

# Dissemination and confidentiality in the SCIP Database

October 2021

ABC

## Disclaimer

This document aims to assist users in complying with their obligations under Article 9(1)(i) of the Waste framework Directive (WFD). However, users are reminded that the text of the WFD is the only authentic legal reference and that the information in this document does not constitute legal advice. Usage of the information remains under the sole responsibility of the user. The European Chemicals Agency does not accept any liability with regard to the use that may be made of the information contained in this document.

Version	Changes	
1.0	First version	July 2020
2.0	New section on specific considerations when using tools to refer to data already submitted.	October 2021

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## 1. Introduction and Legal Basis

### 1.1 Purpose

This document provides information about the online access to information on substances of concern in articles for which a notification has been submitted to the SCIP Database under the Waste Framework Directive, as well as the principles defined to protect confidential information. The aim of this document is to help, in particular, those managers and technical experts in companies who are responsible for preparing the dossiers, to understand:

- which information will be made publicly available on the ECHA website
- what are the principles defined to protect confidential information

### 1.2 Legal Basis

Article 9(1)(i) of the Waste framework Directive (WFD) requires any supplier of an article (duty holder) to provide the information pursuant to Article 33(1) of the REACH Regulation to the European Chemicals Agency (ECHA) as from 5 January 2021. Article 9(2) of the same Directive sets out that ECHA shall establish a database (SCIP Database) for the data to be submitted to ECHA pursuant to point (i) of paragraph 1 and shall provide access to that database to waste treatment operators and to consumers upon request.

The SCIP Database will contain the submitted information on articles as such or in complex objects (products), containing substances of very high concern (SVHCs) in the Candidate List.

Information available to ECHA in relation to the SCIP Database includes:

1. Technical data, which is interpreted to mean information to allow the safe use of the article as such or in complex objects placed on the market (i.e. information to identify the article, safe use information and information to identify the Candidate List substance present in the article) ("Database Information").
2. Administrative information, which helps to administrate the SCIP Database (i.e. submitter identification and other information related with the notification event) ("Administrative Information").

## 2. Dissemination

Information available to ECHA in relation to the SCIP Database includes (1) the Database Information and (2) the Administrative Information.

The Database Information which allows the safe use of articles, will be made publicly available on the ECHA website. This information must enable all actors in the supply chain and consumers 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. It should also allow them to make informed purchase choices on the articles they buy. It may also include information which is necessary to ensure proper management of the article or complex object once it becomes waste.

The Administrative Information which helps to administrate the SCIP Database but does not directly help in more safely handling of articles and complex objects or in identifying them will

not be disseminated.

ECHA will publish the information, as received, on its website. The quality of the data remains the responsibility of each duty holder.

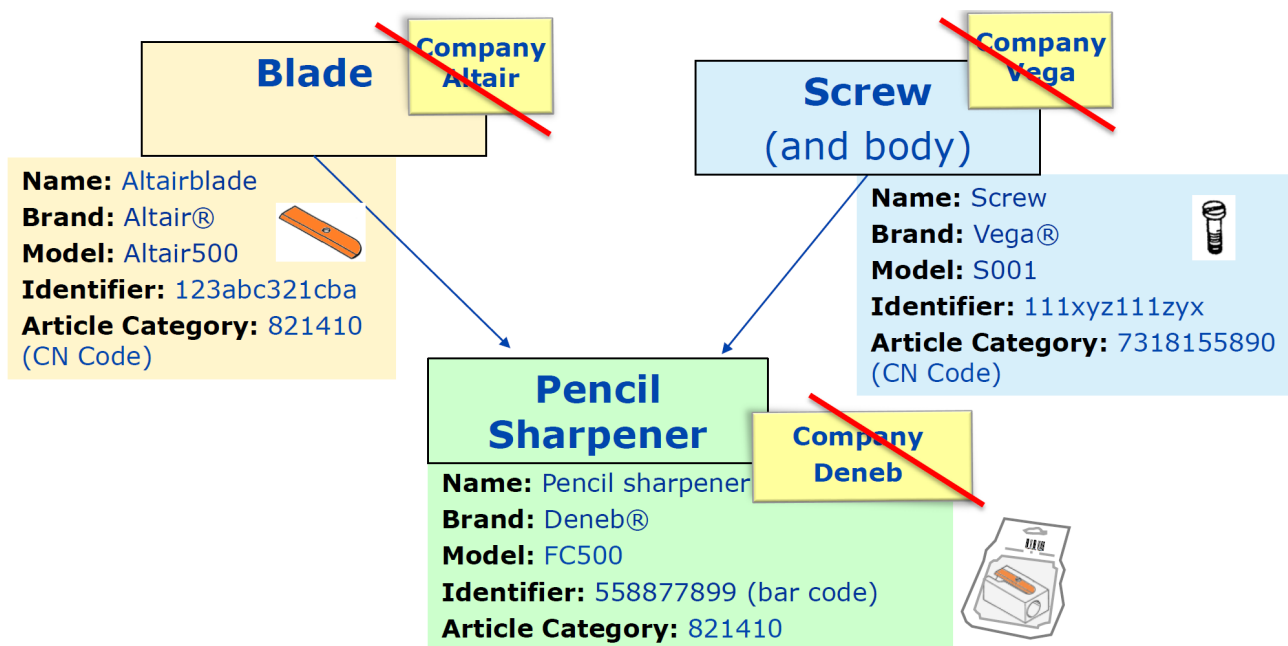
In order to ensure the protection of confidential business information, ECHA will not make publicly available the required mandatory data that would allow the establishment of links between actors in the same supply chain.

