

SCIP-Database – fast facts for window and door manufacturers

Background

In 2018 the Waste Framework Directive 2008/98/EC was modified by the Directive (EU) 2018/851 requesting from Member States in Article 9 to take measures to prevent waste generation. One of the measures to promote the reduction of the content of hazardous substances is that any supplier of an article with a substance on the candidate list > 0.1% (w/w) according to REACH Art. 33¹ has to provide the information to the European Chemicals Agency (ECHA) as from 5 January 2021. ECHA established the SCIP (**S**ubstances of **C**oncern **I**n articles as such or in complex objects (**P**roducts)) database for tracking hazardous chemicals in articles and published requirements for the SCIP notification at <https://echa.europa.eu/scip-support> in October 2020. The SCIP notification obligation for companies applies from January 2021.

Articles and complex objects

Articles means objects which during production is given a special shape, surface or design, for example components. Articles can be assembled to become a 'complex object', for example a window. The articles remain articles when incorporated in 'complex objects' which means that SCIP notifications of articles needs to be forwarded by all industrial or professional users in the supply chain.

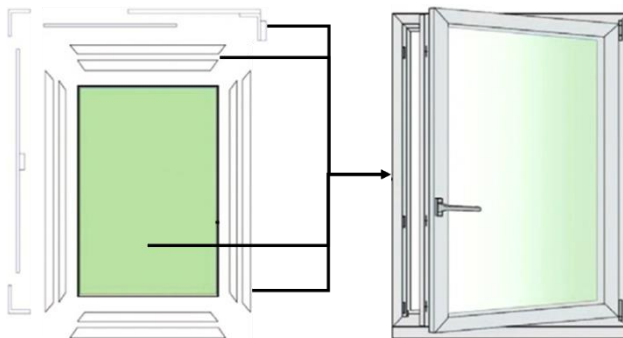


Figure 1: Example of complex object (window) made of articles (components)

Grouping approach

Identical or quasi-identical articles or complex objects should be grouped together in a single SCIP notification to limit the number of entries. Quasi-identical means same function or use, the same Candidate List substance(s) and made of the same material. The sizes, weight or design needs not to be the same.

When window and door manufacturers have to do a SCIP notification

The manufacturer needs to become active only, if informed by a supplier according to REACH Article 33 about substance from the candidate list > 0.1 % (w/w) in an article (e.g. by receiving the SCIP notification number). Suppliers of such articles have the obligation to forward the information. There is no need for manufacturers to collect information from the suppliers.

EuroWindowor is of the opinion that for manufacturers of windows and doors the use of mixtures (e.g. by coating or gluing) usually does not require an own entry for the article, because the percentage by mass of the weight of the article is too low. The manufacturers will only have to do a SCIP entry, when receiving suppliers SCIP information.

Different types of SCIP notification within a supply chain

The supplier producing an article with a substance on the candidate list > 0.1% (w/w) has to do the full notification with a SCIP dossier including information for the substance on the candidate list. On the other hand manufacturers can create a 'light weight' dossier by including 'referencing'

¹ For details on EU regulation no. 1907/2006 see [EuroWindowor Information "REACH – Fast Facts"](#) (August 2016)



to already submitted information by suppliers for components in complex objects ('Referencing' in a SCIP notification). If the article is only distributed, a distributor can create a notification by referring to a previous notification only without the need to prepare a dossier (Simplified SCIP notification = SSN).

