

# European Chemicals Agency

## First ex-post Evaluation of SCIP



Final report - May 2022

*FWC ECHA/2018/452 SC02*





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# 1 Introduction

## 1.1 Context

The Substances of Concern In articles as such or in complex objects (Products) database (hereinafter SCIP) is a database developed and operated by the European Chemicals Agency (ECHA). Established under the Waste Framework directive (WFD) Art. 9 (2), SCIP aims at increasing the knowledge of hazardous chemicals in articles on their own (or articles as such) and products incorporating those articles (as components) throughout their lifecycle – including at the waste stage. SCIP has three core objectives. Firstly, the tool is meant to be a driver for the substitution of Substances of Very High Concern (SVHCs) and the prevention of waste generation containing those substances. Secondly, SCIP aims at making information available to waste operators to further improve waste treatment and to consumers to make informed choices. Lastly, the database allows authorities to monitor the use of candidate list substances in articles and initiate appropriate regulatory actions over the lifecycle of articles.

SCIP was launched on 26 October 2020 and the legal obligation for suppliers of articles to notify to SCIP applies from the 5 January 2021 onwards<sup>1</sup>. By January 2022, 15 million individual notifications from around 7000 companies had been published<sup>2</sup>. The latest data from March 2022, 17 million notifications (25.5 cumulative submissions) have been submitted coming from 7401 notifying legal entities<sup>3</sup>.

The following chart (also named intervention logic) explains how the implementation of the SCIP is expected to perform, step by step, towards the objectives of the database. Based on the needs and requirements related to the instrument, inputs are mobilised. Then, these translate to activities, outputs, outcomes, and impacts.

- Activities are the specific actions undertaken both by ECHA and Member States to address the challenge at hand.
- Outputs are the direct short-term product of the activities.
- Outcomes are defined as the medium-term effects of the intervention's outputs and activities.
- Finally, the impacts are the long-term intended effects.

The intervention logic chart helps understand the objectives and the logic behind the implementation of the database.

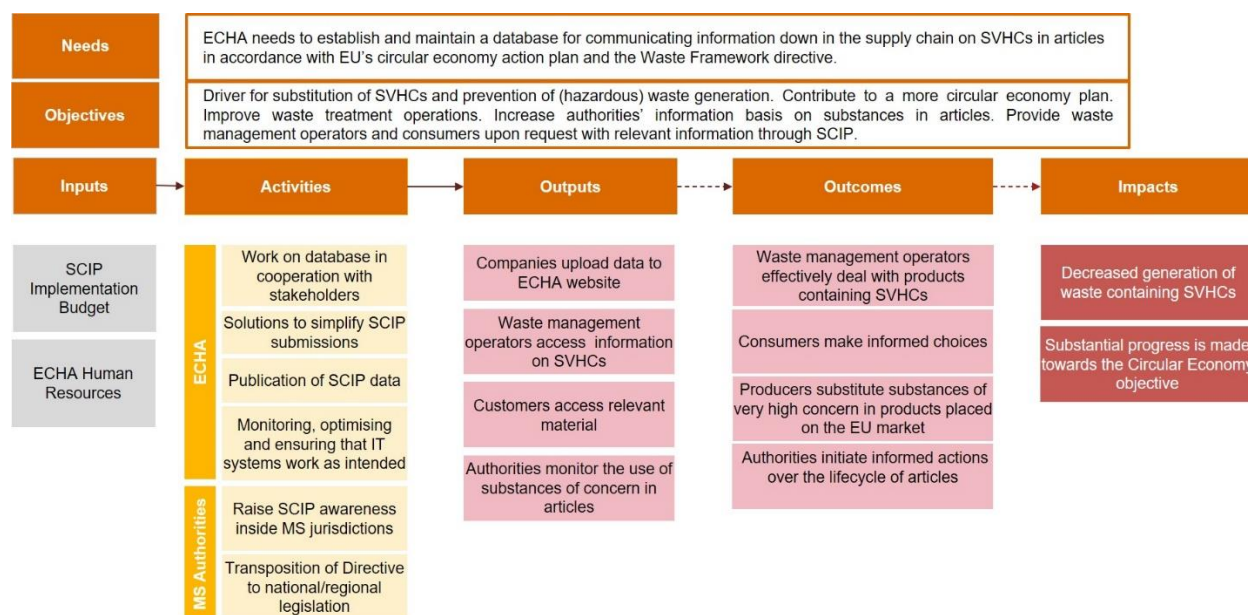
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<sup>1</sup> ECHA, October 2021, Safer Chemicals Conference 2021, *One year of the SCIP database*; ECHA, 2 February 2022, [7 million searchable articles in SCIP database improve transparency on hazardous chemicals](#).

<sup>2</sup> ECHA, 2 February 2022, [7 million searchable articles in SCIP database improve transparency on hazardous chemicals](#)

<sup>3</sup> ECHA, March 2022, Unpublished Data

Figure 1: Evaluation of SCIP - Intervention Logic



## 1.2 Objectives of the evaluation

The evaluation of the database comprises two main objectives. The first is to assess the extent to which the objectives of the implementation of the SCIP database have been met and whether ECHA's duty in setting up and maintaining it has been fulfilled. The assessment also covers the reasons for deviation should the objectives not have been fully met or the tasks not entirely completed. The second objective is to perform a historical cost assessment and use the results to forecast SCIP related expenditures in the future. The results will also serve to determine priority areas of development for the future of the database.

These objectives have been translated in evaluation criteria (effectiveness, efficiency, EU added value, relevance, coherence and utility) and questions, which were addressed on the basis of both primary and secondary data collection in order to formulate findings and recommendations.

The temporal scope of the review covers the period since the beginning of the set-up of SCIP including April 2022.

## 1.3 Methodological approach

The evaluation is based on a mixed-methods approach, combining different types of data sources and analytical methods to obtain robust evidence of the current performance of SCIP and possible areas for improvement.

### 1.3.1 Desk research

The review took account of information and documentation provided by ECHA, including:

- The Regulation (EC) No 1907/2006 Of the EP and Council [...] establishing a European Chemicals

Agency [...]⁴,

- ECHA's Strategic Plan for the period 2019-2023⁵,
- ECHA's mandate as provided by Art. 9(2) of the revised WFD and the SCIP Legislative Financial Statement,
- The draft scenario for the database on articles containing Candidate List substances⁶,
- ECHA reports such as the 2021 Report on the operation of REACH and CLP⁷ and other REACH-ENFORCE reports⁸
- Other information dissemination initiatives such as the LIFE AskReach⁹.
- Operational documents and data such as the database usage statistics, related social media consultation and SCIP's helpdesk metrics.

### 1.3.2 Survey

A dedicated survey was developed for the purpose of the evaluation of the SCIP database and made available to respondents between 3 March and 28 March 2022<sup>10</sup>. The survey questionnaire was developed objectively, in cooperation between ECHA and PwC, with the former facilitating its implementation and promotion among SCIP stakeholders.

In order to ensure that a proper analysis could be carried out, the gathered survey data was extracted, cleaned, rearranged and, when relevant, coded (categorised). After the data was processed, a qualitative analysis was performed, observing trends, as well as patterns and correlations between responses to a given question and factors.

The survey was completed by 397 respondents representing a mix of stakeholder groups and different EU and non-EU geographies. These groups include: Companies submitting SCIP notifications, Waste Operators, Consumers and General Public, EU MS Authorities, EU Institutions and "Other" category for those participants not belonging to any of the above. As such, the survey results can be considered to provide a relevant representation of the general views on SCIP by its users. Even if it's not possible to guarantee statistical representativeness of the results as the sample size is limited and the different groups of stakeholders are not equally represented, the fact that participants from the least represented category (Waste Operators) comprised sectoral organisations representing individual companies increases the representativeness of the results despite the limited numbers. Furthermore, special emphasis was placed on conducting interviews with stakeholders who were underrepresented in the survey sample.

It should be noted that 406 individuals accessed the survey. Of those, 13 had not heard of the existence of

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<sup>4</sup> [REGULATION \(EC\) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL](#)

<sup>5</sup> ECHA, 2019, [Strategic Plan In Brief](#)

<sup>6</sup> ECHA, 2022, [Draft scenario for the database on articles containing Candidate List substances](#)

<sup>7</sup> ECHA, 2021, [Report on the Operation of REACH and CLP](#)

<sup>8</sup> ECHA, [Forum Enforcement Projects](#)

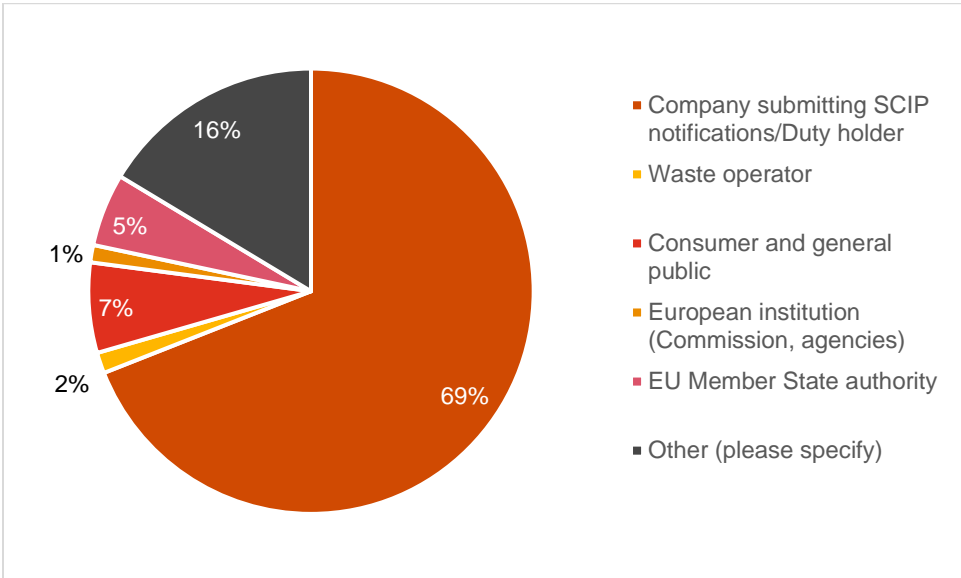
<sup>9</sup> [LIFE AskReach Project](#)

<sup>10</sup> ECHA, 2022, [Survey: Help us improve the SCIP database](#)

SCIP and a further 9 did not wish to familiarise themselves with the SCIP website to continue the questionnaire, leaving 397 respondents who completed the whole survey and whose input was considered for the analysis. In addition, 133 respondents agreed to be contacted for follow up questions and provided their contact details.

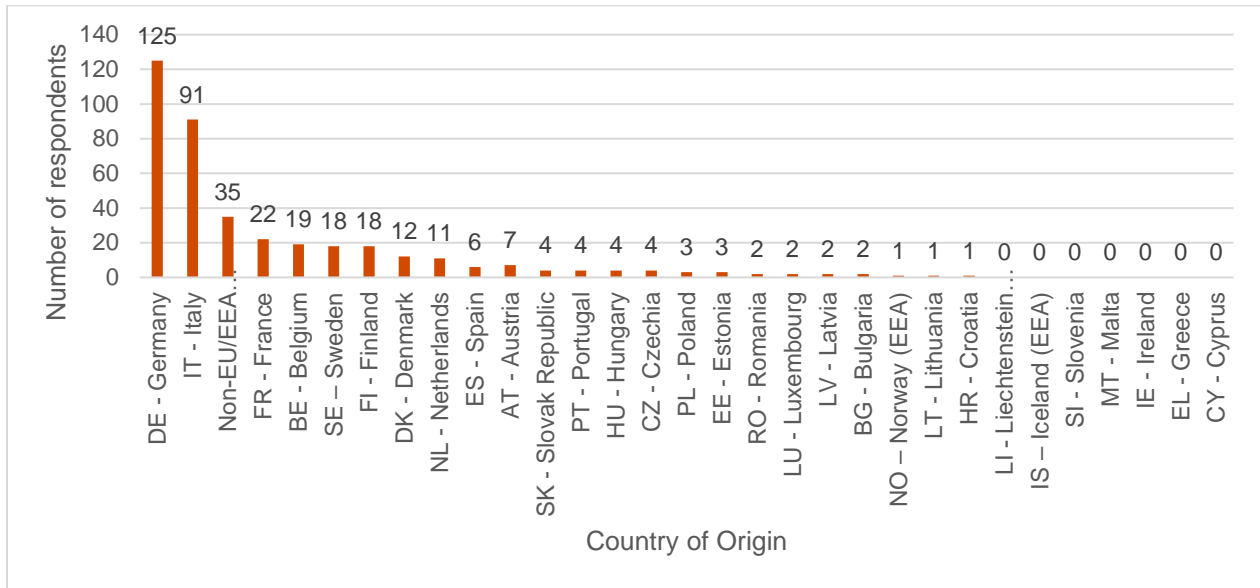
Data on the type of occupation/stakeholder role was provided by all 397 respondents who completed the survey (from the 406 who accessed it). The majority of respondents were companies submitting SCIP notifications (69%). Respondents answering with “other” (16%) mainly described themselves as consultants, service providers, advisors, and third-party actors. The consumer and general public (7%), and Member State Authorities (5%) were the third and fourth most represented stakeholder category. Waste operators, of which half were sectoral associations (2%), and European Institutions (1%) completed the survey sample.

Figure 2: Role of Survey Respondents N=397



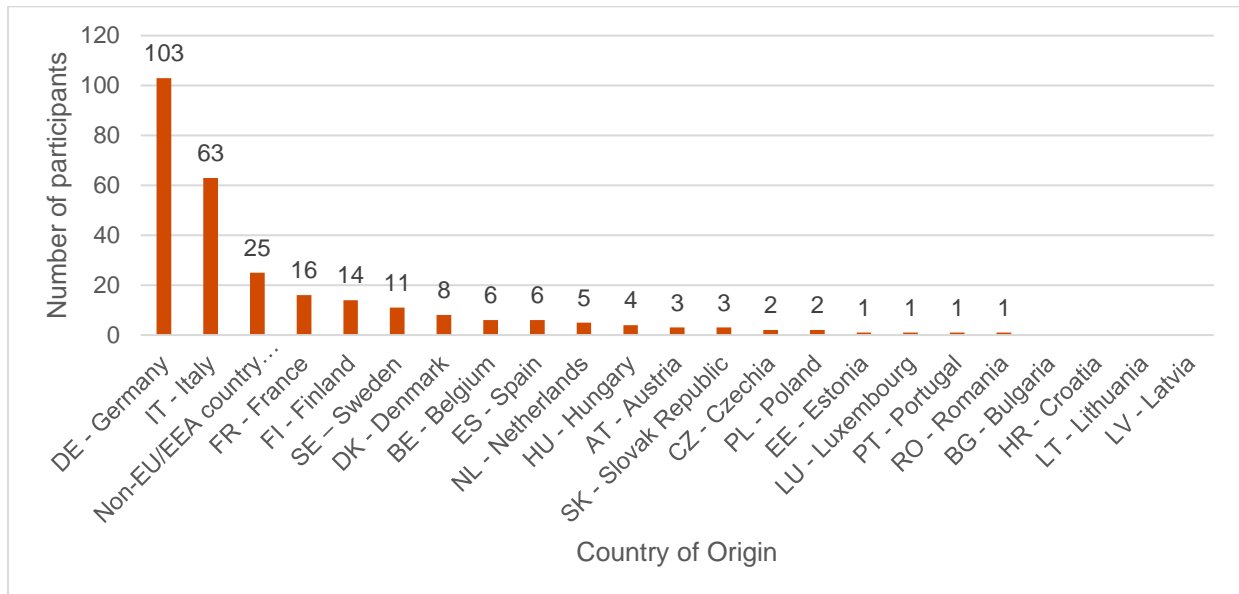
The 397 respondents provided data on the country they were based. Of the 397, 35 were based outside the EU/EAA. There were no respondents from 5 EU MSs: namely Cyprus, Greece, Ireland, Malta and Slovenia. Stakeholders based in Germany (31.4%) and Italy (22.9%) accounted for more than half of the survey respondents.

Figure 3: Country of Origin of Respondents N=397



In terms of Companies, Germany, Italy, and France are the countries containing the most legal entities that submit SCIP notifications (1945, 1510 and 514 respectively). Companies participating to the survey represented these nations accordingly (103 from DE, 62 from IT and 16 from FR). In general, the survey was representative regarding the provenance of legal entities submitting SCIP notifications in Europe.

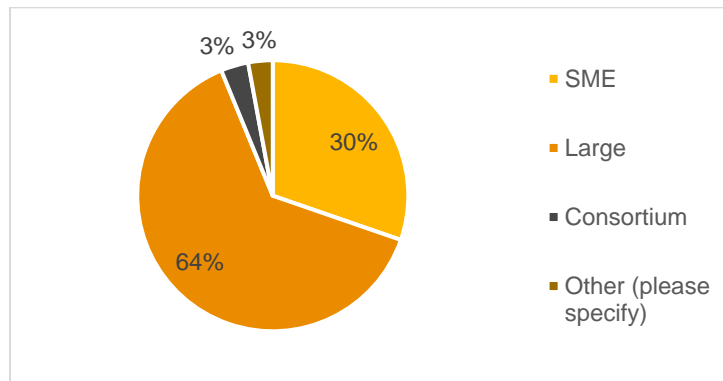
Figure 4: Country of Origin of Participating Duty Holders N=274



Large companies accounted for 63,5% percent of respondents classified as duty holders; SMEs made up 30,2% whereas 3% were consortiums.



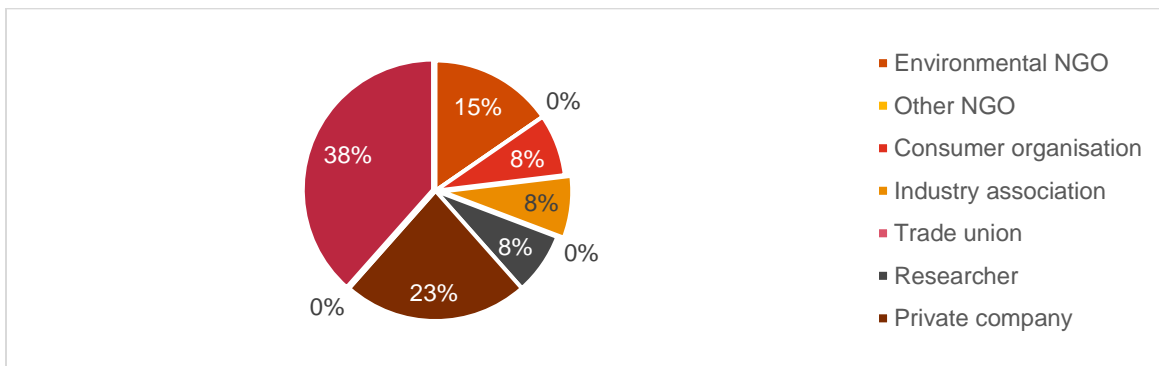
Figure 5: Size/Type of Company for respondents representing companies, N=274



In regard with EU Member State Authorities, 24% said to answer on behalf of the competent authority for the implementation of the Waste Framework Directive (WFD). The remaining 76% were other types of MS authorities such as national environment agencies, national ministries, or authorities in charge of the chemical related policies.

Consumer and general public respondents were mainly composed of private companies (23%) and consumers (38%). In addition, respondents defined themselves as environmental NGOs (15%), consumer organisations (8%), industry associations (8%) and researchers (8%). Journalists, non-environmental NGOs, and trade unions did not participate in the survey.

Figure 6: Type of Consumer and General Public, N= 26



### 1.3.3 Interviews

An extensive interview programme was implemented in the context of the review with the goal of obtaining more detailed information about the performance of SCIP and to collect suggestions for further improvements.

A total of 25 stakeholders were approached for an interview and 12, or 48% accepted the invitation, with interviews taking place over phone or video conference over the course of April 2022.<sup>11</sup> A significant number of the interviewed stakeholders were also survey respondents who expressed interest in being interviewed in order to provide further feedback. A summary of the interviewed stakeholders is provided in the following

<sup>11</sup> Reasons for the declined interviews included lack of familiarity with SCIP (among non-users) and lack of availability.

table.

<b>Type of stakeholders</b>	<b>Total number of interviewees</b>
Legal Entities submitting notifications	1
EU Member State Authorities (both competent and non-competent for SCIP)	3
Consumers Organisations	1
Waste Operators and related associations	4
Third-party solution providers	3
Total	12

# 2 Evaluation analysis

## 2.1 Relevance

The analysis of relevance considered how well SCIP and its objectives are aligned with stakeholders' needs, expectations and obligations. The evaluation under this criterion also observed whether SCIP provides the support duty holders need to comply with their obligations.

SCIP was launched in October 2021 to ensure that sufficient information about the presence of SVHCs is communicated throughout the whole life cycle of products and materials placed in the EU market. In this context, the results of the evaluation show that SCIP objectives are partially aligned with the needs and expectations of stakeholders in terms of access to information regarding SVHCs in articles. Several duty holders expressed their doubts over the support they receive from SCIP when fulfilling their obligations. Consulted Waste Operators and Consumer representatives have conveyed their difficulties when accessing and using the information on the database. Their general perception is that for the moment, the emphasis in the development of SCIP has been around meeting the needs of duty holders and to a lesser extent to meet the needs of users meant to access and use the information (Waste Operators and Consumers).

As described in the intervention logic model (see Section 1.1), SCIP is designed as a tool for companies to better comply with their duty to communicate on the presence of SVHCs in articles and products and has the objectives of improving the availability of appropriate information on SVHCs for waste operators and consumers in order to enable them to optimise waste treatment and consumer choices respectively. In turn, this should improve the risk management of chemicals during waste recovery processes and promote non-toxic materials cycles.<sup>12</sup>

**The final SCIP product is in line with the characteristics set out in the revised Waste Framework Directive (WFD).** The Directive came into force in July 2018 and tasked ECHA with the following mandate:

1. Establish a database by 18 months after the entry into force of the WFD
2. Allows EU suppliers to submit to ECHA the information they are required to communicate down the supply chain (REACH Art. 33.1)
3. Feed the database with the information received
4. Upon request, provide access to the database to waste operators and consumers

ECHA has duly established a database for the data to be submitted with the aim of promoting the reduction of the content of SVHCs in materials and products and enhance transparency regarding Candidate list substances in articles. As requested in the Directive, ECHA has provided access to SCIP to waste operators and consumers. Any EU supplier can submit information to ECHA which is then fed to the database. The evaluation considers SCIP as being in line with the characteristics and objectives laid out in the revised WFD.

**The evaluation results show that the SCIP database's objectives remain in line with stakeholders' needs.** These goals are perceived as relevant across stakeholder types. Survey participants classified as Consumer and General Public, EU MS Authorities and Waste Operators have indicated in several of their comments that SCIP's objectives are still very much aligned with their needs regarding information about

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<sup>12</sup> Annex – Legislative financial statement 'Agencies' for ECHA's SCIP database.

SVHCs in articles. Although not asked directly on this parameter, they have signified the potential use-cases they can derive from SCIP through their comments. While Companies submitting notifications are aligned with the declared objectives of SCIP, they have voiced their reservations over the implementation of the database. In this regard, several duty holders have pointed to the existence of REACH Art. 33 (the “duty to communicate information on substances in articles) as a reason to question SCIP’s relevance, although guidance on the matter points to complementarity rather than overlap (see next Box).

*Box 1 The role of SCIP in the context of REACH*

The REACH Regulation already requires suppliers of articles containing Candidate List substances in a concentration above 0.1% w/w to communicate down the supply chain and to consumers upon request sufficient information to allow the safe use of those articles. However, this information does not reach waste operators at the waste stage once those articles become waste at the end of their service life. The SCIP database ensures that the same information available in supply chains is also available to waste operators to support the waste sector in improving current waste management practices and to foster the use of waste as a resource. Therefore, the SCIP notification duty complements the existing communication and notification requirements for Candidate List substances in articles under REACH, it does not replace them.

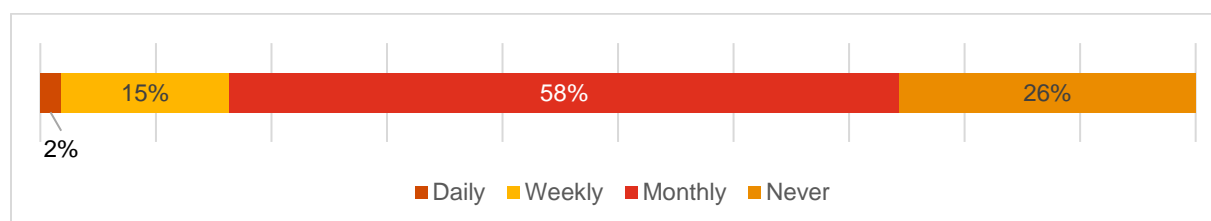
Source: Manual [Requirements for SCIP notifications](#)

**Users other than duty holders have stated that, in its current form the SCIP database appears to be tailored for the submission of notifications rather than for enabling the use of SVHC information.**

The effectiveness section of this report (2.2) discusses in more the detail the fulfilment of the database’s objectives for each stakeholder category. Most notably, Waste operators and Consumers indicated that the information on SCIP is reliable and not found elsewhere but for the moment is of limited relevance in their respective activities. This finding was verified during interviews with associations representing waste operators and consumers in Europe. The section on effectiveness (2.2) looks further into this question as well as possible areas of improvement in order to increase relevance for these users of the database.

**SCIP is used by all stakeholder categories.** Another indicator of relevance is the use of the tool. Based on the results observed in the survey, SCIP is most often used monthly (58%). However, a quarter (26%) of respondents said to have never used the database to find information on SVHCs in articles. Only 2% use SCIP daily and a further 15% do so weekly.

*Figure 7: How often do you visit the SCIP database to find information on SVHCs in articles? N=397*



This visit frequency pattern was confirmed for every respondent category. Deviation was relatively low. For instance, respondents declaring never using the platform to find information on SVHCs ranged from 15% of Waste Operators to 30% of Consumers and General Public.

**Preventing non-EU supply chain participants from submitting notifications to the SCIP limits its relevance.** In today’s global supply chains, very few complex objects are produced exclusively in the EU. For instance, when an article containing SVHCs is produced outside the EU and bought for products put into the EU market, a new SCIP notification is needed for every supplier that has used the article. This

leads to the duplication of information as well as the loss of accuracy of the information as it is passed on from supplier to manufacturer. In other words, any company which operates a supply chain greater than the EU has to use other tools other than SCIP to get information concerning SVHCs in articles.

## 2.2 Effectiveness

This section aims to assess the extent to which SCIP fulfils its objectives. It does so by

- i) Assessing the level of compliance from companies producing articles
- ii) Evaluating the availability, exhaustiveness and quality of SVHC information
- iii) Awareness of SCIP
- iv) Assessing the effectiveness of SCIP by stakeholder category

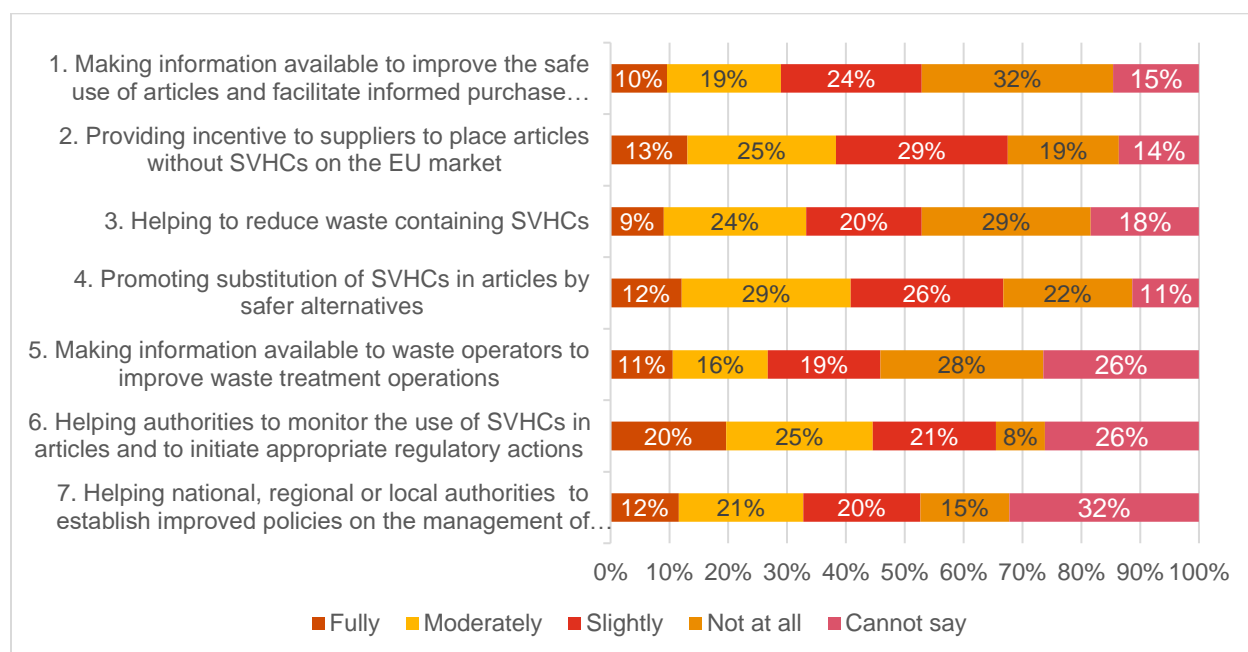
The evaluation finds that SCIP partially fulfils its objectives. Awareness of SCIP and its requirements needs to be increased so that compliance levels rise across Member States. The database does provide incentives for the substitution of SVHCs in articles, but their effect is limited. SCIP does provide reliable and unique SVHC related information, but feedback from the consulted Waste Operators and Consumer representative indicates that the current search options and identifiers are not fully adapted to the needs of these user groups.

