitating their work to submit SCIP notifications. Therefore, the implementation of the 'referencing' mechanism needs to necessarily follow the article in the supply chain since it is produced until it is incorporated in subcomponents and components and then being incorporated in the final complex object placed on the market to be installed and/or used. We also invite you to look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). More information on this will be made available later in the year.

66	Shouldn't the needs of the waste operators be the basis for the database?!	The basis for the database is partly to serve the needs of waste operators and partly those of consumers and authorities. With granular data we can cover the needs of all. It is a legal requirement to submit information at the article level as explained in Q&A 1613 on our website (https://echa.europa.eu/support/qas-support/qas). The information to be submitted to ECHA must allow the user of the database to be able to identify the 'location' of the article containing the Candidate List substance (see the SCIP information requirements document available at https://echa.europa.eu/scip-support and Q&A 1612 on our website). We also invite you to look at presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which was presented in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). The level of granularity and structure of the SCIP data needed seems to be different depending on the specific user group or subgroup under consideration, considering their specific needs. ECHA has made a substantial effort to understand the needs of waste operators (https://echa.europa.eu/waste-operators) and consumers (https://echa.europa.eu/consumers-and-scip) as shown in several documents, case studies, consultations/request for input reports, workshop proceedings, presentations and views (of these stakeholders) available on the SCIP database webpage (https://echa.europa.eu/scip-database). We recognise that there are different and frequently conflicting views between duty holders and target audiences (as users of the SCIP database) explicitly mentioned in the Waste Framework Directive on their needs or the perception of their needs. In this context we invite you to take a look to the content of the webpage https://echa.europa.eu/waste-operators (in particular the use cases therein); the ECHA's Newsletter article 'Cleaning up Europe's act with the SCIP database' (https://newsletter.echa.europa.eu/home/-/newsletter/entry/cleaning-up-europe-s-act-with-the-scip-database); and the presentation 'View of waste operator on use cases for the database and best way to make the data available' (https://echa.europa.eu/documents/10162/28534369/7_scip_en.pdf) given at the SCIP workshop in November 2019. According to a use case prepared by Wood Environment & Infrastructure Solutions UK Limited at ECHA's request concerning regulators with the title 'Supporting efficient and effective development, enforcement and evaluation of regulation', it seems that having the information available may allow local authorities on waste to make decisions. For example, they could implement or demand separate collection of certain waste streams, hence removing waste fractions containing Candidate List substances. This could allow the waste operators to handle cleaner streams. The findings of the study launched by the European Commission on "Tools to manage information flows from products supply chains to waste operators", as a follow-up of the commitment in point 3.2.1. of the Communication of the Commission on options to address the interface between chemical, product and waste legislation [COM(2018) 32 final], could bring further clarity on the needs of data from waste operators at each stage of the waste management chain.
67	I need more Information about System-to-System service please	There is more information available on this webpage: https://echa.europa.eu/scip-prototype where we have collected the S2S documentation. If you need anything else please open a question on our contact form: echa.europa.eu/contact
68	Dear all, Could you please clarify what do you mean be "retailers that supply directly to consumer? . If possible, could you provide an example? Many thanks in advance	A retailer is a distributor that supplies articles or products directly to consumers e.g. a street store. If this retailer only sells articles to consumers (not to professional or industrial users), the retailer is exempted. More information on Q&A 1609 (https://echa.europa.eu/support/qas-support/qas)
69	Am I obliged to submit a SCIP notification if my complex article contain a simple article with a SVHC above 0.1%ww, but the substance in my complex article does not reach the threshold?	Yes. Please see Q&A 1607 (https://echa.europa.eu/support/qas-support/qas) on ECHA's website. The obligation applies to any object that fulfils the definition of an article (under REACH). When articles are assembled in complex objects they remain articles. Therefore the concentration needs to be calculate for each 'individual' article in your product. Please find further information in Chapters 2 and 3 of the Guidance on requirements for substances in articles available on ECHA's website (https://echa.europa.eu/guidance-documents/guidance-on-reach?panel=guidance-on-requirements-for-substances-in-articles#guidance-on-requirements-for-substances-in-articles).

70	Do REACH article 7 (?) and other Substance in Article notification obligations apply in addition to the SCIP database requirements?	Yes. Although they are connected they are different obligations. The SCIP notification obligation under the Waste Framework Directive complements the already existing communication and notification obligations related to the "Candidate List substances" in articles, under Articles 33 and 7(2) of the REACH Regulation and should reinforce compliance with these obligations. It does not replace them. After 5 January 2021, companies are still required to comply with their communication and notification obligations under Articles 33 and 7(2) of the REACH Regulation. A supplier needs to communicate down the information to costumers (according to REACH Art. 33(1)) and also needs to submit a SCIP notification to ECHA.
71	ze it with your tools by contacting ECHA or our IT tool just generate the output with the i6z extension. and another question, please How can we deal with that, will we prepare our dossiers individually and upload them as a bulk via system-to-system?	In principle Yes. We provide 1) A format 2) A tool to fill in the format, and 3) an API to submit files system to system. The preparation of the IUCLID dossiers from your own system is your responsibility
72	I wonder how we can use the System-to-System service, Does my organization build an internal IT tool and synchronize it with your tools by contacting ECHA or our IT tool just generate the output with the i6z extension.	Both connection to ECHA and generation of dossier using an IT tool that respects IUCLID format are required. See also: https://echa.europa.eu/scip-prototype >> System-to-system service
73	How funny to first create a very complicated database going far beyond legal requirements and then to ask the question if and how the legal addresse needs the information which shall be collected	There is no doubt that there is an information gap between industry on the one hand and waste operators and consumers on the other. More transparency about the use of hazardous substances in products will be key. However, what needs further discussion is how different users (e.g. consumers, users from different sectors or from different stages in the recycling process) prefer to receive and search for the information. The level of granularity and structure of the data needed seems to be different depending on the specific user group or subgroup under consideration. The findings of the study launched by the European Commission on "Tools to manage information flows from products supply chains to waste operators", as a follow-up of the commitment in point 3.2.1. of the Communication of the Commission on options to address the interface between chemical, product and waste legislation [COM(2018) 32 final], could bring further clarity on this issue. ECHA has made a substantial effort, in a transparent way, to understand the needs of waste operators (https://echa.europa.eu/waste-operators) and consumers (https://echa.europa.eu/consumers-and-scip) as shown in several documents, case studies, consultations/request for input reports, workshop proceedings, presentations and views (of these stakeholders) available on the SCIP database webpage (https://echa.europa.eu/scip-database), as well as in ECHA's newsletter articles and ECHA's news items. We recognise that there are different and frequently conflicting views between duty holders and target audiences (as users of the SCIP database) explicitly mentioned in the Waste Framework Directive on their needs or the perception of their needs (see e.g. (1) https://newsletter.echa.europa.eu/home/-/newsletter/entry/cleaning-up-europe-s-act-with-the-scip-database ; (2) https://echa.europa.eu/documents/10162/28534369/7_scip_en.pdf ; (3) https://echa.europa.eu/documents/10162/28534369/8_scip_en.pdf ; (4) https://echa.europa.eu/documents/10162/28534369/scip_report_en.pdf ; (5) https://echa.europa.eu/documents/10162/28213971/shd_consultation_info_req_report_en.pdf ; (6) https://echa.europa.eu/documents/10162/28213971/analysis_call_for_input_en.pd f; (7) https://echa.europa.eu/documents/10162/28213971/wfd_oct_2018_workshop_proceedings_en.pdf).

74	Why the reference list is bot automatically linked with the CAS number ?	The IUCLID format is updated once per year and the Candidate list more often (usually two times per year). Hence, we could not integrate the candidate list into IUCLID. We have ideas to improve this in the future, but for now we use the reference substances (Containing CAS number, when available)
75	Similar variants of a product should be able to be submitted in one data set instead of having to map each variant using its own data set. Is this possible?	Grouping of variants into one article (one notification) is technically possible but obviously care needs be taken that this grouping does not undermine the purpose of the notification, i.e. to enable safe use of the article, including at the waste stage. ECHA would like to further discuss approaches with Stakeholders. It is up to the duty holder to decide the best approach to submit a SCIP notification which is compliant with the obligation set out in the Waste Framework Directive and to support their costumers (by allowing them to use the simplification mechanisms which are being assessed and implemented by ECHA, as presented briefly in the webinar, e.g. simplified SCIP notification and referencing - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). ECHA would like to further discuss approaches with Stakeholders Due to the diversity of articles as such and complex objects (incorporating articles), ECHA has developed the (IUCLID) SCIP format as a one-size-fits-all solution to cover all possible articles/products and has kept any constraints that would fail a submission to a minimum. This 'flexibility' provides a lot of discretion to duty holders on how to report data to the SCIP database, and allows different possibilities 'grouping'. A compliant level of reporting by a duty holder should consider the legal text of both REACH and the Waste Framework Directive, the case law of the Court of Justice (case C-106/14), and the ECHA guidance on requirements for substances in articles, as agreed with Member States (regarding REACH Article 33(1)): https://echa.europa.eu/documents/10162/23036412/articles_en.pdf The supplier is responsible for complying with the SCIP notification obligation (and with communication obligation under REACH Article 33(1)). There is no specific guideline at this moment other than to follow the above mentioned Guidance, which describes how to identify what information is necessary to compile and communicate to allow the safe use of an article (chapters 2 and 3; e.g. example 12; Appendix 5; Appendix 6, example 23). We also invite you to look at presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group) .Recommendations on how to use 'grouping' may have to be agreed with the Member states and the European Commission. However, ECHA invites you to submit us your approach and real examples for further consideration on your case and more generally for further discussion with stakeholders using our contact forms: echa.europa.eu/contact.
76	If a product family contains the same articles with the same SVHCs will it be possible to make family declarations?	It may depend on the specific case or situation. It may also depend on how you are defining 'product family'. It is up to the duty holder to decide the best approach to submit a SCIP notification which is compliant with the obligation set out in the Waste Framework Directive and to support their costumers (by allowing them to use the simplification mechanisms which are being assessed and implemented by ECHA, e.g. simplified SCIP notification and referencing - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). ECHA would like to further discuss approaches with Stakeholders. Due to the diversity of articles as such and complex objects (incorporating articles), ECHA has developed the (IUCLID) SCIP format as a one-size-fits-all solution to cover all possible articles/products and has kept any constraints that would fail a submission to a minimum. This 'flexibility' provides a lot of discretion to duty holders on how to report data to the SCIP database, and allows different possibilities 'grouping'. A compliant level of reporting by a duty holder should consider the legal text of both REACH and the Waste Framework Directive, the case law of the Court of Justice (case C-106/14), and the ECHA guidance on requirements for substances in articles, as agreed with Member States (regarding REACH Article 33(1)):