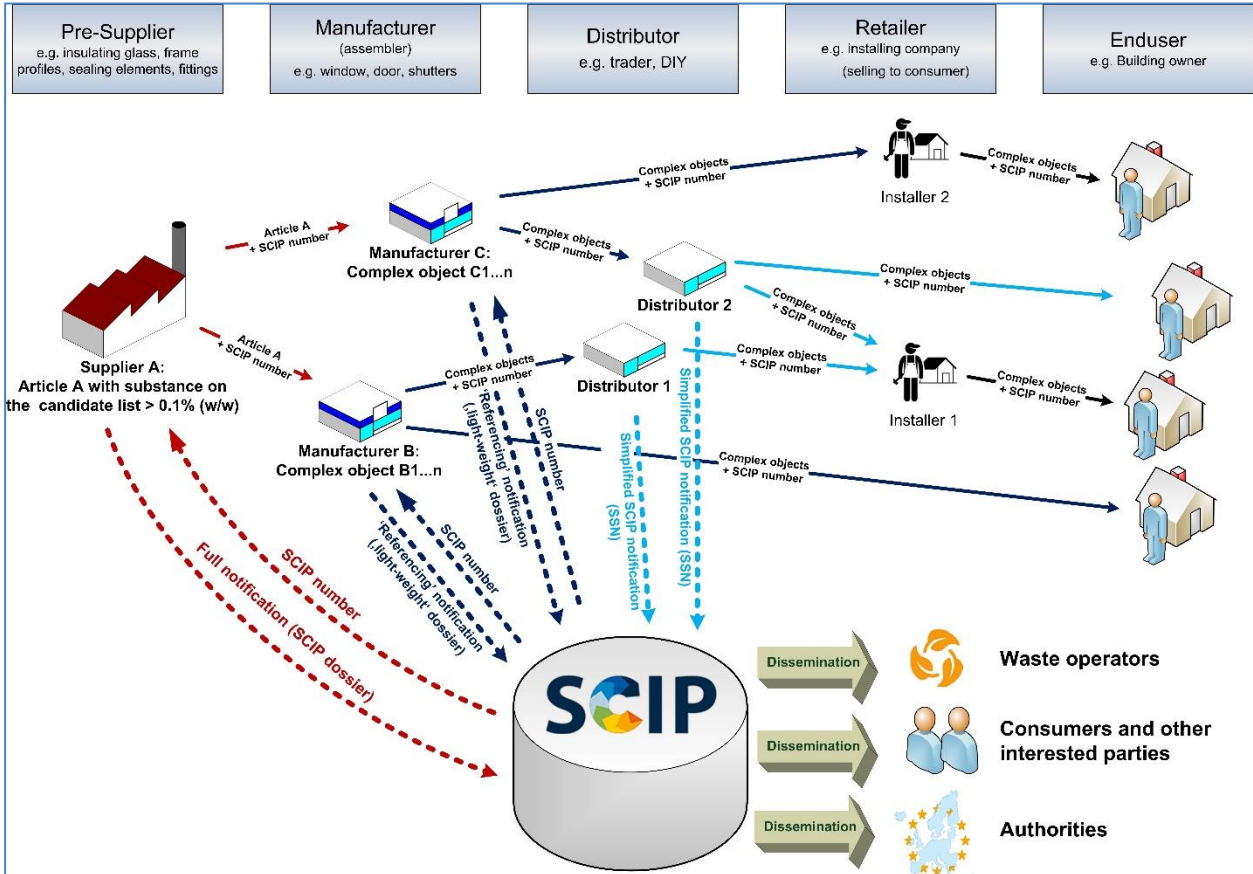


Figure 2: SCIP in the route of distribution in the fenestration sector

'Referencing' in a SCIP notification for complex objects

The following example shows the mandatory information. Blue parts in the example have to be completed by the manufacturer and the orange parts are the information coming via referencing to the suppliers SCIP notification number.

Identifiers	Article name	Window System ABC	Main name assigned to the article as such or the complex object; free text (to be determined by the manufacturer)
	Primary Article Identifier	DoP-No ABC...	Numerical or alphanumeric identifier assigned to the article as such or the complex object and identification of its type.
	Article category	Customs Tariff Number = ZZZZZZZZ	Identification of the article as such or the complex object from a harmonised list (TARIC - list), e.g. for windows with frames made of PVC 39252000, laminated wood 44189990, aluminium 76101000 or steel 73083000.
	Production in European Union	Yes	
Safe use instruction(s)*	Safe use instruction(s)*	No need to provide safe use information beyond the identification of the Candidate List substance	
Complex object component 1	Linked article 1	Link to SCIP-Number from supplier	Reference to SCIP entry of supplier
	Number of units	1	Number of occurrences of the linked article in the complex object
Concern Element 1	Candidate List version	ZZZZ/TT	Data is imported automatically after entering of SCIP-Number
	Candidate List entry / Substance	Candidate List substance S; EC xxx-xxx-x; CAS yyyy-yy-y	
	Concentration range	> 0.1% w/w and < 0.3% w/w	
	Material category	Material of the component	
Complex object component 2	Linked article 2	Link to SCIP-Number from supplier	Reference to SCIP entry of supplier
	Number of units	1	Number of occurrences of the linked article in the complex object
Concern Element 2	Candidate List version	ZZZZ/TT	Data is imported automatically after entering of SCIP-Number
	Candidate List entry / Substance	Candidate List substance S; EC xxx-xxx-x; CAS yyyy-yy-y	
	Concentration range	≥ 1.0% w/w and < 10.0% w/w	
	Material category	Material of the component	

Figure 3: Example for window with 2 components including SVHC > 0.1% w/w (mandatory information only)

The most important task to be done by the manufacturer is to provide sufficient identifiers (names and alphanumeric identifiers available in products, labels, catalogues, etc) enabling to search in the SCIP database for the information linked to a specific product placed on the market.

To comply with the grouping approach, it is suggested to use a general 'article name' and special range of Declaration of Performance (DoP) numbers to be defined by the manufacturer as 'Primary Article Identifier'.

The 'foreign user' feature

It is possible for the supplier of an article or complex object with the need for a SCIP entry to commission an 'foreign user' who can submit the SCIP notification. In this case the company has to create an ECHA account and to add the user to submit data on their behalf. The 'foreign user' needs the information about substance content and the unique identification numbers for the SCIP entry. A foreign user can be, for example, a consultant, a mother company or any other third party: this is based on the agreement reached between the duty holder and the third party.

Video tutorials available on how to get started

<https://www.youtube.com/playlist?list=PLOPGDACSD6qyDkdXwPua1Fjb5bJksY75k>

Creating an ECHA account: <https://www.youtube.com/watch?v=5buL4uyKXF4> (3:25)

Subscribe to use of the Cloud: <https://www.youtube.com/watch?v=ovknuq5W2e0> (at 11'00")

Add Foreign user account: <https://www.youtube.com/watch?v=4JGsQUbGYqw> (3:25)

IUCLID Cloud: <https://www.youtube.com/watch?v=kXaDjajaDOU> (1:11)

Legal notice: The data and recommendations provided are based on the best available information on the date of publication and are not legally binding.

About EuroWindoor AISBL – EuroWindoor AISBL was founded as an international non-profit Association, in order to represent the interests of the European window, door and facade (curtain walling) sector. Our 19 national associations speak for European window, door and facade manufacturers that are in direct contact with consumers, and thereby having large insights on consumers' demands and expectations. We are at the forefront interacting with dealers, installers and consumers buying windows and doors, and the companies behind the associations cover selling all over Europe.