### 2.2.1 To what extent has SCIP been effective in meeting its overall objectives?

**Based on the feedback from stakeholders, the current implementation of SCIP can be considered partially effective.** According to its users it does not fully meet its overall objectives. Respondents from all categories provided an assessment of the SCIP's contribution to its different objectives. Only those answers that provided a normative assessment have been considered for the analysis.

- In the participants' opinion, the only objective the database fully or moderately contributed to is helping authorities monitor the use of SVHCs in articles and initiate appropriate action (60%).
- Two thirds (66%) of survey participants found that SCIP had not or only slightly contributed to making information available to improve the safe use and purchase of articles.
- Over half (56%) considered that SCIP does not substantially provide an incentive to suppliers to substitute SVHCs in articles.
- The same trend was true for the reducing of SVHC-containing waste (59%).
- Regarding waste management operations, SCIP was found to have not helped make information available to waste operators (64%) and not have improved policies on waste management (51%).

Figure 8: To what extent does the SCIP database contribute to its targeted objectives? N=397



**This result reflects views of different types of stakeholders – while duty holders are the majority of respondents, feedback from more limited respondent groups confirmed this assessment.** Companies submitting SCIP notifications accounted for the majority of respondents in the survey (68%). When normative answers were given, more than half provided a negative assessment for all objectives except for number 6. When asked to provide comments, companies pointed to general shortcomings and did not specifically address the objectives. The following trends have been observed:

- Companies find that SCIP duties overlap with those provided by REACH Art. 33 making these processes redundant and burdensome while not bringing added value (11 comments);
- Companies find that the SCIP database is complex to navigate and not optimised in regard with the data it provides and requires (13 comments);
- In theory, SCIP has the potential to be a positive driver for said objectives but falls short in practice (5 comments);
- Although not mentioning file quality explicitly, some companies find the information on the database unreliable due to the lack of quality checks. (2 comments)

**Responses from Consumers and general public category were limited but indicated negative opinions regarding SCIP and the fulfilment of its objectives.** They provided negative assessments (not at all and slightly >50%) for objectives 1, 3, 4, 5, 6 and 7. Only the reliability of data on articles containing SVHCs and the improved transparency and availability of data objectives were considered fulfilled. Comments originating in the Consumer and general public category pointed towards the inability for non-expert users to reliably access data on SVHCs in SCIP. The lack of identifiers such as company name or the usage of a barcode in the database complicates the accessing of data for consumers.

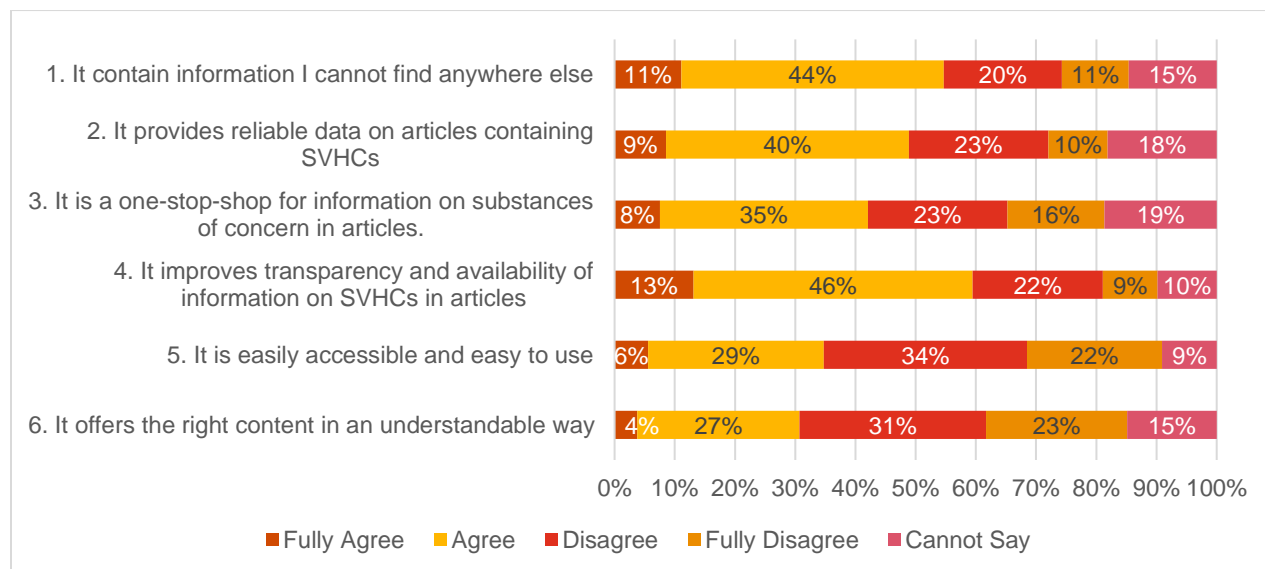
**Member State Authorities were the only type of respondent to positively assess SCIP in the fulfilment of its objectives.** When only taking into consideration those answers which gave a normative judgement, every objective received a positive evaluation (fully and moderately >50%). Nonetheless, comments pertaining to this respondent category mentioned difficulties with the SCIP's ease of use.

**Waste Operators were not convinced SCIP is currently fulfilling its objectives related to the decrease and substitution of SVHCs in products and waste.** The limited number of Waste Operators participating in the survey (6) were split (50% positive, 50% negative) in their opinions concerning the reducing of waste containing SVHCs and the providing of incentives for the substitution of SVHCs. However, qualitative data obtained through the interviews confirmed these views as representative of this stakeholder category. They also provided an unfavourable assessment of the objective of helping authorities in MS to establish improved policies on the management of waste. The lack of aggregated data and the absence of a classification by waste streams hinders the usability of the information for regulatory matters concerning the management of waste.

**SCIP does contain reliable SVHCs information that is not available anywhere else and improves transparency.** The survey results in the following figure show that after only taking into consideration those answers that provided a normative assessment, more than half of the respondents gave a positive opinion on statements 1 to 4 related to the content of SCIP. An example of the usefulness of the data can be found in a recent analysis by ChemSec of the hazardous substances or compounds listed in SCIP which found that 94 percent of the 7.5 million submitted articles contained lead.<sup>13</sup>

**However, for many users SCIP is also complicated to access and not user-friendly.** Survey results on the ease of use and accessibility of SCIP show that most respondents who expressed an opinion gave a negative assessment.

Figure 9: To what extent do you agree with the following statements? N=397



**This general assessment is confirmed by examining the answers by type of respondent.** Across different respondent categories, most respondents disagree or fully disagree with statements concerning the accessibility, ease of use and content clarity (Fig. 9, Statement 5, 6). Notably, the surveyed waste operators mostly disagreed with the notion of SCIP being a one-stop-shop for SVHCs related information. For all other statements (Fig 9. Statements 1 to 4) and respondent types (other than the low number participating Waste Operators), more than half of the assessments provided were positive.

<sup>13</sup> ChemSec (2022) “9 out of 10 items in EU’s new product database contain lead”. Available on: [https://chemsec.org/9-out-of-10-items-in-eus-new-product-database-contain-lead/?utm\\_source=newsletter&utm\\_medium=email&utm\\_campaign=2022\\_05\\_19](https://chemsec.org/9-out-of-10-items-in-eus-new-product-database-contain-lead/?utm_source=newsletter&utm_medium=email&utm_campaign=2022_05_19)

**Companies submitting notifications generally used their comments to point out perceived deficiencies of SCIP.** Some companies assessed positively the intuitiveness of the SCIP database interface, but many highlighted the difficulties that impede the transparency and availability of SVHCs related information:

- The complexity of the declaration process hampers the submission of complete and accurate notifications.
- Additional identifiers to search information by company, product or article are needed if the database is to improve transparency and availability.

Once more, companies mentioned the existence of the Art. 33 REACH protocol through which they already communicate within the supply chain.

- Some companies mentioned that they acquire reliable information on SVHCs in articles via REACH Art.33 communication within their supply chain and do not use SCIP for this purpose

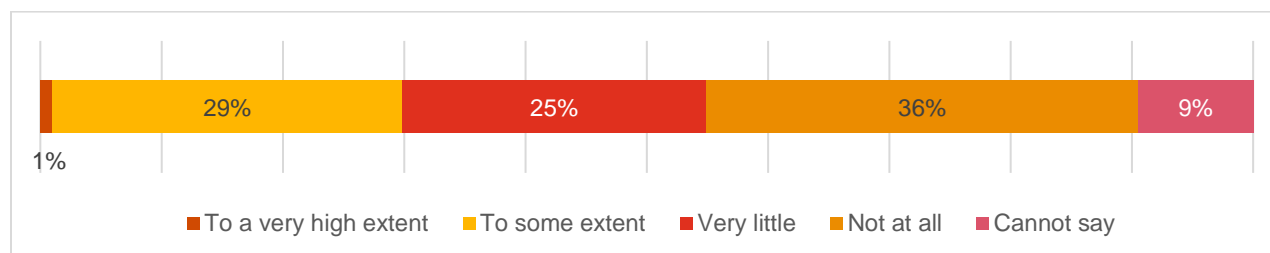
Respondents in this category doubted the usefulness of SCIP for stakeholders other than consumers. They notably declared that the information they provide and would potentially search for through SCIP is available to them via other channels (Fig. 9, Statement 1).

**Consumers' comments focused on the platform's ease of use and accessibility** (Fig.9, Statements 5 and 6). **They pointed out the complexity of navigating SCIP and the need for more identifiers to render information more available.** Similarly, European Institution and Member State Authorities type respondents mentioned the need to simplify access to the database for consumers. The short time since the implementation of the database was mentioned as a limitation to their assessment of the statements.

**Waste Operators declared that their use of the database was limited.** This was partly due to the complexity they associated with the use of SCIP. For example, one of the respondents asserted that they simply could not access the information they needed for their operations. The granularity of the information contained in the SCIP database is not useful for Waste Operators, according to interviewed associations, as they deal with streams of waste and very complex objects which can contain thousands of articles.

**SCIP provides Duty Holders and Member State Authorities with limited additional information regarding their regulatory duties.** Another key aspect for assessing whether SCIP is meeting its core objectives lies in its potential to bring additional information compared to that which is already available to the different stakeholder categories. Especially information used to carry out regulatory or policy duties. Companies and EU MS Authorities were questioned in this regard; more than half of respondents who provided an answer declared receiving very little or no extra information via SCIP (60%).

*Figure 10: Does SCIP bring additional information compared to that which you already have to carry out your regulatory or policy duties? N=295 (Companies and MS Authorities)*



When analysing by respondent type, Companies submitting SCIP notifications were more often negative in their assessment than EU MS Authorities. A third of the latter were not able to provide a normative opinion.

**The legal basis of SCIP did not establish targets on the number of legal entities submitting**



**notifications but evidence points towards low compliance.** ECHA's enforcement forum coordinates various projects such as the series of REACH-EN-FORCE (REF) which aim at harmonising enforcement in MS regarding REACH, PIC and CLP regulations.

Between October 2017 and December 2018, 15 Member States participated in a pilot project coordinated by the Forum to control substances of very high concern (SVHCs) on the Candidate List in articles sold on the European market ("Substances in Articles"- SiA). That enforcement project focused on the notification and communication obligations regarding Candidate List substances in articles under Articles 7(2) and 33 of the REACH Regulation. According to the report of that project,<sup>14</sup> 89% of the inspected articles that contained Candidate List substances above 0,1 % w/w, were found non-compliant with the requirements of Article 33(1) to communicate information down the supply chain. Those requirements are the same as those that trigger the SCIP notification duty under Waste Framework Directive Article 9(1)(i).

Although there are limitations to the assessment of compliance rates such as the lack of detailed data per MS and on an EU aggregate, it is reasonable to assume that the SCIP general compliance rate is not optimal.

Data from March 2022 showed that some 7401 legal entities have produced 17 million SCIP notifications, but as there are no established baseline or targets, it is difficult to estimate what these figures represent in terms of rate of compliance with notification duties. To address this data gap, the evaluation used EUROSTAT data to produce a high-level estimate of the number of legal entities that may have an obligation to provide SCIP notifications. Around 11 million enterprises are registered in the EU-27 zone<sup>15</sup> (this number excludes the agriculture and services sector). In the above-mentioned pilot project on substances in articles coordinated by the Forum, a non-compliance rate of REACH Art. 33(1) of 89% was found concerning articles and 88% concerning companies with obligations under that REACH provision. Based on those figures and taking into account that the enforcement project has been designed to focus on articles where the probability of containing Candidate List substances is higher, we make the assumption that around 0,5% of products placed on the EU market contain SVHCs. Based on that assumption, it could be estimated that approximately 0,5% of EU enterprises should be submitting SCIP notifications. In this scenario, companies' SCIP non-compliance would reach around 86,5%, meaning that only about 13,5% of companies with a potential SCIP notification legal duty have submitted notifications.

It should be noted that a new enforcement project (REF-10) is carried out in 2022 focusing on the compliance with restrictions on hazardous substances and communication down the supply chain (Art. 33(1)) under REACH and will provide more robust evidence regarding compliance rates.<sup>16</sup>

## 2.2.2 To what extent is SCIP effective for different users?

### 2.2.2.1 Extent to which SCIP meets objectives for Member State authorities

**SCIP partially meets objectives for EU Member State Authorities. The database does provide some additional information for them to better perform their regulatory duties. However, they find the access to the information to be very difficult.** These authorities were asked about the additional information they extract from SCIP in the scope of their regulatory and policy duties. More than half (52%) of EU MS respondents declared extracting additional information to some extent. A third were not able to provide an assessment. Not one EU MS authority declared obtaining additional information to a very high

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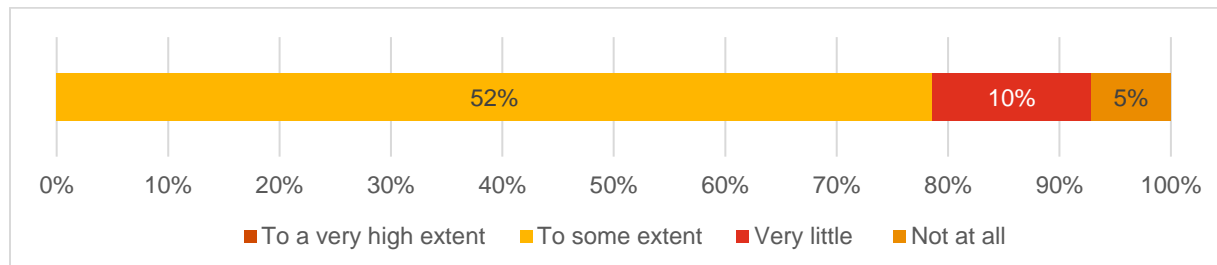
<sup>14</sup> ECHA, 2019, [Pilot project on substances in articles – project report](#)

<sup>15</sup> EUROSTAT, *Annual enterprise statistics by size class for special aggregates of activities (NACE Rev. 2)*, NACE codes B to E, F and G (excludes agriculture and services: 11,329.741 enterprises registered in EU-27 from 2020).

<sup>16</sup> ECHA, 2021, [Enforcement forum agrees on scope of checks for consumer products and biocides in 2022](#)

extent. Participants that declared extracting additional information (52%) did not provide examples of the concrete information they had gained. In addition, they suggested that the extent of the utility they will make of SCIP depended on the future development and improvement of the database.

Figure 11: To what extent does SCIP bring you additional information compared to that which you already have available to perform your regulatory or policy duties? MS Authority N=21

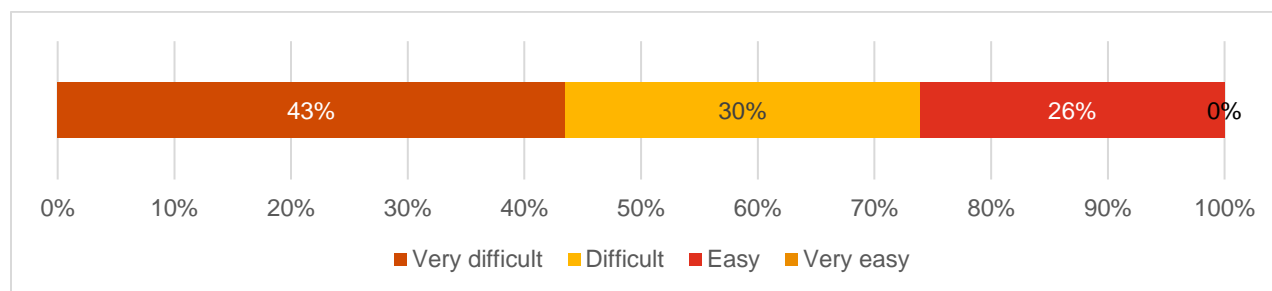


21 respondents answered the survey as representatives of Member State authorities. Out of those, 2 respondents declared having information about the sectors which are frontrunners in complying with SCIP notification duty. They mentioned the paper and paperboard sector as well as sectors dealing with machinery and mechanical appliances, and electrical and electronic equipment, machinery, devices, and appliances. MS authorities answering the question negatively pointed to the lack of representative data and the fact that enforcement has yet to be carried out as the reasons for not having this information.

### 2.2.2.2 Extent to which SCIP meets objective for consumers:

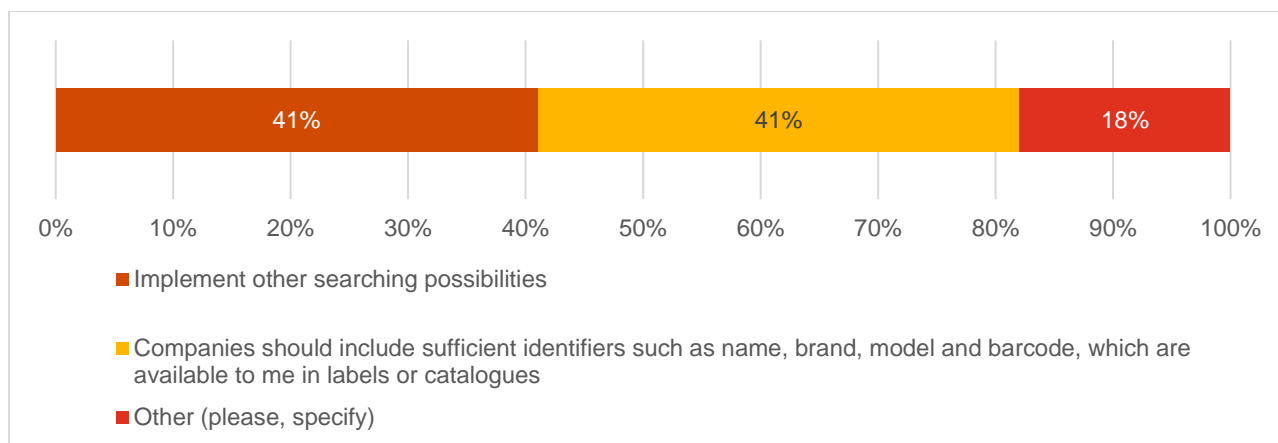
**SCIP limitedly meets the objectives for Consumers and General Public in that it provides reliable information that is not available elsewhere. However, consumers find it difficult to use the database to find said information on SVHCs in articles. Currently, SCIP does not influence their purchasing habits.** Based on the data provided in the survey, consumers have pointed to the difficulty of finding information about products in the database. Close to three thirds believe it is difficult (30%) or very difficult (43%) while a quarter answered with easy. Notably, zero consumers declared it to be very easy.

Figure 12: How easy is it to find information about an article or product you know contains SVHCs on SCIP? N=26



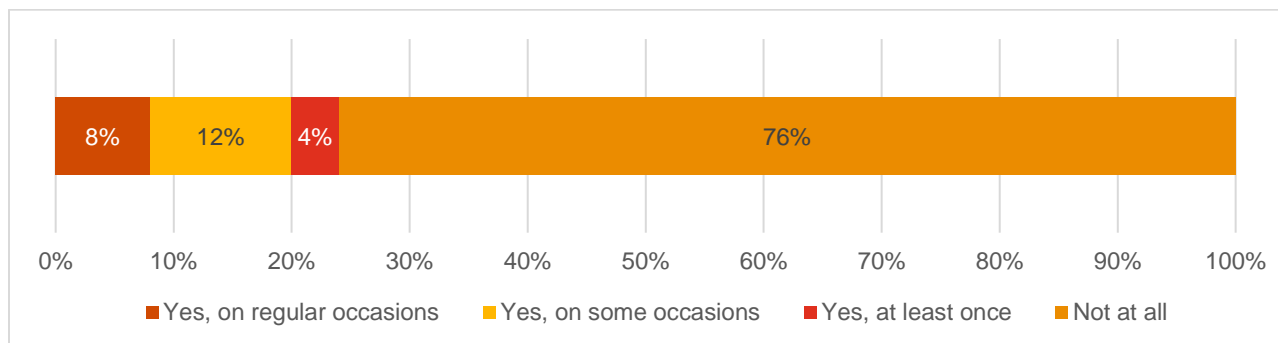
**The inclusion by companies of more identifiers such as name, brand, barcode, etc. as well as other searching possibilities** were the preferred options in terms of possible changes to the platform.

Figure 13: How could we improve the SCIP database to make it easier for you to find information about a product that contains SVHCs? Multiple choice N=26 (consumers)



The survey also provided an overview of the influence SCIP might have on consumers' decisions to buy products. Three quarters of respondents (75%) affirmed not having been influenced by SCIP when deciding to buy a product.

Figure 14: Has the SCIP database influenced your decision to buy a product that is listed in it? N=26



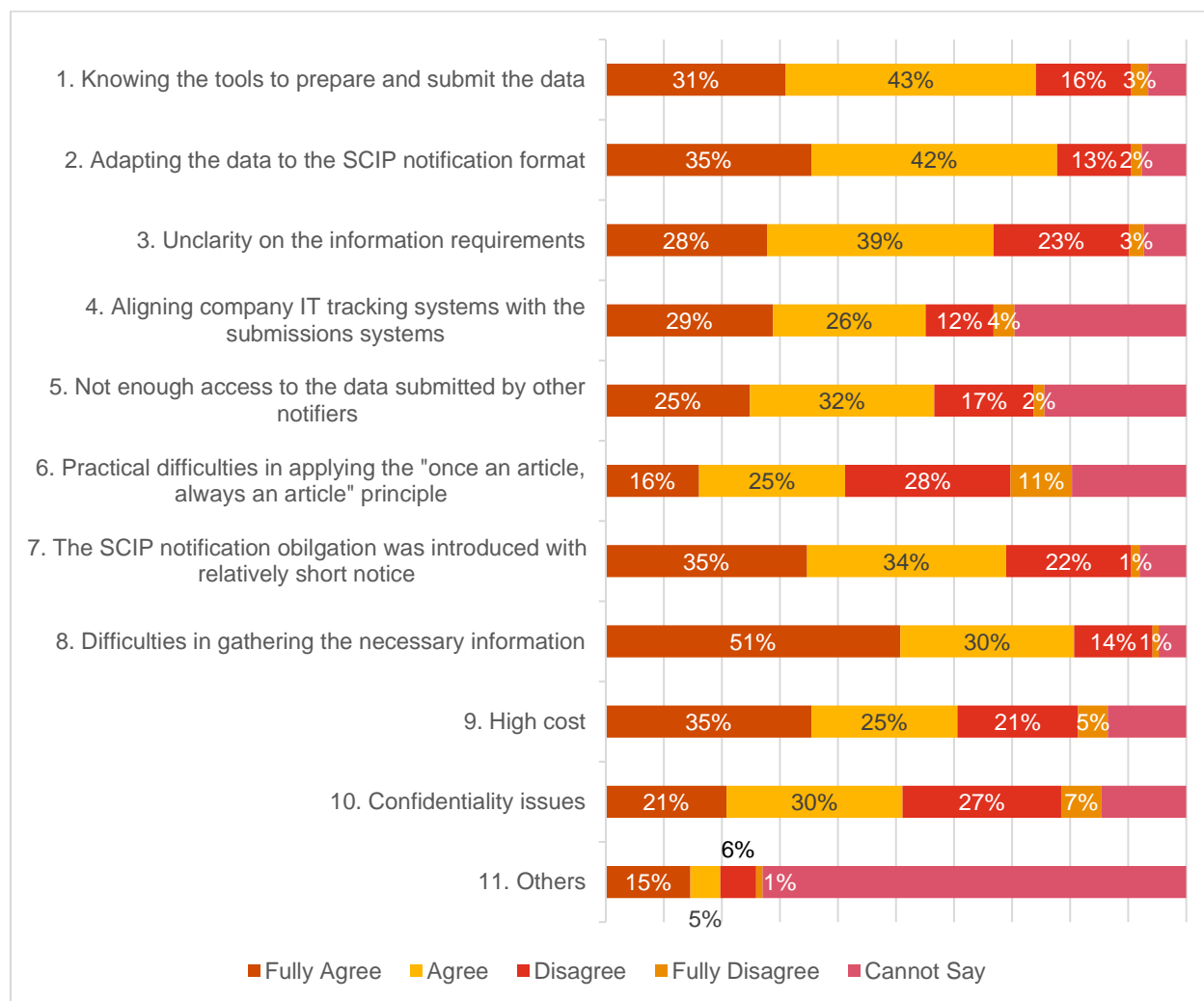
### 2.2.2.3 Extent to which SCIP meets objectives for duty holders

**SCIP does not fully meet the objectives for companies. Notification preparation is said to be burdensome, time-consuming, and costly. The system is difficult to use.** Companies submitting SCIP notifications were the largest group of respondents (N=297) to take part in the survey. They were questioned on the challenges they experience when complying with their duties. A series of 10 assertions were provided by the survey with which respondents had the possibility to express their agreement or disagreement. When only considering answers which gave a normative assessment, duty holders mostly agreed or fully agreed with every possible challenge provided. Notably, more than half of the companies fully agreed with the statement regarding the difficulties in gathering the necessary information for submitting a notification (Statement 8). On the other hand, duty holders were split in half when assessing whether they encounter practical difficulties in applying the “once an article, always an article” principle (Statement 6).

Most companies agreed with experiencing challenges regarding knowing the tools to prepare and submit data (76% in agreement). Respondents confirmed having difficulties adapting data to the SCIP format. They also pointed to the unclarity of the information requirements, although ECHA has provided guidance on

this.<sup>17</sup> Aligning their company’s IT tracking systems with the submission systems equally proved challenging. The lack of enough access to data provided by other notifiers and the short time they had had to prepare for their duties was also signified. Finally, the high cost of submitting notifications and confidentiality issues were considered challenges. Section 2.3 provides more information on the costs experienced by users.

Figure 15: What are the challenges you experienced most often when using SCIP to comply with your duty?



In addition, respondents had the possibility to provide comments regarding the challenges they faced when fulfilling their notification duties. Companies replying with “Other” indicated that entering data into the system was either very time consuming or simply impossible for larger companies. They would then resort to consultants which are expensive. Other comments pointed to the difficulty in getting information on SVHCs from other companies and suppliers, especially when these are from outside the EU. Such difficulties are most likely related to the high number of components that need to be notified for very complex objects like electronics products.

It should be noted that the results in these questions do not reflect the findings of ECHA’s survey from

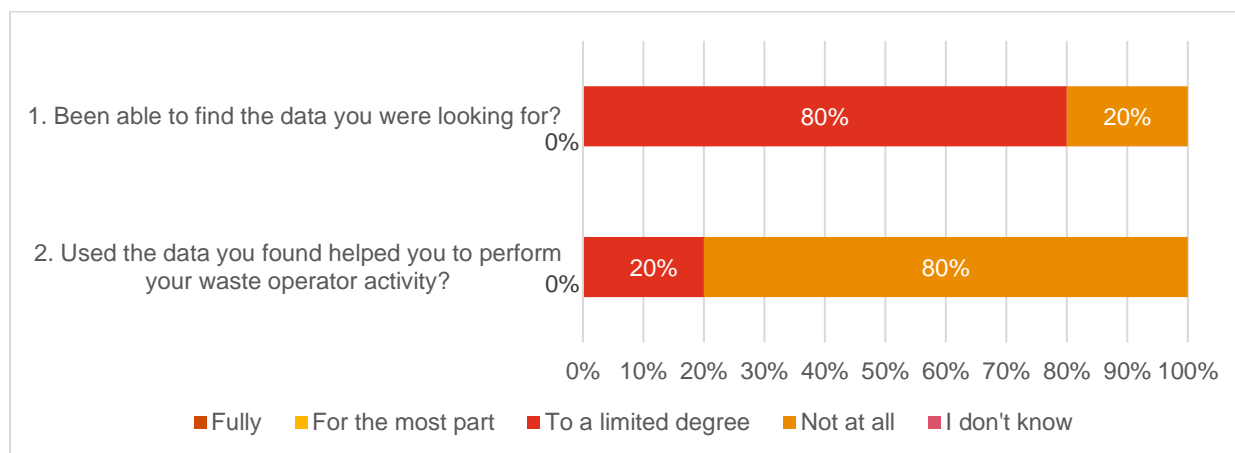
<sup>17</sup> ECHA, [SCIP Support](#)

October 2021 with the SCIP IT user group<sup>18</sup> which is comprised of 100 representatives of submitters of data (companies, IT suppliers, associations). The survey gathered overall positive feedback on the tools to prepare and submit the data, perhaps reflecting the higher degree of familiarity of the IT user group with the tool compared to that of other users.

