Breakout groups

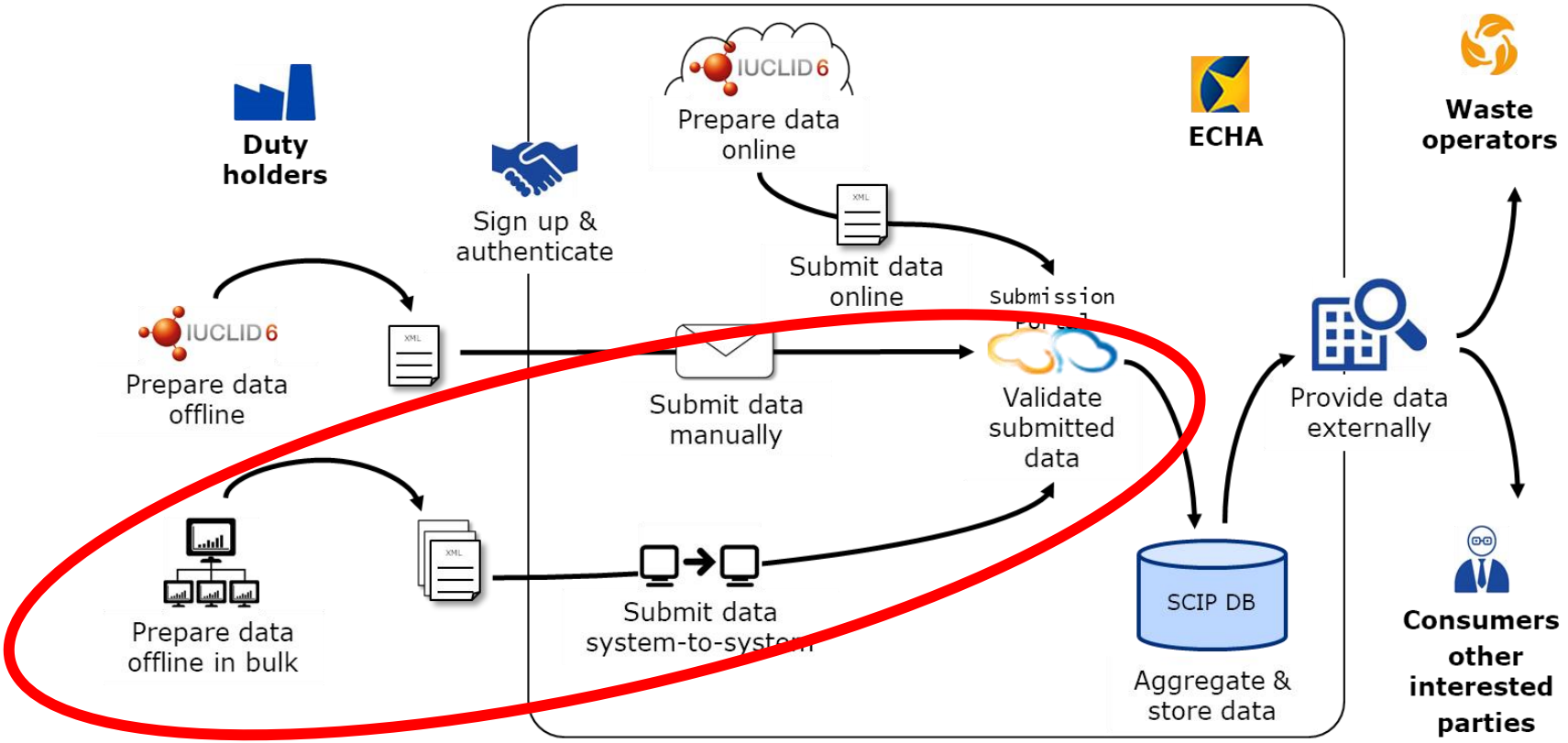
How to ensure efficient notification procedures