ECHA has established the following main principles to avoid the disclosure of links between actors in the supply chain:



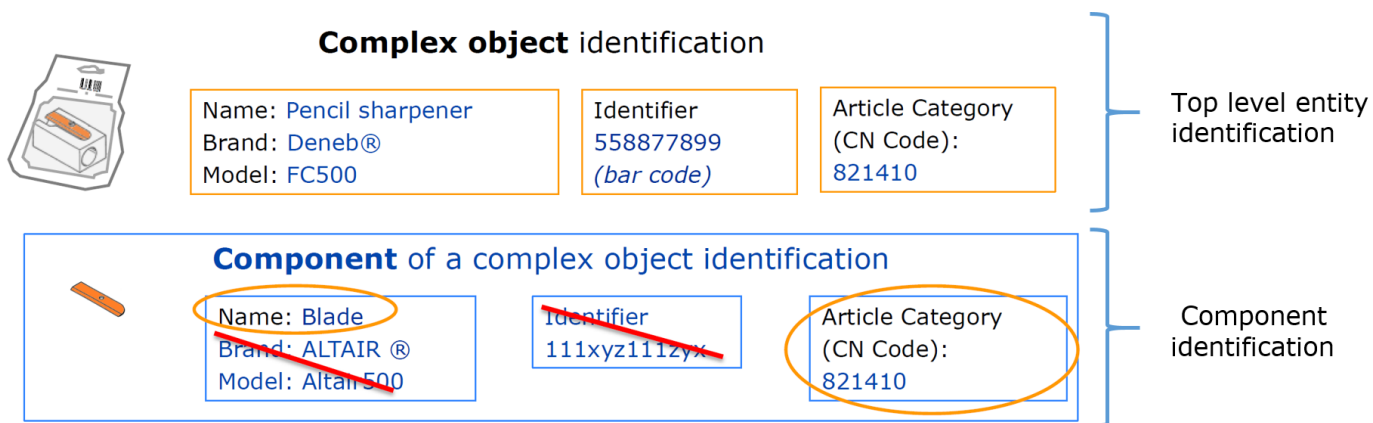
- The SCIP Database does not disclose the link between the SCIP notification and its submitter (Legal Entity).
- Only identifiers of top-level entities are disclosed (i.e. identifiers of articles as such or complex objects available to be placed on the market for which a SCIP notification is being submitted). As a consequence, specific names (e.g. brand, model) or alphanumeric identifiers of components of complex objects are not disclosed.

The protection of confidential information under the SCIP Database is illustrated in Figures 1 and 2 for hypothetical examples.



**Figure 1: Protection of confidential information under the SCIP Database.**

The SCIP Database does not disclose the link between the notification and its submitter. The crossed-out information corresponds to the Legal Entity that submits a SCIP notification for the blade, for the screw and for the pencil sharpener. The SCIP Database does not make public the names and contacts of these Legal Entities that submit a SCIP notification.



**Figure 2: Protection of confidential information under the SCIP Database.**

Only identifiers of top-level entities are disclosed (i.e. identifiers of articles as such or complex objects available to be placed on the market for which a SCIP notification is being submitted). Specific names (e.g. brand, model) or alphanumeric identifiers of components of complex objects are not disclosed. The SCIP Database does make public all the identifiers of the pencil sharpener that is placed on the market (top-level entity in a complex object notification) but does not make public the crossed-out identifiers of the blade – a pencil sharpener’s component.