### 2.2.2.4 Extent to which SCIP meets objectives for waste operators

**SCIP provides reliable data to Waste operators. However, this data is difficult to find and does not substantially help with their waste management activity.** Waste operators accounted for 6 of the survey respondents. Out of those, only one had not used the SCIP database as a source of information and did not intend to use in the future. Most respondents in this category declared that they had been able to find the information they were looking for in SCIP but to a limited extent. Additionally, 80% of waste operators said to have never found the data useful for the performance of their waste management activity while the 20% did so only to a limited degree.

Figure 16: To what extent have you been able to find and use data? Waste Operators N=6.

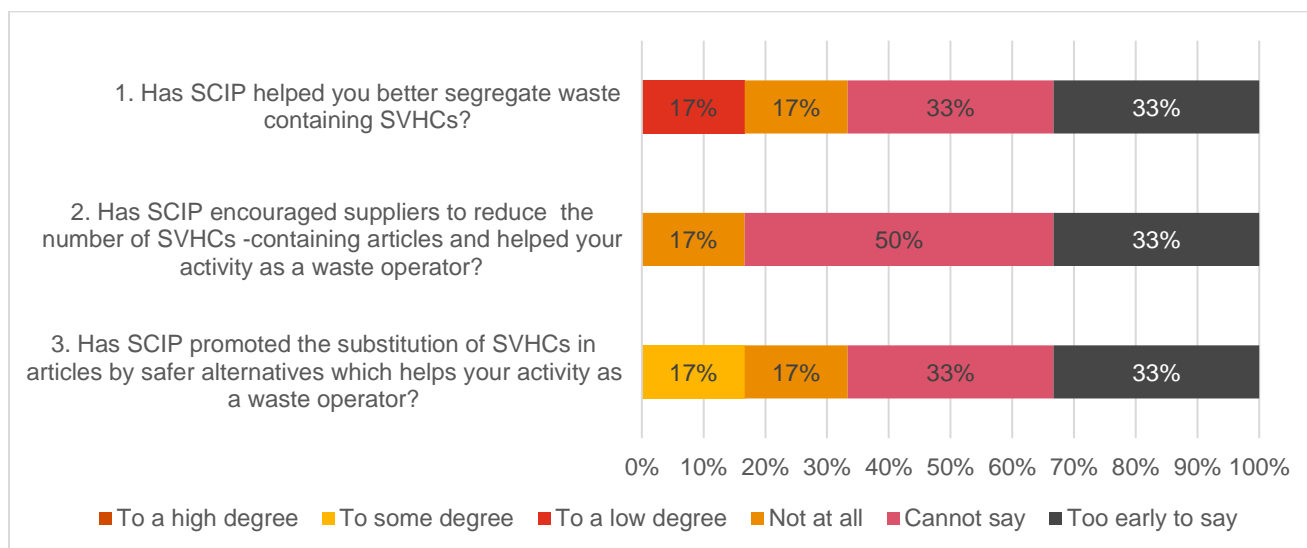


In their comments, Waste operators indicated that the searching tool was not fully adapted to their needs. Search identifiers were missing for them to use data for waste operations. In their view, the information on the site could not be linked to the reality of their activity sites.

Waste operators were further questioned on the impacts the implementation of the SCIP database has had on several aspects of their SVHC related waste management operations. More than half of their answers could not provide an assessment, some of them citing the short time elapsed since the creation of SCIP. Most respondents providing an assessment declared that SCIP had not substantially helped them better segregate waste containing SVHCs or promoted the substitution of said substances with safer alternatives. SCIP had thus not had a profound effect on their waste management operations.

<sup>18</sup> ECHA, [SCIP IT User Group](#)

Figure 17: Benefits of SCIP for Waste Operators N=6.:

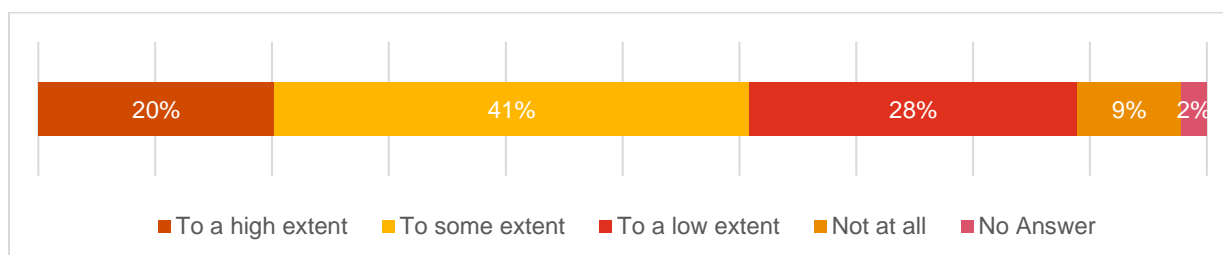


Once again, comments indicated the difficulties in retrieving information due to the database identifiers and nomenclature system.

### 2.2.3 To which extent is there sufficient awareness of SCIP?

**There is growing consciousness of SCIP, but consumer and waste operator awareness are areas for improvement.** This section of the survey aimed at gathering stakeholders’ opinions on the extent of the awareness of SCIP in their respective areas of work. Only a low number of respondents (9%) declared that SCIP awareness was non-existent. A combined 62% of answers referred to “some extent” (41%) and “high extent” (20%) of SCIP awareness whereas 29% described it as low.

Figure 18: To what extent is there sufficient awareness of SCIP in your area of work? N= 397

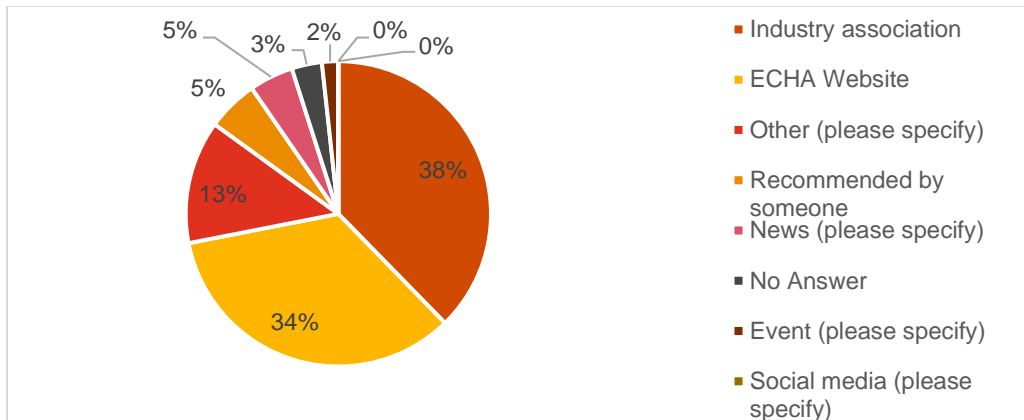


After being sorted by respondent category, results showed that more than half of the Companies and EU MS State Authorities surveyed considered that there was some or a high extent of awareness of SCIP in their line of work. On the other hand, Consumers and Waste operators mostly indicated that awareness of SCIP was low or non-existent in their area of occupation.

**Industry Associations and ECHA’s website are the main contributors to SCIP awareness.** With the aim of assessing stakeholder’s awareness of the SCIP database, respondents were questioned on the medium through which they had found out about SCIP. Most respondents came across SCIP via Industry Associations (38%). The ECHA website was the second most mentioned medium (34%). Respondents answering “Other” (13%) were asked to specify and most referred to policy work and their involvement in regulatory processes as the reason for their knowledge of SCIP. Personal recommendations (5%) and the news (5%) were also cited as awareness sources. Webinars organised ECHA and other Chemical Agencies

were mentioned by respondents answering with “Event” (2%). The survey results showed that social media had not played a part in raising awareness.

Figure 19: How did you find out about SCIP? N=397



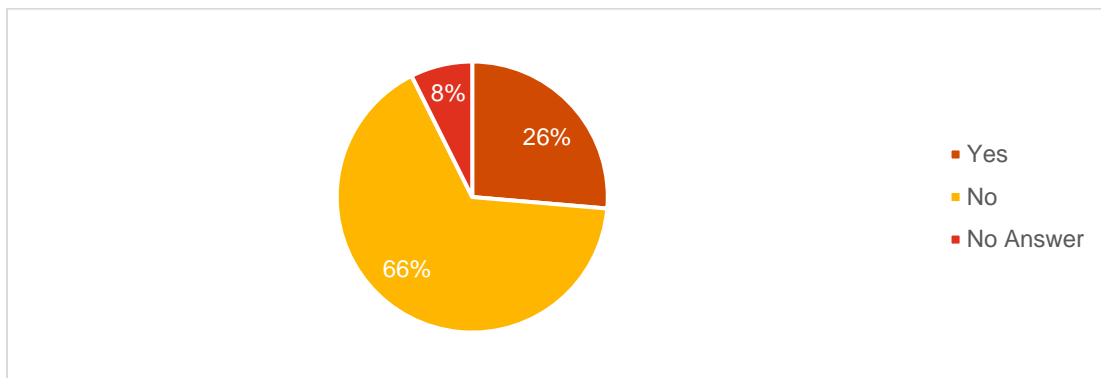
**Website metrics show that SCIP web resources are being consulted and utilised and ECHA has raised awareness of it.** The survey results reflect the efforts made by ECHA to raise awareness of SCIP. According to data from ECHA, the SCIP database had received over 1.3 million visitors between January 2019 and February 2022. For the year 2021, SCIP posts across different social media platforms (Twitter, Facebook, LinkedIn, etc.) had the potential to reach close to 4 million people. On YouTube, videos describing several aspects of SCIP have over 30 thousand views. The SCIP podcast has over 1000 downloads and the SCIP mailing list has more than 3000 subscribers.

Figure 20: Media and Website datapoints



**Stakeholders have limited knowledge of national SCIP awareness-raising activities.** Respondents were asked whether they knew about any activities aimed at raising awareness in their country. Two thirds of respondents declared not having any knowledge of the existence of such activities at a national level. This trend was confirmed for every respondent category except Waste operators. Answers from this respondent category were split in half; 50% had knowledge of national domestic awareness activities whereas the other half did not. However, the low number of participants from this category limits the representativity of these numbers.

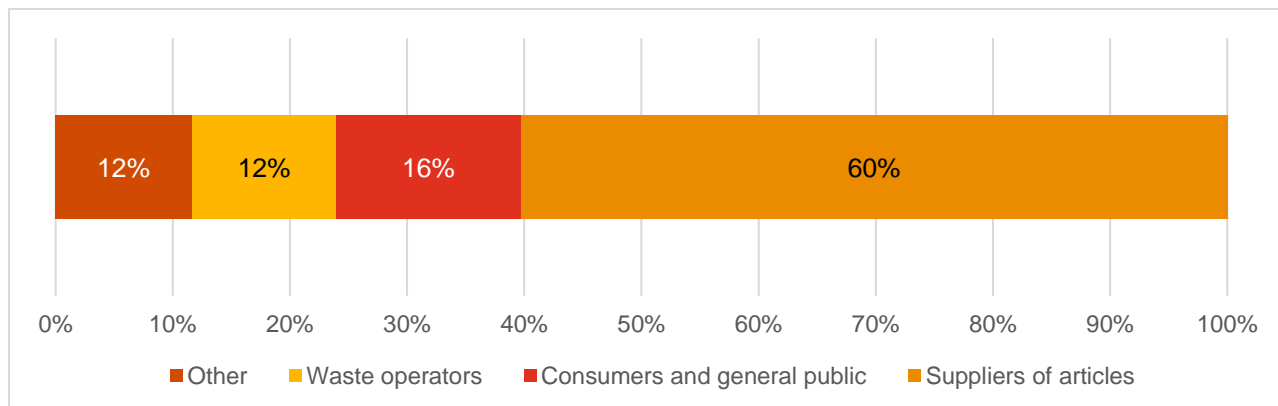
Figure 21: Do you know of any awareness-raising activity about SCIP in your country? N=397





**Awareness-raising activities are mainly destined to suppliers of articles.** Survey participants who had knowledge of national awareness-raising initiatives were asked to specify the intended recipients of such activities. Duty holders were the most common beneficiaries (60%). Consumers (16%) and Waste operators (12%) also benefitted from these initiatives. Respondents answering “Other” (11%) were asked to specify and included industry associations, NGOs, ECHA and third-party companies tasked with collecting data on behalf of their customers.

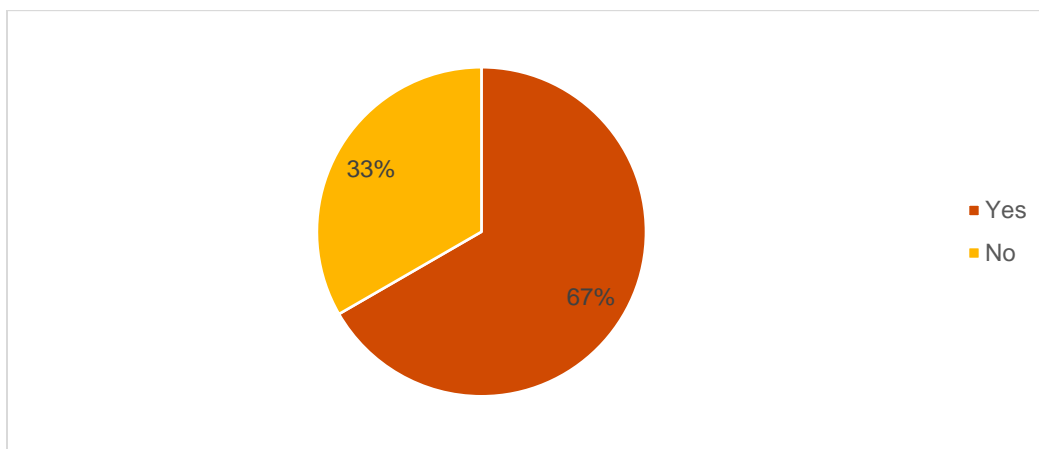
Figure 22: To whom are awareness-raising activities directed in your country? Multiple choice N=107



Most of the time, these events were organised by Industrial or Commercial Associations (52%). In addition, Public authorities (27%), NGOs (8%) and Waste Operator Associations (7%) were mentioned as organisers of this type of events.

Respondents in the European MS Authority category were asked whether public authorities in their country had organised awareness-raising activities. Two thirds of respondents answered positively.

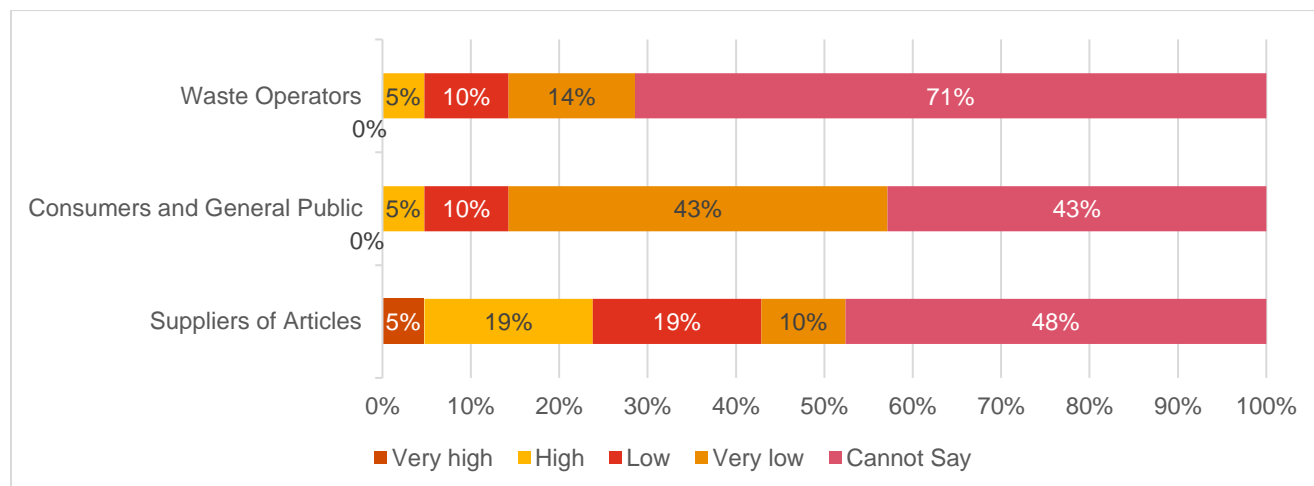
Figure 23: Have public authorities raised awareness about the SCIP database in your country? N=21



**EU Member State authorities have pointed to low levels of SCIP awareness for Consumers and Waste Operators while Duty holders are said to be aware to some extent.** EU MS respondents were prompted to provide their assessment on the awareness surrounding SCIP by type of stakeholder (supplier of articles, consumer and general public, waste operator). Around half of European Member State Authorities were not able to provide an assessment on the awareness of SCIP by stakeholder category. For instance, more than 70% of respondents did not give an evaluation on waste operators’ awareness of

SCIP. Similarly, some 40% of answers could not provide such an assessment for Consumers and the General Public. For MS Authorities that did provide a normative answer, more than half pointed to “low” or “very low” levels of awareness of SCIP for every stakeholder category.

Figure 24: How would you rate the awareness of the SCIP database concerning: [...]? (N=21)



These trends hold true when only considering answers from the Competent Authorities for the Implementation of the Waste Framework Directive.

## 2.3 Efficiency

This section analyses the SCIP costs for development and maintenance on the ECHA side (§2.3.1), as well as the costs for users (§2.3.2).

### 2.3.1 SCIP costs for development and maintenance on the ECHA side

This section presents the historical cost assessment, the comparison with another initiative, namely PCN, as well as a forecasting exercise.

#### Historical cost assessment

The historical data and documents made available by ECHA have been analysed based on the following assumptions:

- The costs have been categorised against the ECHA budget titles, namely:
  - **Title 1-Staff:** In addition to the salary costs, it also includes other staff expenditure as medical services, training, interims etc.
  - **Title 2-Admin expenditure:** Title 2 costs are shared among the 3 regulations ECHA implements and SCIP covers a share based on FTEs based drivers
  - **Title 5-Operational expenditure:** This expenditure mainly consists of maintenance and development costs.
- The analysis focus on the main costs related to SCIP. Other direct or indirect costs are much more limited and are excluded from the analysis. These other costs consist of other common costs, such as rent, medical services, IT infrastructure etc. SCIP financing contributes to these costs and is apportioned accordingly in respective budget titles.

- The budgeted data have been analysed, as the actuals may show only non-significant differences as confirmed by ECHA. In addition, the budget yearly split has been reviewed for some lines in order to facilitate the analysis of the data (e.g. as maintenance costs were booked end of 2018 but spent in 2019, this amount is specified in 2019).
- ECHA confirmed that there are no direct incomes (revenues from fees) to be considered in the cost assessment. Thus, it is not possible to assess the coverage of SCIP expenditures with its received revenues.

The following table summarises the historical cost assessment based on the information and data provided by ECHA.

Table 1: SCIP historical costs

Main costs	2019	2020	2021	2022	Total	
<b>T1 (Staff)</b>	€ -	€ 25,000.00	€ 627,000.00	€ 720,171.00	€ 1,372,171	22%
<b>T2 (Admin expenditure)</b>		€ 82,000.00	€ 240,568.00	€ 197,358.00	€ 519,926	8%
Rental of buildings and associated costs			€ 119,418.00			
Information and communication technology			€ 113,000.00			
Movable property and associated costs			€ 4,900.00			
Current administrative expenditure			€ 3,250.00			
<b>T5 (Operational expenditure)</b>	€ 900,000.00	€ 1,535,000.00	€ 1,380,000.00	€ 625,181.00	€ 4,440,181	70%
Development	€ 639,439.35	€ 1,151,250.00	€ 1,035,000.00	€ 468,885.75		
Maintenance	€ 230,224.03	€ 383,750.00	€ 345,000.00	€ 156,295.25		
<b>Total</b>	€ 900,000.00	€ 1,642,000.00	€ 2,247,568.00	€ 1,542,710.00	€ 6,332,278	

- The main expenditure is the IT Development and Maintenance costs (70%), while the Staff costs represent 22% of the expenditure.
- The Title 1 costs correspond to the foreseen eight agents allocated to SCIP in 2020-2021. Horizontal staff service costs are included in the depicted data. ECHA estimates the consumption may have been higher than 8 in 2020-2021 due to the peak of the work (go-live, trouble shooting). For 2019 ECHA estimates that around 5 FTEs from REACH have been used for SCIP-related tasks.
- After a thorough analysis with ECHA; the cost breakdown for Title 5 has been done based on the following definition and ratio:
  - **Maintenance:** Corrective/Preventive maintenance- refers to repairing design and programming errors in order to prevent any costly unplanned downtime from unexpected equipment failure. These costs are estimated at 25% of the maintenance and development costs based on the ratio of the historic costs;
  - **Development:** Adaptive maintenance- refers to modifying a system in response to environmental changes and/or developing new features. These costs are estimated at 75% of the maintenance and development costs.

### High-level comparison with Poison Centres Notification (PCN)

This section aims to analyse the SCIP expenditure against the PCN expenditure.

#### Preliminary on PCN

According to Article 45 of the CLP Regulation, companies placing hazardous mixtures on the market are obliged to provide information about certain hazardous mixtures to the relevant national bodies. The national bodies make this information available to poison centres so that they can give advice to the citizens or medical personnel in the event of an emergency. Annex VIII to the CLP Regulation, adopted in March 2017, defines the harmonised requirements for poison centre notifications (PCN) applicable as of 1 January

2021 to mixtures for consumer and professional uses and from 1 January 2024 for industrial mixtures. PCN tools and guidance have been set up and developed by the ECHA to support companies, national bodies and poison centres with the new requirements.

### Maintenance & development costs of PCN and SCIP

The following table presents the IT maintenance & development costs of PCN and SCIP.

Table 2: Title 5 expenditure for PCN and for SCIP

T5 Operational expenditure	2017	2018	2019	2020	2021	Total for the development phase	Overall total
PCN	€ 127,298	€ 1,093,930	€ 1,275,539	€ 891,545	€ 235,237	€ 3,388,312	€ 3,623,550
SCIP	€ -	€ -	€ 900,000	€ 1,535,000	€ 1,298,505	€ 3,733,505	€ 3,733,505

The evolution of the operational expenditure for PCN shows the effort of development during the four first years (namely 2017, 2018, 2019 and 2020), while mainly the maintenance mode was active in 2021. For SCIP, it is considered that the development phase lasted mainly the first three years, namely 2019-2020-2021.

The SCIP operational expenditure during the development phase shows 9% more additional operational expenditure than for PCN and only 3% for the overall duration. These additional costs (9%) have to be considered as a success taking into account the additional complexity of SCIP platform compared to PCN platform. The overall efficiency of SCIP should be valued considering the short period available for its implementation. This efficiency gain was also the result of the re-use of the common components, i.e. the ECHA Submission portal, that was initially built for PCN.

In conclusion, notwithstanding a similar budget spent on each activity, it could be considered that there have been certain economies of scale in SCIP due to its much higher volumes and complexity.

The following table highlights some of the factors that explain the additional challenges brought by SCIP and how it benefited from the initial IT developments already made at ECHA, in particular for PCN purposes.

	PCN challenges	Additional SCIP challenges
<b>Initial context</b>	Information requirements for PCN notifications could build to a certain extent to information requirements already set at national level; however, the diversity and generally lower level of information requirements at national level, made it challenging to have all Member States agreeing on a higher level and harmonised information requirements Furthermore, it was challenging to make the replacement of exiting systems to be accepted.	Completely new initiative without limited requirements or format definition on the legislation and that required a flexible format that would allow the reporting of a very broad range of articles/products from a very simple article as a plastic fork to a very complex object like a car.
<b>Timeline requirements</b>	After an initial go-live in the ECHA Submission Portal in April 2019, PCN requirement entered into application in a staggered way: <ul style="list-style-type: none"> <li>1<sup>st</sup> Jan 2021 for mixture for consumer and professional use (the original date for consume use was 1<sup>st</sup> January 2020, but it was postponed to address a number of workability issues).</li> </ul>	Binding and tight deadline: SCIP was launched in October 2020 further to a prototype in February 2020 and the legal obligation for producers to notify on the platform came into force in January 2021. By January 2022, 15 million individual notifications from around 7000 companies had been published.

	PCN challenges	Additional SCIP challenges
	<ul style="list-style-type: none"> <li>1<sup>st</sup> Jan 2024 for industrial mixtures</li> <li>1<sup>st</sup> Jan 2025 end of the transitional period (for mixture notified according to national provisions before the relevant compliance date).</li> </ul> <p>It should however be noted that multiple legal text revisions brought in additional challenges to the smooth implementation.</p>	
<b>Volume of submissions</b> (Jan 21-Mar 22)	2,320,040 submissions	20,792,145 submissions
<b>Complexity of the data model</b> (notably due to the nature of the notification)	<ul style="list-style-type: none"> <li>Moderate complexity of the mixtures that are to be notified in PCN. Higher complexity was introduced by notification features introduced with the legal text amendments. These nevertheless concern a minor part of submissions.</li> <li>Data is made accessible to Poison centres and appointed bodies through a dedicated ECHA portal (Interact portal), and directly sent to them through an eDelivery service upon subscription.</li> </ul>	<ul style="list-style-type: none"> <li>Complex notification due to the additional concept of articles/products and the number of those articles/products to be notified in SCIP, and the complexity of many of the articles notified. In complex objects like a car or a phone, since all the components that contain SVHC needs to be reported</li> <li>Data aggregation required for storage and dissemination purposes (to waste operators, as well as consumers and other interested parties)</li> </ul>

### Optimising the implementation of the SCIP platform

In order to optimise the implementation of the SCIP database end-to-end solution, it was built relying on existing component applications/systems which were enhanced where needed for SCIP:

- IDM – allows company registration and user management
- IUCLID – provides the capability to encode the required information for SCIP notifications and create the needed dossier
- Submission Portal – used for submitting the SCIP notification dossier per article and that was built for PCN
- BIDI – ECHA’s data integration platform used to prepare the data for publishing and integrating the CL substances being reported to substance information cards
- Dissemination – used for publishing SCIP notifications received by ECHA

In addition to the key application components listed above, other underlying systems components are also employed by the SCIP database solution, for example ECHA Cloud Services for distributing IUCLID as a cloud service, system-to-system (s2s) submissions providing a machine based submission channel, etc.

This approach explains the limited development costs comparing to PCN, notably thanks to the high expertise of the ECHA teams in designing and developing IT tools to implement the EU’s chemicals legislation.

### Forecasting SCIP expenditures

The forecasting exercises are based on the assumptions below. The following table presents the possible

evolution of the main expenditures based on two scenarios:

- Scenario 1 is based on the ECHA internal note dated 11 Nov 2021 “ECHA waste framework directive activities resources from 2023 on”, – Low: Entering into maintenance mode
  - Decrease of the number of staff dedicated to SCIP to 5 FTEs, instead of about 8 FTEs
  - Limiting the operational expenditure to the maintenance (e.g. software updates, IUCLID format application, bug fixing, infrastructure maintenance), including dissemination of information as part of the maintenance costs
  - No further development

**Further development of SCIP could be considered in the next two scenarios based on the outcomes of the historical cost assessment:**

- Scenario 2 – Medium: Limited development
  - Decrease of the number of staff dedicated to SCIP to 5 FTEs, instead of about 8 FTEs
  - Limiting the operational expenditure to the maintenance (e.g. software updates, IUCLID format application, bug fixing, infrastructure maintenance), including dissemination of information as part of the maintenance costs
  - Development strictly limited to submission and data management
- Scenario 3 – High: Further development of SCIP functionalities
  - Maintain the number of dedicated staff to the current level (about 8 FTEs) in order to be able to cope with the new development
  - Developing certain functionalities (Please refer to the note dated 11 Nov 2021): improvement, management and dissemination of successive versions of SCIP notification; improved access to the SCIP database for its expected users, improved article view and publication of attachments.
  - Maintaining the services and the SCIP platform (helpdesk, supporting activities, etc.)

