



National Institute for Public Health  
and the Environment  
*Ministry of Health, Welfare and Sport*

# Short info on REACH article 33 and the SCIP database

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## REACH Article 33

- Duty to communicate information on substances in articles

<b>Obligation:</b>	<b>Registration of substances in articles (chapter 4)</b>	<b>Notification of substances in articles (chapter 3)</b>	<b>Communication of information on substances in articles (chapter 3)</b>
legal basis in REACH Regulation	Article 7(1)	Article 7(2)	Article 33
actors concerned	article producers and article importers	article producers and article importers	article suppliers
substances concerned	substances intended to be released from articles	substances included in Candidate List of Substances of Very High Concern for authorisation	substances included in Candidate List of Substances of Very High Concern for authorisation
tonnage threshold	1 tonne per year	1 tonne per year	-
concentration in article threshold	-	0.1% (w/w)	0.1% (w/w)



# Articles

- What is an article?
  - an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition
- Complex products consist of >1 article
  - Art. 33 applies to all articles in a complex object (ECJ, 10 September 2015, case C-106/14)

ECHA Guidance on requirements for substances in articles:

[https://echa.europa.eu/documents/10162/23036412/articles\\_en.pdf](https://echa.europa.eu/documents/10162/23036412/articles_en.pdf)



## SCIP Database

- Substances of **C**oncern in **P**roducts database
- Directive (EU) 2018/851 amending Directive 2008/98/EC (Waste Framework Directive)

Art. 9.1i:

**“[...] any supplier of an article as defined in point 33 of Article 3 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council provides the information pursuant to Article 33(1) of that Regulation to the European Chemicals Agency as from 5 January 2021”**

- All articles placed on market from January 5<sup>th</sup>, 2021
- Although it is Waste Legislation, it concerns product information → strong relation with REACH art. 33



## Objectives

- Make Substances of Very High Concern (SVHCs) traceable through out the supply chain
  - Helps with safer (use of) products
  - Awareness of SVHCs stimulates demand for SVHC-free products
  - Helps waste operators in processing products in a responsible manner, now and in the future
- 
- Results may have a long-term horizon for products with a long life cycle



# Time line

- Where are we now?

Feb. 17, 2020  
Prototype SCIP  
Database released

October, 2020  
All test data is  
deleted from  
database

October, 2020  
Implementation of  
SCIP v.1 – data  
can be submitted

**DEADLINE:**  
January 5, 2021  
Obligation to notify  
to SCIP database

↓  
Feedback on usability  
and technical issues

↓  
Possibility of notifying



- National and EU level:

On-going discussions on implementation, requested information, and technical issues and improvements



## Questions?

- Legislative issues? Please contact the NL REACH and CLP Helpdesk – [www.chemischestoffengoedgeregeld.nl](http://www.chemischestoffengoedgeregeld.nl)
- Technical issues, e.g., S2S integration? Please contact ECHA:
  - [https://comments.echa.europa.eu/comments cms/Contact SCIP.aspx](https://comments.echa.europa.eu/comments/cms/Contact SCIP.aspx)
- ECHA website:
  - General information: <https://echa.europa.eu/nl/scip-database>
  - Support: <https://echa.europa.eu/scip-support>
  - SCIP database prototype: <https://echa.europa.eu/nl/scip-prototype>
  - Webinar on SCIP database prototype: <https://echa.europa.eu/nl/-/introducing-the-scip-database-prototype>
  - SCIP IT User group meetings: <https://echa.europa.eu/scip-it-user-group>