		https://echa.europa.eu/documents/10162/23036412/articles_en.pdf The supplier is responsible for complying with the SCIP notification obligation (and with communication obligation under REACH Article 33(1)). There is no specific guideline at this moment other than to follow the above mentioned Guidance, which describes how to identify what information is necessary to compile and communicate to allow the safe use of an article (chapters 2 and 3; e.g. example 12; Appendix 5; Appendix 6, example 23). We also invite you to look at presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group), which seems to already provide further clarifications to the specific case covered by your question. Recommendations on how to use 'grouping' may have to be agreed with the Member states and the European Commission. However, ECHA invites you to submit us your approach and real examples for further consideration on your case and more generally for further discussion with stakeholders using our contact forms: echa.europa.eu/contact.
77	Till when must a sub supplier provide the information to us?	The supplier needs to communicate down the information to you (according to REACH Art. 33(1)). From 5 January 2021, the supplier also needs to submit a SCIP notification to ECHA. The supplier needs to submit the SCIP notification when supplying the article to one of its customers from that date onwards. The supplier has already provide you with that information as required under Art. 33(1) when that supplier supplied the article to you, or will do, so as a matter of course when supplying an article to you after that date. If he needs to update the information that will impact the information previously submitted to you, the supplier needs to update it on the next supply. In this case, he also needs to update its SCIP notification.
78	We have a legal entity in EU. can we have our brands locate in the USA have as foreign users to create the dossiers in our name?	Only EU legal entities have a legal obligation, but yes, US based entities can act as "foreign users" and submit on their behalf. For more information check the Q&A 960 and 1610 (https://echa.europa.eu/support/qas-support/qas) and the ECHA Accounts Manual (https://echa.europa.eu/manuals) on our website.
79	Which language should the article name have? German okay for a German company?	The article name can be in any (EU official) language, ultimately the purpose of the name is to help you as duty holder to manage your articles as well as for SCIP database users to recognise/identify the article, whenever possible. The article category (CN/TARIC codes and descriptions) ensures a harmonised way to understand which category/family of product (article as such or complex object) is being submitted based on its function/use, which can not be ensured by the article name on its own (free text field, submissions in different languages, meaningless names attributed for a user of the database). The CN codes and descriptions are available in all EU languages. You can find all the lists of the IUCLID format in the SCIP Webpage/tools/SCIP format: SCIP format annex – Picklists: October 2019. (https://echa.europa.eu/scip-format). The EU Trade Helpdesk is a useful tool to find CN/TARIC codes, which is kept by European Commission (DG TRADE) available at https://trade.ec.europa.eu/tradehelp . For more information, please consult the slides (8 to 17) from the IT User Group of 6 February 2020 under SCIP support webpage available at https://echa.europa.eu/scip-it-user-group (https://echa.europa.eu/documents/10162/28213971/SCIP_Trials_feedback_%28I%29.pdf).
80	Is the Characteristics mandatory or optional?	The Characteristics are optional. Characteristics should help to allow the identification of the product.
81	Is it consumer as in the general public or end-user (industrial/professional) e.g. would a distributor of a building board manufactured by others need to notify?	A consumer is any person that does not use an article for professional or industrial activities. A distributor needs to submit a SCIP notification, except if this distributor supplies the article (e.g. building board) directly and exclusively to consumers (retailer). Please see Q&A 1609 (https://echa.europa.eu/support/qas-support/qas)

82	Who is responsible for articles, that are offered for example from Amazon for suppliers out of EU? Who is in the case importer?	Depends on who is buying from those platforms (or market places) such as Amazon: consumers do not seem to be covered by the obligation, but if it concerns professional suppliers who intend to sell further, then they are considered EU importers and will have to submit.
83	Hi, we are not familiar with the CN/TARIC code system. How can we get guidance to be able to use the correct code?	There are several sources available. The EU Trade Helpdesk is a useful tool to find CN/TARIC codes, which is kept by European Commission (DG TRADE) available at https://trade.ec.europa.eu/tradehelp . For more information, please consult the slides (8 to 17) from the IT User Group of 6 February 2020 under SCIP support webpage available at https://echa.europa.eu/scip-it-user-group (https://echa.europa.eu/documents/10162/28213971/SCIP_Trials_feedback_%28I%29.pdf). Sector associations could provide support on the most appropriate code of each article or complex object.The SCIP format accepts the selection of declarable CN/TARIC codes (and descriptions) with 6 digits (CN code), 8 digits (CN code) or 10 digits (TARIC code). The article category ensures a harmonised way to understand which category/family of product (article as such or complex object) is being submitted based on its function/use, which cannot be ensured by the article name on its own (free text field, submissions in different languages, meaningless names attributed for a user of the database).
84	The SCIP database requires much more information than what is required under REACH article 33. Will this be corrected?	We do not agree with this interpretation. The (mandatory) information requirements have been kept to a minimum to allow identification of the article, the substance of very high concern on the Candidate List, and its safe use, as prescribed in the legal text. Please see Q&A 1612 (https://echa.europa.eu/support/qas-support/qas) and the 'Detailed Information Requirements for the SCIP database' document (https://echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf) on ECHA's website. The information to be submitted should also allow all operators in the supply chain and consumers 'to make a supply choice in full knowledge of the properties of the products, including those of articles forming part of their composition' (judgement of the Court of Justice in case C-106/14, - paragraphs 77 to 79 - http://curia.europa.eu/juris/liste.jsf?language=en&td=ALL&num=C-106/14). A duty holder should consider the legal text (and the objectives) of both REACH and the Waste Framework Directive, the case law of the Court of Justice (case C-106/14), and the ECHA guidance on requirements for substances in articles, as agreed with Member States (regarding REACH Article 33(1)), when preparing a SCIP notification. We invite you to see the Questions and Answers which were published on the ECHA website (https://echa.europa.eu/support/qas-support/browse/-/qa/70Qx/view/topic/Waste+Framework+Directive+-+SCIP+database). A number of Q&As were provided by the European Commission to bring clarification on the scope of application of the legal duties related to Articles 9(1)(i) and 9(2) of the WFD (Commission non-paper on the implementation of articles 9(1)(i) and 9(2) of the revised Waste Framework Directive 2008/98/EC, distributed to the CARACAL and Waste Expert Group in June 2019, ref. Ares(2019)3936110). Following feedback received from stakeholders, and as briefly explained in the webinar, ECHA is planning to introduce some changes in the SCIP format and to further clarify the difference between mandatory data fields and those where an answer is "required". For those that are 'required', the requirement can be "waived" if data is not available (e.g. "no data"). For example, it is recommended that the appropriate concentration range must be selected when this information is available to the duty holder because it is relevant information to ensure the safe use of the article and its proper treatment at the waste stage, but if that information is not available the range >0.1% to 100% w/w can be selected. We also invite you to look at presentations: - 'Planned IUCLID format changes' (https://echa.europa.eu/documents/10162/28639054/planned_iuclid_format_changes_en.pdf) - 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf) presented in the SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). In this context, we also invite you to consult subchapters 3.2.1 and 3.4.1 (including example 12) of the Guidance on requirements for substances in articles available on ECHA's website (https://echa.europa.eu/guidance-documents/guidance-on-

		reach?panel=guidance-on-requirements-for-substances-in-articles#guidance-on-requirements-for-substances-in-articles), as well as e.g. Appendix 5; Appendix 6, example 23. We also would like to invite you to take a look to the Forum's Final report on the Forum Pilot Project on Substances in Articles to check how enforcement actions are being implemented in Member States for REACH Article 33 (For SCIP enforcement see Q&A 1611) - https://echa.europa.eu/-/companies-need-to-improve-communication-of-hazardous-substances-in-products .
85	I work for a large multinational, I am based in Northern Ireland, am I allowed to input the data from NI for my company, using the European country vat number	The responsibility for fulfilling the obligation of providing information to ECHA lies with the EU importers. Companies outside of the EU are not subject to this obligation and are not allowed to submit SCIP notifications. This is subject to further clarification of the duties included under the Northern Ireland Protocol between the EU and the UK. However, you may be able to submit on behalf of an EU entity, using the foreign user concept. For more information, check the Q&A 960 and 1610 (https://echa.europa.eu/support/qas-support/qas) and the ECHA Accounts Manual (https://echa.europa.eu/manuals) on our website.
86	If REACH notifications still apply to SHVCs are we expected to submit both an SIA notification and SCIP notification?	Yes. The requirement to submit a SCIP notification does not make void the obligation to also submit SiA notification under REACH article 7(2) should the condition apply, i.e. both notifications need to be submitted. The SCIP notification obligation under the Waste Framework Directive complements the already existing communication and notification obligations related to the "Candidate List substances" in articles, under Articles 33 and 7(2) of the REACH Regulation and should reinforce compliance with these obligations. It does not replace them. After 5 January 2021, companies are still required to comply with their communication and notification obligations under Articles 33 and 7(2) of the REACH Regulation. A producer or an importer need to submit a SiA notification according to REACH Art. 7(2) (if all conditions apply) and also needs to submit a SCIP notification to ECHA.
87	What are EAN and GITN identifiers?	EAN = European Article Number; GTIN = Global Trade Item Number - both are the basis of the so-called bar code numbering systems. GTIN is managed by GS1 (https://www.gs1.org/): https://www.gs1.org/gtin .
88	Do we have to submit a notification for each EU country where article is sold ? Any way to cover multiple countries with single notification ? Thanks	Each duty holder is a supplier of articles in its own right under the legal definitions and needs to submit a SCIP notification, when all the conditions are fulfilled. ECHA has implemented a technical solution which is the "foreign user" feature which consists of duty holders adding a 'foreign user' to their accounts to submit data to the SCIP database. It allows third parties to submit data on duty holder's behalf on a voluntary or contractual basis, under the legal responsibility of the company concerned. This solution is useful mainly for companies within a corporate group where the mother company wishes to submit data on behalf of its daughter companies. For more information, check the Q&A 960 (https://echa.europa.eu/support/qas-support/qas) and the ECHA Accounts Manual (https://echa.europa.eu/manual s) on our website.
89	In which cases can the safe use instruction be left out as no need to submit is?	Not needing to specify any safe use instructions (beyond indicating the SVHC) is left to the discretion of the duty holder. But see answers to Questions 11 and 32 above also.
90	Would a recycling passport based on PAS 1049 suffice to provide disassembly instructions?	The disassembling instructions have to be provided in pdf format. If suitable to your articles or complex objects (products), you can add the relevant information you may have from the 'recycling passport based on PAS 1049' in a pdf format and attach it to your notification to provide disassembling instructions regarding the presence of components with Candidate List substances. However, if that information concerns instructions regarding recycling or other waste treatment advice as a result of the presence of Candidate List substances in articles, once they become waste, then we recommend you to add safe use instructions (text fields) in your notification, following the guidelines provided in slide 36 of the "How to prepare and submit a SCIP Notification Dossier" document (https://echa.europa.eu/documents/10162/28213971/SCIP_Database_Notifications.pdf).