Table 3: Forecasting SCIP main expenditures

Main costs	SCENARIO 1 - LOW			SCENARIO 2 - MEDIUM			SCENARIO 3 - HIGH		
	2023	2024	2025	2023	2024	2025	2023	2024	2025
T1 (staff)	€ 450,000	€ 459,000	€ 468,180	€ 450,000	€ 459,000	€ 468,180	€ 720,000	€ 734,400	€ 749,088
T2 (Admin expenditure)	€ 200,000	€ 200,000	€ 200,000	€ 200,000	€ 200,000	€ 200,000	€ 200,000	€ 200,000	€ 200,000
T5 (Operational expenditure)	€ 300,000	€ 306,000	€ 312,120	€ 500,000	€ 506,000	€ 312,120	€ 1,050,000	€ 806,000	€ 312,120
Development	€ -	€ -	€ -	€ 200,000	€ 200,000	€ -	€ 750,000	€ 500,000	€ -
Maintenance	€ 300,000	€ 306,000	€ 312,120	€ 300,000	€ 306,000	€ 312,120	€ 300,000	€ 306,000	€ 312,120
<b>Total</b>	<b>€ 950,000</b>	<b>€ 965,000</b>	<b>€ 980,300</b>	<b>€ 1,150,000</b>	<b>€ 1,165,000</b>	<b>€ 980,300</b>	<b>€ 1,970,000</b>	<b>€ 1,740,400</b>	<b>€ 1,261,208</b>
<b>Grand total</b>	<b>€ 2,895,300</b>			<b>€ 3,295,300</b>			<b>€ 4,971,608</b>		

The forecasting is based on the following assumptions:

- T1-Staff expenditure in 2022 represents the costs for 8 FTEs and the basis for the calculation (5 FTEs for scenario 1 and scenario 2, and keeping 8 FTEs for scenario 3). The staff expenditure is a pro-rata of the 2022 staff expenditure.

- The maintenance costs are estimated at €250,000 based on the average of the current costs in 2021 and 2022 and €50,000 are added for covering the information dissemination costs.
- For scenario 3, the development costs are estimated to €750,000 for the first year, to be reduced to €500,000 for the second year, knowing that the average development costs for 2021 and 2022 are about €750,000.
- An indexation rate of 2% per year is included for T1-staff and T5-Operational expenditure.

### 2.3.2 Costs for users

A bit more than half of all companies submitting notifications to SCIP who responded to the survey provided data on their associated costs for complying with their duty to submit notifications. Survey responses on the number of submissions made in the past year show a broad range of use – about 30% had less than 10 submissions, while 17% had more than 1000. The average value is approximately 2255 submissions, while the median one is 50.

151 respondents also provided estimates on the amount of time needed per submission and there is appears to be some correlation with the size of the company and number of submissions prepared, pointing towards efficiency gains with higher volume of notifications and for larger companies. While companies submitting more than a 1000 notifications report that on average it takes between 30 and 60 min to make a submission, for less frequent notifiers or notifiers of more complex products, the cost per submission can be as high as 500 h per submissions. This could be attributed to the use of S2S solutions by bigger companies which are not easily available for smaller ones. S2S solutions have been found to save considerable amounts of time when preparing notifications (c.f. Utility section, 2.4.1). In addition, bigger companies might be able to deploy more resources for the fulfilment of their SCIP duties.

About a fourth of the respondents indicated that there were also costs related to IT systems integration and software development ranging between EUR 1,000 and EUR 250,000 per company, on average 68,000 among the 14 companies that reported data on this.

## 2.4 Utility

The aim of this section is to evaluate the utility and use of the SCIP and its helpdesk tool by examining how often respondents used it, the extent to which they value its key features and how likely they are to recommend it.

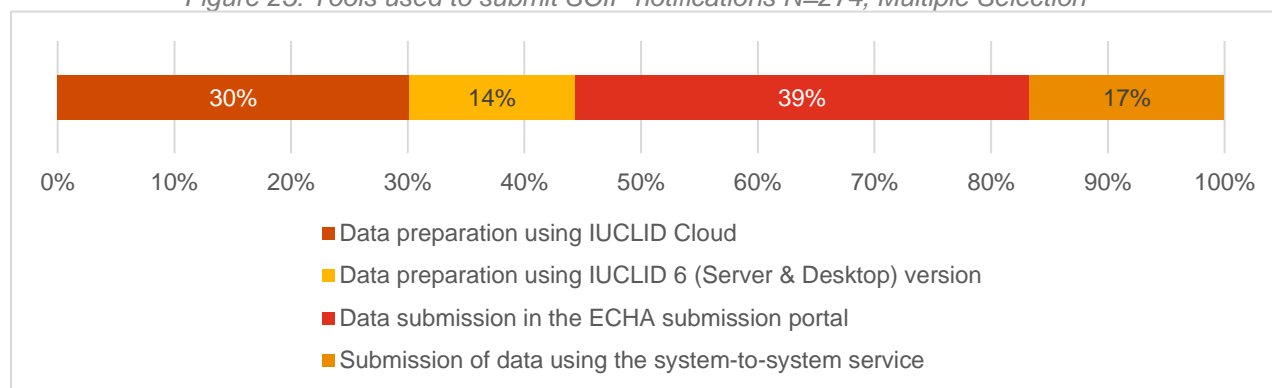
Utilisation of SCIP and its helpdesk reached a peak when the legal duty to notify came into force. Since then, usage metrics have decreased but since about April 2021, they remain constant. When choosing from submission pathways, duty holders value user-friendliness and timesaving. The SCIP's support and simplification features for submitting notifications (tools for preparing and submitting, manuals and webinars) are useful and save time for duty holders. The helpdesk has also been found helpful for the preparation of notifications. For users of SCIP information, the search functionalities remain suboptimal, although substantial progress has been made. Stakeholders other than duty holders providing notifications have expressed their desire for additional and more practical search functions and identifiers.

## 2.4.1 To what extent have SCIP and its support features been used and accessible?

Since the launch of SCIP in October 2020, the number of notifying legal entities and notifications has been increasing. While the legal basis for the database did not set targets for the number of notifications or users, the notification volume received can be considered as unsatisfactory. From October 2020 to January 2022, 15 million notifications from around 7000 legal entities had been received. Recent data from March 2022 compile 24 million notifications from 7600 entities.

**The ECHA submission portal and IUCLID cloud are the preferred tools to submit notifications by duty holders.** In order to assess the SCIP database utility, the survey asked duty holders to provide information on which tools they had used to prepare and submit their notifications. Respondents mostly (39%) used the ECHA submission portal solution to prepare their notifications. Second, IUCLID Cloud was used close to a third of the time (30%). S2S services (17%) and IUCLID 6 (14%) were the least used tools for notification preparation.

Figure 25: Tools used to submit SCIP notifications N=274; Multiple Selection



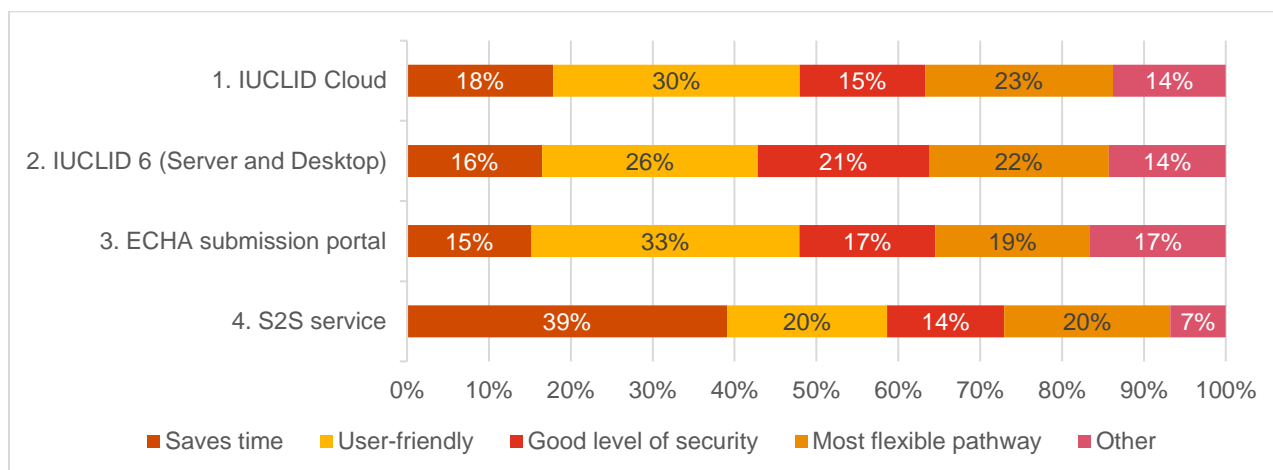
It should be noted that a small number of companies are responsible for a large share of the volume of notifications. These companies use mostly S2S services to submit their notifications. In turn, for the period between 26/10/2020 to 04/02/2022, around 75% of the submissions received by ECHA were sent via S2S<sup>19</sup>.

**User-friendliness and timesaving are important for duty holders.** Possible benefits arising from the different IT solutions were provided by the survey. Participants were prompted to declare which of them were applicable for each pathway. For clarity purposes, only answers from respondents having used the respective solutions have been considered. Predominantly, respondents used their chosen pathway based on its user-friendliness and time-saving benefits. The ECHA submission portal and both IUCLID Cloud and IUCLID 6 were found to be user-friendly above all (33%, 30% and 26% respectively). On the other hand, the S2S service's main benefit was said to be time saved (39%).

<sup>19</sup> ECHA, Submission Pathways, Unpublished Information



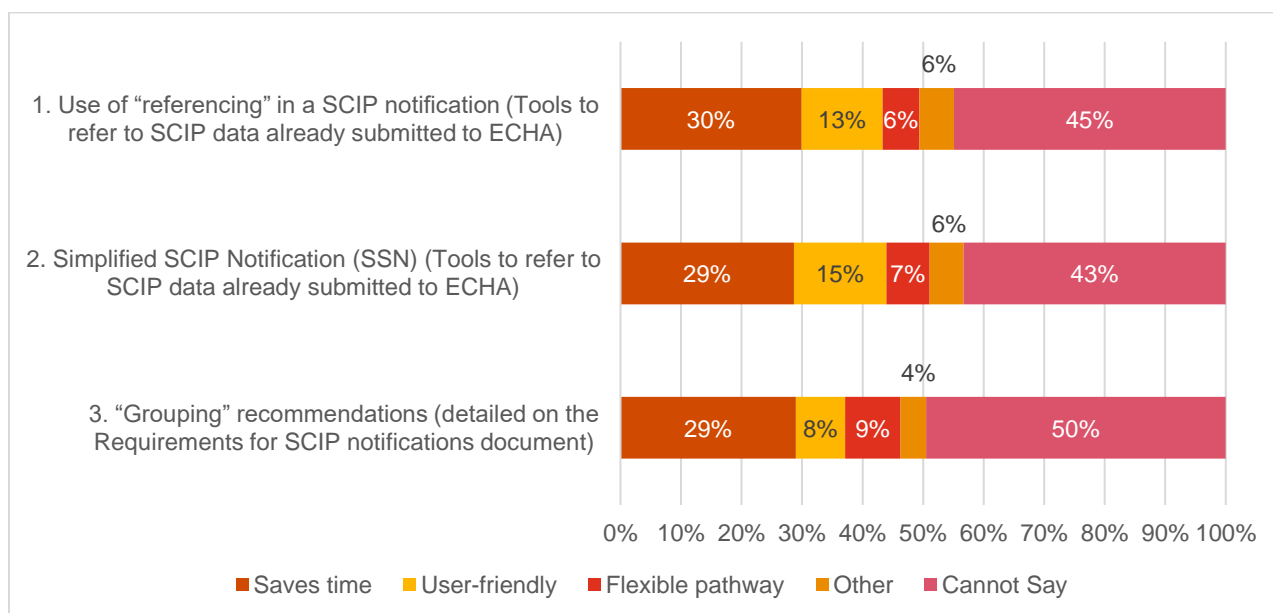
Figure 26: Benefits experienced when using a chosen pathway, N=274, Multiple selection



## 2.4.2 To what extent are SCIP features useful for users?

**SCIP features are useful and save time for duty holders. Its helpdesk is helpful for the preparation of notifications.** ECHA has developed three main simplification mechanisms for the submission of SCIP notifications (referencing, SSN and grouping). The survey aimed at determining which benefits said mechanisms provide to duty holders. From those answers which provided an assessment, respondents indicated that all three mechanisms majorly saved time when preparing submissions. Timesaving was mentioned twice as often as user-friendliness and three times as much as flexibility for every simplification mechanism in question.

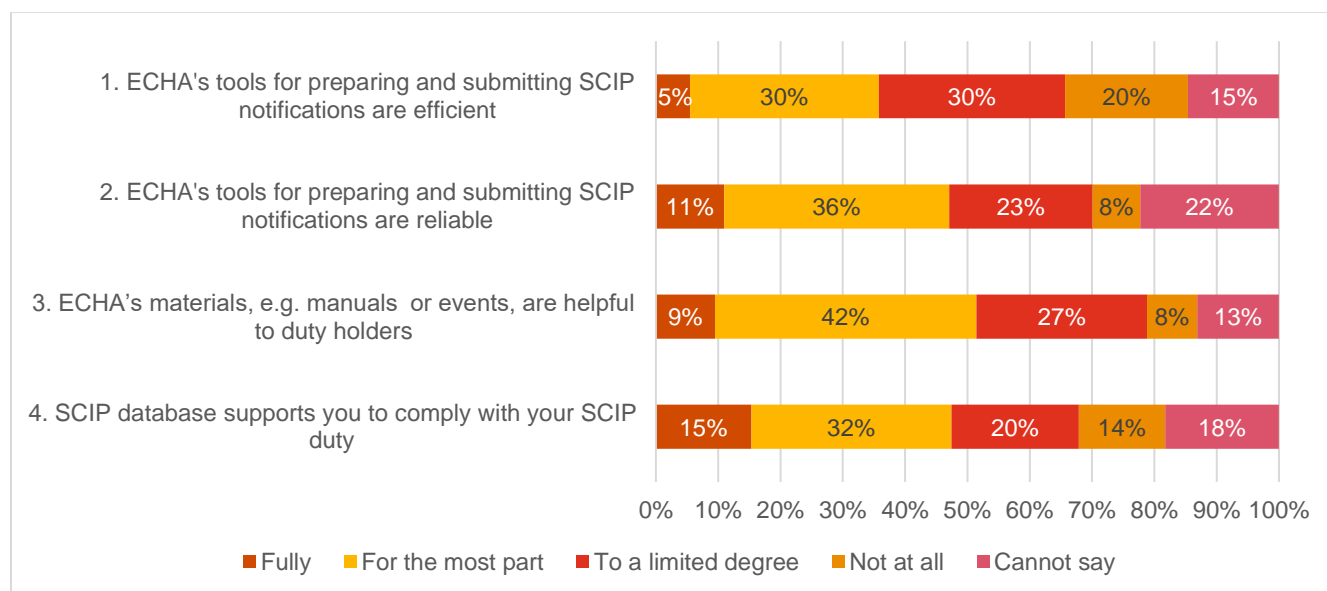
Figure 27: Benefits experienced when using the simplification mechanism developed by ECHA, N=274



**ECHA's simplification tools and mechanisms are efficient to an extent, reliable and support duty holders.** The survey asked for the duty holders' assessment of a series of assertions regarding the quality of instruments at their disposal. Half of respondents (50%) found that ECHA's tools were not efficient. Nonetheless, when considering those answers that provided an assessment, most respondent indicated

that these tools were reliable. Further, ECHA’s materials such as manuals or events were mostly deemed helpful. Most companies believe the SCIP database supports them with their SCIP obligations.

Figure 28: Duty holder assessment of ECHA’s tools and support N=274

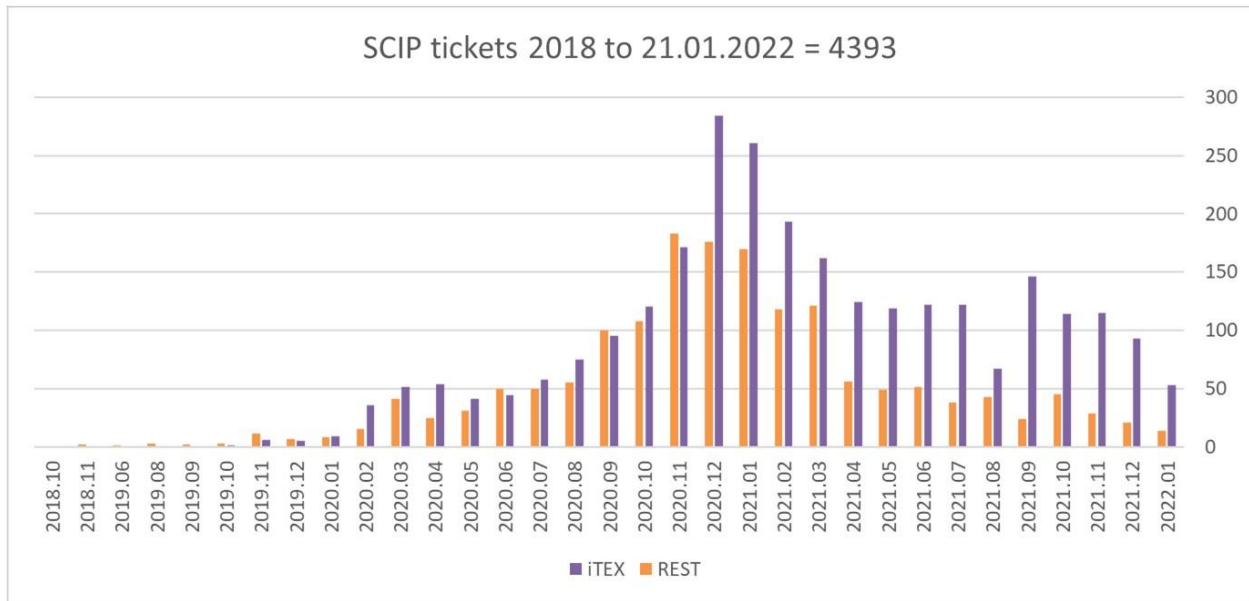


Following their answers on ECHA’s tools for preparing and submitting notifications and other materials, some respondents representing duty holders provided further comments on this matter:

- Several participants praised ECHA’s webinars quality and the content found in the training material although information was sometimes not easy to find,
- The fact that, once submitted, data could not be modified or deleted was criticised by various users,
- The manual submission of notifications was found to be time-consuming,
- Several companies have entrusted their SCIP duties to third-party service providers
- The IT user group was praised and its continuation encouraged by those respondents mentioning their participation to it

SCIP’s helpdesk usage numbers have followed the volume of notification submissions. The highest point of usage was reached in the weeks surrounding the entry into force of the legal obligation in January 2021. Then, as the rate of submissions slowed down, so did helpdesk tickets.

Figure 29: SCIP Helpdesk tickets since launch



Source: ECHA

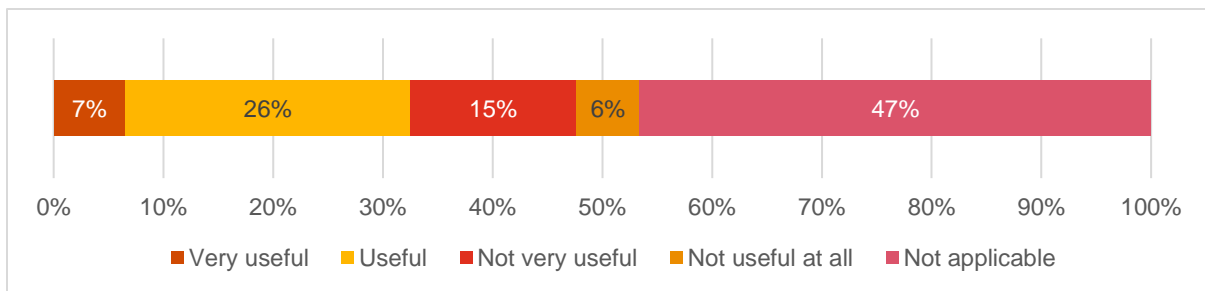
Table 4 Helpdesk enquiries by type

Type of Inquiry	Before prototype Launch, Feb 2020	Between Feb '20 and Oct '20	Since Live Version, Oct, 2020	Total Inquiries
ITEX	38	533	2170	2741
REST	46	448	1157	1651
Total	84	981	3327	4392

Source: ECHA

**The helpdesk was found useful by respondents.** Survey participants were prompted to provide their insights on their use of it. A third of respondents found the helpdesk to be useful (26%) or very useful (7%). On the contrary, a fifth of survey answers indicated the helpdesk was not very useful (15%) or not useful at all (6%). Close to half (47%) declared the question was not applicable as they had not used the feature. When analysing by category of respondent, the type of participant did not have a significant effect on said applicability.

Figure 30: Degree of helpdesk helpfulness N=397



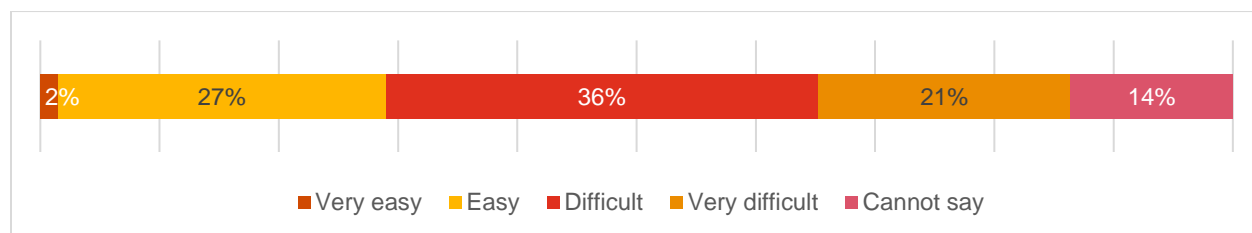
Respondents had the possibility of leaving general remarks concerning their helpdesk use:

- Several comments regretted the lack of a translation of ECHA documents, Q&A sessions, and webinars.
- Comments indicated user-experience varies greatly. Some comments praised the helpdesk excellent work and fast response times while others regretted long waiting times and impractical answers.

Qualitative data from interviews has confirmed the stakeholders' need for the translation of ECHA's documents and webinars into other national languages. However, it should be noted that significant progress is being made with the number of translated documents<sup>20</sup>. Additionally, several interviewees expressed their satisfaction with the SCIP's helpdesk. Although the waiting times can be somewhat long, the helpdesk has been found to respond with worthwhile information.

**Overall, finding information on the SCIP database is considered to be difficult.** Over half of the survey participants asserted that SCIP was difficult (36%) or very difficult (21%) to use when it came to finding information about products that contain SVHCs. Very few (2%) respondents rated the use of SCIP as very easy and further quarter (27%) deemed it to be easy.

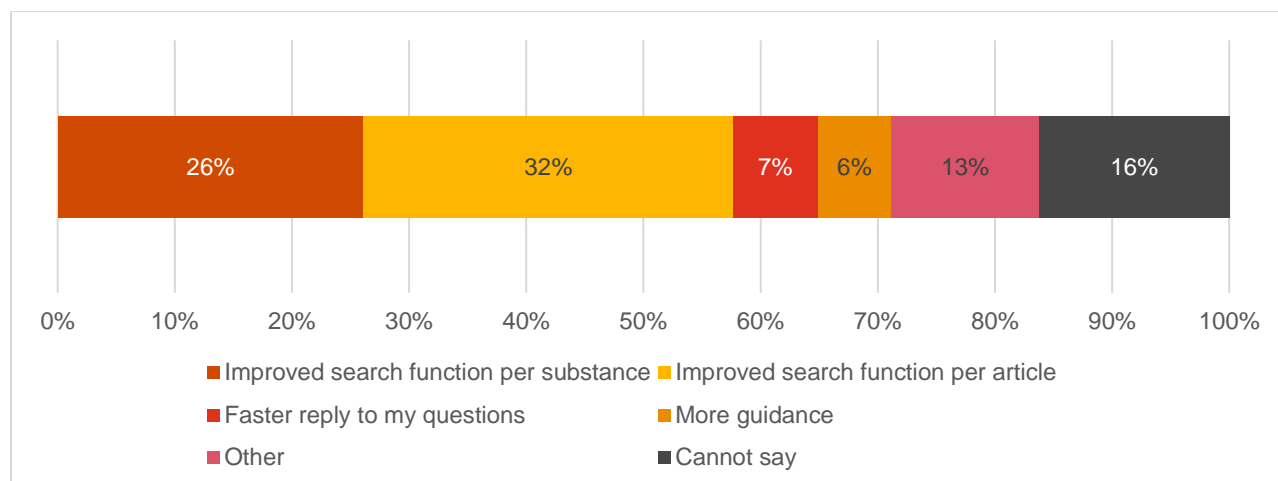
Figure 31: How easy is it to find information about products that contain SVHCs in the SCIP database?  
N=397



**The most desired changes to SCIP in terms of additional information and features are the improvement of the search function per article (41%) and per substance (26%).** 13% of non-duty holder respondents answered with other and specified their answers. Their comments mostly referred to search functionalities and identifiers. 7% of users' answers indicated the need for faster reply times and another 7% wished for more guidance. Those answering with more guidance were also prompted to detail their needs. The main potential improvements concern the system's ease of use, the translation of material to other European languages and guidance regarding business confidentiality.

<sup>20</sup> ECHA, [Support Page](#)

Figure 32: Desired additional information, features, and services to increase the usefulness of SCIP, N=123, Multiple choice



The survey asked companies submitting SCIP notifications to provide comments indicating the additional information or clarification that would be helpful for them to comply with their duty. Survey participants mentioned:

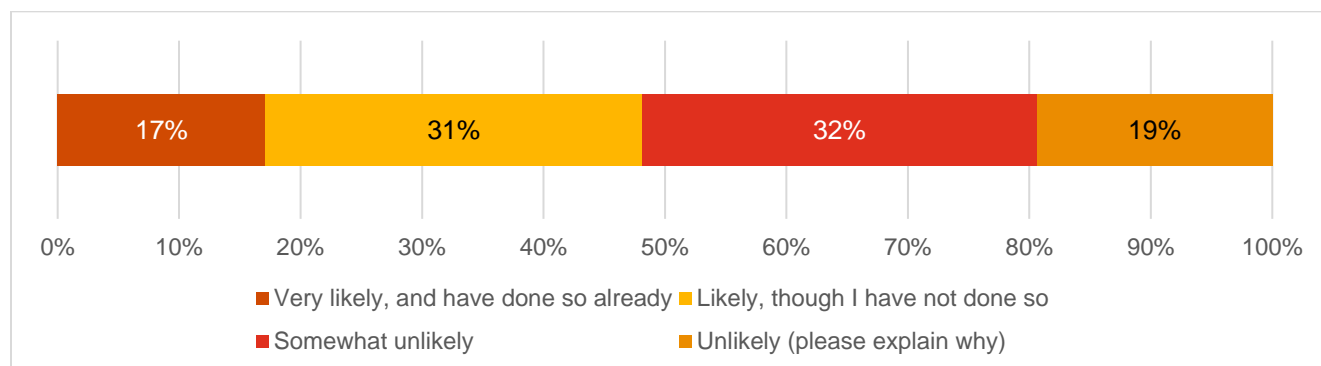
- The need for the implementation of national helpdesks.
- Enhancing the simplification of notification submission.
- More specific answers as well as more practical tools.

**More identifiers are needed for Consumers and Waste Operators to be able to make an appropriate use of the SCIP.** This observation was often repeated in the interviews with stakeholders accessing SCIP information. The current identifier design does not provide this type of stakeholders with meaningful ways to access the database. Be it for consumer purchase choices or waste treatment operations, the division by article and lack of intuitive search functions are severely limiting the use of the database.

### 2.4.3 How likely are stakeholders to recommend SCIP and its features?

**Based on stakeholders' willingness to recommend SCIP to their network, the tool can be considered to provide limited utility to its users.** In this regard, survey participants were prompted to assess their likelihood of recommending the database. Most respondents declared being somewhat unlikely to recommend SCIP (32%). Another third (31%) of participants indicated they were likely to recommend the database though not having done so. 17% had already recommended it and were likely to continue doing so. 19% of respondents stated they were unlikely to recommend SCIP and were then asked to specify their reasons.

Figure 33: How likely are you to recommend the SCIP? N=397



The comments provided by those unlikely to recommend SCIP helped identify the following trends:

- Several users found the system to be difficult to use (7 comments) and delivering a poor user experience (3 comments).
- Respondents did not see the added value in SCIP as in their opinion art. 33 of REACH already provides the necessary information on SVHCs (5 comments)
- Others indicated that the information they retrieved from the database was not useful to them (4 comments).
- Identifiers in the database were considered to be confusing and not optimised for a seamless user experience (2 comments).
- Some users had simply not used SCIP and were thus not able to recommend it (5 comments).

## 2.5 EU Added Value

This section aims to assess the added value of SCIP by looking at what impacts its discontinuation would have on users.

