

The Webinar will begin at

2:00 PM (EEST)

1:00 PM (CEST)

11:00 AM (GMT)

1:00 PM (EET)

7:00 AM (CT)

Duration: ca. 70 min.

REACH LAW
COMPLIANCE. SUSTAINABILITY.

Assent

September 9th, 2021
2:00- 3:15 PM (EEST)
Webinar

Securing WFD/SCIP Compliance In Your Organization



Legal and regulatory insights, lessons learned and how to manage WFD/SCIP requirements efficiently in your company

Welcome

Presenters:



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Securing WFD/SCIP Compliance In Your Organization

Some Practical Information for this Webinar

Let's make this webinar interactive:

1. You are able to send questions to us using the chat, please do that! We will answer your questions in the Q&A, if time permits.
2. Questions you have been sending during the webinar or prior to the webinar will be answered after the presentation by e-mail if not answered during the Q&A.
3. A recording of the webinar will be made available to the attendees.

AND IN ANY CASE PLEASE SEND US FEEDBACK, THANK YOU!

Securing WFD/SCIP Compliance In Your Organization

Agenda

By REACHLaw:

- REACHLaw in a nutshell
- SCIP notification and database update: Requirements, simplifications, status
- Adopted measures by the Member States to transpose the EU legal requirements into national law → focus on the Nordic countries
- SCIP legal pitfalls and risks

By Assent Compliance

- Assent Compliance in brief
- Best practices to manage SCIP compliance inside of your organization
- How Assent's solution streamlines data collection and reporting – S2S connection to support data submission