		When preparing such documents, please make sure that you are not inserting information that could be considered sensitive. For further information on Confidential Business Information, please see https://echa.europa.eu/documents/10162/28534369/6_scip_en.pdf/2a53e093-7445-1bd0-169c-63f781b61fe5
91	What about the language of the database? Specially for safe use instructions as they are free text? Who will be responsible to translate or will English be sufficient?	We recommend to submit information provided in the text fields, namely the name and the safe use instructions in English. However, the duty holder can submit the information in any (EU official) language.
92	BREXIT - As the UK is still following EU rules are we expected to submit?	The responsibility for fulfilling the obligation of providing information to ECHA lies with the EU importers. Companies outside of the EU are not subject to this obligation and are not allowed to submit SCIP notifications. For further information we invite you to contact the UK authorities and/or the European Commission.
93	Concerning the ECHA timeline, corona virus is keeping corporate investments and capacities on a minimum level. Is there any consideration concerning the timeline expected?	The date from which companies are required to submit SCIP notifications stem directly from the Waste Framework Directive and its transposition in national legislations. It is not within our remit to decide changes to legal deadlines. The Commission is the right addressee for such requests. We invite you to regularly consult our established official webpage with COVID updates (https://echa.europa.eu/covid-19), where we publish updates on any exceptions or special arrangements that will be put in place and we also publish official correspondence on such issues. The work on the SCIP database is progressing as planned. Additionally, the SCIP IT user group meetings continue. The next foreseen update will be the release of the next version of the database in late October, which will be open for submitting SCIP notifications.
94	Why the concentration range is orange? Can it be waived?	You have to select one option on the pick list of this field, but there are a number of options to allow the notification according to the data you have available, e.g. '>0.1% w/w and ≤ 100% w/w'. When the information is available to you, we recommend you to report the most accurate concentration range that covers your case. If the information is not available to you at the time you are submitting the notification, the concentration range '>0.1% w/w and ≤ 100% w/w' can be selected. However, we recommend you to update your notification if you get more accurate information on the concentration, or if that information is made available to you.
95	If I will put on the market un article the 1th of January 2021, I have any obligation about SCIP?	As from 5 January 2021, information on articles containing SVHCs (on the Candidate List) in a concentration above 0.1% w/w placed on the EU market needs to be notified to ECHA at the time it is supplied by you on that date or later. If you place an article fulfilling that condition on the market on 2 January 2021 and do not supply it anymore as from 5 January 2021 (to any costumer), you do not have a legal obligation to submit a SCIP notification. However, you may still consider to do so on a voluntary basis, because ECHA is planning to invite duty holders to submit their notifications after the release of the next version of the SCIP database foreseen for end of October 2020.
96	Our company is located in Japan. How can we support our Importers? I understand we can support by submitting SCIP notification to ECHA in behalf of our importers. Is it useful 'foreign user' on page 12? Could you explain it more?	Yes indeed, the foreign user concept may be the right solution for you, among others. The use of the 'foreign user' feature should be based on voluntary agreements between you and your customers and the access to their accounts to submit on their behalf. The responsibility for fulfilling the obligation of providing information to ECHA lies with the EU importers. ECHA has implemented a technical solution which is the "foreign user" feature which consists of duty holders adding a 'foreign user' to their accounts to submit data to the SCIP database. It allows third parties to submit data on duty holder's behalf on a voluntary or contractual basis, under the legal responsibility of the company concerned. For more information, check the Q&A 960 and 1610 (https://echa.europa.eu/support/qas-support/qas) and the ECHA Accounts Manual (https://echa.europa.eu/manuals) on our website.

97	For complex articles, should we only provide information of the component that contains the SVHC or about the complete complex article?	You have to provide information about the complex object you are placing on the market and about the components and subcomponents of this complex object that incorporate articles which contain the Candidate List substances above 0.1% w/w. You need to provide enough information to allow the user of the database to be able to identify the 'location' of the article containing the Candidate List substance. The supplier is responsible for complying with the SCIP notification obligation (and with communication obligation under REACH Article 33(1)). Please see Q&A 1612 (https://echa.europa.eu/support/qas-support/qas) and the 'Detailed Information Requirements for the SCIP database' document (https://echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf) on ECHA's website. We also invite you to look at presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). ECHA would like to further discuss approaches with Stakeholders. ECHA invites you to submit us your approach and real examples for further consideration on your case and more generally further discussion with stakeholders using our contact forms: echa.europa.eu/contact.
98	Do we need to identify each similar article per individual product number (P/N)? Or can we declare a generic P/N to notify one entire product line of similar articles with same composition, same SVHC, very similar concentration range? Thanks.	It is up to the duty holder to decide the best approach to submit a SCIP notification which is compliant with the obligation set out in the Waste Framework Directive and to support their costumers (by allowing them to use the simplification mechanisms which are being assessed and implemented by ECHA, e.g. simplified SCIP notification and referencing - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). ECHA would like to further discuss approaches with Stakeholders. Due to the diversity of articles as such and complex objects (incorporating articles), ECHA has developed the (IUCLID) SCIP format as a one-size-fits-all solution to cover all possible articles/products and has kept any constraints that would fail a submission to a minimum. This 'flexibility' provides a lot of discretion to duty holders on how to report data to the SCIP database, and allows different possibilities 'grouping'. A compliant level of reporting by a duty holder should consider the legal text of both REACH and the Waste Framework Directive, the case law of the Court of Justice (case C-106/14), and the ECHA guidance on requirements for substances in articles, as agreed with Member States (regarding REACH Article 33(1)): https://echa.europa.eu/documents/10162/23036412/articles_en.pdf The supplier is responsible for complying with the SCIP notification obligation (and with communication obligation under REACH Article 33(1)). There is no specific guideline at this moment other than to follow the above mentioned Guidance, which describes how to identify what information is necessary to compile and communicate to allow the safe use of an article (chapters 2 and 3; e.g. example 12; Appendix 5; Appendix 6, example 23). We also invite you to look at presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group).Recommendations on how to use 'grouping' may have to be agreed with the Member states and the European Commission. However, ECHA invites you to submit us your approach and real examples for further consideration on your case and more generally for further discussion with stakeholders using our contact forms: echa.europa.eu/contact.
99	Must you add articles which do not include candidate list substances to the SCIP database. If they are part of a complex object which contains articles with candidate list substances?	Articles not containing SVHC (on the Candidate List) should not be notified. You always need to link a Candidate List substance to the article as such (on its own or in a complex object). However, if a complex object incorporates a component article containing a Candidate List substance or a (sub-) assembly that contains an article with SVHC, it should be included as a 'complex object component' to describe the 'location' of the SVHC, i.e. You have to provide information about the complex object you are placing on the market and about its components and subcomponents of this complex object that incorporate articles which contain the Candidate List substances above 0.1% w/w. You need to provide enough information to allow the user of the database to be able to identify the 'location' of the article containing

		the Candidate List substance. The supplier is responsible for complying with the SCIP notification obligation (and with communication obligation under REACH Article 33(1)). Please see Q&A 1612 (https://echa.europa.eu/support/qas-support/qas) on ECHA's website. We also invite you to look at presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). ECHA would like to further discuss approaches with Stakeholders. ECHA invites you to submit us your approach and real examples for further consideration on your case and more generally further discussion with stakeholders using our contact forms: echa.europa.eu/contact.
100	Hi. You mentioned earlier that Retailers do not have obligations for the SCIP database? If we are a retailer, who import into the EU, would we still have obligations or not?	Correct, retailers who are also importers, do have to submit a SCIP notification as importers. Only retailers who supply articles or complex objects directly and exclusively to consumers are not covered by the obligation to submit a SCIP notification to ECHA. All actors above in the supply chain, including distributors have to submit a SCIP notification. See also our Q&A 1609 on our website (https://echa.europa.eu/support/qas-support/qas).
101	How long is a manufacturer obliged to notify, when a product is no longer produced/delivered? Does the SCIP database offer the opportunity to highlight that the product is eliminated, even when the waste operators might get the product at a later stage?	Only as long as the article/complex object (product) is supplied to your costumers or placed on the market (e.g. as a result of an import). As from 5 January 2021, information on articles containing SVHCs (on the Candidate List) in a concentration above 0.1% w/w placed on the EU market needs to be notified to ECHA at the time of the next supply to any of your costumers or placement on the market as a result of an import, on that date or later. You can always update your notification after 5 January 2021, on a voluntary basis, if there are changes on the information already submitted, e.g. if you remove a Candidate List substance from a previously notified (component) article, for instance due to successful substitution effort, to indicate that the substance is no longer present. We allow and recommend suppliers of articles to update their notification (or submit a new one) on a voluntary basis if they are not supplying an article anymore on 5 January 2021 or later (legacy article or product), but they are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles they supplied previously, in particular if they foresee a high probability of the articles are still in use (based on an estimated time for the service life). The old notification itself will remain in the system, in order that dismantlers and waste sector operators can access the (historical) data. The SCIP database recognises that a submission is an update of a previously submitted notification based on the following elements: primary article identifier type, primary article identifier values and legal entity (LE). However, you are required to update your notification if (1) a substance present in an article already notified is included in the Candidate List after 5 January 2021; (2) that Candidate List substance is present in a (component) article of a complex object already notified (due e.g. to the presence of other component containing other Candidate List substance); In this case you need to identify the new components or subcomponents where this new Candidate List substance is present; (3) an already listed SVHC on the Candidate List substance is incorporated in one of the component articles, due to e.g. a change in production or you become aware of the presence of that substance. In these cases, the update has to be done at the time of any supply or placement on the market the of the covered articles to any costumer or as a result of an import (from 5 January 2021 onwards). See also Q&A 1617 on our website (https://echa.europa.eu/support/qas-support/qas).
102	Is a single registration sufficient for all EU-countries?	Each supplier of an article or complex object incorporating an article with a Candidate List above 0.1% w/w needs to submit a notification when placing the article or complex object on the EU market. The 'foreign user' feature may be used in certain cases. ECHA has implemented a technical solution which is the “foreign user” feature which consists of duty holders adding a ‘foreign user’ to their accounts to submit data to the SCIP database. It allows third parties to submit data on duty holder’s behalf on a voluntary or contractual basis, under the legal responsibility of the company concerned. This solution is useful mainly for companies within a corporate group where the mother company wishes to submit data on behalf of its daughter companies. For more information, check the Q&A 960 (https://echa.europa.eu/support/qas-support/qas) and the ECHA Accounts Manual (https://echa.europa.eu/manuals) on our website.

