**REPORT REACH Art. 33 MEETING, MAY 12, 2020**

**Results:**

Last year the NAG has organized an information session about REACH. During this session there appeared to be considerably interest in REACH Art. 33. We therefore organized a follow-up meeting specifically about REACH Art. 33. This particular article states that suppliers have to actively communicate information on the presence of substances of very high concern (SVHCs) in articles to the recipients of these articles if they contain >0.1% (w/w) of a SVHC. This information should allow safe use of these articles. Art. 9 of the updated Waste Framework Directive (WFD) refers to REACH art. 33. This article states that the information required by art. 33 should be registered in a special database – the SCIP database, managed by the European Chemicals Agency (ECHA). This obligation from WFD art. 9 will be effective as of January 5, 2021.

This means all articles containing SVHCs (>0.1%) in an airplane that’s placed on the market after January 5, 2021 must be registered in the SCIP database. The registration is intended to make harmful substances in the supply chain transparent and traceable. The database also helps as a tool to work safely with substances and is an incentive to look at other substances that are less harmful. As of January 5, 2021, companies that place articles on the EU market (from then on) will have to submit information on SVHCs in these articles (see: amendment art. 1.10.2 in Directive (EU 2018/851). These need to be registered in the SCIP database. More information, including a link to the prototype, can be found [here](https://echa.europa.eu/nl/scip-database). The meeting started with a presentation held by Johan Zijp, Manager Central Laboratory at DAF. This presentation appeared to be very interesting because the developments within the automotive industry regarding the implementation of REACH Art. 33 are ahead of the developments in the aerospace and we can certainly learn from that. The automotive industry already works with a large number of OEMs with a database for the registration of articles. However, more detailed information must be included in the SCIP database. Johan explained that the SCIP database requires more information in comparison to the REACH Art. 33 database. The presentation of Johan Zijp was followed by a presentation held by Nel Verstoep, Program Manager Reach at KLM Engineering & Maintenance. Nel has indicated that the Aerospace Sector is nowhere near as far as the automotive industry and that it might be difficult to register all articles of an airplane. An engine for instance consists of 40,000 articles and an airplane from 4 to 6 million articles. There is no common database in which OEMs, airlines and the entire supply chain register these items. The NAG will verify with the IQMG of the ASD how far the sector is regarding the implementation of the SCIP database for the Aerospace Industry. The meeting was concluded by a presentation and subsequent discussion with Thijs de Kort, Representative of Center for Safety of Substances and Products of the RIVM, Coordinator of the [REACH and CLP Helpdesk](https://www.chemischestoffengoedgeregeld.nl/). Thijs has cordially invited all participants to practice with the prototype for SCIP database and to share the feedback with [ECHA (European Chemicals Agency)](https://echa.europa.eu/nl/scip-database). The new [SCIP database](https://echa.europa.eu/nl/scip-database) will be available from October and the database can actually be filled in. The prototype – that is meant for test and practice purposes for companies – is already online and test data will be deleted in October.

The Dutch industry has asked the EU to reconsider the decision to introduce the SCIP database and has taken a position towards the Dutch government. A follow-up session will be organized within two months in which the question “how will the Aerospace sector implement the REACH Art. 33 and the SCIP database” and “What should the platform for (OEMs, airlines, suppliers) look like?” The NAG is happy to make the [recording](https://transcripts.gotomeeting.com/?utm_source=recordingReadyNotification&utm_medium=email#/s/59cd138ba5f706a00014834d85840de2313cf6cf5762cda2f26e593def20fce3) of the online session available to those who were unable to participate or who would like to listen to the recordings again.