Duration ca.70 minutes

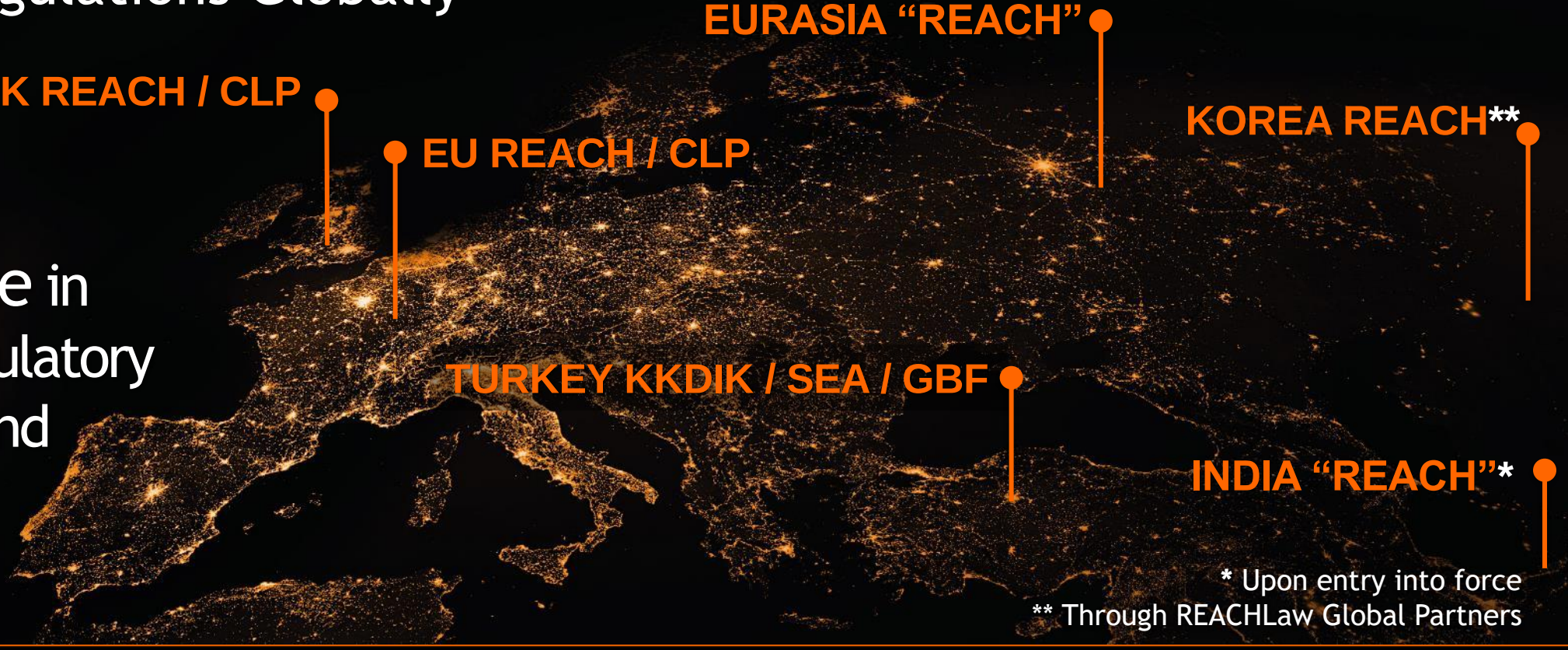
+10 minutes for Q&A

1. REACHLAW IN A NUTSHELL
2. ASSENT COMPLIANCE IN BRIEF
3. SCIP NOTIFICATION AND DATABASE UPDATE
4. ADOPTED NATIONAL MEASURES: FOCUS ON THE NORDIC COUNTRIES
5. SCIP LEGAL PITFALLS AND RISKS
6. BEST PRACTICES TO MANAGE SCIP COMPLIANCE IN YOUR ORGANIZATION
7. HOW ASSENT'S SOLUTION STREAMLINES DATA COLLECTION AND REPORTING – S2S CONNECTION TO SUPPORT DATA SUBMISSION
8. QUESTIONS & ANSWERS
9. CONTACT

REACHLAW
COMPLIANCE. SUSTAINABILITY.

OUR FOCUS

Providing Support for REACH and "REACH-Like" Chemical Regulations Globally



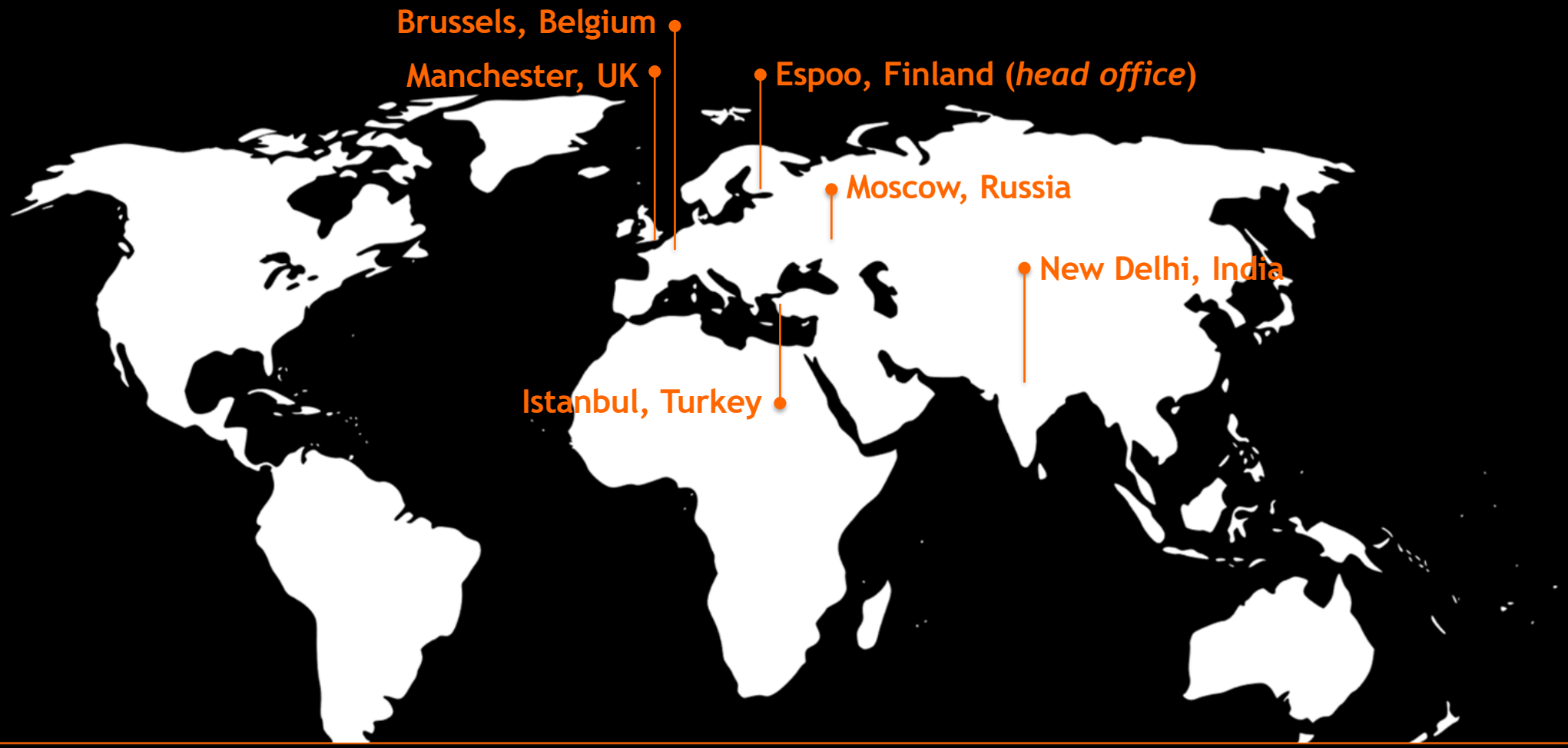
We Specialize in Chemical Regulatory Compliance and Sustainability

* Upon entry into force
** Through REACHLaw Global Partners

REACHLAW

COMPLIANCE. SUSTAINABILITY.