103	Can you please explain in more detailed the difference between RED/mandatory information and YELLOW/required information?	Your question will be answered in the upcoming presentations. If you miss the answer, re-send your question before the end of the webinar. The information requirements are available on ECHA's website: 'Detailed Information Requirements for the SCIP database' document (https://echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf). Please see also Q&A 1612 (https://echa.europa.eu/support/qas-support/qas) and the document 'How to prepare and submit a SCIP Notification Dossier' available on the SCIP support webpage (https://echa.europa.eu/documents/10162/28213971/SCIP_Database_Notifications.pdf), which contains guidelines on how to fill in each data field. In the coming weeks, we are planning to update the information requirements document with further clarifications about the mandatory, required and voluntary requirements, as briefly presented in the webinar (https://echa.europa.eu/-/introducing-the-scip-database-prototype). In this context, please see the presentation 'Planned IUCLID format changes' (https://echa.europa.eu/documents/10162/28639054/planned_iuclid_format_changes_en.pdf) presented in the SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group).
104	Can you confirm that the Candidate List version is no longer required?	ECHA has re-evaluated this issue due to the confusion this field has caused, despite the requests from several stakeholders to include it. Most likely that field will be deleted from the SCIP information requirements document (available at https://echa.europa.eu/scip-support) and removed from the format (https://echa.europa.eu/scip-format) in their next update. Please see the presentation 'Planned IUCLID format changes' (https://echa.europa.eu/documents/10162/28639054/planned_iuclid_format_changes_en.pdf) presented in the SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). However, please consult periodically the SCIP webpage for an official confirmation.
105	Are there discussions about it? Is it planned to be considered or discussed with the EU Commission?	[COVID-19 situation] The European Commission was made aware of this concern from duty holders. At this point the focus in the Corona crisis has been on the health side of things. We invite you to regularly consult our webpage and follow ECHA on social media to keep yourself updated on any change or on the support we provide due to the COVID-19 situation.
106	How to know the structure format of the data to send for a system-to-system notification?	The technical description of the format can be found here: https://echa.europa.eu/scip-format
107	Will there be an interface to established database systems like IMDS or BOMcheck?	This is up to the systems themselves. If they choose, they can build the creation and submission of the notification dossiers from the system. No specific integration point can be offered.
108	How will u handle product families - such as a jacket with an SVHC on a patch - jacket sold in multiple sizes and EANs - one single with other id fields used to do identification of sizes / models	You need to provide enough information that allow the user of the database to be able to identify the 'location' of the article containing the Candidate List substance. The supplier is responsible for complying with the SCIP notification obligation (and with communication obligation under REACH Article 33(1)) and should take into consideration how to best support their costumers (by allowing them to use the simplification mechanisms which are being assessed and implemented by ECHA, e.g. simplified SCIP notification and referencing - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). ECHA would like to further discuss approaches with Stakeholders. ECHA invites you to submit us your approach and real examples for

		further consideration of your case and more generally for further discussion with stakeholders using our contact forms: echa.europa.eu/contact. We also invite you to look at presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group).
109	is there any kind of integration between SCIP and IMDS where information of chemical composition of articles for automotive industry is already managed?	Any integrations between the SCIP format and existing industry systems (e.g. IMDS, BomCheck, etc.) are the responsibility of those actors owning these solutions. ECHA will not develop any such integrations.
110	If SCIP is online, are customer inquiries about SVHC substances in products automatically answered by the database?	Your customers can look for your products in the database in order to access the information about SVHC in products. After 5 January 2021, companies are still required to comply with their communication and notification obligations under Articles 33 and 7(2) of the REACH Regulation. A supplier needs to communicate down the information to costumers (according to REACH Art. 33(1)) and also needs to submit a SCIP notification to ECHA. The SCIP notification obligation under the Waste Framework Directive complements these already existing communication and notification obligations related to the "Candidate List substances" in articles, under Articles 33 and 7(2) of the REACH Regulation and should reinforce compliance with these obligations. It does not replace them.
111	Part numbers change in time due to minor modifications or upgrades while part is actually still the same. How to trace back in SCIP over the years?	Changing part numbers can be updated/added to a previously made notification if the article is considered the same. How articles and complex objects are managed for the purposes of the SCIP notification is up to duty holders, in particular regarding the alphanumeric identifiers. The SCIP database recognises that a submission is an update of a previously submitted notification based on the following elements: primary article identifier type, primary article identifier values and legal entity (LE). You can always update your notification after 5 January 2021, on a voluntary basis, if there are changes on the information already submitted. You are required to update your notification if (1) a substance present in an article already notified is included in the Candidate List after 5 January 2021; (2) that Candidate List substance is present in a (component) article of a complex object already notified (due e.g. to the presence of other component containing other Candidate List substance); In this case you need to identify the new components or subcomponents where this new Candidate List substance is present; (3) an already listed SVHC on the Candidate List substance is incorporated in one of the component articles, due to e.g. a change in production or you become aware of the presence of that substance. In these cases, the update has to be done at the time of any supply or placement on the market of the covered articles to any costumer or as a result of an import (from 5 January 2021 onwards). See also Q&A 1617 on our website (https://echa.europa.eu/support/qas-support/qas). As said previously, you can update your notification whenever you wish, e.g. if you remove a Candidate List substance from a previously notified (component) article, for instance due to successful substitution effort, to indicate that the substance is no longer present. We allow and recommend suppliers of articles to update their notification (or submit a new one) on a voluntary basis if they are not supplying an article anymore on 5 January 2021 or later (legacy article or product), but they are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles they supplied previously, in particular if they foresee a high probability of the articles are still in use (based on an estimated time for the service life). If you no longer produce and place certain articles on the market then their notification dossiers do not need to be updated. The 'old' notification itself will remain in the system however in order that dismantlers and waste sector operators can access the (historical) data.

112	How does the system-to-system solution work if you have to make entries for complex articles from bottom to top. During an import all data is transferred simultaneously and then the final article cannot be created if the components below are missing...	Actually what is being submitted S2S is a dossier which already reflects the whole structure of the complex object as prepared by the duty holder before submission. The complex object structure is not built after submission centrally at ECHA.
113	Will there be a test environment available?	Yes, we offer a test mode. Additionally, you can always test the IUCLID data with IUCLID, see more here: https://poisoncentres.echa.europa.eu/documents/22284544/22295820/PCN_S2S_integration.pdf/23ca3bbe-d8cb-f6d2-b4c0-a9a0310d6007
114	Is there a function similar to "only representative" that can be used to support SCIP notifications for companies who are importing into Europe and want to support the entities who are technically the Importer of Record?	No 'only representative' - OR - is defined in the legislation/Directive meaning that all importers have to take on the responsibility. We offer a "Foreign user" concept that allows for the use of consultants or non-EU producers to help, but the responsibility is with the Importer. The responsibility for fulfilling the obligation of providing information to ECHA lies with the EU importers. ECHA has implemented a technical solution which is the "foreign user" feature which consists of duty holders adding a 'foreign user' to their accounts to submit data to the SCIP database. It allows third parties to submit data on duty holder's behalf on a voluntary or contractual basis, under the legal responsibility of the company concerned. For more information, check the Q&A 960 and 1610 (https://echa.europa.eu/support/qas-support/qas) and the ECHA Accounts Manual (https://echa.europa.eu/manuals) on our website.
115	How to use supplier references offline?	This is a voluntary approach. The supplier will need to inform the recipient about the SCIP number of his notification, on a voluntary basis as part of his approach to best support their costumers (by allowing them to use the simplification mechanisms which are being assessed and implemented by ECHA, e.g. simplified SCIP notification and referencing - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). How to use this number (online and offline) will be made available when the analysis has been finalised.
116	Manufactures for parts for automotive industry using IMDS, now they must also add their data into SCIP?	Yes. S2S approaches are being developed as described in the last presentation. Please discuss with IMDS how they can help you to make this new obligation as smooth as possible.
117	Is IMDS integrated to transfer data?	This would be a question for those responsible for developing and maintaining IMDS. ECHA will not develop any such integration.
118	Will there be phases for the data input? The manufacturers of complex objects must have the opportunity for referencing to data already reported by their suppliers in order to avoid duplicate/triplicates...	The submission of production data, in principle, can be started in late October 2020. No phases are mentioned in the Directive as the obligation starts at the next supply. We recommend that this discussion is held in the supply chain. ECHA is currently working on the referencing option and we foresee it to be released at the end of October 2020. This approach can only be used when your supplier provides voluntarily to you with an identifier provided by ECHA (e.g. in submission report). This is a voluntary approach that can be adopted by suppliers to support their customers in facilitating their work to submit SCIP notifications. Therefore, the implementation of the 'referencing' mechanism needs to necessarily follow the article in the supply chain since it is produced until it is incorporated in subcomponents and components and then being incorporated in the final complex object placed on the market to be installed and/or used. We also invite you to look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). More information on this will be made available later in the year.

119	Did someone in ECHA evaluate the cost of the registration (IT investment, data organization, time for registration and notification each day, ...) ???	ECHA is only implementing a legal duty created by the European Parliament, Council and Commission (duty under Art. 9(2) of the Waste Framework Directive). However, when transposing this EU Directive into national law, we are aware that several Member States are doing impact assessments.
120	is the format of the IUCLID file documented on the ECHA website or where we can found this Information to prepare the input for the database in our own system?	Please refer to the SCIP format page for more information - https://echa.europa.eu/scip-format We will publish the appropriate links under the SCIP web pages once we have them ready. For more information earlier, please have a look at the IUCLID 6 web site
121	I work for a multinational company who manufacture and import many types of products including clothing, motorcycles, and off-road aftermarket components. Understanding the effort, does ECHA have any advice base on enforcement to help prioritization?	Enforcement is a national duty and we cannot advise on that. The legal duty applies equally to all articles on the EU market without prioritisation. See also our Q&A 1611 on our website (https://echa.europa.eu/support/qas-support/qas).
122	Can a manually submitted notification be updated to a system -to -system notification at a later stage?	Yes. The dossier is similar regardless how it has been submitted. Meaning you can create the initial dossier manually and submit it using the submission portal and then update the notification via system to system.
123	If the article includes RohS exemption such as lead in resistors. I have heard various comments whether or not these should be notified. I hope you can help.	Such resistors are not exempted for SCIP notification, neither by the communication obligation under REACH Article 33(1) which should already take place.
124	Question to all participants: Is everybody aware that almost all electric and electronic products on the European market including millions of sub-articles have to be entered in the database? Almost all electronics contain brass with 1-3%. of lead.	Yes we are aware of the large impact of this legal duty. Therefore we are trying to implement several technical solutions to simplify the burden, within the boundaries of the legal text, such as system-to-system notifications or 'referencing'.
125	Is it possible for a headquarter to insert the data also for the subsidiaries or do they have to do it on their own?	Headquarters can act on their behalf as a 'foreign user'. Each supplier of an article or complex object incorporating an article with a Candidate List above 0.1% w/w needs to submit a notification when placing the article or complex object on the EU market. ECHA has implemented a technical solution which is the "foreign user" feature which consists of duty holders adding a 'foreign user' to their accounts to submit data to the SCIP database. It allows third parties to submit data on duty holder's behalf on a voluntary or contractual basis, under the legal responsibility of the company concerned. This solution is useful mainly for companies within a corporate group where the mother company wishes to submit data on behalf of its daughter companies. For more information, check the Q&A 960 (https://echa.europa.eu/support/qas-support/qas) and the ECHA Accounts Manual (https://echa.europa.eu/manuals) on our website.
126	Under REACH article 33 one has to identify SVHC (substance name) and	We do not agree with your statement. Please see Q&A 1612 (https://echa.europa.eu/support/qas-support/qas) and the 'Detailed Information Requirements for the SCIP database' document

