

Insights

EUROPEAN CHEMICALS AGENCY SCIP DATABASE IS LAUNCHED AND READY FOR USE

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SUMMARY

At the end of October, the European Chemicals Agency (ECHA) launched the SCIP database. When populated, the database will ensure that information on articles in the EU that contain substances of very high concern (SVHCs) is widely available. The information will be of particular use to consumers and to waste industry operators.

This is a significant environmental regulatory development for EU manufacturers, importers into the EU and EU distributors operating in EU goods supply chains. Such companies now need to submit data on SVHCs in their articles to ECHA by 5 January 2021.

On 28 October 2020, the European Chemicals Agency (ECHA) launched the SCIP database as required under the EU's Waste Framework Directive – with ECHA's Executive Director noting:

"We need to know more about the hazardous chemicals in products so that they can be safely recycled. This is key for a better circular economy and essential to make the EU Green Deal work. The increased knowledge protects workers, citizens and the environment, helps consumers make safer choices and encourages industry to replace hazardous chemicals with safer ones. We call on industry to start submitting the data to us now and we stand ready to support them."

The database needs to be populated. This is to be achieved following the extension of the existing "duty to communicate" REACH obligation (under Article 33 of the REACH Regulation) which requires suppliers of articles containing SVHCs on the Candidate List (in a concentration above 0.1% weight by weight (w/w)) to communicate certain information down the supply chain. The extended obligation now requires them to also submit the relevant information to ECHA for the purpose of populating the database.

This is a significant further environmental regulatory development which supplier companies (i.e. EU manufacturers, importers into the EU and EU distributors) should now be considering carefully –

particularly given that the obligation to submit data starts to apply from 5 January 2021. ECHA has stated that consumers and waste operators will be able to access and use the data from February 2021 onwards.

ECHA has stated that:

"The SCIP database therefore complements the existing communication and notification obligations for Candidate List substances in articles under Articles 33 and 7(2) of REACH, and should reinforce compliance with them."

With this in mind, environmental regulatory teams in companies should now be embedding SCIP into their regulatory functions – in order to ensure that SCIP is picked up as part of a full suite of chemical compliance/product stewardship for the business.

As they consider SCIP and its application, businesses will need to factor in the impact of Brexit as we approach the end of the transition period. As the UK ceases to participate in the Single Market, the formerly established roles of businesses in their supply chains (EU manufacturer, EU importer, etc) may change – with knock-on effects regarding their regulatory obligations.

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MEET THE TEAM



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