Breakout groups

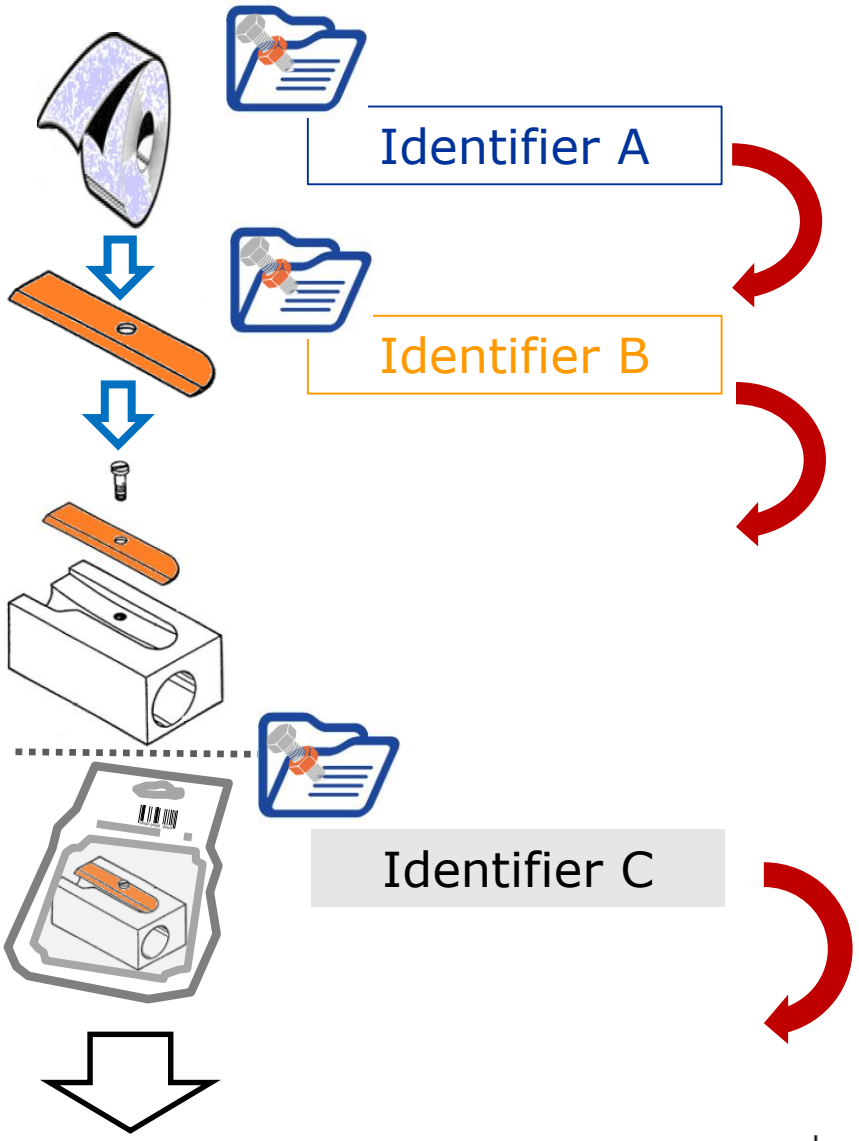
Aim: Discussion on different options to ensure efficient notification procedures

- ✓ System to system notification
- ✓ Identifiers
- ✓ Approaches to reduce double reporting

S2S notifications



Identifiers / IUCLID datasets



- **Preparing and submitting SCIP notifications** – primary (alpha)numeric identifier(s)
- Allowing to identify articles/complex objects in the database
- **Communication down the supply chain**