	article. It is not a requirement to identify sub-component where substance is present, no requirement to list concentration or material category etc.. SCIP is not in line with REACH.	(https://echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf) on ECHA's website. The information to be submitted should also allow all operators in the supply chain and consumers "to make a supply choice in full knowledge of the properties of the products, including those of articles forming part of their composition" (judgement of the Court of Justice in case C-106/14, - paragraphs 77 to 79 - http://curia.europa.eu/juris/liste.jsf?language=en&td=ALL&num=C-106/14). A duty holder should consider the legal text (and the objectives) of both REACH and the Waste Framework Directive, the case law of the Court of Justice (case C-106/14), and the ECHA guidance on requirements for substances in articles, as agreed with Member States (regarding REACH Article 33(1)), when preparing a SCIP notification. We invite you to see the Questions and Answers which were published on the ECHA website (https://echa.europa.eu/support/qas-support/browse/-/qa/70Qx/view/topic/Waste+Framework+Directive+-+SCIP+database). A number of Q&As were provided by the European Commission to bring clarification on the scope of application of the legal duties related to Articles 9(1)(i) and 9(2) of the WFD (Commission non-paper on the implementation of articles 9(1)(i) and 9(2) of the revised Waste Framework Directive 2008/98/EC, distributed to the CARACAL and Waste Expert Group in June 2019, ref. Ares(2019)3936110). Following feedback received from stakeholders, and as briefly explained in the webinar, ECHA is planning to introduce some changes in the SCIP format and to further clarify the difference between mandatory data fields and those where an answer is "required". For those that are 'required', the requirement can be "waived" if data is not available (e.g. "no data"). For example, it is recommended that the appropriate concentration range must be selected when this information is available to the duty holder because it is relevant information to ensure the safe use of the article and its proper treatment at the waste stage, but if that information is not available the range >0.1% to 100% w/w can be selected. We also invite you to look at presentations: - 'Planned IUCLID format changes' (https://echa.europa.eu/documents/10162/28639054/planned_iuclid_format_changes_en.pdf)- 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf) presented in the SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). In this context, we also invite you to consult subchapters 3.2.1 and 3.4.1 (including example 12) of the Guidance on requirements for substances in articles available on ECHA's website (https://echa.europa.eu/guidance-documents/guidance-on-reach?panel=guidance-on-requirements-for-substances-in-articles#guidance-on-requirements-for-substances-in-articles), as well as e.g. Appendix 5; Appendix 6, example 23. We also would like to invite you to take a look to the Forum's Final report on the Forum Pilot Project on Substances in Articles to check how enforcement actions are being implemented in Member States for REACH Article 33 (For SCIP enforcement see Q&A 1611) - https://echa.europa.eu/-/companies-need-to-improve-communication-of-hazardous-substances-in-products .
127	Manufacture of parts for automotive industry are using IMDS, now they have to add their data again into SCIP?	Yes. Please discuss with IMDS how they can help you to make this new obligation as smooth as possible.
128	How can we support our Importers? I understand we can support by submitting SCIP notification to ECHA in behalf of our importers. Is it useful 'foreign user' on page 12? Could you explain it more?	Yes indeed, the foreign user concept may be the right solution for you, among others. The use of the 'foreign user' feature should be based on voluntary agreements between you and your customers and the access to their accounts to submit on their behalf. The responsibility for fulfilling the obligation of providing information to ECHA lies with the EU importers. ECHA has implemented a technical solution which is the "foreign user" feature which consists of duty holders adding a 'foreign user' to their accounts to submit data to the SCIP database. It allows third parties to submit data on duty holder's behalf on a voluntary or contractual basis, under the legal responsibility of the company concerned. For

		more information, check the Q&A 960 and 1610 (https://echa.europa.eu/support/qas-support/qas) and the ECHA Accounts Manual (https://echa.europa.eu/manuals) on our website.
129	When no minimum tonnage triggers the obligation to notify (as in REACH Art. 7) hundreds of thousands SME will have to notify (amongst them tens of thousands locksmiths) due to lead (Pb) being contained in small amounts in many products.	There is indeed no tonnage trigger and we are aware of the large impact, but the legal duty does not apply to retailers or suppliers who only sell directly and exclusively to consumers (see also the Q&As 1607 and 1609 on our website - https://echa.europa.eu/support/qas-support/qas). ECHA is also planning to implement simplification mechanisms for SCIP notifications which may help assemblers and distributors.
130	where is the format of the IUCLID format documented for the S2S upload and preparation in our own system?	Please refer to the SCIP format page for more information - https://echa.europa.eu/scip-format
131	Is the SVHC CL in prototype correctly updated? It showed multiple versions for 1 year, e.g. 3 for 2019 and 5 for 2020... the SVHC CL list published twice a year. Also, I cannot choose the substance. I do not get the list as presented during the demo.	The 'Candidate list version' field is aimed at indicating what substances you have assessed your articles against. To get the reference substances into your IUCLID, please look at the page https://echa.europa.eu/candidate-list-package". We also invite you to consult the guidelines provided in slides 25 and 26 of the "How to prepare and submit a SCIP Notification Dossier" document (https://echa.europa.eu/documents/10162/28213971/SCIP_Database_Notifications.pdf). ECHA has re-evaluated the current 'Candidate List version' field due to the confusion it has caused, despite the requests from several stakeholders to include it. That field will be most likely be deleted from the SCIP information requirements document (available at https://echa.europa.eu/scip-support) and removed from the format (https://echa.europa.eu/scip-format) in their next update. Please see the presentation 'Planned IUCLID format changes' (https://echa.europa.eu/documents/10162/28639054/planned_iuclid_format_changes_en.pdf) presented in the SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group).However, please consult periodically the SCIP webpage for an official confirmation.
132	Where can I find the list of articles and materials categories in order to prepare them in advance?	You can find all the lists of the IUCLID format in the SCIP Webpage/tools/SCIP format (https://echa.europa.eu/scip-format): SCIP format annex – Picklists: October 2019. For the article category, please see the presentation (slides 8 to 17) made on the IT User Group meeting of 6 February, available on the SCIP support webpage (https://echa.europa.eu/documents/10162/28213971/SCIP_Trials_feedback_%28I%29.pdf). The EU Trade Helpdesk is a useful tool to find CN/TARIC codes, which is kept by European Commission (DG TRADE) available at https://trade.ec.europa.eu/tradehelp . Concerning the material categories, besides the excel file available (picklists of the SCIP format), we are planning to make a word document available on our website in the coming weeks.
133	How can I implement this list into the ICLUID Cloud system?	[IMPORT of Candidate List Reference Substances] Please have a look at https://echa.europa.eu/candidate-list-package and import the available files to your own IUCLID. We also invite you to consult the guidelines provided in slides 25 and 26 of the "How to prepare and submit a SCIP Notification Dossier" document (https://echa.europa.eu/documents/10162/28213971/SCIP_Database_Notifications.pdf).
134	Shall we have all the notifications done by January 05th 2021? Or should we start the notification from that date?	The legal duty indeed kicks in on 5 January 2021 and requires all articles on the market to be notified at the time of any supply of the covered articles placed on the market (to any costumer or as a result of an import) from that date onwards. ECHA is planning to allow submissions already from end October 2020 onwards. See also Q&A 1617 on our website (https://echa.europa.eu/support/qas-support/qas). According to Article 9(1)(i) of the WFD, suppliers should

		provide to ECHA the information pursuant to Article 33(1) of REACH Regulation from 5 January 2021 onwards, at the time of any supply or placement on the market the of the covered articles to any costumer or as a result of an import. After 5 January 2021, if substances present in the articles are added to the Candidate List, concerning the communication obligation down the supply chain (under Art. 33(1)), the Guidance on requirements for substances in articles, in its subchapter 3.2.1 mentions that the "information is to be provided to the recipient of the article when the article is supplied for the first time after the inclusion of the substance into the Candidate List". The same applies to the SCIP notification. The suppliers (including importers) need to update the SCIP notification at the time of the next supply or placement on the market to any costumer or as a result of an import, after the substance has been included in the Candidate List and is present in the concerned articles (on their own or in complex objects) in a concentration above 0.1% w/w. You can update your notification whenever needed (on a voluntary basis) e.g. if you remove a Candidate List substance previously present in your article, for instance as a result of substitution efforts, to indicate that the substance is no longer present. We also recommend that you to update your notification (or submit a new one) on a voluntary basis if you are not supplying an article anymore on 5 January 2021 or later (legacy article or product), but you are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles you supplied previously, in particular if you foresee a high probability of the articles are still in use (based on an estimated time for the service life). The mentioned Guidance is available at https://echa.europa.eu/guidance-documents/guidance-on-reach?panel=guidance-on-requirements-for-substances-in-articles#guidance-on-requirements-for-substances-in-articles
135	could you please tell me if a product puts on the EU market after 5 January 2021 has to be notified to the database before the placing on the market	The legal duty indeed kicks in on 5 January 2021 and requires all articles on the market to be notified at the time of any supply of the covered articles placed on the market (to any costumer or as a result of an import) from that date onwards. ECHA is planning to allow submissions already from end October 2020 onwards. See also Q&A 1617 on our website (https://echa.europa.eu/support/qas-support/qas). According to Article 9(1)(i) of the WFD, suppliers should provide to ECHA the information pursuant to Article 33(1) of REACH Regulation from 5 January 2021 onwards, at the time of any supply or placement on the market of the covered articles to any costumer or as a result of an import. After 5 January 2021, if substances present on the articles are added to the Candidate List, concerning the communication obligation down the supply chain (under Art. 33(1)), the Guidance on requirements for substances in articles, in its subchapter 3.2.1 mentions that the "information is to be provided to the recipient of the article when the article is supplied for the first time after the inclusion of the substance into the Candidate List". The same applies to the SCIP notification. The suppliers (including importers) need to update the SCIP notification at the time of the next supply or placement on the market to any costumer or as a result of an import, after the substance has been included in the Candidate List and is present in the concerned articles (on their own or in complex objects) in a concentration above 0.1% w/w. You can update your notification whenever needed (on a voluntary basis) e.g. if you remove a Candidate List substance previously present in your article, for instance as a result of substitution efforts, to indicate that the substance is no longer present. We also recommend you to update your notification (or submit a new one) on a voluntary basis if you are not supplying an article anymore, but you are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles you supplied previously, in particular if you foresee a high probability of the articles are still in use (based on an estimated time for the service life). The mentioned Guidance is available at https://echa.europa.eu/guidance-documents/guidance-on-reach?panel=guidance-on-requirements-for-substances-in-articles#guidance-on-requirements-for-substances-in-articles
136	Could you please clarify how SCIP will apply to UK article suppliers? Is the UK still required to transpose the revised WFD into its national law by 5 July 2020? (considering that we are in the implementation period)	The responsibility for fulfilling the obligation of providing information to ECHA lies with the EU importers. Companies outside of the EU are not subject to this obligation and are not allowed to submit SCIP notifications. Regarding any requirement for transposition by the UK, we invite you to contact the UK authorities and/or the European Commission.