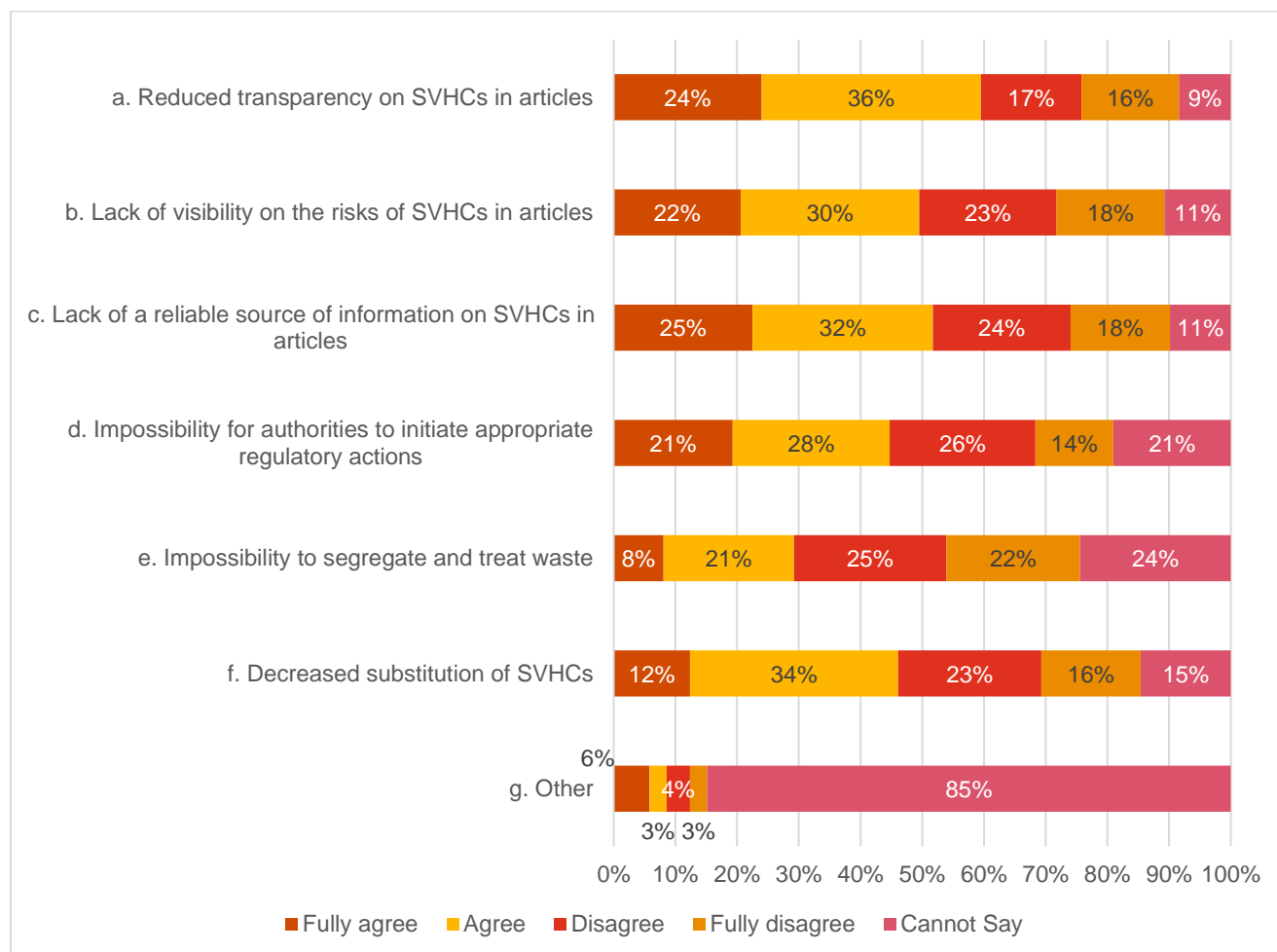
SCIP can be considered to deliver substantial EU Added Value. The database provides reliable information that is not available elsewhere. However, consulted stakeholders were divided regarding the consequences of a hypothetical discontinuation. While most believed it would hamper transparency and visibility regarding the presence of SVHCs in articles, they indicated that waste management operations and regulatory actions would not be negatively affected. This is due to the difficulties associated with the retrieving of information and its subsequent use.

### 2.5.1 What would be the most likely consequences if SCIP was discontinued?

**The potential negative consequences of a SCIP discontinuation are limited. This is due to the current low levels of compliance and accessibility. The full benefits provided by a perfectly functioning SCIP are yet to be attained.** With the aim of determining SCIP's added value, survey participants were prompted to identify the most likely consequences should the database cease operations. Over half of respondents who provided a normative assessment found that transparency (63%) and visibility (52%) of SVHCs in articles would be reduced. Survey data also shows that participants mostly believe a cancellation of SCIP would result in the lack of a reliable source of information on SVHCs in articles (52%).

A decrease in the substitution of SVHCs by safer alternatives by companies (53%) was also forecast. Respondents mostly determined that segregation and treatment of waste would not be affected (61%). Concerning the potential impossibility for authorities to initiate appropriate action, opinions were split (50%). The data on the substitution of SVHCs by safer alternatives contradicts the answers concerning the same objective under the effectiveness criterion (Figure 8). This inconsistency could be attributed to the temporal dimension of the question. In their comments, several participants mentioned taking into account future improvements of the database and higher compliance rates when providing answers to this particular section.

Figure 34: Most likely consequences if the SCIP database was discontinued. N=397



Regarding a hypothetical SCIP termination, survey participants had the possibility to make general comments. Companies submitting SCIP notifications provided several remarks regarding the database's added value or lack thereof.

- Several comments pointed to the already existing Art. 33 of REACH as an instrument providing the supply chain with SVHC transparency and incentivising SVHCs substitution (9 comments).
- Several comments expressed their doubts over the benefits brought by SCIP to regulators and waste operators (statements e. and d.) (5 comments).
- Sector specific companies mentioned the existence of sectoral regulations and systems that already track SVHCs in articles (3 comments).

- In some countries, national enforcement of SCIP is not yet a reality which results in low awareness of SCIP and thus limits its added value (1 comment from Italy, which is the 2<sup>nd</sup> largest country in terms of legal entities submitting SCIP notifications).
- When providing additional consequences (g. other), duty holders pointed to the burdens, costs and time associated with complying with SCIP requirements (8 comments)

EU Member State authorities also discussed the potential SCIP discontinuation effects:

- At the current state of compliance, a cancellation of SCIP would have minor implications on the aforementioned goals.
- Although discontinuing the programme would complicate waste treatment operations and regulatory initiatives, it wouldn't severely affect them.

A respondent pertaining to the Waste operator category indicated that their answers to this section of the survey integrated future SCIP improvements. They were hopeful of the future case uses for their waste segregation and treatment operations and declared having several ideas for improving SCIP in this regard. Interviews with waste operators confirmed the potential future use cases of the SCIP for Waste Operators.

In the same manner, respondents classified as "Others" (i.e. consultants, service providers, third party actors) found crucial that SCIP is improved in its accessibility and ease of use so as to establish itself as a reference for achieving the transparency, communication and substitution goals.

The last survey sub-section provided respondents with the opportunity to make general remarks and recommendations on the SCIP database. Five main topics were addressed:

1. The limited awareness and enforcement of the SCIP at national levels hinders its reach and effectiveness
2. Several simplifications in the submission process and the addition of more identifiers for users consulting the database are needed.
3. The relative short time elapsed since the introduction of the legal obligation and the implementation of the database are partly responsible for current difficulties.
4. For some duty holders, the usefulness of the SCIP for B2B communication is deemed limited. SCIP requirements are seen as burdensome, costly and providing low added value due to the already existing REACH Art. 33 duty.
5. SCIP B2C and B2Waste Operators communication needs to be improved through more identifier options and search functionalities.

Qualitative data obtained through the interviews has provided with the evaluation with general remarks on possible improvements of the SCIP database:

1. The lack of intuitive identifiers adapted for consumers (company name or product name) and for waste operators (aggregated classification through product-streams and complex products) was mentioned multiple times as a key area for improvement.
2. Accessibility and user-friendliness need to be improved before proceeding with awareness-raising activities for information-seekers.
3. Further simplifications need to be made for duty holders to swiftly comply with their obligations and being able to edit their notifications.
4. The fact that non-EU supply chain participants are barred from registering SCIP notifications contributes to out of date and inaccurate declarations.



5. The SCIP users group has been deemed to be very useful and its continuation is encouraged.
6. National enforcement and awareness are to be improved.

## 2.6 Coherence

This section evaluates whether SCIP is coherent and complimentary with other tools and instruments such as Ask Reach. The evaluation under this criterion will compare SCIP to ECHA's internal governance and search for potential interlinkages.

The SCIP database is coherent with other ECHA's initiatives and operations. Together with other regulations and tools, it contributes to the advancing of ECHA's broader goals related to chemical safety such as consumer health and environment protection. However, some duty holders have pointed to the existence of REACH Art. 33 (2) as already requiring them to communicate information related to SVHCs; making SCIP somewhat redundant. In addition, Companies' SVHCs-tracking systems are gradually being integrated with SCIP by duty holders.

### 2.6.1 Is SCIP coherent and complimentary with other EC and ECHA initiatives?

**SCIP is coherent and complimentary with other ECHA initiatives.** ECHA was "established for the purposes of managing and in some cases carrying out the technical, scientific and administrative aspects of this Regulation and to ensure consistency at Community level in relation to these aspects<sup>21</sup>" ECHA's strategic goals are based on its three main priorities:

1. The identification of substances of concern and managing risks,
2. The safe and sustainable use of chemicals by industry,
3. The managing of chemicals in a sustainable manner by applying EU legislation<sup>22</sup>.

A 2021 report on the past 5 years of the operation of REACH and CLP regulations provides some context for ECHA's actions and initiatives<sup>23</sup>. These operations have advanced several key objectives of the Agency. Worker health, consumer health and environment protection have all benefited from both programmes. In addition, the Agency's actions have contributed to increased levels of innovation and competitiveness in the EU market. One of the goals of the implementation of REACH was putting the responsibility of ensuring chemical safety back on industry.<sup>24</sup> In this regard, SCIP is coherent with ECHA's initiatives in that it aims advancing relevant and linked objectives.

**The implementation of the SCIP database is in line with the EC's Chemicals Strategy for Sustainability Towards a Toxic-free Environment<sup>25</sup>.** The EC's Sustainable Product Policy<sup>26</sup> could be of particular relevance for the SCIP database. For instance, the proposal to introduce Digital Product Passports (DPP) for goods put on the EU market could result in a duplication of the efforts of companies to

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<sup>21</sup> [REGULATION \(EC\) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL](#), Art. 75

<sup>22</sup> ECHA, 2021, [ECHA's Strategic Plan 2019-2023 In brief](#).

<sup>23</sup> ECHA, 2021, [Report on the operation of REACH and CLP](#)

<sup>24</sup> *Ibidem*

<sup>25</sup> European Commission, Communication from the EC to the EP, Council, ECSOC, and CoR, [Chemicals Strategy for Sustainability Towards a Toxic-Free Environment](#)

<sup>26</sup> European Commission, Communication from the EC to the EP, Council, ECSOC, and CoR, [On making sustainable products the norm](#)

comply with their duty to communicate information on substances. Should the EC propose an integration of both systems (DPP & SCIP), significant changes should be made to the SCIP database before creating interdependencies with other information systems.

**Duty holders have pointed to the fact that the Art. 33 (2) of the REACH regulation already requires them to communicate information on substances in articles.** Several of them do not see the introduction of SCIP as complimentary with said regulation. In its current form, the SCIP notification processes are seen as time-consuming and burdensome. However, some stakeholders have underlined the SCIP as being an invaluable tool in that it implements the first measure of whether an entity makes any effort to comply with REACH Art. 33.

**Projects such as the LIFE AskReach are examples of initiatives aimed at rendering information on SVHCs in articles and products accessible for consumers.** The project comprises 20 partner organisations representing governmental institutions, research, institutes, and NGOs. It is funded by the LIFE Programme of the EU. The initiative aims at:

- Raising consumer awareness about SVHCs in articles,
- Enabling consumers to make responsible purchasing decisions,
- Raising supplier awareness of their obligation to comply with REACH information duties,
- Improving the information flow on SVHCs between consumers and suppliers,
- Improving supply chain communication process with the aim of substituting SVHCs with safer alternatives<sup>27</sup>

This type of project specifically addresses the need for appropriate tools for consumers seeking information for their purchasing choices. The AskReach project has developed an intuitive app, *Scan4Chem*, which allows consumers to easily request information about the presence of SVHCs in products from suppliers using barcodes, pictures, EAN and GTIN identifiers. According to consulted representatives of the AskReach project, plans to integrate SCIP and the Scan4Chem app have been made, but deprioritised due to resources constraints. Ensuring integration of the two tools could be an efficient way of ensuring the attainment of SCIP's goal to contribute to consumer's decisions regarding SVHC articles and amplify the database's reach and use-cases.

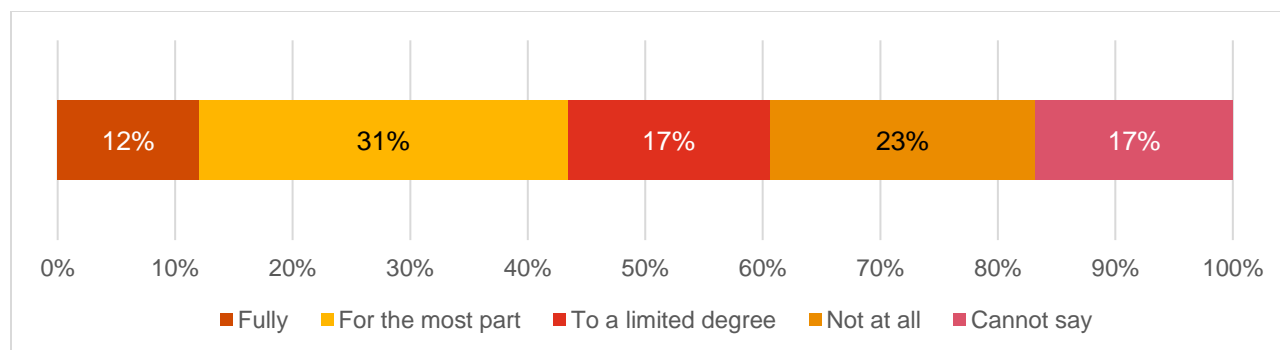
## 2.6.2 How well is SCIP integrated with companies' SVHCs tracking systems for articles placed in the market?

**SCIP is partially integrated with companies' SVHCs tracking systems.** The short time elapsed since the entry into force of the system and legal obligation means that some companies are currently adapting their systems. SMEs face difficulties keeping up with costs. Duty holders supplying articles and products in the market were asked about the integration of their SVHCs tracking systems with SCIP. From those answers that provided a normative assessment, more than half (52%) of respondents confirmed SCIP was integrated fully or for the most part with their SVHCs tracking systems.

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<sup>27</sup> LIFE AskReach, [About Project](#)

Figure 35: How well is SCIP integrated with your tracking systems for SVHCs in the articles that you place on the market? N=274



When answering with “to a limited degree” or “not at all” (48%), respondents were asked to specify:

- Companies pointed to the very short time they have had to integrate their systems; integration is ongoing.
- Duty holders often have limited information available from their suppliers, especially when they are located outside the EU.
- Other companies indicated that they input their notifications manually.
- Comments from several SMEs pointed to the high cost of these operations.

# 3 Conclusions and recommendations

The conclusions and recommendations are structured in line with the main criteria assessed as part of the evaluation. It should be noted that this evaluation has followed a methodological approach mainly focused on the use of data coming from survey results, supplemented where possible with interviews and desk research. It should be noted that the low number of survey participants from certain stakeholder categories limits the representativity of the data obtained, although interviews were conducted to remedy this issue and confirm the observations when possible.

## **Relevance - Are SCIP objectives aligned with stakeholder's needs, expectations and obligations?**

In terms of its relevance, the final SCIP product conforms with the requirements set out in the revised Waste Framework Directive. The external review also finds that the SCIP database's objectives are aligned with stakeholders' needs, expectations and obligations. However, SCIP users other than legal entities submitting notifications, i.e. consumers and waste operators have expressed their difficulties in making use of the information provided by the database. While the reliability and quality of the information is not in question, its accessibility and practical use cases for waste operators and consumers remain limited for the moment, according to the consulted stakeholder organisations. Equally, some Companies are uncertain about the usefulness of the information they provide to SCIP for other stakeholders. As such, while the tool is considered to be pertinent in its goals and objectives, the reality of its use-cases and applicability to real-life situations limits the degree to which it is relevant for users of the information notified through it.

**Recommendation 1:** It is recommended that the SCIP team tailors future iterations of the database towards information-seekers so that they have a streamlined access to information relevant to them. This would render the database relevant across stakeholder categories.

**Recommendation 2:** Considering the global dimension of current supply chains, the evaluation finds a policy-level solution related to non-EU entities ability to register and report to SCIP would make the database more relevant as a one-stop-shop for information on articles and products containing SHVCs. Further, it would improve the reliability of information and avoid instances of duplication.

## **Effectiveness - To what extent does SCIP fulfil its objectives?**

The external review finds that SCIP partially fulfils its core objectives. While it does provide reliable information that is not found elsewhere, the difficulties with which this information is used means the database falls short with regard to the complete achievement of its goals. In addition, the evaluation has found that stakeholders do not perceive the database as providing a substantial incentive for the promotion of the substitution of SVHCs in articles by safer alternatives.

Awareness of the SCIP database, both from a duty holder and information seeker perspective, needs to be increased. Together with Member State enforcement, an increased consciousness of SCIP is needed for the attainment of higher levels of duty holder compliance.

**Recommendation 3:** It is recommended that SCIP implements search functions and identifiers adapted to the needs of waste management activities such as aggregated information on product-streams and identifiers by complex objects. The current format of the information on SCIP is too granular for the needs of waste operators.

**Recommendation 4:** The evaluation recommends that consumers are provided with common naming identifiers such as company names or barcodes. In addition, the EC and ECHA should prioritise integration with tools facilitating access to information for consumers, such as those developed by the AskReach

project. The Scan4Chem application is an example of a tool facilitating information for consumers and the public. The portal uses simple identifiers such as barcodes to provide consumers access to SVHCs related information and make informed choices.

**Recommendation 5:** The evaluation finds that processes relating to the submission of notifications need to be further simplified, especially for those companies that do not have the possibility of using S2S solutions.

#### **Efficiency - Are the costs associated to SCIP coherent with the services and benefits it provides?**

Analysis of the historical cost of SCIP in comparison to the PCN platform (also developed by ECHA) shows that even if the budget spent on both initiatives is similar, it could be considered that the SCIP project benefited and built on developments earlier made for PCN purposes in order to reach certain efficiencies and economies of scale despite its even higher level of volumes and complexity.

**Recommendation 6:** It is recommended that the European Commission and ECHA reflect the range of possible improvements identified in the evaluation in estimating the resources needed going forward, taking the forecasts provided as part of this report as a reference point.

#### **Utility - Are SCIP and its support tools helpful for users?**

Utilisation of the SCIP and its helpdesk reached a peak when the legal duty to notify came into force. Since then, usage metrics have decreased but remain constant. The evaluation finds that the utilisation of SCIP is difficult. On one side, when choosing from the different submission pathways, duty holders value user-friendliness and timesaving the most and use said pathways accordingly. On the other, consumers, waste operators and other information seekers have signified their need for more intuitive and practical search functions.

The helpdesk is useful and helpful for the preparation of notification submissions. Stakeholders' assessment of ECHA's materials and other SCIP support tools is mixed. In this regard, the current utility of SCIP is tangible but not optimal. ECHA's materials such as webinars are found to be useful but are not always translated into languages other than English. Additionally, the stakeholders' limited willingness to recommend SCIP to their network further confirms this finding.

**Recommendation 8:** Considering the added value and helpfulness of ECHA's materials and helpdesk, this evaluation recommends they be translated into other EU languages to render them as accessible as possible.

**Recommendation 9:** As user-friendliness and timesaving are of great importance for duty holders, it is the recommendation of this evaluation that future improvements of SCIP focus on these parameters.

#### **EU Added Value - Does the SCIP database deliver EU Added Value?**

The evaluation finds that the SCIP database delivers substantial EU Added Value. Nevertheless, the full benefits of a perfectly functioning SCIP are yet to be attained. The database provides reliable information that is not available elsewhere. However, consulted stakeholders are divided regarding the consequences of a hypothetical discontinuation. While most believe it would hinder transparency and visibility regarding the presence of SVHCs in articles and products, stakeholders have expressed their doubts over the use of SCIP for waste management operations and regulatory initiatives.

**Recommendation 10:** It is recommended that SCIP builds on the usefulness of the information it contains and maximises its reach and use-cases for information-seekers by integrating dissemination tools adapted to its target audience.

#### **Coherence - Is the SCIP coherent and complimentary with other ECHA initiatives and integrated with duty holders' IT systems?**

The SCIP database is coherent with other ECHA's initiatives and operations. Together with other regulations and tools, it contributes to the advancing of ECHA's broader goals related to chemical safety such as consumer health and environment protection. However, some duty holders have pointed to the existence of REACH Art. 33 (2) as already requiring them to communicate information related to SVHCs making SCIP somewhat redundant.

Companies' SVHCs-tracking systems are gradually being integrated with SCIP by duty holders. Notably, SMEs have expressed the high costs associated with the integration of their IT systems

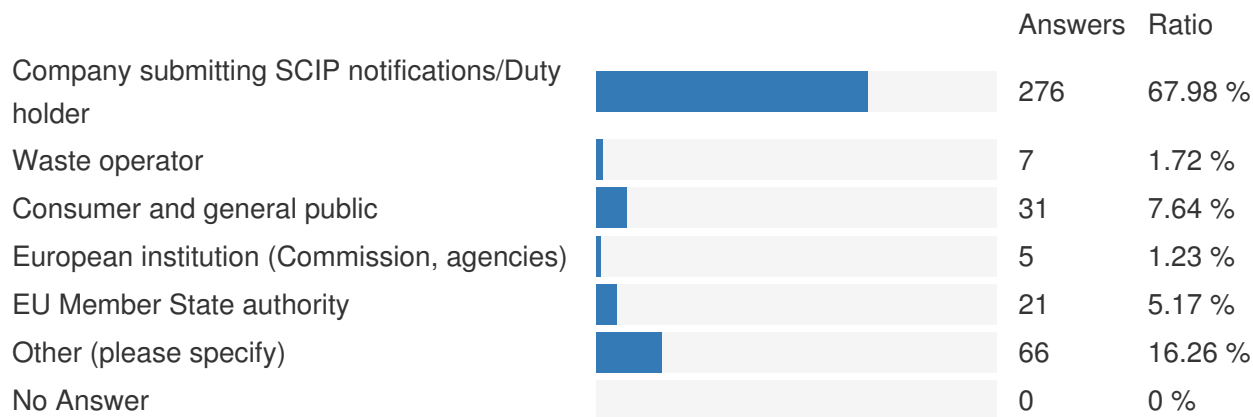
**Recommendation 11:** It is recommended that the European Commission consider providing clarifications regarding the coherence between REACH Art. 33 and WFD SCIP obligations in order to address perceptions of lack of coherence. In addition, integrating with the AskREACH app or comparable databases and applications focused on information dissemination will improve coherence and effectiveness for consumers (see Recommendation 4).

# Annex 1

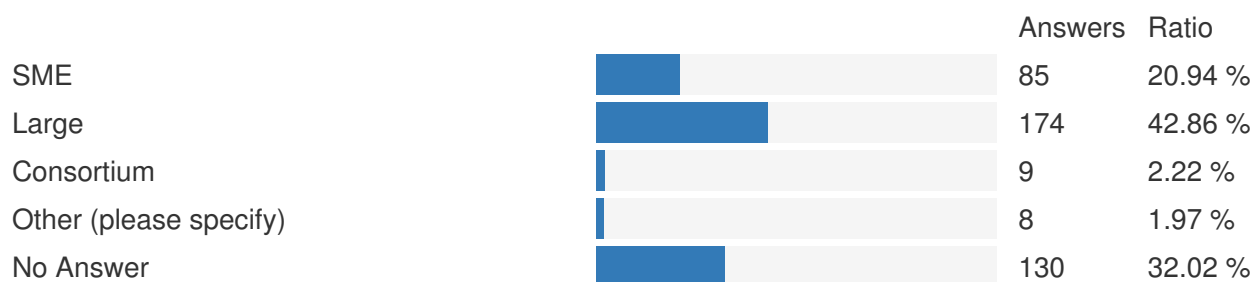
## Survey questionnaire and results

# Statistics: Survey on SCIP

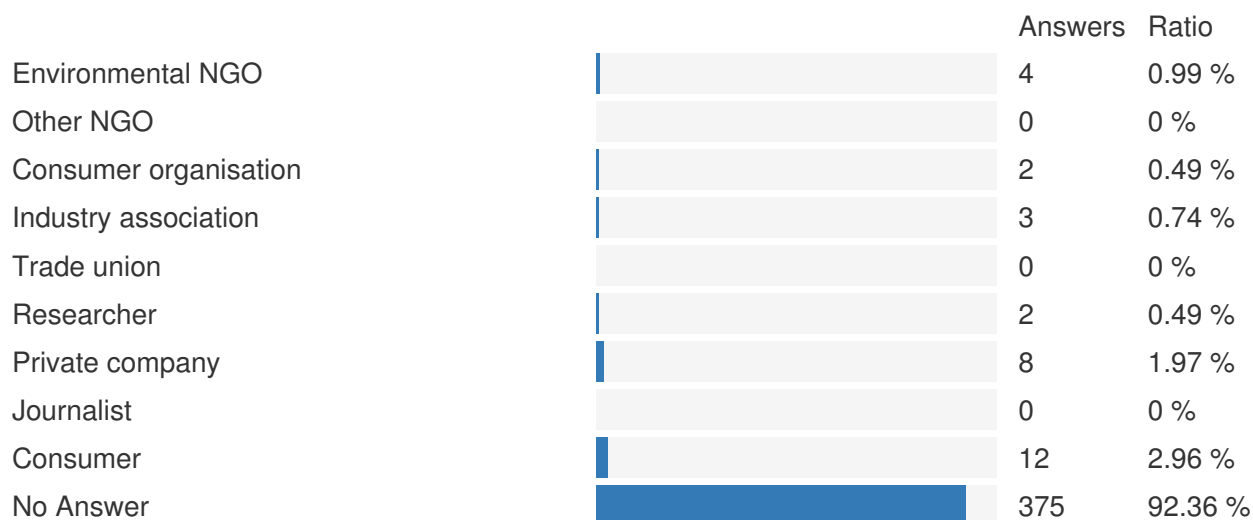
## Which of the following roles best describes you?