## 2.1 Information disseminated

Detailed information on articles as such containing Candidate List substances and complex objects (products) incorporating those articles for which ECHA has received SCIP notification dossiers is made available on the ECHA website.

ECHA has established a harmonised IUCLID format for preparing SCIP notifications. Table 1 will summarise which information from the SCIP notification will be disseminated.

**Table 1: Dissemination of information from the SCIP notifications**

SCIP notification content		Dissemination of the information	
Notification data	Description	Top-level article or complex object	Complex object component
<b>Article name</b>	The name of the article or complex object given by the duty holder. The name should be concise but descriptive of the specific article or complex object notified (e.g. screw, blade, pencil sharpener, digital watch, engine, motorcycle). It is a text field.	Yes	Yes
<b>Other names</b>	Any additional name of the article or complex object (e.g. brand, model) given by the duty holder. Each article may be identified by more than one name. It comprises two attributes: value and type. The type is selected from a picklist and the name is a text field. Other names rather refer to other names used to identify the article or complex object within a family, category or group (e.g. brand, model) than to synonyms of the name provided in ‘Article name’ field. Therefore, they must be must inserted for articles or	Yes	No

	complex objects to be supplied to consumers, when such names are available to them and are key to allow them to search the information in the SCIP database (e.g. brand and model).		
<b>Primary article identifier</b>	<p>The primary article identifier is a numerical or alphanumerical identifier, in the SCIP database context, assigned by the duty holder to the article as such or to the complex object and the identification of its type. The primary article identifier is composed of:</p> <ul style="list-style-type: none"> <li>• Type: This can be selected from a set of pre-defined picklist values (e.g. European Article Number - EAN, Universal Product Code - GPC, Global Trade Item Number - GTIN, catalogue number, part number) or defined freely using "other:".</li> <li>• Value: Alphanumeric text assigned by duty holder (e.g. the EAN number)</li> </ul> <p>For articles placed on the market for consumers, at least, if available, an identifier made available to them, e.g. European Article Number (EAN), needs to be provided in this attribute or in the "Other Article Identifier" attribute, in order to allow consumers to identify unequivocally the article or the complex object for which information is being submitted.</p>	Yes	No
<b>Other article identifiers</b>	Any additional identifier of the article or complex object given by the duty holder. It comprises the same two attributes (type and value) defined in the Primary Article identifier field.	Yes	No
<b>Article category</b>	<p>Article category 'classifies' an article as such (with Candidate List substances) or a complex object (incorporating such articles) according to its function/use (from a harmonised list). The appropriated article category is selected from a set of pre-defined values on a multi-select picklist – the integrated Tariff of the European Union – TARIC – list. This list incorporates the Combined Nomenclature (CN) codes and descriptions as set out in Annex I to Council Regulation (EEC) No 2658/87. Both TARIC and the Combined Nomenclature are managed by the European Commission (DG TAXUD).</p> <p>The article category is composed of:</p> <ul style="list-style-type: none"> <li>• Code: Numerical code: CN code or TARIC code. The CN code corresponds to a number attributed to each subdivision of the Combined Nomenclature. The TARIC code is based on the Combined Nomenclature, with additional subdivisions.</li> <li>• Description: CN or TARIC description associated to the CN or TARIC code. [These descriptions are available in all official EU languages, it can be access from the Taxation and customs union page, <a href="#">TARIC consultation section</a>.]</li> </ul> <p>See SCIP Format Annexes available in the SCIP webpage to find the full picklist for articles categories.</p>	Yes	Yes
<b>Production in European Union</b>	Indication of whether or not the article or complex object has been produced or assembled in the European Union.	Yes	Yes
<b>Picture(s)</b>	Visual identification of the article as such or the complex object.	Yes	Yes