137	Would it be possible to distribute and share all Q&A to the participants afterwards?	Try both Save and Save as options please and let us know if it worked.
138	If we have lead in glass in resistors (as RoHS exemption) Is this exempted for SCIP notification?	No, it seems that you have to send a SCIP notification for this article. However, we recommend you to consult Q&A 1218 (https://echa.europa.eu/support/qas-support/qas)
139	Will ECHA check the information provided in a notification (like a compliance check) and do we need to update notifications?	Besides an automated data validation, ECHA does not perform any other checks on the dossiers submitted to the portal. However, ECHA's IT tools allow you to validate your own information before you submit in a validation report. Regardless of the support offered by ECHA's automated validation tool, it will not replace the quality or adequacy of the information submitted which will remain responsibility of duty holders. You need to update a notification in case a substance present in your article are included in the Candidate List after 5 January 2021 or if you include additional Candidate List substances in your article after that date. After 5 January 2021, if substances present on the articles are added to the Candidate List, concerning the communication obligation down the supply chain (under Art. 33(1)), the Guidance on requirements for substances in articles, in its subchapter 3.2.1 mentions that the "information is to be provided to the recipient of the article when the article is supplied for the first time after the inclusion of the substance into the Candidate List". The same applies to the SCIP notification. The suppliers (including importers) need to update the SCIP notification at the time of the next supply or placement on the market to any costumer or as a result of an import, after the substance has been included in the Candidate List and is present in the concerned articles (on their own or in complex objects) in a concentration above 0.1% w/w.You can update your notification whenever needed (on a voluntary basis) e.g. if you remove a Candidate List substance previously present in your article, for instance as a result of substitution efforts, to indicate that the substance is no longer present. We also recommend you to update your notification (or submit a new one) on a voluntary basis if you are not supplying an article anymore on 5 January 2021 or later (legacy article or product), but you are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles you supplied previously, in particular if you foresee a high probability of the articles are still in use (based on an estimated time for the service life). Any check on compliance and adequacy of the information submitted to ECHA is the responsibility of the Member States. See also our Q&A 1611 on our website (https://echa.europa.eu/support/qas-support/qas).The mentioned Guidance is available at https://echa.europa.eu/guidance-documents/guidance-on-reach?panel=guidance-on-requirements-for-substances-in-articles#guidance-on-requirements-for-substances-in-articles
140	Automobiles have many options and every single car has slightly different components even within the same model. Should we make notification on every VIN (Vehicle Identification Number)?	It is up to the duty holder to decide the best approach to submit a SCIP notification which is compliant with the obligation set out in the Waste Framework Directive and to support their costumers (by allowing them to use the simplification mechanisms which are being assessed and implemented by ECHA, e.g. simplified SCIP notification and referencing - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). ECHA would like to further discuss approaches with Stakeholders. Due to the diversity of articles as such and complex objects (incorporating articles), ECHA has developed the (IUCLID) SCIP format as a one-size-fits-all solution to cover all possible articles/products and has kept any constraints that would fail a submission to a minimum. This 'flexibility' provides a lot of discretion to duty holders on how to report data to the SCIP database, and allows different possibilities 'grouping'. A compliant level of reporting by a duty holder should consider the legal text of both REACH and the Waste Framework Directive, the case law of the Court of Justice (case C-106/14), and the ECHA guidance on requirements for substances in articles, as agreed with Member States (regarding REACH Article 33(1)): https://echa.europa.eu/documents/10162/23036412/articles_en.pdf The supplier is responsible for complying with the SCIP notification obligation (and with communication obligation under REACH Article 33(1)). There is no specific guideline at this moment other than to follow the above mentioned Guidance, which describes how to identify what

		information is necessary to compile and communicate to allow the safe use of an article (chapters 2 and 3; e.g. example 12; Appendix 5; Appendix 6, example 23). We also invite you to look at presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group).ECHA would like to work with the automotive sector to find a workable solution that potentially could avoid notifications for each vehicle unit placed on the market, i.e. submit SCIP notifications at the VIN (Vehicle Identification Number). Such solution may need to be agreed with the Member states and the European Commission. However, ECHA invites you to submit us your approach and real examples for further consideration on your case and more generally for further discussion with stakeholders (automotive sector) using our contact forms: echa.europa.eu/contact
141	But all 100s Q&A are now lost	The questions are here, WebEx has issues and we are trying to work around them.
142	What does one do with a submission done by one legal entity, when the business dealing with the article is transferred to another legal entity (sale of a business, for example).	ECHA is analysing this issue. At this moment in time, change of the legal entity will need a new submission of the SCIP notifications.
143	When updating the same article information already reported to the database, will it happen through same dossier name or a different dossier name?	When you are submitting an update you need to keep the same primary article identifier (value and type).
144	Compliance deadline: what is the notification deadline for articles being on the markets before Jan 5, 2021 and for the new products shipped after Jan 5, 2021?	According to Article 9(1)(i) of the WFD, suppliers should provide to ECHA the information pursuant to Article 33(1) of REACH Regulation from 5 January 2021 onwards. This applies to all old and new articles on the EU market from 05.01.2021 onwards, at the time of any supply or placement on the market the of the covered articles to any costumer or as a result of an import from that date onwards. See also Q&A 1617 on our website (https://echa.europa.eu/support/qas-support/qas). After 5 January 2021, if substances present on the articles are added to the Candidate List, concerning the communication obligation down the supply chain (under Art. 33(1)), the Guidance on requirements for substances in articles, in its subchapter 3.2.1 mentions that the "information is to be provided to the recipient of the article when the article is supplied for the first time after the inclusion of the substance into the Candidate List". The same applies to the SCIP notification. The suppliers (including importers) need to update the SCIP notification at the time of the next supply or placement on the market to any costumer or as a result of an import, after the substance has been included in the Candidate List and is present in the concerned articles (on their own or in complex objects) in a concentration above 0.1% w/w. You can update your notification whenever needed (on a voluntary basis) e.g. if you remove a Candidate List substance previously present in your article, for instance as a result of substitution efforts. We also recommend you to update your notification (or submit a new one) on a voluntary basis if you are not supplying an article anymore on 5 January 2021 or later (legacy article or product), but you are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles you supplied previously, in particular if you foresee a high probability of the articles are still in use (based on an estimated time for the service life). The mentioned Guidance is available at https://echa.europa.eu/guidance-documents/guidance-on-

		reach?panel=guidance-on-requirements-for-substances-in-articles#guidance-on-requirements-for-substances-in-articles
145	Is there a preference for substance data to be provided by suppliers or to be obtained the manufacturer of complex articles via chemical testing of the articles the purchase to manufacture the complex object	If we understand correctly the question, the Guidance on requirements for substances in its subchapter 5.1 states that "Supply chain communication is therefore the most important and efficient way of gathering the information needed in order to identify one's obligations under REACH. Chemical analysis, although a possible way to identify and quantify substances in articles, is time consuming, costly and difficult to organise." From this, the preferred way to generate and collect information about the presence of Candidate List substances in articles and information to ensure the safe use of the articles to comply with substances in articles-related obligations, including SCIP notifications, should be supply chain communication, e.g. by proactively requesting information from actors up the supply chain. If such approaches to obtaining information fail or become too complicated, conducting chemical analysis may be an option to obtain information on the composition of articles to ensure compliance, because SCIP notification like the communication down the supply chain (under REACH Art. 33(1)) applies regardless of whether or not you are aware of the presence of the Candidate List substances. Therefore, it is in your interest to seek for all information you need from your suppliers by all means possible. The mentioned Guidance is available at https://echa.europa.eu/guidance-documents/guidance-on-reach?panel=guidance-on-requirements-for-substances-in-articles#guidance-on-requirements-for-substances-in-articles
146	As an assembler are you supposed to wait until the supplier creates the a SCIP dossier which you can use? Or does the assembler has to create their own submissions for each part that they buy?	This is left up to the supply chains to decide and agree. You may wait for your supplier to make the notification and then simply refer to their data or to enter the data yourself. If a SCIP notification dossier is not created (or has not yet been created) by the supplier (duty holder), the obligation to notify still would apply to a duty holder with obligations to submit a notification to the SCIP database, i.e. EU assemblers with articles supplied in the EU market containing a SVHC substance in the candidate list with a concentration of 0.1%(w/w) or above. If your supplier agrees to share his dataset with you for the component, then you can wait for it to incorporate the complex object component in your notification (dataset). ECHA is currently working on a 'referencing' model to allow to refer to articles already notified when incorporated into a complex object. If your supplier is unable to provide the required data to you to then you will need to determine what data needs to go in the SCIP notification that needs to be generated. ECHA is assessing and implementing simplification mechanisms (e.g. simplified SCIP notification and referencing) which are being assessed and implemented which could be used by the actors in the supply chain, as presented briefly in the webinar. These are voluntary approaches. The supplier will need to inform the recipient about the SCIP number of his notification, on a voluntary basis as part of his approach to best support their costumers (by allowing them to use those mechanisms), e.g. simplified SCIP notification and referencing, as presented briefly in the webinar - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). How to use this SCIP number (online and offline) will be made available when the analysis has been finalised.
147	Is submitting information to SCIP the only thing one has to do to be compliant to REACH article 33 in the future?	No. SCIP notification obligation and the communication obligation under REACH Art. 33 are different obligations. After 5 January 2021, companies are still required to comply with their communication and notification obligations under Articles 33 and 7(2) of the REACH Regulation. A supplier needs to communicate down the information to costumers (according to REACH Art. 33(1)) and also needs to submit a SCIP notification to ECHA. The SCIP notification obligation under the Waste Framework Directive complements these already existing communication and notification obligations related to the "Candidate List substances" in articles, under Articles 33 and 7(2) of the REACH Regulation and should reinforce compliance with these obligations. It does not replace them. The main aims of the SCIP notification are:- improving the availability of relevant information on articles containing Candidate List substances to waste treatment

		operators and consumers (https://echa.europa.eu/-/scip-database-will-improve-transparency-on-hazardous-substances-in-articles ; https://newsletter.echa.europa.eu/home/-/newsletter/entry/scip-database-improving-product-safety-and-reducing-hazardous-waste), in order that it is available throughout the whole lifecycle of products and materials, including at the waste stage;- reducing the generation of waste containing Candidate List substances;- and promote substitution of these substances in articles by safer alternatives. For more information see Q&A 1605 (https://echa.europa.eu/support/qas-support/qas) on ECHA's website and the video: https://youtu.be/Ixiq71L_G-o The aim of Article 33 is to ensure that sufficient information is communicated down the supply chain to allow the safe use of articles by end-users including consumers. The information flow along the supply chain enables all operators to take, at their stage of the use of the article, the appropriate risk management measures to guarantee the safe use of articles containing Candidate List substances. The information should also allow the operators in the supply chain and consumers to make informed purchase choices on the articles they buy. Finally, the notification obligation of importers and producers of articles under Article 7(2) of REACH aims at providing ECHA and the Member State competent authorities with information on the presence of Candidate List substances in articles, which may be used to identify a need for initiating regulatory risk management procedures under REACH (authorisation and restriction) or under other EU legislation. Of course, the SCIP database will also support these objectives by improving transparency on the presence of Candidate List substances in articles, but the main additional value of the database is that the SCIP data is also available to support waste operators to improve their waste separation and recycling techniques and processes over time (https://echa.europa.eu/waste-operators). ECHA is currently investigating how the SCIP database could be adapted or used by suppliers to comply with their duties under Article 33 and 7(2) of REACH. This will be further clarified in due time. However, suggestions from duty holders to streamline and find ways to gain efficiencies in complying with these obligations in an integrated way are welcomed. They can be provided to us via our contact form: echa.europa.eu/contact.
148	I could create dossier successfully. I don't know if I need separate access to submit to submission portal. Can you help?	The access roles needed in ECHA Account to submit is Submission Manager. This will be assigned automatically if you created a new company. Otherwise you can check with your LE manager to get access. If you create dossier on IUCLID cloud you can submit directly by the 'proceed with submission' button. You can also submit a dossier by entering on the Submission portal, upload the dossier and then submit. More info https://echa.europa.eu/scip-prototype
149	Concerning the legal text deadline response to the earlier Coronavirus question, isn't it true that whilst the deadline for submissions is fixed and the requirement for ECHA to have a DB is fixed,	The date from which companies are required to submit SCIP notifications stem directly from the Waste Framework Directive and its transposition in national legislations. It is not within our remit to decide changes to legal deadlines. The Commission is the right addressee for such requests. No additional information about any possible change impacting duty holders is available now. We invite you to regularly consult our established official webpage with COVID updates (https://echa.europa.eu/covid-19), where we publish updates on any exceptions or special arrangements that will be put in place and we also publish official correspondence on such issues. The work on the SCIP database is progressing as planned. Also the SCIP IT user group meetings continue. The next foreseen update will be the release of the next version of the database in late October 2020, which will be open for submitting SCIP notifications.
150	The actual format for industry to submit notifications is not & therefore industry can submit (quite legally) in any format. It is not legally required for industry to POPULATE the ECHA DB?	When there is a legal duty to submit data to an EU database, it is clear that the format of the database has to be followed to submit. Furthermore, ECHA has the responsibility to **establish a database for the data to be submitted to it** by duty holders (pursuant to REACH Article 33(1)) and maintain it (Article 9(2) of the Waste Framework Directive). The ownership of the data belongs to the submitter (https://echa.europa.eu/legal-notice), i.e. ECHA cannot extract and/or structure (or even 'interpret') unstructured bulk information submitted in any format or document by all duty holders. The information submitted to the (SCIP) database is made available by ECHA to waste treatment operators and consumers as received, i.e. as submitted by the duty holder, in order to ensure that the information about the presence