## My company is



## If "Consumer and general public", please specify:





**If "EU Member State authority", please specify:**

	Answers	Ratio
Competent Authority for the implementation of the Waste Framework Directive	5	1.23 %
Other MS authority (please specify)	16	3.94 %
No Answer	385	94.83 %

**Please indicate the country where you are based:**

	Answers	Ratio
AT - Austria	7	1.72 %
BE - Belgium	20	4.93 %
BG - Bulgaria	2	0.49 %
HR - Croatia	1	0.25 %
CY - Cyprus	0	0 %
CZ - Czechia	4	0.99 %
DK - Denmark	12	2.96 %
EE - Estonia	3	0.74 %
FI - Finland	18	4.43 %
FR - France	22	5.42 %
DE - Germany	126	31.03 %
EL - Greece	0	0 %
HU - Hungary	4	0.99 %
IE - Ireland	0	0 %
IT - Italy	97	23.89 %
LV - Latvia	2	0.49 %
LT - Lithuania	1	0.25 %
LU - Luxembourg	2	0.49 %
MT - Malta	0	0 %
NL - Netherlands	11	2.71 %
PL - Poland	3	0.74 %
PT - Portugal	4	0.99 %
RO - Romania	2	0.49 %
SK - Slovak Republic	4	0.99 %
SI - Slovenia	0	0 %
ES - Spain	7	1.72 %
SE – Sweden	18	4.43 %
NO – Norway (EEA)	1	0.25 %
IS – Iceland (EEA)	0	0 %
LI - Liechtenstein (EEA)	0	0 %
Non-EU/EEA country (please specify)	35	8.62 %
No Answer	0	0 %

**Have you heard about SCIP – ECHA’s database for information on substances of very high concern in articles as such or in complex objects (products)?**

	Answers	Ratio
Yes	393	96.8 %
No	13	3.2 %
No Answer	0	0 %

**If "No", are you willing to explore it at <https://echa.europa.eu/scip> and respond to additional questions?**

	Answers	Ratio
Yes	4	0.99 %
No	9	2.22 %
No Answer	393	96.8 %

**How did you find out about SCIP?**

	Answers	Ratio
ECHA Website	139	34.24 %
News (please specify)	19	4.68 %
Event (please specify)	7	1.72 %
Social media (please specify)	0	0 %
Recommended by someone	22	5.42 %
Industry association	153	37.68 %
This survey	0	0 %
Other (please specify)	53	13.05 %
No Answer	13	3.2 %

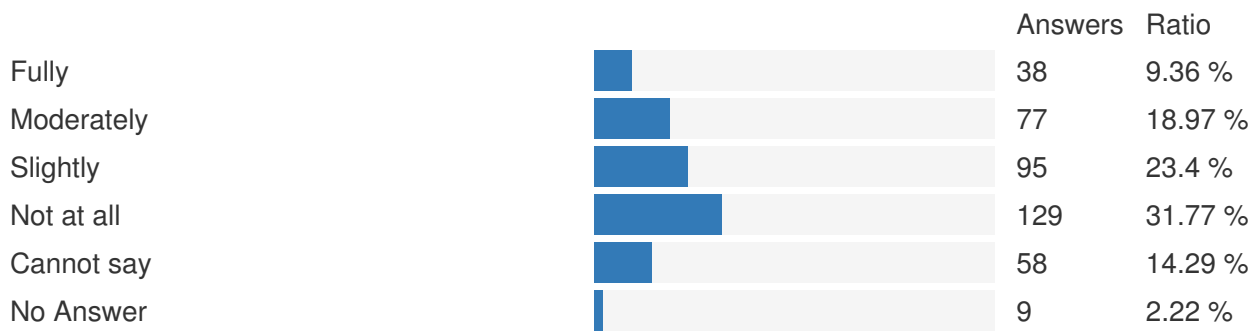
**Can we contact you to follow up your answers, if necessary?**

	Answers	Ratio
Yes (please provide your contact information below)	133	32.76 %
No	264	65.02 %
No Answer	9	2.22 %

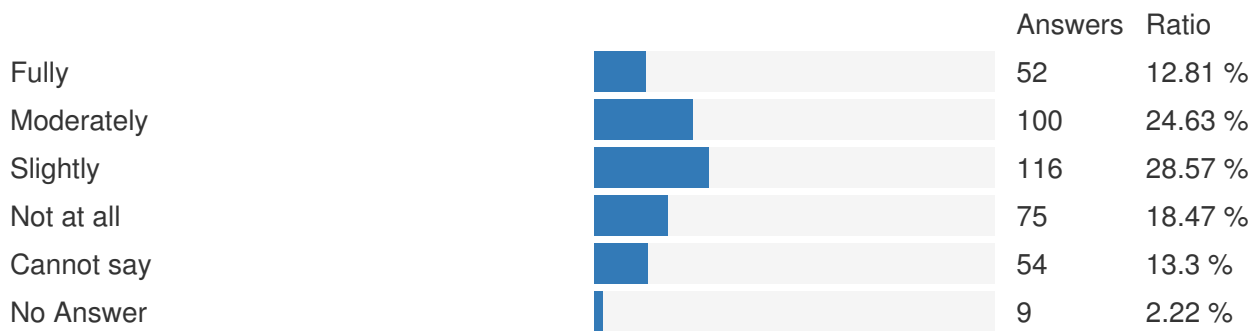
**How often do you visit the SCIP database to find information on substances of very high concern (SVHCs) in articles? SVHCs are severely hazardous substances such as carcinogenic, mutagenic, reprotoxic, PBTs (persistent, bioaccumulative and toxic), and vPvB (very persistent and very bioaccumulative) substances, endocrine disruptors, and respiratory sensitisers**

	Answers	Ratio
Daily	7	1.72 %
Weekly	58	14.29 %
Monthly	230	56.65 %
Never	102	25.12 %
No Answer	9	2.22 %

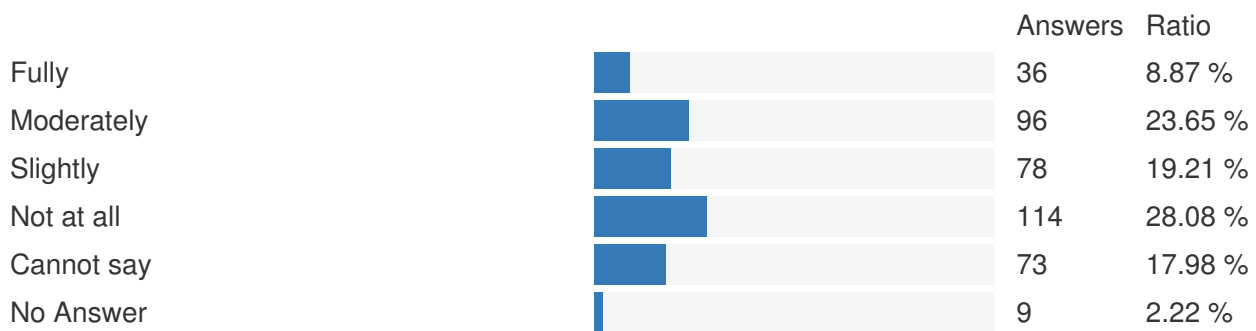
**To what extent does the SCIP database contribute to the following? : 1. Making information available to improve the safe use of articles and facilitate informed purchase choices**



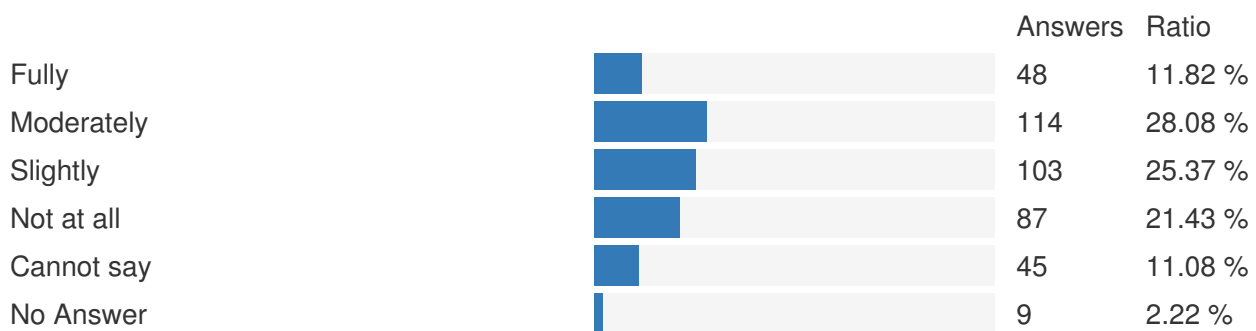
**To what extent does the SCIP database contribute to the following? : 2. Providing incentive to suppliers to place articles without SVHCs on the EU market**



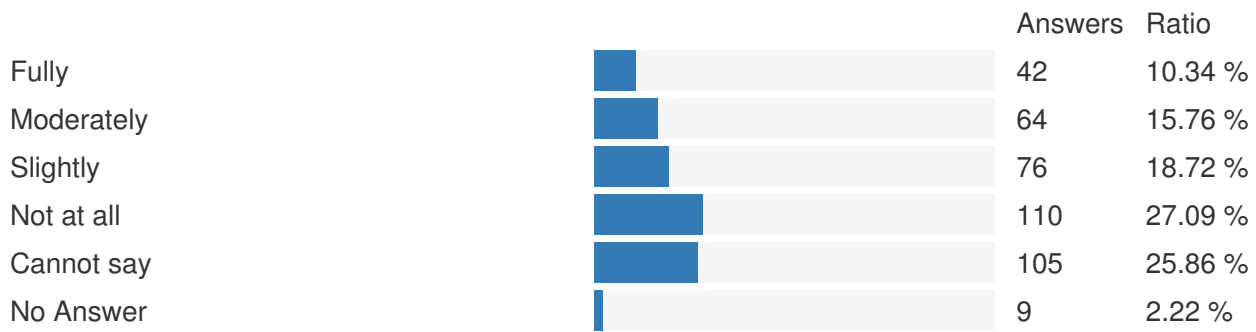
**To what extent does the SCIP database contribute to the following? : 3. Helping to reduce waste containing SVHCs**



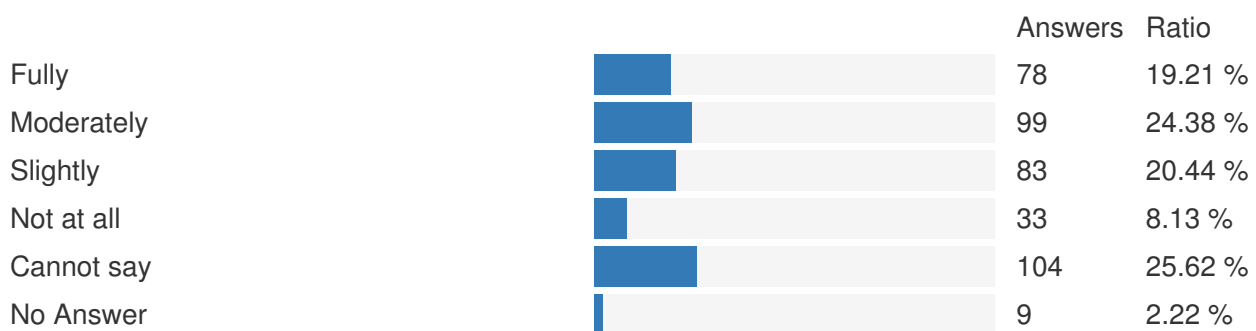
**To what extent does the SCIP database contribute to the following? : 4. Promoting substitution of SVHCs in articles by safer alternatives**



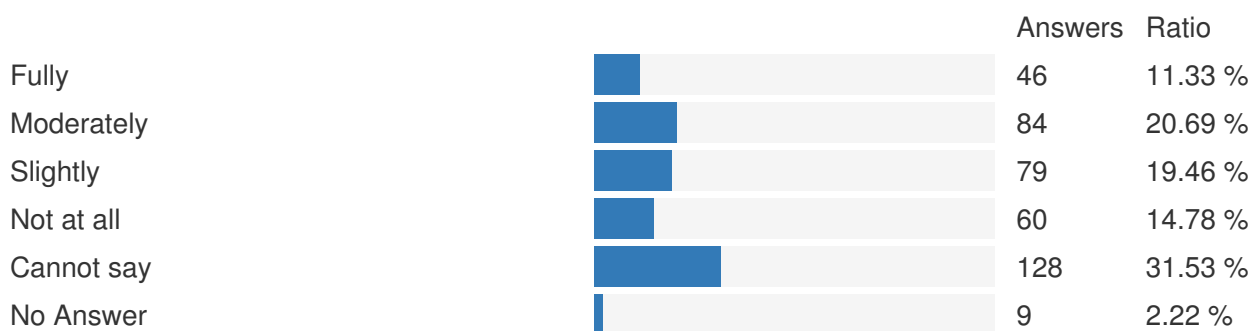
**To what extent does the SCIP database contribute to the following? : 5. Making information available to waste operators to improve waste treatment operations, which otherwise would not be available to them**



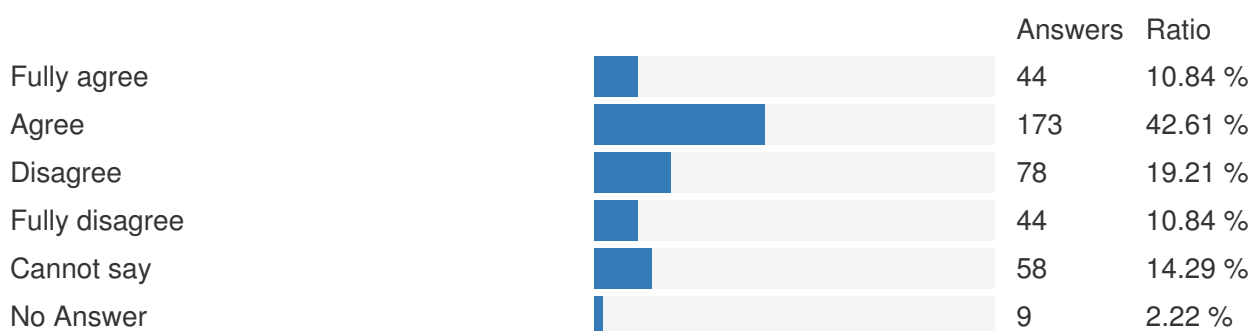
**To what extent does the SCIP database contribute to the following? : 6. Helping authorities to monitor the use of SVHCs in articles and where needed to initiate appropriate regulatory actions (e.g. restrictions)**



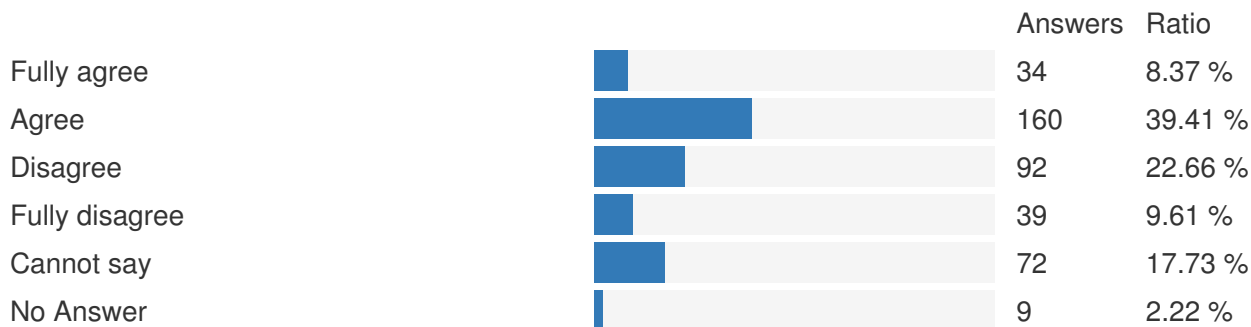
**To what extent does the SCIP database contribute to the following? : 7. Helping national, regional or local authorities in the Member States to establish improved policies on the management of wastes**



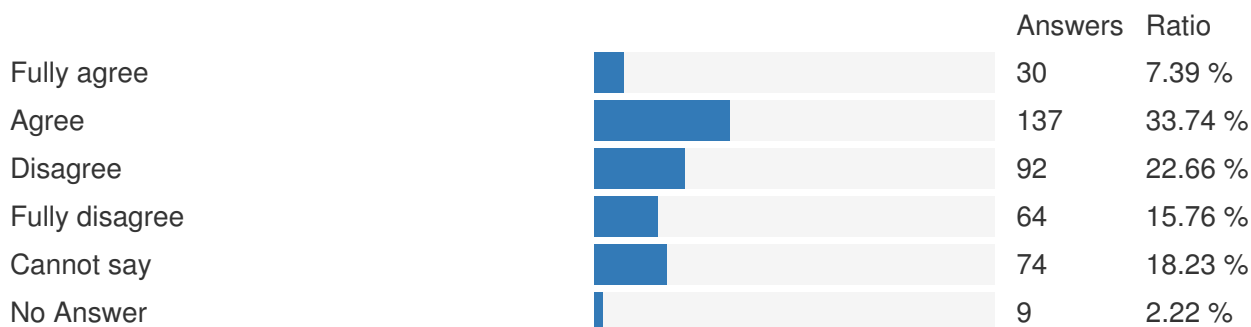
**To what extent do you agree with the following statements about SCIP? : It contains information I cannot find anywhere else**



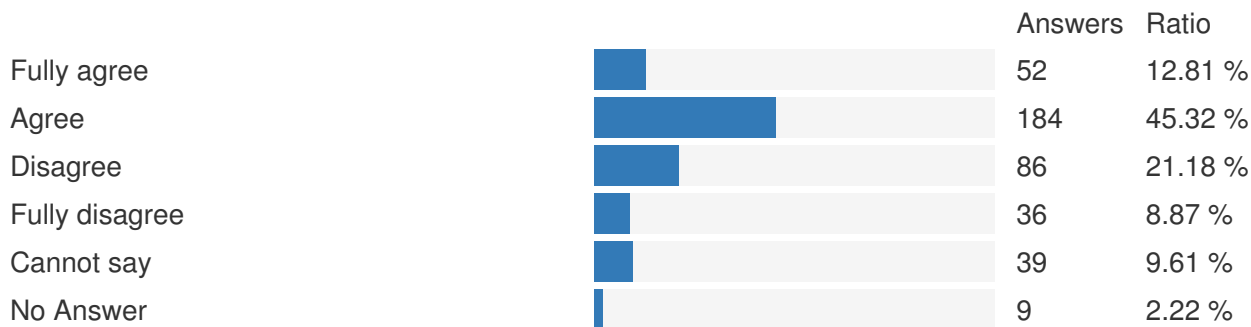
**To what extent do you agree with the following statements about SCIP? : It provides reliable data on articles containing SVHCs**



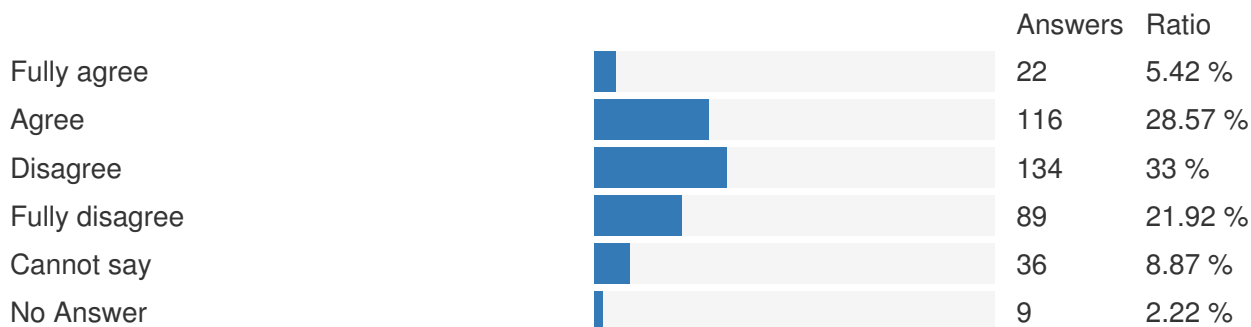
**To what extent do you agree with the following statements about SCIP? : It is a one-stop-shop for information on substances of concern in articles**



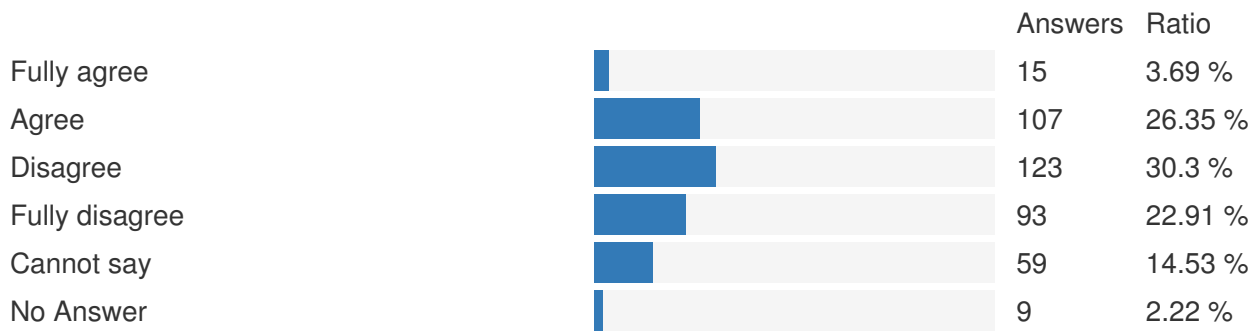
**To what extent do you agree with the following statements about SCIP? : It improves transparency and availability of information on SVHCs in articles**



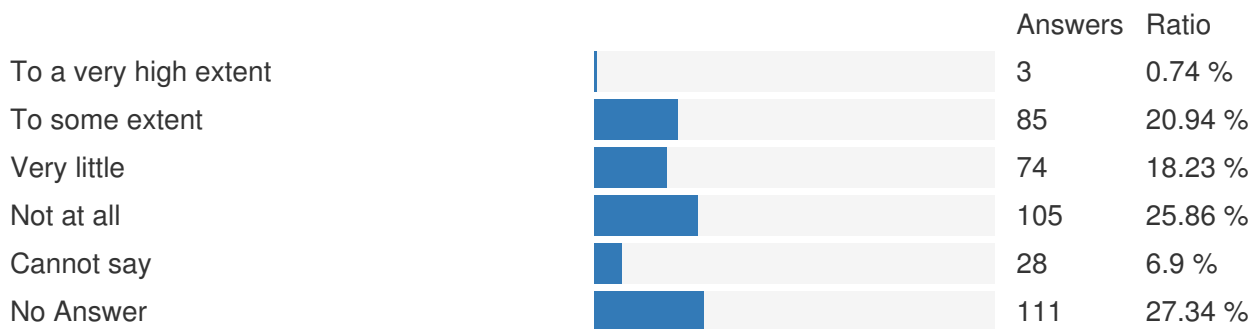
**To what extent do you agree with the following statements about SCIP? : It is easily accessible and easy to use**



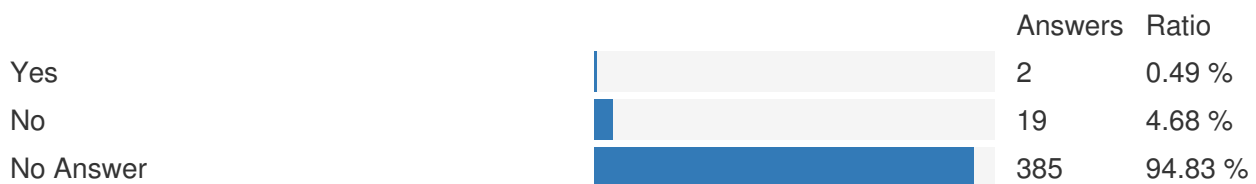
**To what extent do you agree with the following statements about SCIP? : It offers the right content in an understandable way**



**Does the SCIP database bring you additional information compared to the information you already have to carry out your regulatory or policy duties?**



**Do you have information about the sectors which are frontrunners in complying with the SCIP notification duty?**



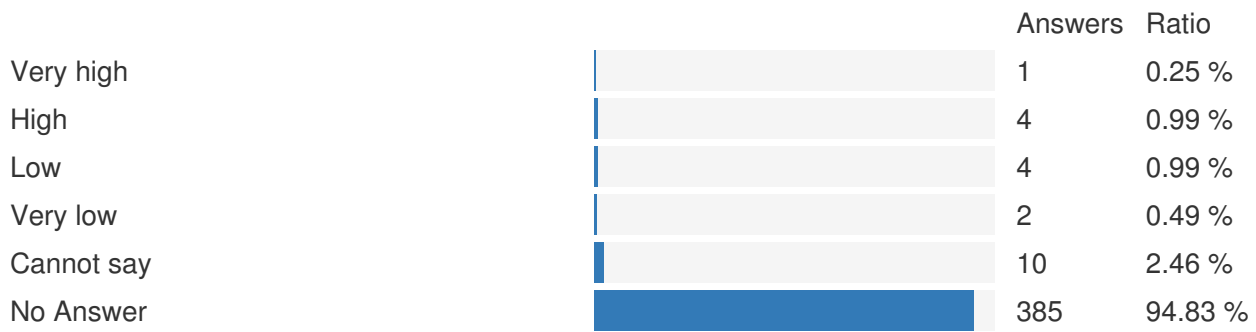
**If you answered "yes" to the previous question, which ones (select all that are relevant)?**

	Answers	Ratio
Plastic articles	0	0 %
Rubber articles	0	0 %
Leather articles and similar such as clothing, handbags, sports bags, suitcases	0	0 %
Articles made of minerals such as stone, plaster, cement, ceramics, glassware	0	0 %
Wood, cork, straw and similar articles such as hardwood furniture, floorings, plywood, tool handles, stoppers, baskets	0	0 %
Paper and paperboard	1	0.25 %
Textile and clothing	0	0 %
Footwear and headgear	0	0 %
Base metal articles such as tools, cutlery, blades, metal profiles	0	0 %
Machinery and mechanical appliances and components thereof	1	0.25 %
Electrical and electronic equipment, machinery, devices and appliances, and components thereof	2	0.49 %
Vehicles and components thereof	1	0.25 %
Optical, photographic, cinematographic, measuring, checking, precision, medical or surgical instruments and apparatus, and components thereof	0	0 %
Other (please specify)	0	0 %
No Answer	404	99.51 %

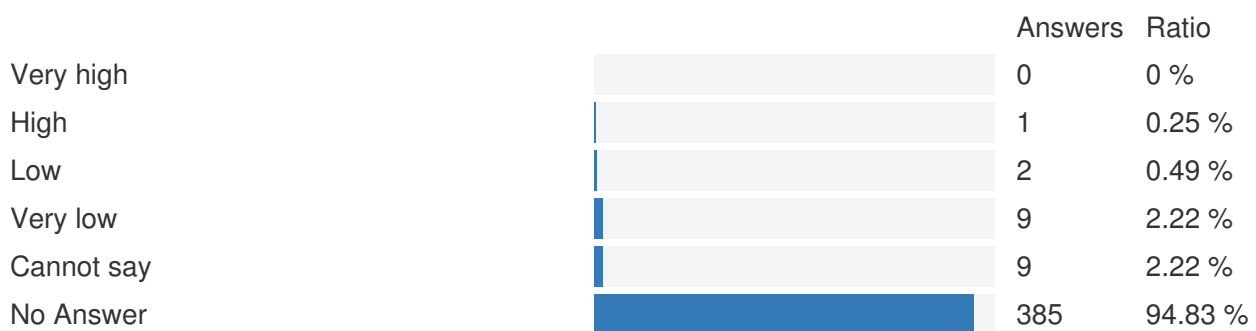
**If you answered "no" to the previous question, why not?**

	Answers	Ratio
No enforcement carried out yet	10	2.46 %
No representative data has been collected or available	7	1.72 %
Other (please specify)	2	0.49 %
No Answer	387	95.32 %

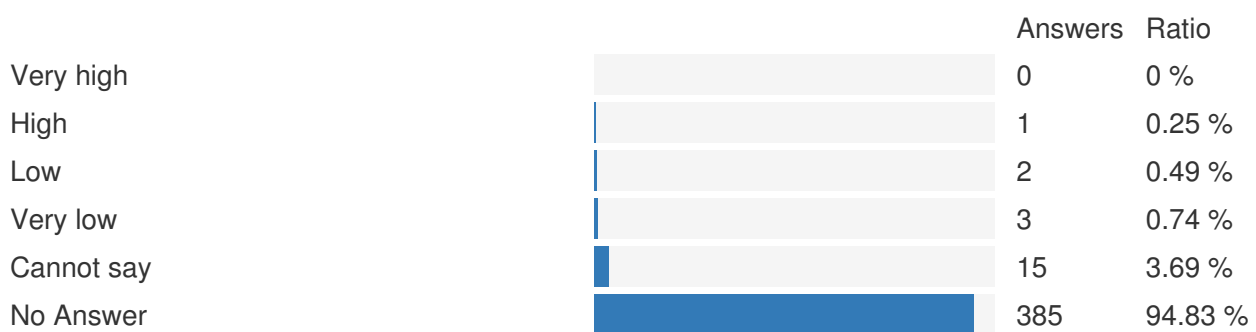
**How would you rate the awareness about the SCIP database in your country concerning: : Suppliers of articles (duty holders)?**



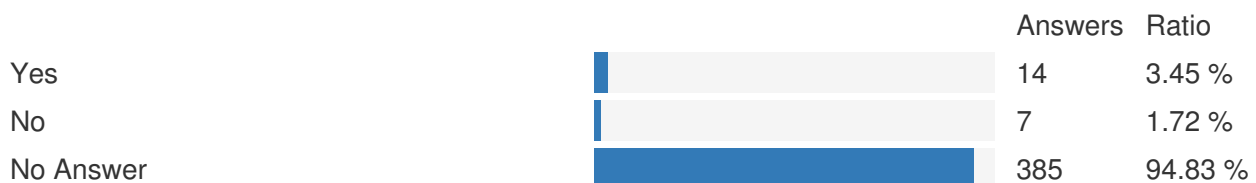
**How would you rate the awareness about the SCIP database in your country concerning: : Consumers and general public?**



**How would you rate the awareness about the SCIP database in your country concerning: : Waste operators?**



**Have public authorities raised awareness about the SCIP database in your country?**





**If "yes", directed to whom? (Select all that apply.)**

	Answers	Ratio
Suppliers of articles (duty holders)	13	3.2 %
Consumers and general public	7	1.72 %
Waste operators	5	1.23 %
Other (please specify)	4	0.99 %
No Answer	392	96.55 %

**If "no", why not? (Select all that apply.)**

	Answers	Ratio
Not a priority	0	0 %
No resources available	2	0.49 %
Not enough information available	0	0 %
Too early considering the launching of the database by ECHA in September 2021	5	1.23 %
Other (please specify)	3	0.74 %
No Answer	399	98.28 %

**Are you aware of any awareness-raising activity about the SCIP database in your country?**

	Answers	Ratio
Yes	107	26.35 %
No	269	66.26 %
No Answer	30	7.39 %

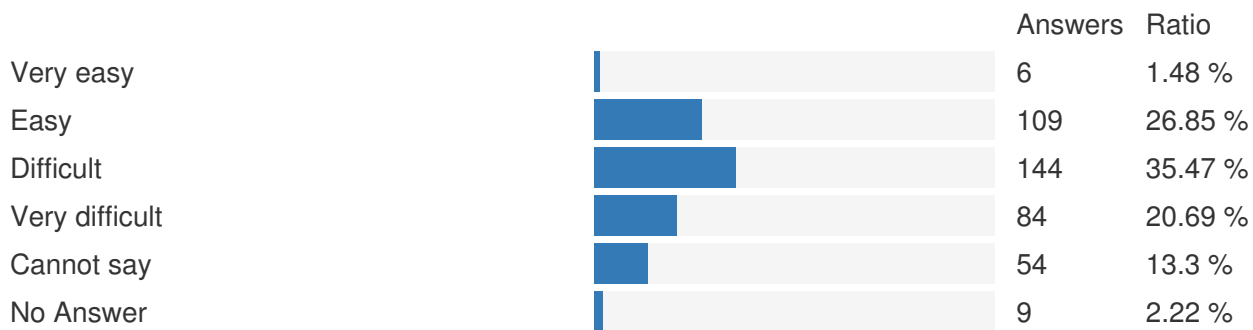
**If "yes", directed to whom? (Select all that apply.)**