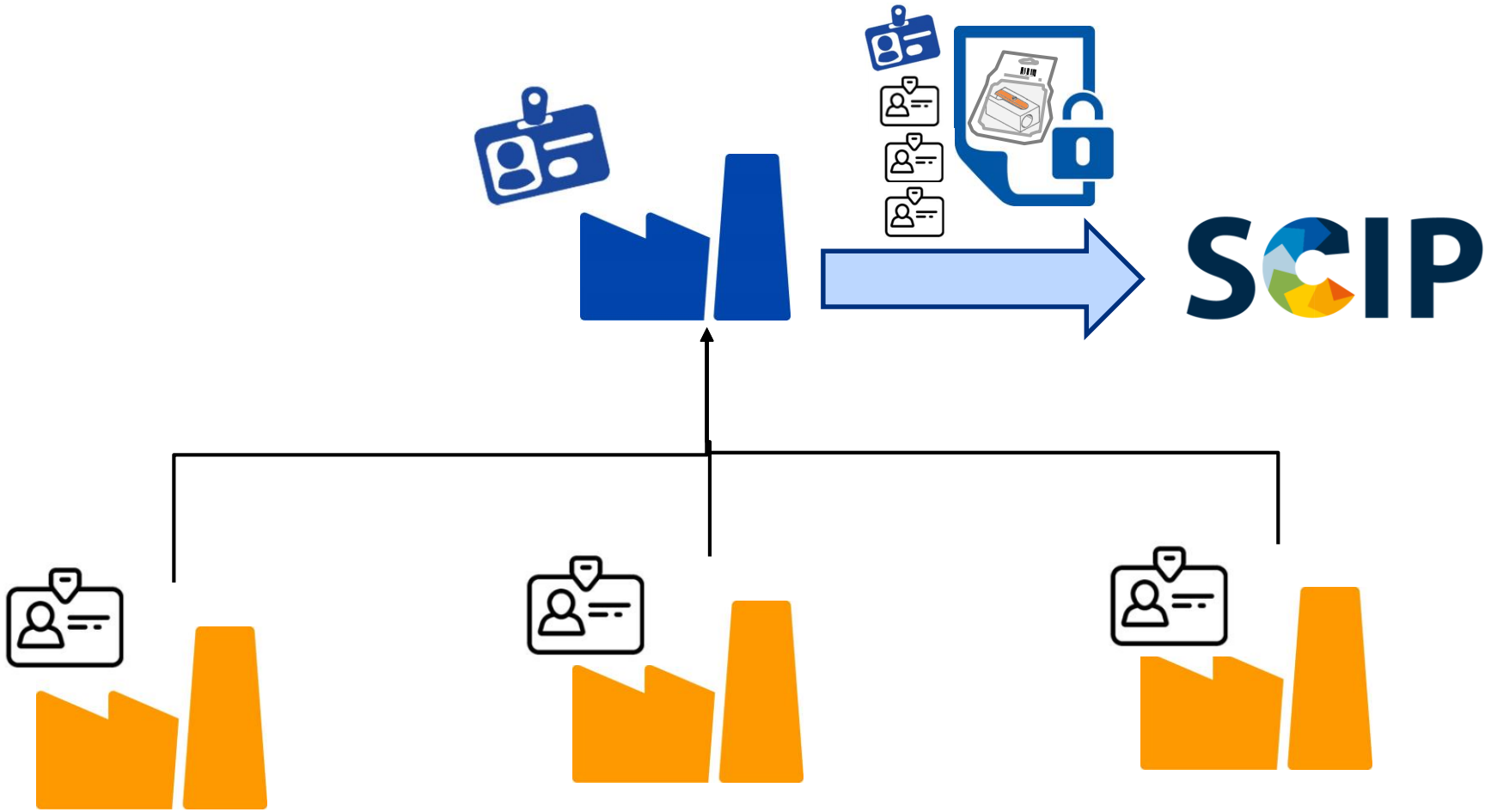
[Art. 33(1)]

using:

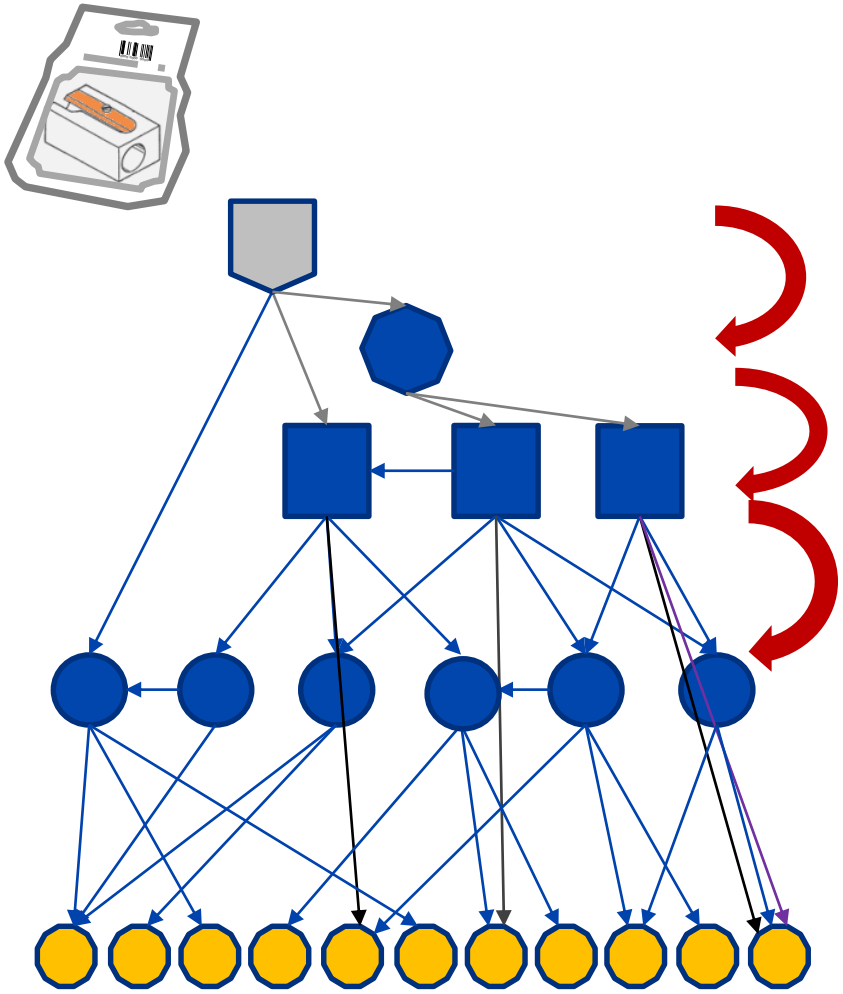
- (alpha)numeric identifiers
- SCIP IUCLID datasets (or compatible formats)

?

Managing accounts of different legal entities



Re-distribution model (RDM)



- Communication of information that allows to identify the submitted notification for an article/complex object
- The recipient of the article/complex object submits a simplified notification with the same content as the notification of the supplier (association / not re-submission of data)

Only applicable if the **article/complex object received** is the **same** as the **one supplied.**

Discussion – general ideas raised

- Submission by non-EU supplier on behalf of EU supplier?
- Articles with same primary ID are not always the same article (in terms of SVHC content). How to aggregate? “May contain”? Grouping approach?
- Update only required when impact on your article when the Candidate List is amended
- Timing limited – start now – additional support by ECHA needed
- Provide examples for right level of reporting
- Alignment with Member States needed

Discussions – S2S

- Timing – additional information to be made available by end 2019
- Format only to be changed once a year, backwards compatibility on picklist?
- How the validation rules work in S2S?
- Test system needed as early as possible
- Account management?
- Other automation needs: following articles, API also for extracting data from dissemination portal?

Discussions – avoiding duplication

- Unique ID or not, pros and cons
- CBI vs. right to know
- Bulk export of submission ID in submission portal
- Step-wise approach: can we start with reporting at higher level and improve over time (e.g. material categories)?
- What to do if my supplier doesn’t provide data?
- Submission on behalf of others (conglomerates, consultants, software providers)