		of substances of very high concern **is available** throughout the whole life cycle of products and materials, including at the waste stage (recital 38 of Directive (EU) 2018/851).
151	How are changes in articles i.e. removing SVHC substances expected to be tracked in the waste/reuse systems, when you are just expected to change information in the existing registration? Then you can not see in your engine, whether the O-ring is with SVHC	This 'legacy' situation is of course not catered for by the SCIP DB solution and a rather long transition period will be there whilst long service life products get phased out over time. A duty holder can update the submitted notifications whenever he/she wishes, e.g. if the duty holder removes a Candidate List substance from a previously notified (component) article, for instance due to successful substitution effort, to indicate that the substance is no longer present. The 'old' notification itself will remain in the system however in order that dismantlers and waste sector operators can access the (historical) data.
152	Will the simplified notification and the referencing be for sure available in October? This makes a big difference for us in preparing!	ECHA will do its utmost to have such features available in the end of October 2020 release.
153	In case of a complex object manufacturer: could we access to our suppliers reporting??	If I understand your question correctly, when you assemble several articles into a complex object, you may indeed refer to data already submitted by your supplier by using the 'referencing' approach. ECHA is currently working on the 'referencing' option and we foresee it to be released at the end of October 2020. This approach can only be used when your supplier voluntarily provides you with an identifier provided by ECHA (e.g. in submission report). This is a voluntary approach that can be adopted by suppliers to support their customers in facilitating their work to submit SCIP notifications. Therefore, the implementation of the 'referencing' mechanism needs to necessarily follow the article in the supply chain since it is produced until it is incorporated in subcomponents and components and then being incorporated in the final complex object placed on the market to be installed and/or used. We also invite you to look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). More information on this will be made available later in the year.
154	If I understand Article 33 right then the Candidate List does not cover all substances which need to be reported (ie. CMR category 1A and 1B, PBTs, vPvBs, Endocrine Disruptors). But talking about SCIP usually we talk about only SVHCs. Clarification please?	To be precise the SCIP notification duty applies to articles containing substances of very high concern that have been put on the Candidate List for authorisation. The official Candidate List is available at https://echa.europa.eu/candidate-list-table Substances fulfilling one or more of the criteria defined in REACH Article 57 can be identified as Substances of Very High Concern (SVHCs) and put on the Candidate List for authorisation. The procedure to add SVHCs to the Candidate List is briefly explained in the 'Substances of very high concern identification' under the 'Authorisation' webpage available at https://echa.europa.eu/substances-of-very-high-concern-identification-explained . New substances are regularly added to the Candidate List, usually twice a year. Please see Q&A 1607 available at https://echa.europa.eu/support/qas-support/qas , as well as the introductory text in the SCIP webpage (https://echa.europa.eu/scip-database), and step 1 on 'Suppliers of articles' section of that webpage. The requirements to submit a SCIP notification to ECHA are the same as those that trigger the communication down the supply chain under REACH Article 33(1), i.e. any supplier of an article (see Q&A 1609, https://echa.europa.eu/support/qas-support/qas) containing a substance has to submit a SCIP notification to ECHA, when both the following conditions are met: • The substance is included in the Candidate List for authorisation (https://echa.europa.eu/candidate-list-table), and • The substance is present in articles produced, imported or supplied above a concentration of 0.1% w/w.

		The Candidate List substance concentration threshold of 0.1% w/w applies to every article supplied. This threshold applies to each article of an object made up of more than one article, which were joined or assembled together (complex objects) (see Q&A 1607).
155	All SVHCs need to be notified no matter if other directives such as RoHS exempt the use of the SVHC for the specific application?	Yes. Exempted articles from RoHS are still covered by the communication obligation under REACH Article 33(1) and therefore also covered by the SCIP notification obligation, because they are allowed to be placed on the market. Products can fall under several EU legislation at the same time. These obligations can be identified via ECHA's EUCLEF tool. https://echa.europa.eu/information-on-chemicals/euclef
156	For complex objects: do we have to report / enter in the database only subcomponents which directly contain the SVHC? Or also the stages in between containing them indirectly up to the complex object?	You have to provide information about the complex object you are placing on the market and about its components and subcomponents of this complex object that incorporate articles which contain the Candidate List substances above 0.1% w/w.You need to provide enough information to allow the user of the database to be able to identify the 'location' of the article containing the Candidate List substance. The supplier is responsible for complying with the SCIP notification obligation (and with communication obligation under REACH Article 33(1)). Please see Q&A 1612 (https://echa.europa.eu/support/qas-support/qas) and the 'Detailed Information Requirements for the SCIP database' document (https://echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf) on ECHA's website. We also invite you to look at presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). ECHA would like to further discuss approaches with Stakeholders. ECHA invites you to submit us your approach and real examples for further consideration on your case and more generally further discussion with stakeholders using our contact forms: echa.europa.eu/contact.
157	Is there a weight limit for very small articles such a electronic sub-components that those do not need to be notified?	No. Every article as such or in a complex object containing a Candidate List substance above 0.1% w/w are covered by the communication obligation under REACH Article 33(1) and therefore also covered by the SCIP notification obligation, regardless of the quantity of that substance present or of their weight. Please see Q&A 1607 (https://echa.europa.eu/support/qas-support/qas) on ECHA's website. We also invite you to look at presentation 'Electronic Components' (https://echa.europa.eu/documents/10162/28639054/electronic_components_en.pdf) which took place in SCIP IT user Group meeting of 28 February 2020 (https://echa.europa.eu/scip-it-user-group).
158	Will material category/mixture category really be a mandatory information? There is no * in the SCIP-Prototype.	The notification must include information of the material category or the mixture category where the SVHC is present. The information requirements are available on ECHA's website: 'Detailed Information Requirements for the SCIP database' document (https://echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf). Please see also Q&A 1612 (https://echa.europa.eu/support/qas-support/qas) and the document 'How to prepare and submit a SCIP Notification Dossier' available on the SCIP support webpage (https://echa.europa.eu/documents/10162/28213971/SCIP_Database_Notifications.pdf), which contains guidelines on how to fill in each data field. In the coming weeks, we are planning to update the information requirements document with further clarifications about the mandatory, required and voluntary requirements, as briefly presented in the webinar (https://echa.europa.eu/-/introducing-the-scip-database-prototype).
159	Does the dossier have to stay in the SCIP database forever or can we remove it sometime? For example if we have a packaging of cosmetics and the storage life is overdue 1 year.	In theory, we could say that any submission will be in 'the SCIP database forever'. All submissions will remain in the system in order that waste operators can access the historical data concerning an article or complex object. In other words, ECHA will keep all historic data for an article. We are still analysing on how to make this information available to waste operators. Concerning the possibility to indicate a 'cease of supply', ECHA is analysing this issue.

160	I do not see "Proceed to Submission" button once dossier is prepared. Do I need separate access?	Are you creating the dossiers on the Beta environment? The IUCLID Beta does not include 'proceed to submission' button. In this case export the dossier, enter in the submission portal and then upload the dossier and submit it.
161	When Candidate List is updated (new SVHC added), how many days are allowed until updating the existing SCIP dossier?	Regarding the communication obligation down the supply chain (under Art. 33(1)), the Guidance on requirements for substances in articles, in its subchapter 3.2.1 mentions that the "information is to be provided to the recipient of the article when the article is supplied for the first time after the inclusion of the substance into the Candidate List". The same applies to the SCIP notification. The suppliers (including importers) need to update the SCIP notification at the time of the next supply or placement on the market to any costumer or as a result of an import, after the substance has been included in the Candidate List and is present in the concerned articles (on their own or in complex objects) in a concentration above 0.1% w/w. We also recommend you to update your notification (or submit a new one) on a voluntary basis if you are not supplying an article anymore on 5 January 2021 or later (legacy article or product), but you are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles you supplied previously, in particular if you foresee a high probability of the articles are still in use (based on an estimated time for the service life). You can update your notification whenever needed (on a voluntary basis) e.g. if you remove a Candidate List substance previously present in your article, for instance as a result of substitution efforts, to indicate that the substance is no longer present. See also Q&A 1617 on our website (https://echa.europa.eu/support/qas-support/qas). The mentioned Guidance is available at https://echa.europa.eu/guidance-documents/guidance-on-reach?panel=guidance-on-requirements-for-substances-in-articles#guidance-on-requirements-for-substances-in-articles
162	Do all articles with SVHC need to be submitted at the 5th of January 2021, or is there a kind of transition period?	The obligation says that the next time you supply you must submit a SCIP notification. No official transition period exist. Note that ECHA is planning to allow submissions already from end October 2020 onwards. According to Article 9(1)(i) of the WFD, suppliers should provide to ECHA the information pursuant to Article 33(1) of REACH Regulation from 5 January 2021 onwards, at the time of any supply or placement on the market the of the covered articles to any costumer or as a result of an import. See also Q&A 1617 on our website (https://echa.europa.eu/support/qas-support/qas). After 5 January 2021, if substances present on the articles are added to the Candidate List, concerning the communication obligation down the supply chain (under Art. 33(1)), the Guidance on requirements for substances in articles, in its subchapter 3.2.1 mentions that the "information is to be provided to the recipient of the article when the article is supplied for the first time after the inclusion of the substance into the Candidate List". The same applies to the SCIP notification. The suppliers (including importers) need to update the SCIP notification at the time of the next supply or placement on the market to any costumer or as a result of an import, after the substance has been included in the Candidate List and is present in the concerned articles (on their own or in complex objects) in a concentration above 0.1% w/w. You can update your notification whenever needed (on a voluntary basis) e.g. if you remove a Candidate List substance previously present in your article, for instance as a result of substitution efforts, to indicate that the substance is no longer present. We also recommend you to update your notification (or submit a new one) on a voluntary basis if you are not supplying an article anymore on 5 January 2021 or later (legacy article or product), but you are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles you supplied previously, in particular if you foresee a high probability of the articles are still in use (based on an