<b>Characteristic type</b>	Article or complex object's characteristic(s) that may help to distinguish the reported article or complex object from similar articles or complex objects.  E.g. Height; Length; Width; Diameter; Density; Weight; Volume; Colour; Other characteristics.	Yes	Yes
<b>Characteristic value</b>	Value of the (selected) characteristic.	Yes	Yes
<b>Characteristic unit</b>	Unit of measure for the (selected) characteristic, when applicable.	Yes	Yes
<b>Safe use instruction(s)</b>	Safe use information.	Yes	Yes
<b>Disassembling instructions</b>	Disassembling instructions document (e.g. pdf format) and the language of the document.	Yes	Yes
<b>Number of units in a complex object</b>	Number of occurrences of the linked article in the complex object.	NA	Yes
<b>Candidate List substance</b>	Name, EC and CAS numbers, when available, of the Candidate List substance selected from the Candidate List entries, that is present on the article.  Also applicable to substances belonging to a group entry.	Yes	Yes
<b>Candidate list substance no longer present</b>	Name, EC and CAS numbers, when available, of the Candidate List substance selected from the Candidate List entries, that is <b>no longer</b> present on the article.  Also applicable to substances belonging to a group entry	Yes	Yes
<b>Concentration range</b>	Indication of the concentration range of the Candidate List substance present in the article. This is selected from a set of pre-defined picklist values.	Yes	Yes
<b>Material categories</b>	Identification of the material the article (containing the Candidate List substance) is made of from a list to be provided by ECHA.  <i>[It also allows the identification of the article based on the material it is made of.]</i>	Yes	Yes
<b>Mixture category</b>	Identification of the mixture category from the European product categorisation system (EuPCS) containing the Candidate List substance(s) incorporated in the further processing step (e.g. coating) of an article or incorporated when joining or assembling two or more articles in a complex object (e.g. adhesive, solder). <i>[It allows to identify where in the article the Candidate List substance is present.]</i>	Yes	Yes



## 2.2 General considerations


ECHA will publish the information, precisely as received, on its website.

The duty holder who is responsible for preparing the dossier(s) should ensure that the information included in the fields that will be disseminated is not sensitive or considered as confidential information. If the SCIP dossier created by the duty holder includes information considered confidential in sections that will be disseminated, this information will become visible on the ECHA dissemination website.









- If need be, ensure that the Legal Entity cannot be deduced from any of the free text fields, disassembly instruction documents nor pictures.
- Ensure that identifiers of complex object components that are confidential cannot be deduced from any of the free text fields, disassemble instruction documents nor pictures.

**Article name\***: Pencil sharpener  
**Brand\***: Deneb®  
**Model\***: FC500

**Primary Article ID\***: 558877899   
**Article Category\***: 821410 (CN code)


**(Characteristics:)\***  
 Weight: 0.05kg  
 Colour: Silver





   


**Safe use instructions\***:   
**Disassembling instructions\***: 

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**Components:**







Name\*:  Altairblade  
 Article Category\*: 821410

  +  

Candidate List substance CLS, EC zzz-yyy-x   
 Concentration range: ≥ 1.0% and < 10.0% w/w  
 Material category: Metal > Steel  
 Mixture category: Paints/coatings-Protective and functional

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Name\*:  Screw  
 Article Category\*: 7318155890

  +   +  

**Figure 3: SCIP and CBI principles. Illustrates the data in the fields that will be made public for a hypothetical example.**

**Responsibility for confidentiality of the data reported in fields that will be made public \*** lies with the duty holder.  = picture;  = document;  = safe use instructions;  = concern elements.

## 2.3 Specific considerations when using tools to refer to data already submitted to SCIP

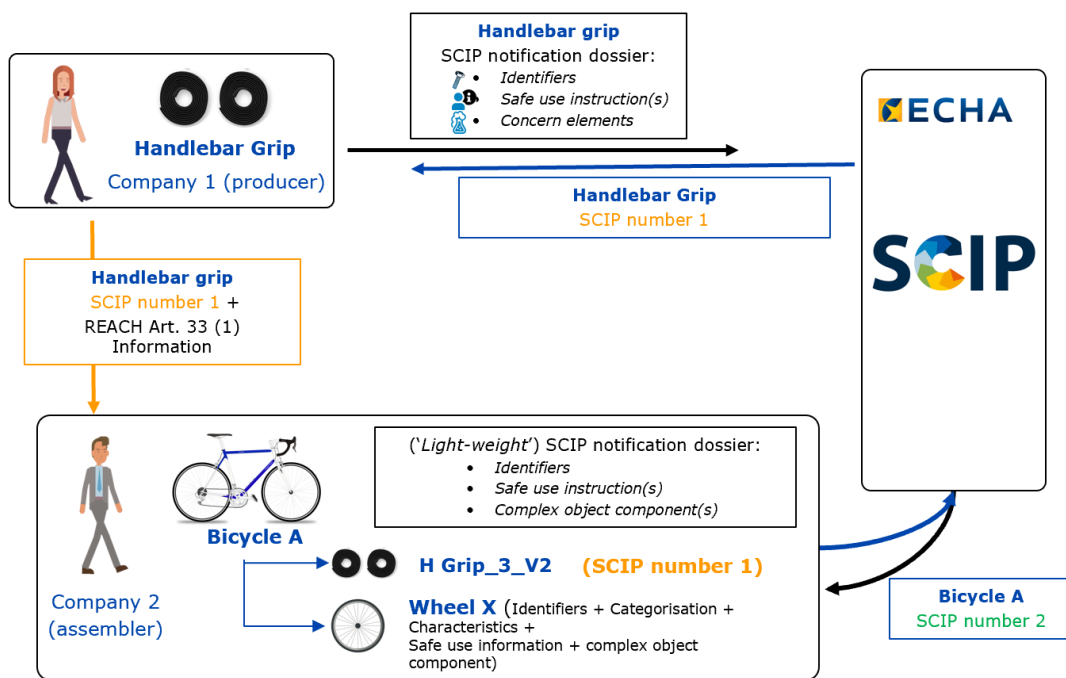
ECHA has developed technical solutions that can be used on a voluntary basis to make it possible for suppliers of articles (e.g. distributors, 'assemblers') to refer to data already submitted under SCIP by other duty holders. These tools facilitate the submission of SCIP notifications to ECHA, while keeping consistency in the information submitted, by avoiding multiple reporting of same data and thereby limiting duty holders' administrative burden. The two tools that can be used to refer to information already successfully submitted to the SCIP Database are:

