

SCIP DATABASE

Data Services & Software Solution for SCIP Submissions



A Comprehensive SCIP Database Solution

GreenSoft Technology, Inc. has a solution for **Substances of Very High Concern (SVHC)** submissions to the **SCIP Database**, as required under the **EU Waste Framework Directive**.

Our comprehensive **SCIP Database** solution combines our industry-proven data collection and validation services with powerful **GreenData Manager® (GDM)** software to deliver a complete SCIP compliance package, which includes:

- Article ID Management
- Article and Material Category Validation
- Protection of Confidential Business Information
- True "Once-an Article" Analysis and Reporting
- SCIP Dossier Management and Generation
- SCIP Portal Dossier Submission Capabilities

Data Services & GreenData Manager Software

As part of our **Data Services**, we'll collect SVHC compliance data from your suppliers, including article and material classifications, and all other information needed for mandatory SCIP data requirements.

Our compliance experts will validate that data for accuracy and completeness using a stringent quality control process that combines manual and automated checks to ensure **99.9% data accuracy**.

We also help assess and assign **article and material category classifications** to the reportable SVHCs in your products as required when submitting to the **SCIP Database** when suppliers are unable to supply such classifications themselves.

Using our **GreenData Manager (GDM) with SCIP Module** software, we can automatically generate SCIP dossiers for upload to the **SCIP Database**.

Developed by engineers and regulatory experts, GreenSoft Technology's **Data Services** and **GDM with SCIP Module** software provide the unique ability to validate the contextual framework needed for **SCIP Database** submissions.

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Regulatory Requirements of the SCIP Database

Both the **EU REACH Regulation** and the **EU Waste Framework Directive** require affected companies to evaluate and communicate or report on the risk of hazardous substances within their products.

EU REACH Substances of Very High Concern (SVHCs)

Per the **EU REACH Regulation**, companies with products containing SVHCs over 0.1% w/w at the article level have an obligation to notify their down-stream customers.

The list of SVHCs grows and changes every 6 months, so Compliance Statements for components claiming **EU REACH** compliance have very short lifespans.

The best method for companies to manage the substance data on their products is to collect **Full Material Declaration (FMD)** data from suppliers, so that substances can be re-evaluated every time the SVHC list is updated without having to recollect data from suppliers.

EU Waste Framework Directive (WFD) SCIP Database

As of January 2021, companies placing articles on the EU market which contain reportable levels of SVHCs under **EU REACH** also need to submit their product information to the **Substances of Concern in Products (SCIP) Database** as part of the requirements under the **EU WFD**.

Submissions to the **SCIP Database** require significantly more information than **EU REACH** SVHC communication obligations. Suppliers of articles with SVHCs over 0.1% w/w are required to submit the following information to the **SCIP Database**:

- Name of the substance and its safe use (currently required under Article 33 of EU REACH)
- Category of the article containing the reportable SVHC (selected from a list of over 20,000 options)
- Category of the material or substance (mixture) which contains the reportable SVHC
- Linking of articles that contain the reportable SVHC within complex objects
- Concentration range of the reportable SVHC within the reported article
- Information on whether the article was produced or assembled in the EU

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Category Classification and Supplier Guidance

Submissions to the **SCIP Database** require data to be classified into article categories and material categories from a list of over 20,000 options. As part of our **Data Services**, our data collection team will contact your suppliers to obtain SVHC and SCIP compliance data for the parts contained in your products.

Since the **SCIP Database** is still relatively new to suppliers, the amount of suppliers who are capable of providing this complex data (such as article and material category classifications) without errors is small. Our team will provide **guidance and education** to your suppliers to help improve response rates and data accuracy.

We will work with your suppliers to determine the category of articles and materials in your products which contain reportable levels of SVHCs. If suppliers are unable to provide category classifications, we will perform **classification assessments** on the articles and materials to fulfill the data requirements for the **SCIP Database**.

Our data collection team will actively pursue unresponsive suppliers via telephone and email as many times as it takes to obtain the required data. We then validate that data to ensure it is complete and accurate. This **person-to-person data collection** model allows for validation not only of the presence of the data, but of the contextual content of the data as well.

Article Processing per “Once-an-Article, Always-an-Article” Requirements

Under the EU Court of Justice ruling in September 2015 (C-106/14), processing articles per the “**Once-an-Article, Always-an-Article**” (**O5A**) requirements is now an inherent part of the compliance with the **EU REACH Regulation**. This means that subparts of electrical components are considered articles when complying with **EU REACH** and for **SCIP Database** submissions.

The **European Chemicals Agency (ECHA)** has confirmed that this **O5A** article processing is necessary to prepare data for **SCIP Database** submissions. This process is difficult and tedious, and requires complex knowledge of your parts. Any software tool used to validate product compliance for **EU REACH** SVHC should have the ability to dynamically apply article designations for each material present in a part, as well as have the capability to process complex objects made of multiple materials within the part. But software alone cannot determine the article status of materials. That requires human intervention for construction analysis.

GDM with SCIP Module software is able to designate materials within parts as articles, as well as combinations of materials as complex objects. GreenSoft Technology engineers and regulatory experts oversee this process and provide the context and designations required to meet **O5A** standards.

GreenSoft Technology is the **only** solution provider in the industry that offers **O5A** article processing.

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Keep Your Part Data Private with Unique Article ID Management

Submissions to the **SCIP Database** online portal require companies to disclose the articles and substances, and locations of articles and substances, within their products, as well as the hierarchy of their Bill of Materials (BOM).

This information is required for waste processors to identify which articles contain hazardous substances which must be removed for product disposal. But providing this information to a central database puts companies at risk of having their data and trade secrets exposed.

GreenSoft Technology's **SCIP Database** solution includes an **intelligent article ID assignment and management system** to keep your trade secrets private.

GDM with SCIP Module software generates a displayable name for articles which allows you to supply the required component information, article location, and BOM hierarchy without exposing your sensitive data.

GreenData Manager (GDM) with SCIP Module Software

Our **GDM with SCIP Module** software is a powerful tool that allows for complex data processing and article analysis. Companies can use **GDM with SCIP Module** software to manage their **EU REACH** compliance and **SCIP Database** reporting themselves, or GreenSoft Technology's team can generate reports and SCIP dossiers from within **GDM with SCIP Module** software for you as part of our **Turnkey Services**.

GDM with SCIP Module software features the identification of reportable SVHCs in BOMs, components, articles, and materials/mixtures.

GDM with SCIP Module can assist in completing data requirements to prepare SCIP dossiers and export the dossiers into IUCLID i6z format for submissions.

You can choose to submit SCIP dossiers one at a time, or process them in bulk through a system-to-system transfer into the **SCIP Database**. Contact us to learn more and get started.

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