		estimated time for the service life). The mentioned Guidance is available at https://echa.europa.eu/guidance-documents/guidance-on-reach?panel=guidance-on-requirements-for-substances-in-articles#guidance-on-requirements-for-substances-in-articles
163	Is it known which MS perform SCIP impact evaluation exercise?	ECHA is only implementing a legal duty created by the European Parliament, Council and Commission (duty under Art. 9(2) of the Waste Framework Directive). However, when transposing this EU Directive into national law, we are aware that several Member States are doing impact assessments as part of their national legislative procedures. We recommend you to ask to your national authority whether an impact assessment is being performed or not.
164	Why was the Candidate List version strikethrough in the presentation? Is it no more mandatory?	ECHA has re-evaluated this issue due to the confusion this field has caused, despite the requests from several stakeholders to include it. Most likely that field will be deleted from the SCIP information requirements document (available at https://echa.europa.eu/scip-support) and removed from the format (https://echa.europa.eu/scip-format) in their next update. Please see the presentation 'Planned IUCLID format changes' (https://echa.europa.eu/documents/10162/28639054/planned_iuclid_format_changes_en.pdf) presented in the SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group).However, please consult periodically the SCIP webpage for an official confirmation.
165	When will a test environment for S2S-solution be online?	You can already test S2S. Read carefully S2S service at https://echa.europa.eu/fr/scip-prototype and https://echa.europa.eu/fr/scip-format
166	Do you expect differences in the national transposition of the WFD? That might address such challenges as if the supplier of simple articles will have a shorter time frame then the ones of complex products so that the referencing could work?	Member States are obliged to transpose the EU Directive into national law by 5 July 2020. The national transposition cannot deviate far from the EU Directive (it sets the result to be achieved). ECHA and the Commission are following the progress by the Member States and have not been made aware of large discrepancies up to now.
167	Do we have to update all articles when there is a new candidate list version?	If new substances are added to the official Candidate List, after 5 January 2021, and that substance is present in your article, a new submission of the dossier is required (update). The official Candidate List is available at https://echa.europa.eu/candidate-list-table In the SCIP context, ECHA provide a Candidate List package to support the preparation of SCIP notifications (it is not an official list). The Candidate List package is available (to download) at: https://echa.europa.eu/candidate-list-package Regarding the communication obligation down the supply chain (under Art. 33(1)), the Guidance on requirements for substances in articles, in its subchapter 3.2.1 mentions that the "information is to be provided to the recipient of the article when the article is supplied for the first time after the inclusion of the substance into the Candidate List". The same applies to the SCIP notification. The suppliers (including importers) need to update the SCIP notification at the time of the next supply or placement on the market to any costumer or as a result of an import, after the substance has been included in the Candidate List and is present in the concerned articles (on their own or in complex objects) in a concentration above 0.1% w/w. We also recommend that you update your notification (or submit a new one) on a voluntary basis if you are not supplying an article anymore on 5 January 2021 or later (legacy article or product), but you are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles you supplied previously, in particular if you foresee a high probability of the articles are still in use (based on an estimated time for the service life). You can update your notification whenever needed (on a voluntary basis), e.g. if you remove a Candidate List substance previously present in your article, for instance as a result of substitution efforts, to indicate that the substance is no longer present. See also Q&A 1617 on our website (https://echa.europa.eu/support/qas-support/qas). The mentioned Guidance is available at https://echa.europa.eu/guidance-documents/guidance-on-reach?panel=guidance-on-requirements-for-substances-in-articles#guidance-on-requirements-for-substances-in-articles

168	If we have lead in glass in resistors (as RoHS exemption) Is this exempted for SCIP notification?	No. Exempted articles from RoHS are still covered by the communication obligation under REACH Article 33(1) and therefore also covered by the SCIP notification obligation, because they are allowed to be placed on the market.
169	Is it possible to summarize several articles in one notification if they differ only slightly, e.g. in color?	You need to provide enough information to allow the user of the database to be able to identify the 'location' of the article containing the Candidate List substance. The supplier is responsible for complying with the SCIP notification obligation (and with communication obligation under REACH Article 33(1)) and should take into consideration how to best support their costumers (by allowing them to use the simplification mechanisms which are being assessed and implemented by ECHA, as presented briefly in the webinar, e.g. simplified SCIP notification and referencing - please take also a look at presentation 'Approaches to simplify submission process' (https://echa.europa.eu/documents/10162/28639054/approaches_to_simplify_submission_process_en.pdf) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group)). ECHA would like to further discuss approaches with Stakeholders. ECHA invites you to submit us your approach and real examples for further consideration on your case and more generally further discussion with stakeholders using our contact forms: echa.europa.eu/contact. We also invite you to look at the presentation 'SCIP IT user group 20 Mar - EXAMPLES' (https://echa.europa.eu/documents/10162/28639054/scip_it_user_group_20_mar_examples_en.pdf/4eeb74d9-f763-025c-e192-f1dbb23c3de5) which took place in SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group).
170	I understand that one can say that a substance is no longer present in new supplies of a product. But in B2B context it often occurs that a product with a new composition gets a NEW PRODUCT ID. How does one indicate that the old product is no longer sold?	If the products get a new composition and a new product ID, you should create a new notification. ECHA is analysing this questions of products that are no longer sold.
171	Maybe this questions was already there - is it possible to enter more than one SVHC substance for the same article?	Yes, in the SCIP notification you can include the information of all the substance included in each article. If an article as such (on its own or as component article of a complex object) contains more than one Candidate List substance, you need to create an additional concern element block (Candidate List substance, Concentration range, Material category/Mixture category) by clicking '+ New item' appearing next to 'Concern element' as shown in the webinar video after 44:19 (https://youtu.be/_VlKWD1ENy0). Please see also slides 41 to 45 in the document 'How to prepare and submit a SCIP Notification Dossier' (https://echa.europa.eu/scip-support). These slides explain on how to include a Candidate List substance and other concern elements. To add an additional Candidate List substance present in the article as such, please repeat the same procedure.
172	How to deal with article notifications when the components of an article change but the product is sold under the same name and identifiers? When updating the notification, products with "old" components are still in stock, sold or in use.	ECHA will need to figure out how to display the different versions of the product. You should update the information according to your supply, i.e. the data base will know of all different versions of the product. The database only covers articles as they are placed on the market at a given point in time, it does not follow their service life (except if the notification is updated, because it is legally required or on a voluntary basis). Regarding the submission of the SCIP notification, you may need to update your notification, for instance, if the article (during the time it is being placed on the market) contains a Candidate List substance present in the article added to the Candidate List after 5 January 2021, or you may update your notification voluntarily if your article no longer contains the Candidate List substance.
173	Is the date of the SVHC substance list the date of the current version or the date when the substance has been added to the SVHC-list?	ECHA has re-evaluated the current 'Candidate List version' field due to the confusion it has caused, despite the requests from several stakeholders to include it. That field will be most likely be deleted from the SCIP information requirements document (available at https://echa.europa.eu/scip-support) and removed from the format (https://echa.europa.eu/scip-format) in their next update. Please see the presentation 'Planned IUCLID format changes'

		(https://echa.europa.eu/documents/10162/28639054/planned_iuclid_format_changes_en.pdf) presented in the SCIP IT user Group meeting of 20 March 2020 (https://echa.europa.eu/scip-it-user-group). However, please consult periodically the SCIP webpage for an official confirmation.
174	If I can update my notification whenever need e.g. if I remove a SVHC does this mean that if my article no longer contains a SVHC (because we changed the material) we can update the dossier?	Yes you can update the notification. You can always update your notification after 5 January 2021, on a voluntary basis, if there are changes on the information already submitted. You can update your SCIP notification, by updating a dataset, creating a new dossier and submitting it. You are required to update your notification if (1) a substance present in an article already notified is included in the Candidate List after 5 January 2021; (2) that Candidate List substance is present in a (component) article of a complex object already notified (due e.g. to the presence of other component containing other Candidate List substance); In this case you need to identify the new components or subcomponents where this new Candidate List substance is present; (3) an already listed SVHC on the Candidate List substance is incorporated in one of the component articles, due to e.g. a change in production or you become aware of the presence of that substance. In these cases, the update has to be done at the time of any supply or placement on the market of the covered articles to any costumer or as a result of an import (from 5 January 2021 onwards). See also Q&A 1617 on our website (https://echa.europa.eu/support/qas-support/qas).
175	When using the S2S solution, do we get the ECHA alphanumeric identifier automatically "back", so that we can put in our IT system?	Detail information about system to system service (how to submit and get a submission report) can be found here: https://echa.europa.eu/scip-prototype
176	Does "foreign user" also stand for a service provider submitting data on behalf of the manufacturer?	Yes, it can also be use in this case. ECHA has implemented a technical solution which is the "foreign user" feature which consists of duty holders adding a 'foreign user' to their accounts to submit data to the SCIP database. It allows third parties to submit data on duty holder's behalf on a voluntary or contractual basis, under the legal responsibility of the company concerned. This solution is useful mainly for 1) companies within a corporate group where the mother company wishes to submit data on behalf of its daughter companies; 2) voluntary arrangements between companies (e.g. a brand owner submitting on behalf of a full and closely controlled supply chain) and 3) consultants or other third parties supporting duty holders. For more information, check the Q&A 960 (https://echa.europa.eu/support/qas-support/qas) and the ECHA Accounts Manual (https://echa.europa.eu/manuals) on our website.
177	Do e.g. "medical devices" and "food contact materials" / "food contact articles" also fall under SCIP because they fall under specific separate EU legislation?	Yes they do, as long as they fall under the definition of article, which is usually the case for components of medical devices (or some medical devices themselves) and many food contact materials (FCM). Products can fall under several EU legislation at the same time. Via ECHA's EUCLEF tool these obligations can be identified.
178	At 10:30 someone answered: we are aware that several Member States are doing impact assessments-. My Q is: What MS are doing impact assessment? If those assessment reports are ready what further steps from MS may be expected?	Member States are obliged to transpose the EU Directive into national law by 5 July 2020. They are therefore going currently through the national legislative procedures, sometimes including impact assessments. For more information please contact your national authority.
179	Legacy situation: If an article needs to notify know but the SVHC will be substituted in the future, will the	The notification can indeed be updated to no longer contain SVHC. The notification itself will remain in the system however. You can update your notification whenever needed (on a voluntary basis) e.g. if you remove a Candidate List substance previously present in your article, for instance as a result of substitution efforts, to indicate that the

	existing notification be deleted or set on "inactive"?	substance is no longer present. Concerning the possibility to indicate a 'cease of supply', ECHA is analysing this issue. We also recommend you to update your notification (or submit a new one) on a voluntary basis if you are not supplying an article anymore on 5 January 2021 or later (legacy article or product), but you are aware that a substance that has been included in the Candidate List (after 5 January 2021) is present in the articles you supplied previously, in particular if you foresee a high probability of the articles are still in use (based on an estimated time for the service life).
180	If I shift article from one plant to another plant, it is considered as placed on the market?	If you are not importing the article and not placing it on the EU market (individually or as a component in assemblies - complex objects), then you do not need to notify until you do. 'Placing on the market' is defined under REACH as "supplying or making available, whether in return for payment or free of charge, to a third party. Import shall be deemed to be placing on the market."
181	What about support of production, if one plant needs support and another plant will produce on its behalf, who will have to report to SCIP?	The entity that places the article on the EU market (individually or as a component in assemblies - complex objects). 'Placing on the market' is defined under REACH as "supplying or making available, whether in return for payment or free of charge, to a third party. Import shall be deemed to be placing on the market."