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

More details on how to use these tools are available in the document ["Tools to refer to SCIP data already submitted to ECHA"](#).

The submission of a **simplified SCIP notification (SSN)** for a specific article will not have any impact on the information disseminated for that article, i.e. only the information from the notification dossier users are referring to is published.

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



**Figure 4. illustrates a hypothetical example of the use of ‘referencing’ in a SCIP notification dossier.**

In this example, Company 2 is submitting a SCIP notification dossier for Bicycle A doing referencing to previously submitted data by Company 1 for the Handlebar grip. The information disseminated by SCIP for the handlebar grip of Bicycle A, is the information from the notification already submitted to the SCIP Database for the Handlebar grip by Company 1. For example, if the referenced article name in Company 1 notification is “Handlebar Grip”, but Company 2 name it “H Grip\_3\_V2” in his own dossier, in ECHA dissemination “Handlebar Grip” will be shown as the name of the handlebar grip in Company 2 SCIP notification, and **not** “H Grip\_3\_V2”.

**Article Name:** Bicycle A

**Brand:** Deneb bicycle

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**Article Identification** **Characteristics:**

**Primary Article ID:** 1565498798798 Weight: 5kg

**Article Category:** 87120000

---

**Link Components:**

**v Name:** Handlebar grip

**Article Category :** 7318155890 Diisobutyl phthalate, CAS 84-69-5

**Characteristics:** ≥1.0% and <10.0% w/w

**Weight:** 200g Material Category: PVC

---

**> Name:** Wheel + +

Art cat

The name published correspond to the name included into the notification referring to

**Figure 5. Illustrates the data that will be disseminated when using ‘referencing’ for the hypothetical example of Bicycle A used in figure 4.**

**Advice for SCIP notifiers that support their customer to use 'referencing':**

A SCIP notifier can support its customers to use 'referencing' following ECHA advice<sup>1</sup> and using, as article name, simple but descriptive names without any reference to its brand, model and/or respective alphanumeric identifier. This data, e.g. brand or model, should be reported in the dedicated fields under "Other names" or "Other article identifiers" which are not disseminated later when the customers use 'referencing' when notifying complex objects where the product(s) has been incorporated as a component(s).

**Advice for SCIP notifiers who use 'referencing' on their dossiers:**

A SCIP notifier using 'referencing' on his dossier for the components of his complex object (product), should be aware and familiar with the information that would be disseminated, in particular regarding the name of the article, and work with the Legal Entities who submitted the information that he is referring to, in order to ensure that no commercial sensitive information is disseminated as part of his notification for that component (e.g. including the "brand" and the "model" in the article name field).

Regardless of using 'referencing' or not, we recommend you work with your suppliers, customers, and other actors in your supply chain to make sure that the article name reported in the SCIP dossiers, is simple, clear and concise, but still descriptive enough. The name of the article should reflect how it is commonly known (e.g., screw, blade, pencil sharpener, digital watch, engine, motorcycle) and should not include the brand and model in "Article name" field; those should always be included under the "Other names" field of the SCIP format instead.

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<sup>1</sup> See section 2.1.1 Identifiers and categorisation of the "[Requirements for SCIP notification](#)" document.

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