	Answers	Ratio
Suppliers of articles (duty holders)	88	21.67 %
Consumers and general public	23	5.67 %
Waste operators	18	4.43 %
Other (please specify)	17	4.19 %
No Answer	299	73.65 %

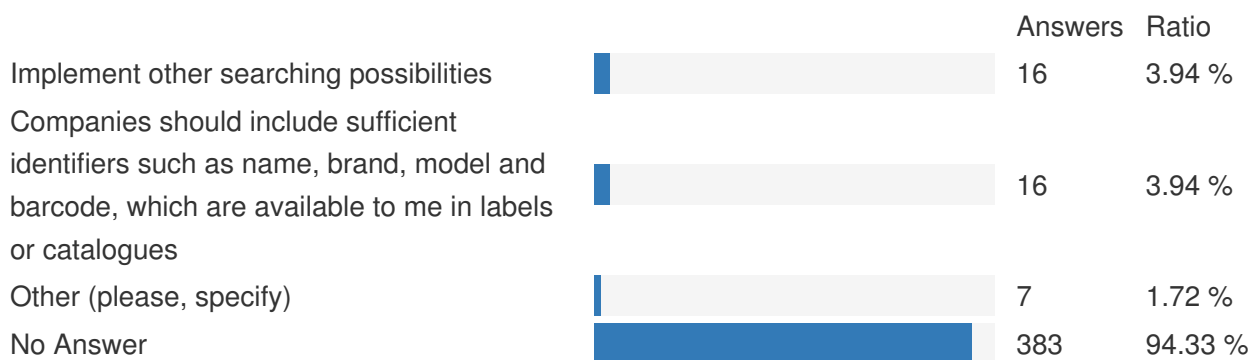
**If "yes", organised by (Select all that apply.)**

	Answers	Ratio
Public authority(ies)	42	10.34 %
Industrial or commercial associations	79	19.46 %
Waste operators' associations	11	2.71 %
NGOs	13	3.2 %
Other (please specify)	8	1.97 %
No Answer	299	73.65 %

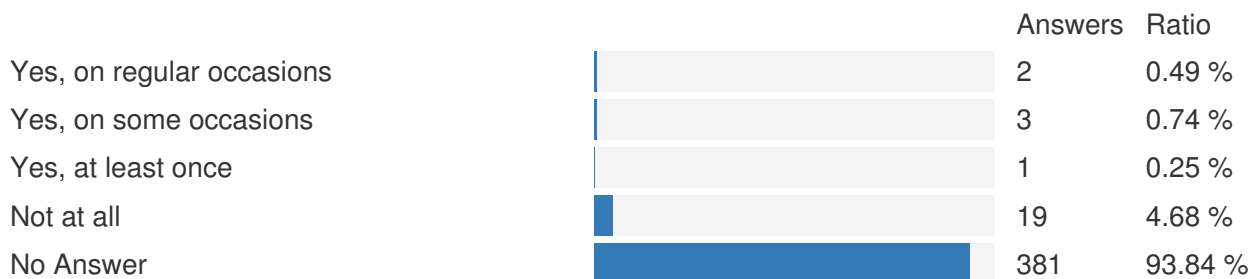
**How easy is it to find information about products in the SCIP database?**



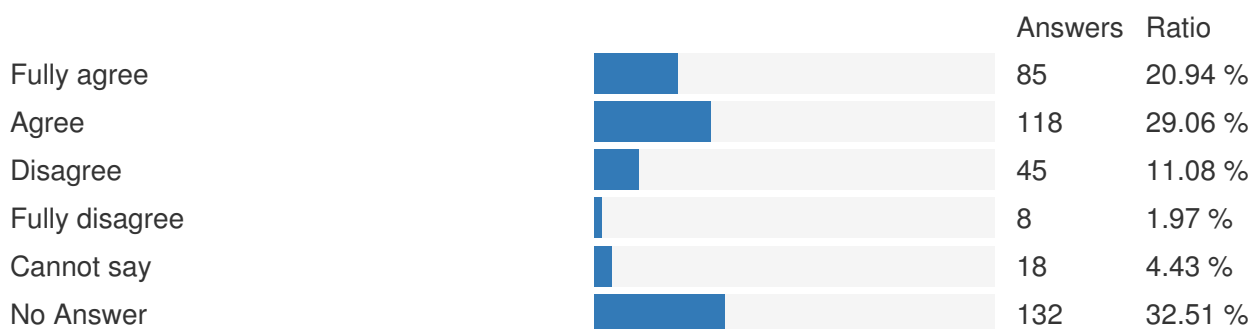
**How could we improve the SCIP database to make it easier for you to find information about a product that contains SVHCs? (Select all that apply.)**



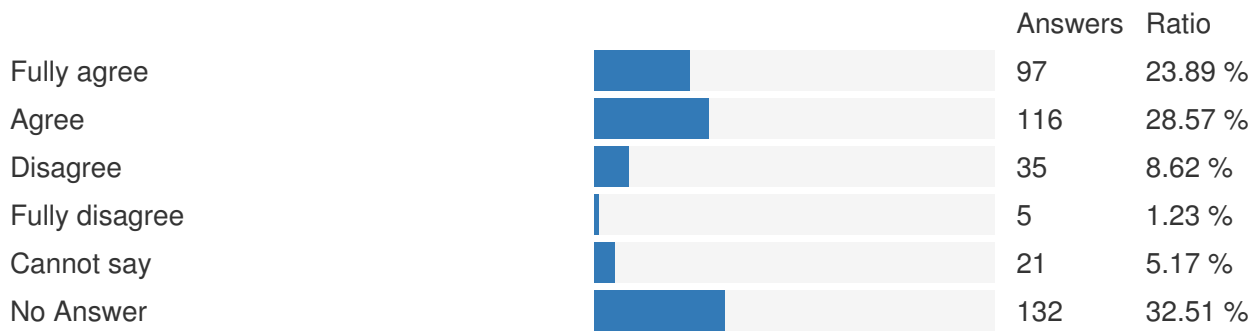
**Has the SCIP database influenced your decision to buy a product that is listed in it?**



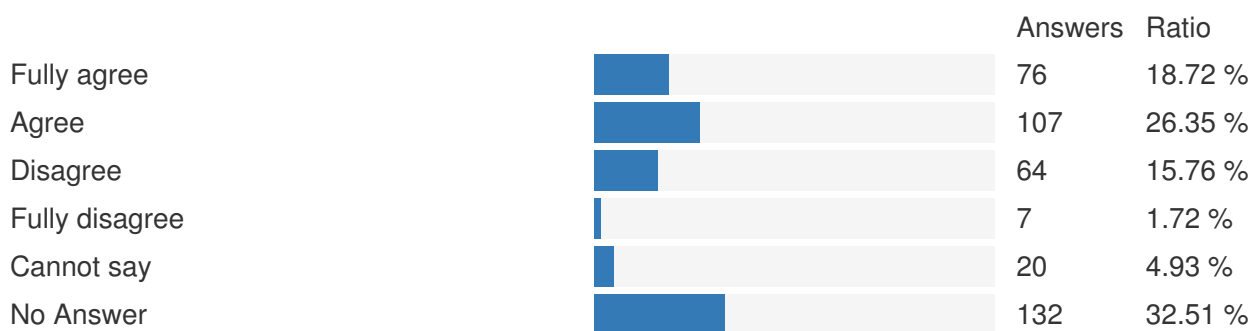
**Which challenges have you experienced when submitting notifications to SCIP? : 1. Knowing the tools to prepare and submit the data.**



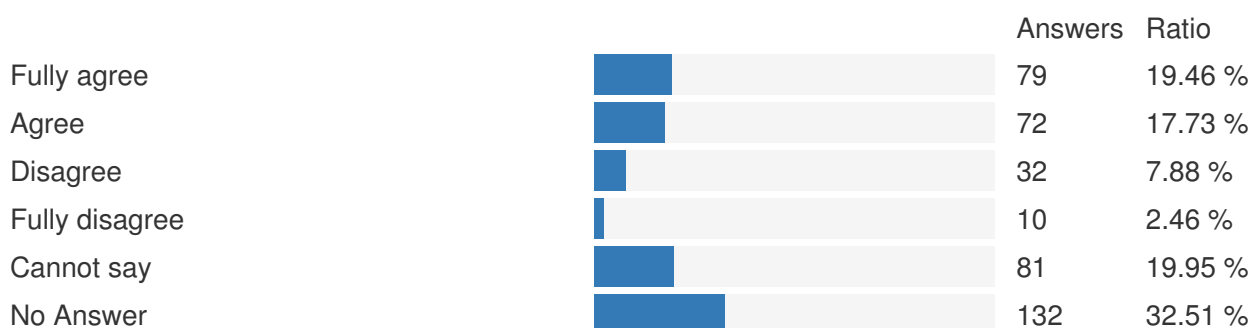
**Which challenges have you experienced when submitting notifications to SCIP? : 2. Adapting the data to the SCIP notification format.**



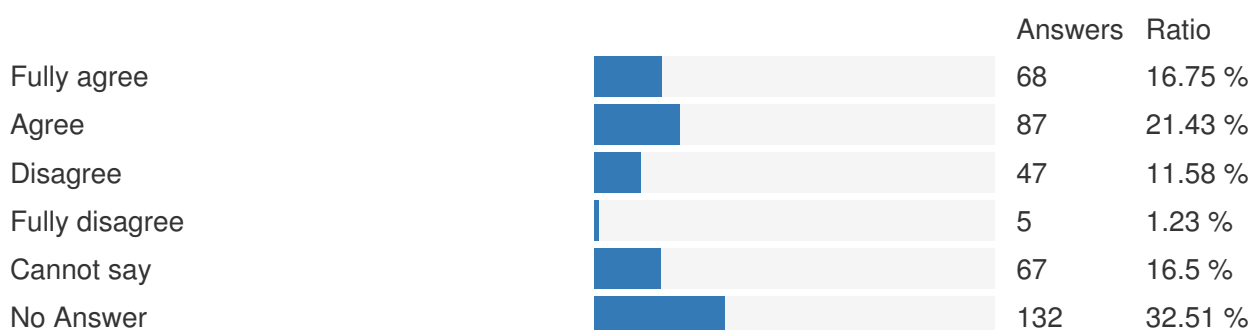
**Which challenges have you experienced when submitting notifications to SCIP? : 3. Unclarity on the information requirements**



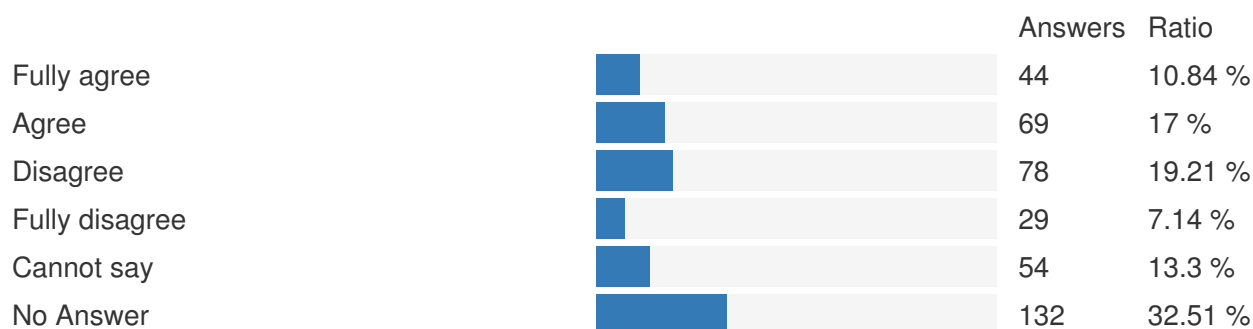
**Which challenges have you experienced when submitting notifications to SCIP? : 4. Aligning company IT tracking systems with the submission systems**



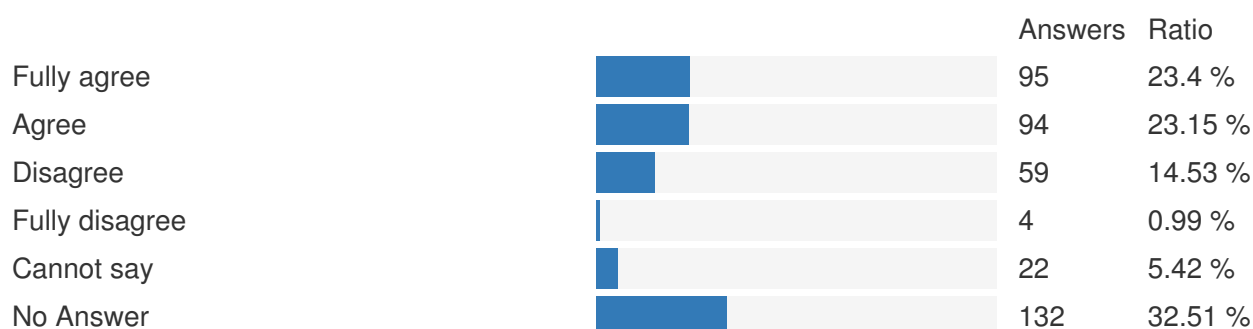
**Which challenges have you experienced when submitting notifications to SCIP? : 5. Not enough access to the data submitted by other notifiers.**



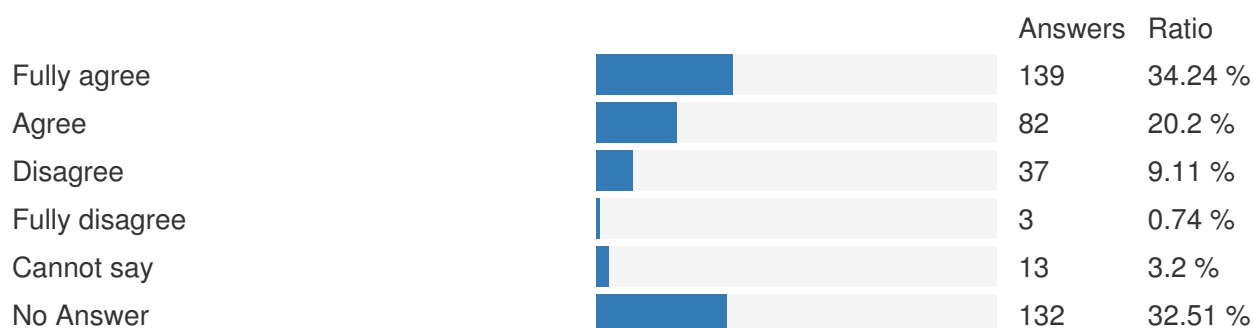
**Which challenges have you experienced when submitting notifications to SCIP? : 6. Practical difficulties in applying the “once an article, always an article” principle**



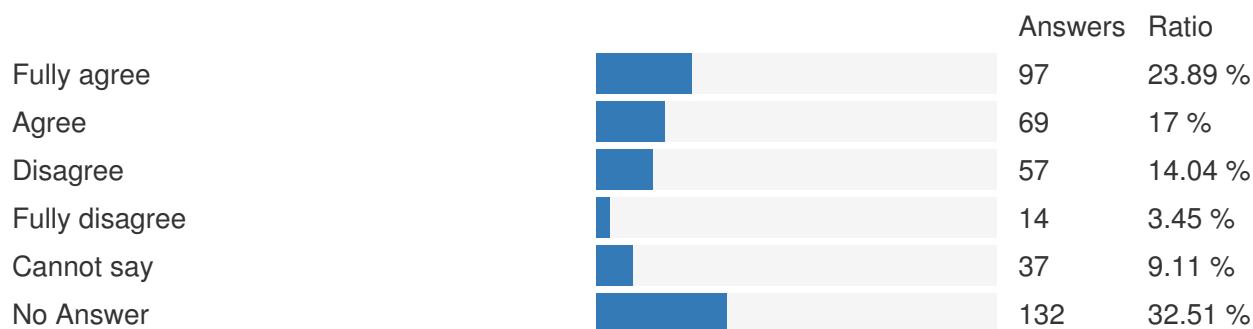
**Which challenges have you experienced when submitting notifications to SCIP? : 7. The SCIP notification obligation was introduced with relatively short notice**



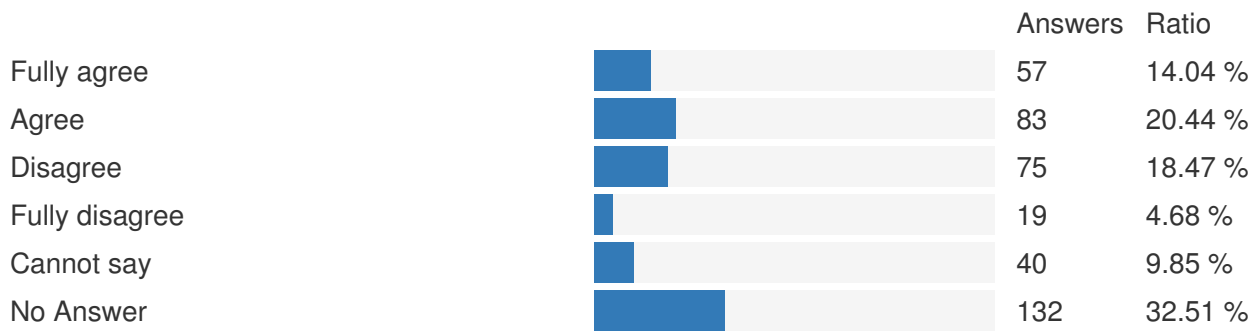
**Which challenges have you experienced when submitting notifications to SCIP? : 8. Difficulties in gathering the necessary information**



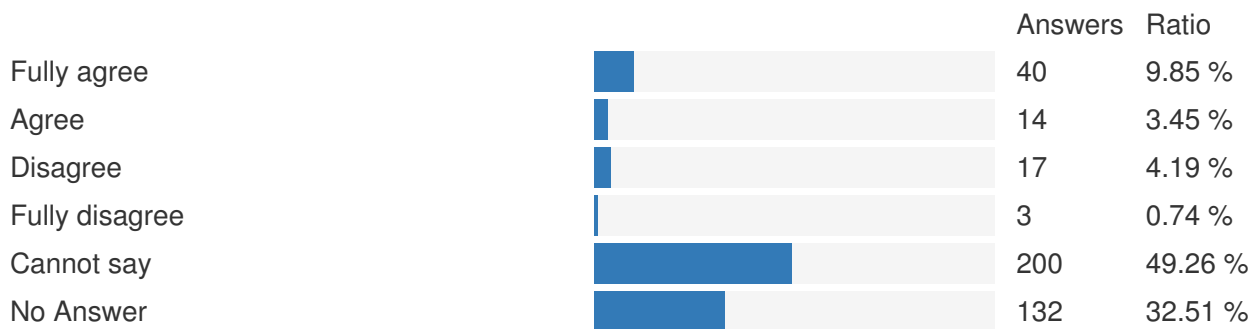
**Which challenges have you experienced when submitting notifications to SCIP? : 9. High cost**



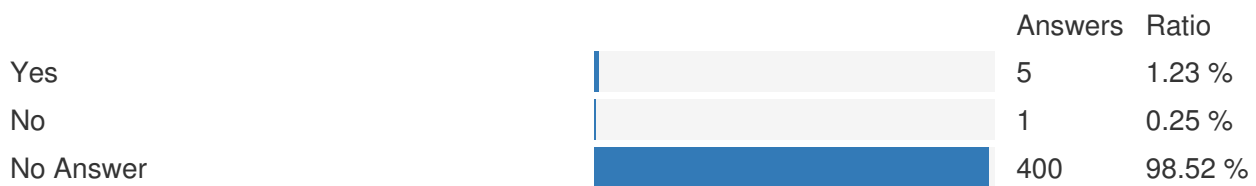
**Which challenges have you experienced when submitting notifications to SCIP? : 10. Confidentiality issues**



**Which challenges have you experienced when submitting notifications to SCIP? : 11. Others**



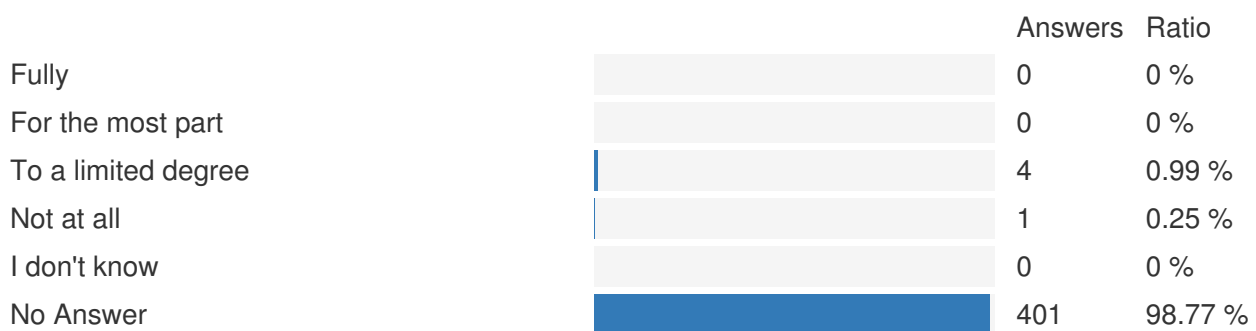
**Have you already used the SCIP database as a source of information?**



**If you answered "no", do you intend to use it as a source of information?**



**If you answered "yes", to what extent have you been able to find the data that you were looking for?**



**If you answered "yes", to what extent have the data you found helped you to perform your activity as a waste operator?**

	Answers	Ratio
Fully	0	0 %
For the most part	0	0 %
To a limited degree	1	0.25 %
Not at all	4	0.99 %
I don't know	0	0 %
No Answer	401	98.77 %

**To what extent has the SCIP database: : helped in better segregating waste containing SVHCs?**

	Answers	Ratio
To a high degree	0	0 %
To some degree	0	0 %
To a low degree	1	0.25 %
Not at all	1	0.25 %
Cannot say	2	0.49 %
Too early to say	2	0.49 %
No Answer	400	98.52 %

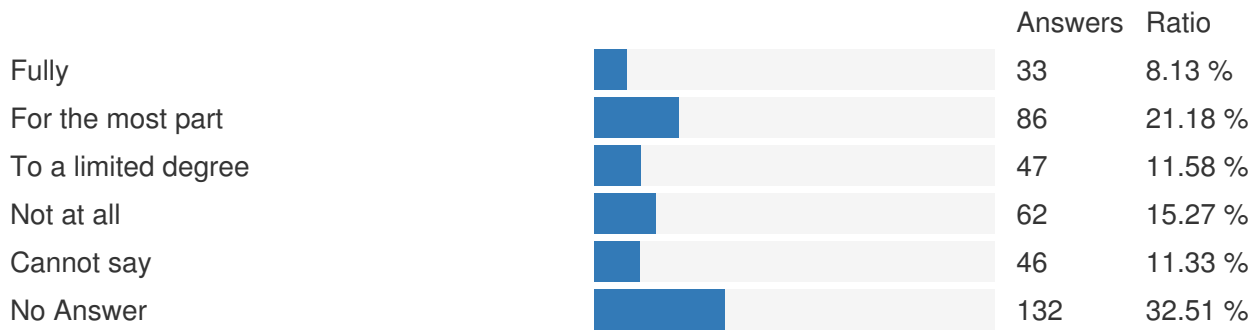
**To what extent has the SCIP database: : encouraged suppliers of articles to reduce the number of articles with SVHCs and therefore helped your activity as a waste operator, when those articles reach the waste stage?**

	Answers	Ratio
To a high degree	0	0 %
To some degree	0	0 %
To a low degree	0	0 %
Not at all	1	0.25 %
Cannot say	3	0.74 %
Too early to say	2	0.49 %
No Answer	400	98.52 %

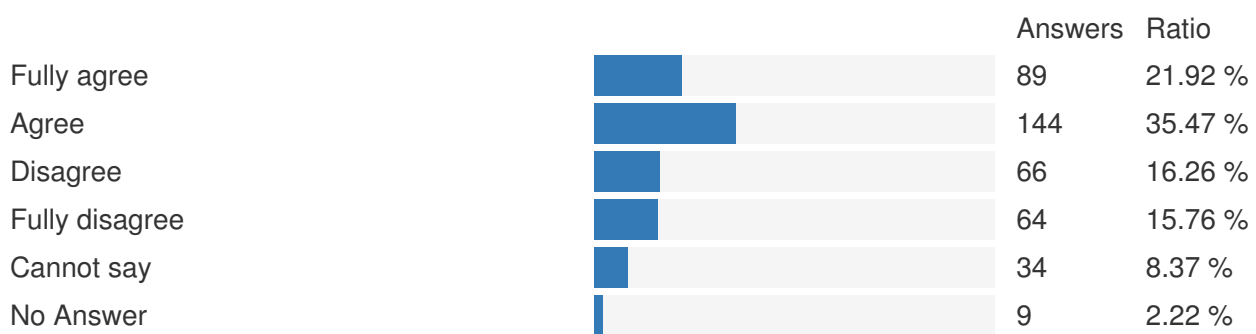
**To what extent has the SCIP database: : promoted substitution of SVHCs in articles by safer alternatives which helps your activity as a waste operator?**

	Answers	Ratio
To a high degree	0	0 %
To some degree	1	0.25 %
To a low degree	0	0 %
Not at all	1	0.25 %
Cannot say	2	0.49 %
Too early to say	2	0.49 %
No Answer	400	98.52 %

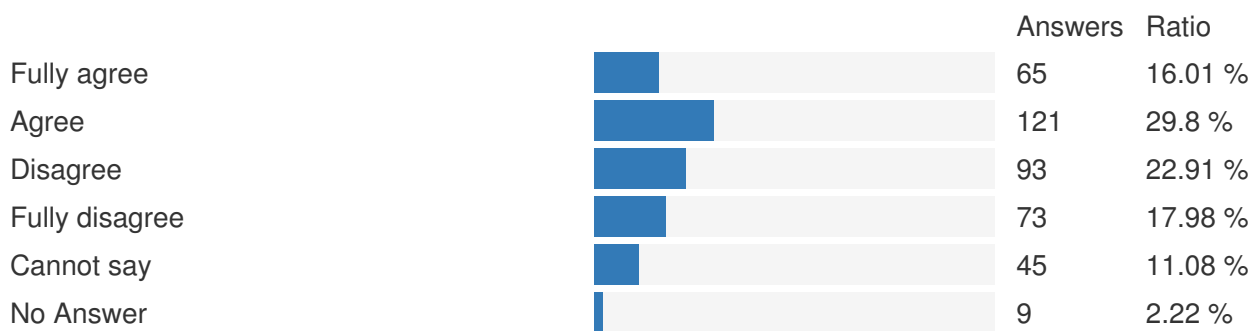
**How well is SCIP integrated with your tracking systems for SVHCs in the articles that you place on the market?**



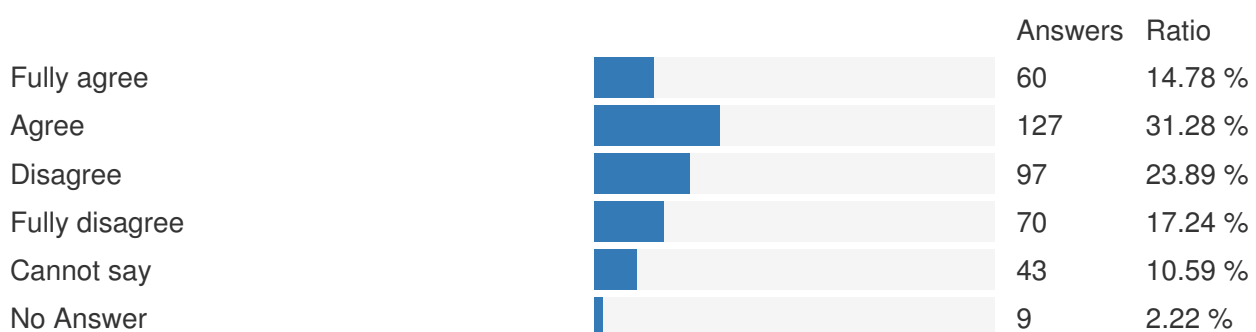
**What would be the most likely consequences if the SCIP database was discontinued? : a. Reduced transparency on SVHCs in articles**



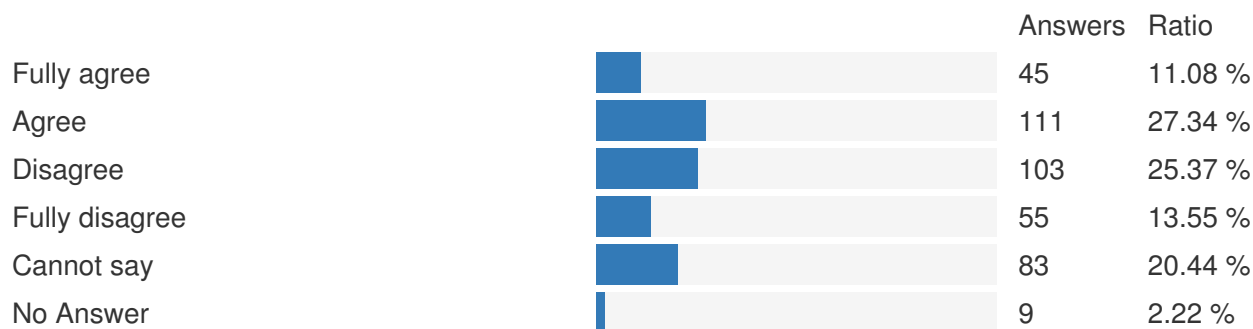
**What would be the most likely consequences if the SCIP database was discontinued? : b. Lack of visibility on the risks of SVHCs in articles**



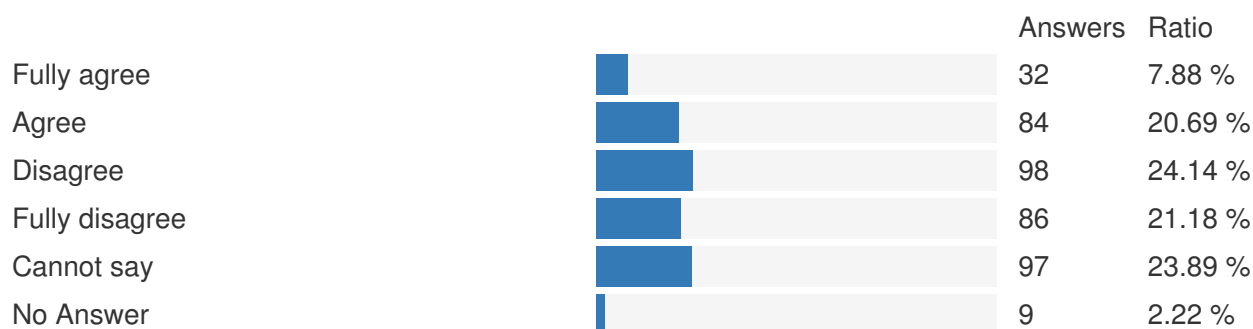
**What would be the most likely consequences if the SCIP database was discontinued? : c. Lack of a reliable source of information on SVHCs in articles**



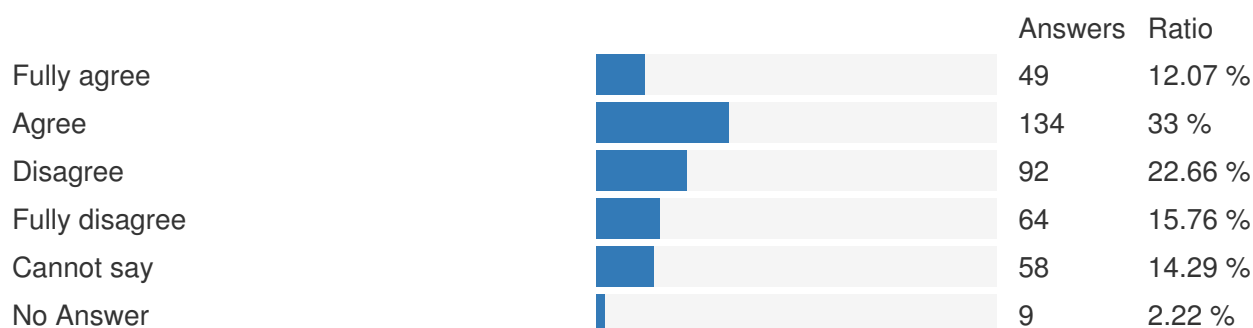
**What would be the most likely consequences if the SCIP database was discontinued? : d. Impossibility for authorities to initiate appropriate regulatory actions**



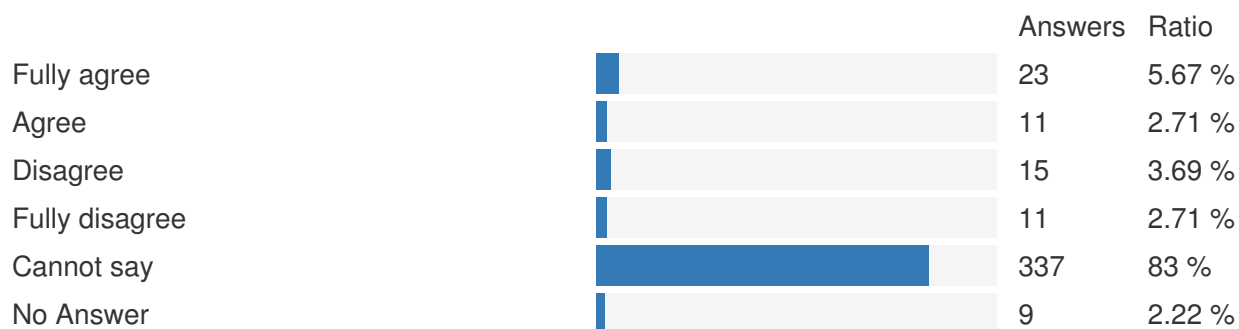
**What would be the most likely consequences if the SCIP database was discontinued? : e. Impossibility to segregate and treat waste**



**What would be the most likely consequences if the SCIP database was discontinued? : f. Decreased substitution of SVHCs**

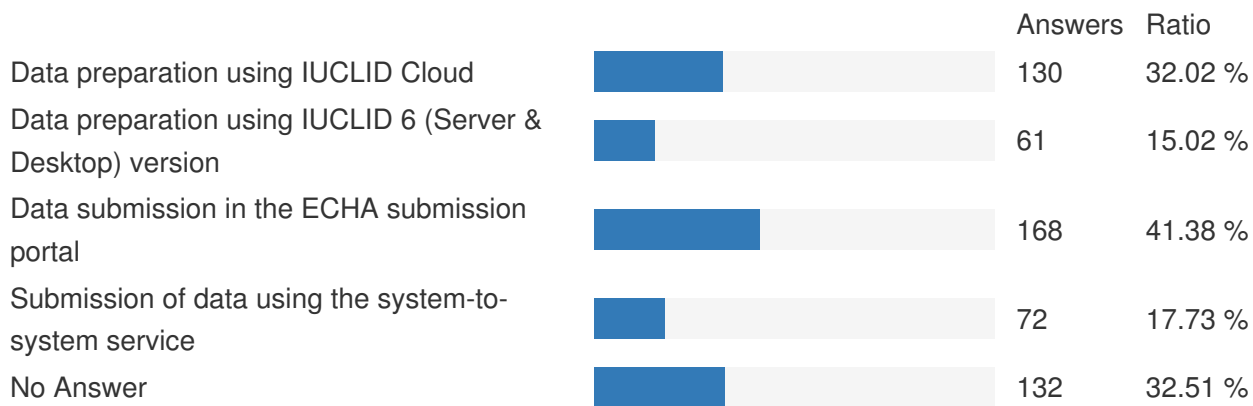


**What would be the most likely consequences if the SCIP database was discontinued? : g. Other**

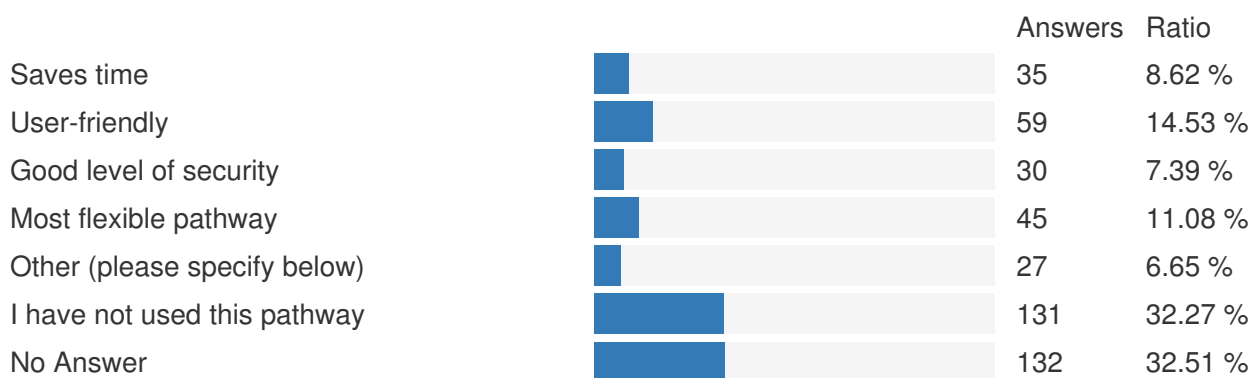




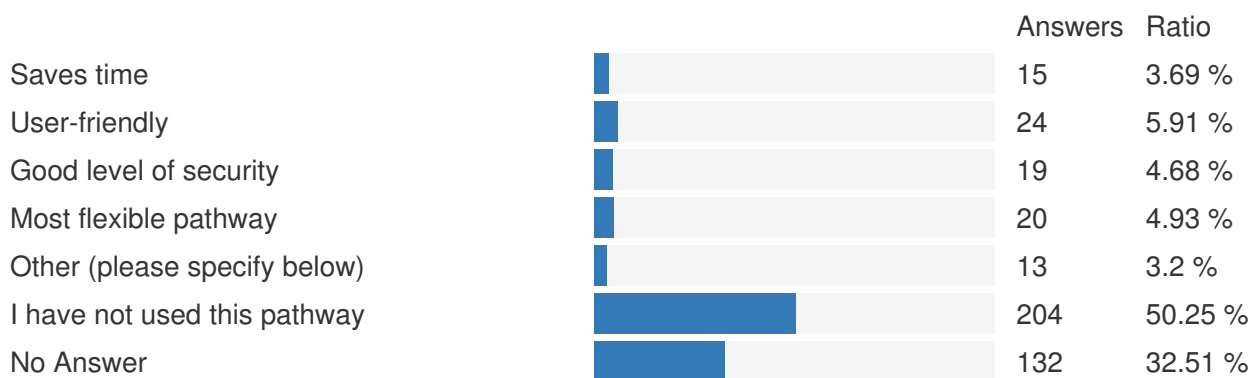
**Which tools have you used to prepare and submit your SCIP notification? (Select all that apply.)**



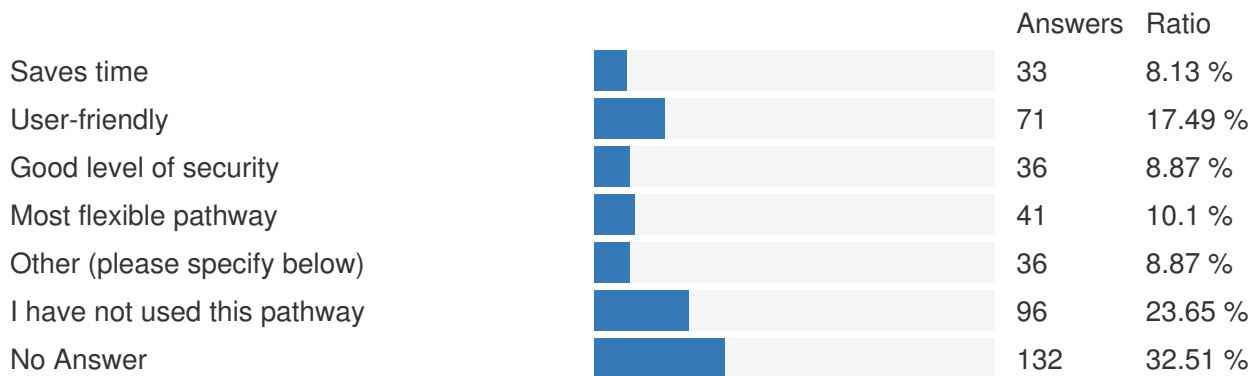
**Which benefits have you experienced from using your chosen pathway for submission? (Select all that apply.) : IUCLID Cloud**



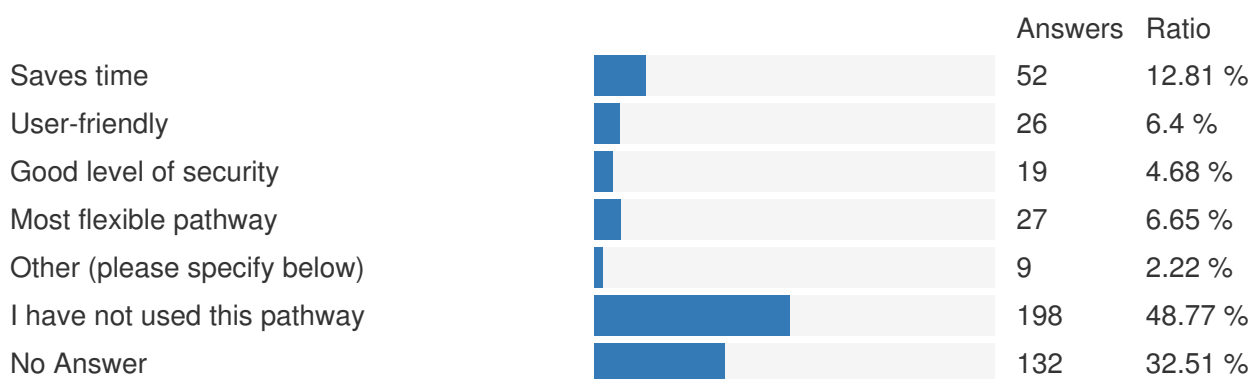
**Which benefits have you experienced from using your chosen pathway for submission? (Select all that apply.) : IUCLID 6 (Server & Desktop) version**



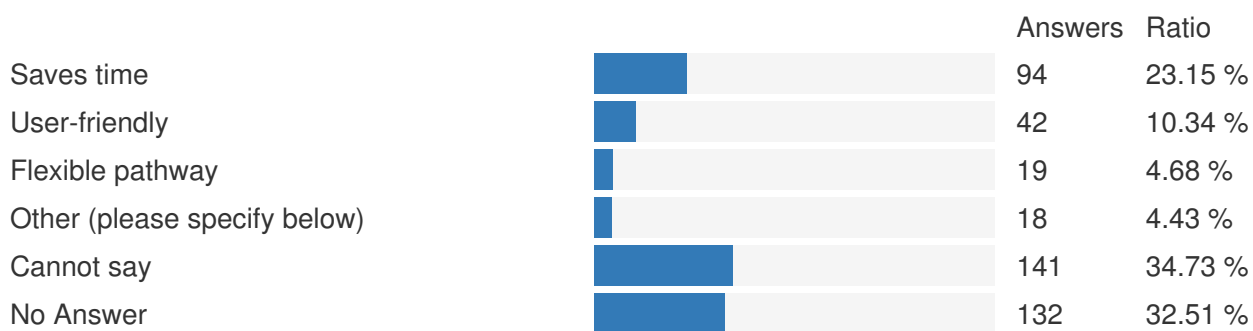
**Which benefits have you experienced from using your chosen pathway for submission? (Select all that apply.) : Data submission in the ECHA submission portal**



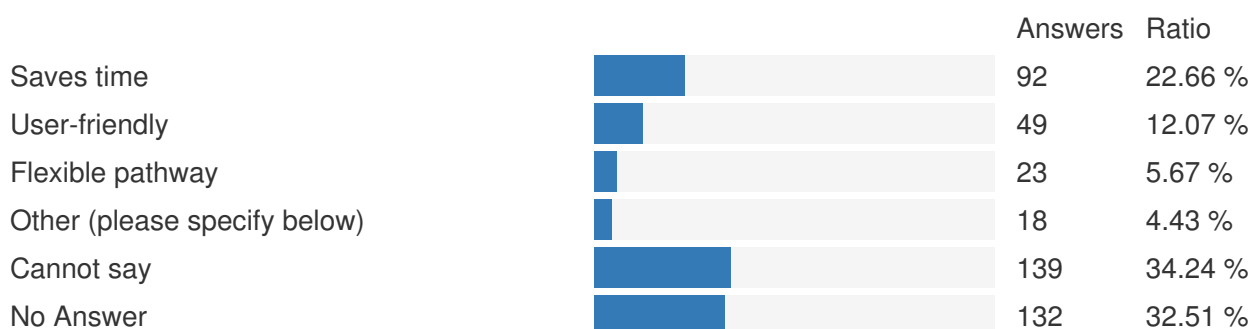
**Which benefits have you experienced from using your chosen pathway for submission? (Select all that apply.) : Submission of data using the system-to-system service.**



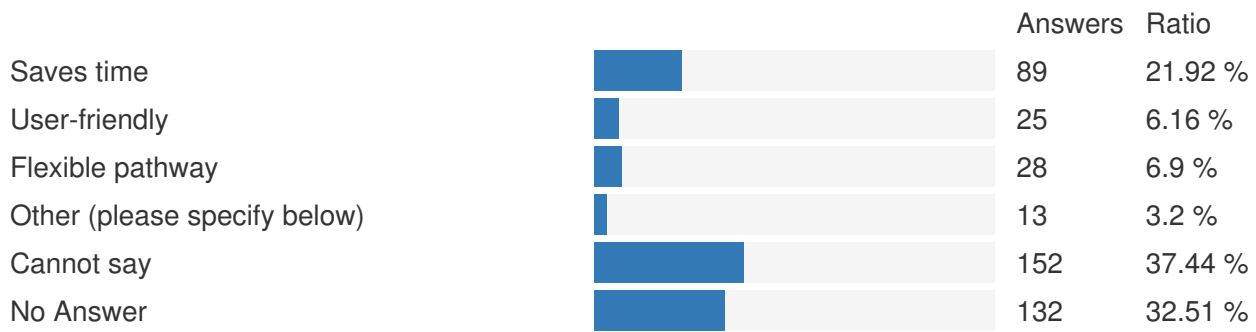
**Which benefits have you experienced from using the simplification mechanism developed by ECHA? : Use of “referencing” in a SCIP notification (Tools to refer to SCIP data already submitted to ECHA)**



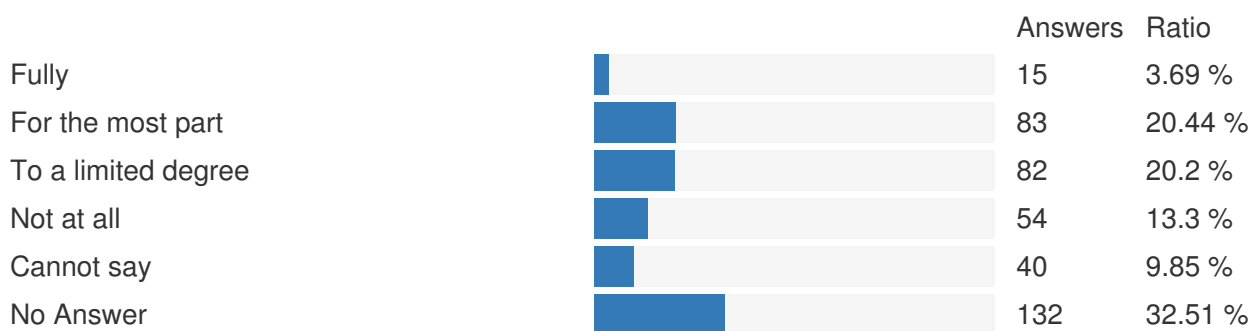
**Which benefits have you experienced from using the simplification mechanism developed by ECHA? : Simplified SCIP Notification (SSN) (Tools to refer to SCIP data already submitted to ECHA)**



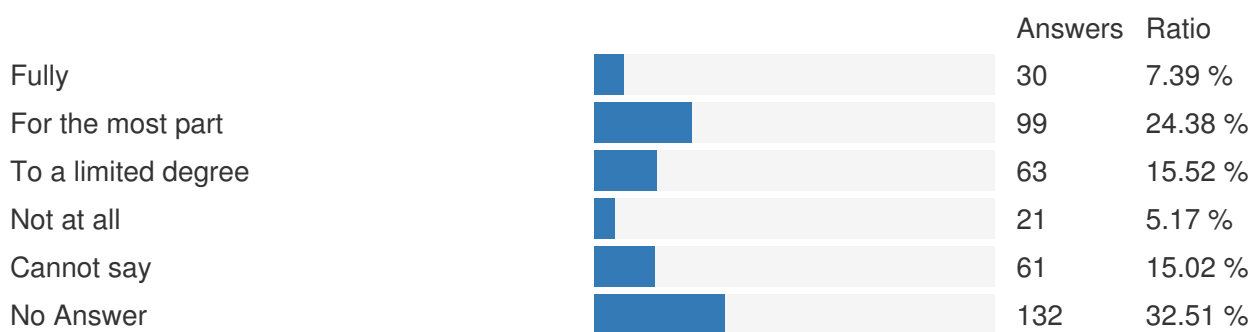
**Which benefits have you experienced from using the simplification mechanism developed by ECHA? :  
“Grouping” recommendations (detailed on the Requirements for SCIP notifications document)**



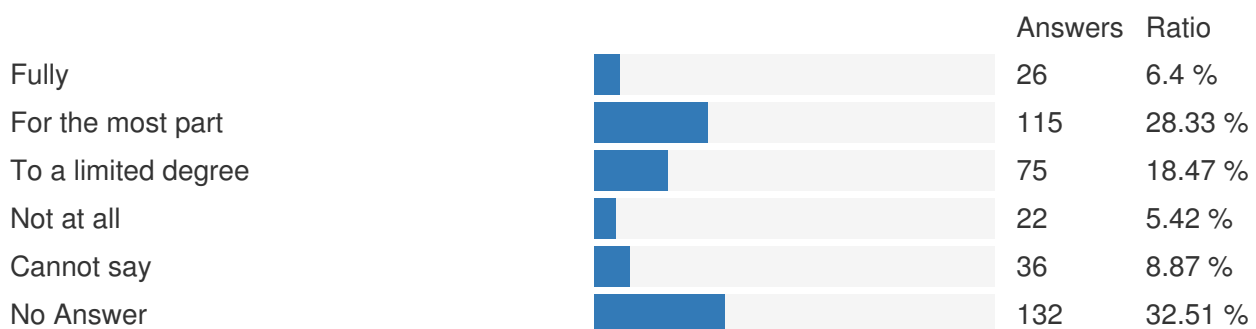
**To what extent do you agree with the following statements? : 1. ECHA's tools for preparing and submitting SCIP notifications are efficient**



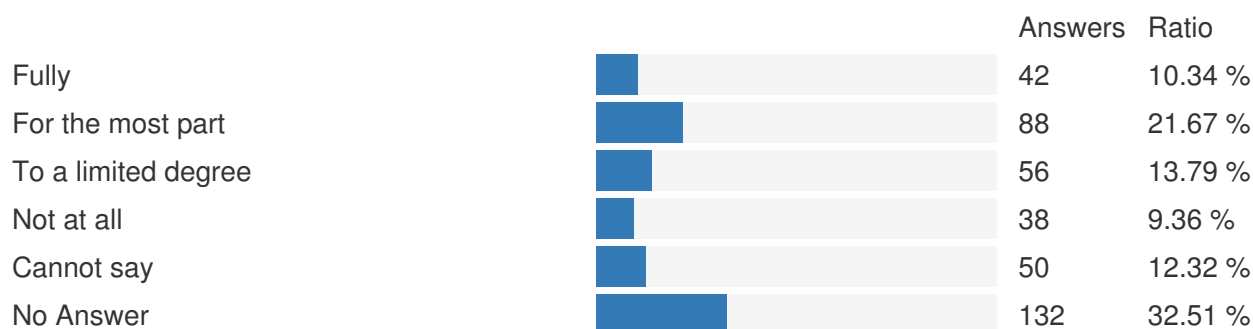
**To what extent do you agree with the following statements? : 2. ECHA's tools for preparing and submitting SCIP notifications are reliable**



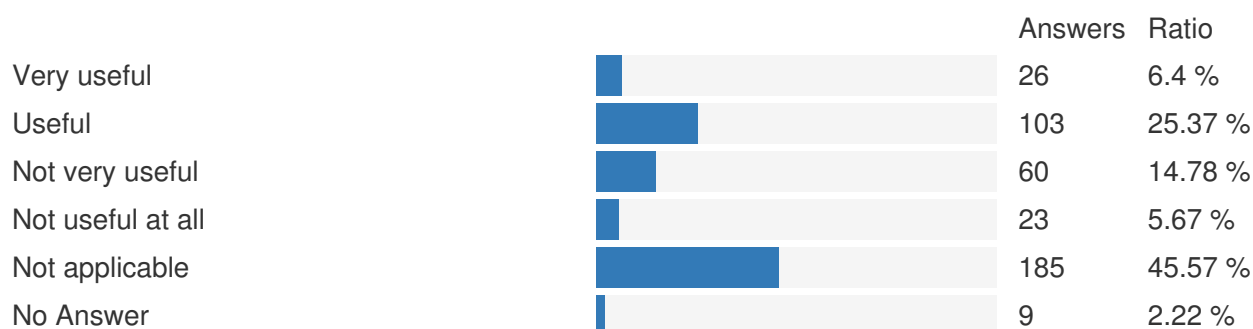
**To what extent do you agree with the following statements? : 3. ECHA's materials, e.g. manuals (How to prepare and submit a SCIP notification, Tools to refer to SCIP data already submitted to ECHA, other available materials on SCIP support page) or events (Webinars and other conferences) are helpful to duty holders**



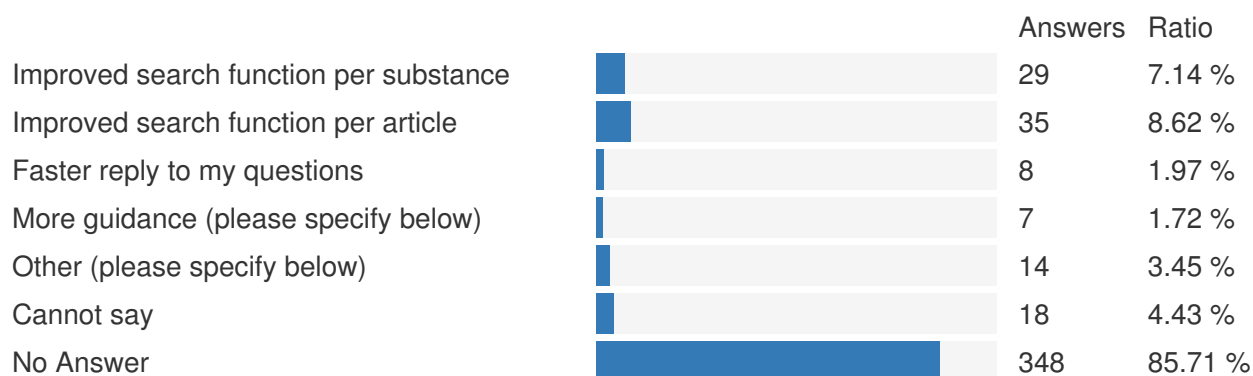
**To what extent do you agree with the following statements? : 4. SCIP database supports you to comply with your SCIP duty**



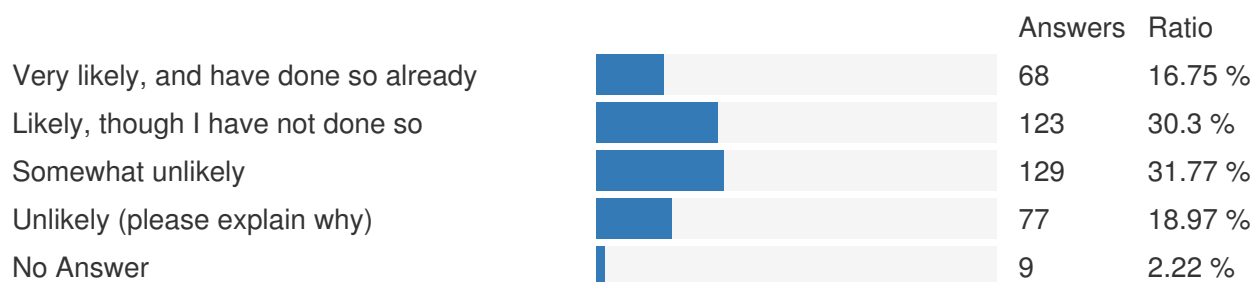
**How useful has the helpdesk been to resolve your doubts and questions?**



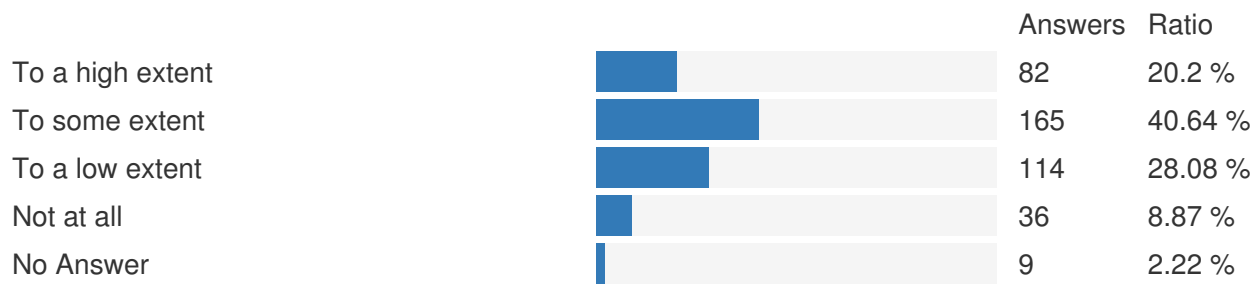
**What additional information, features or services would you like to see in the future in order to increase the usefulness of the SCIP for you? (Select all that apply.)**



**How likely are you to recommend SCIP to find information on articles containing SVHCs?**



**In your area of work, are relevant users aware of SCIP?**



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