WORLDWIDE OFFICES



REACHLAW
COMPLIANCE. SUSTAINABILITY.

MARKET ACCESS SERVICES FOR CHEMICAL PRODUCTS AND MORE

SCIP Strategy and Notification Services *(more info later in the presentation)*

Only Representation *(EU, UK, Turkey, India*, Eurasia, South Korea)*

Authorisation *(EU, UK, Turkey)*

Co-Registration / Lead Registration *(EU, UK, Turkey)*

SVHC Advocacy & Consultancy

Outsourcing of Chemicals Regulatory Compliance Functions

Global Inventory / Product Registry Notifications

Classification and Labelling

Circular Economy Services

Legal & Technical Services

Consulting & Training ***…etc***

Regulations Supported:

- *EU REACH & CLP*
- *UK REACH & CLP*
- *Turkey KKDIK & SEA & GBF*
- *Eurasia REACH*
- *Korea REACH*
- *India REACH**
- *Swiss ChemO*

…and more

* *Upon Entry Into Force*

REACHLAW
COMPLIANCE. SUSTAINABILITY.

SOME STATISTICS

Customers: 860+
Continents: 5
Countries: 60+
REACH Pre-Registrations: 3 000+
REACH Co-Registrations: 1 000+
REACH Lead Registrant cases: 100+
REACH Authorisation Applications: 30+
Turkey KKDIK Pre-Registrations and SEA Notifications: +5 000
CLP Notifications: 1 000+
Global Chemical Notifications: 12 000+

REACHLAW
COMPLIANCE. SUSTAINABILITY.

SCIP NOTIFICATION SERVICES

1. SCIP Impact Assessment
2. “Importer” determination & support
3. Compliance Strategy and Roadmap
4. Legal / Contract Drafting
5. Notifications via IUCLID
6. Foreign User Service
7. Sector-level Harmonisation support
8. Supplier Briefing
9. Compliance Maintenance
10. Consulting *…and more*

Available for:

- EU article suppliers
- Non-EU exporters
- Industry Associations

REACHLAW

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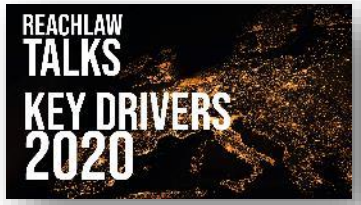
REACHLAW TALKS















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Introduction
TO ASSENT

75%
OF FORTUNE 500 MANUFACTURERS
Work With Assent

500+
CUSTOMERS

FREE
Assent University Educational Resources



WORLD CLASS SOLUTIONS FOR:
Product Compliance | Corporate Social Responsibility | Vendor Management



A GLOBAL PRESENCE

Ottawa, **Canada** (Headquarters)
Columbus, **USA**
Amsterdam, **Netherlands**
Penang, **Malaysia**
Eldoret, **Kenya**

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Our **regulatory experience** is your advantage.



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General Counsel



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Abiola Okpechi
Subject Matter Expert, Business & Human Rights



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Screening Solutions Analyst

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SCIP notification and database update

Background: REACH Article 33(1) reporting in the supply chain

Article 33

Duty to communicate information on substances in articles

1. Any supplier of an article containing a substance meeting the criteria in Article 57 and identified in accordance with Article 59(1) in a concentration above 0,1 % weight by weight (w/w) shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance.

Applies to Substances of Very High Concern (SVHCs) included in the REACH Candidate List (CL)

The Candidate List is currently updated twice per year.

https://echa.europa.eu/de/candidate-list-table

Last update on 5.7.2021: + 8 → total 219 entries

Reporting is triggered for each component article with CL-SVHC above 0.1% w/w

"Once an article, always an article"

(CJEU judgment 10.9.2015 in Case C-106-14)

ECHA EUROPEAN CHEMICALS AGENCY

Objects can be very complex...



... but principles remain the same.



Substances of Concern In articles, as such or in complex objects (Products)

SCIP notification and database update

SCIP legal basis: The revised Waste Framework Directive (WFD)

Legal basis

Art. 9(1)(i)&(2) of Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste - revised Waste Framework Directive (WFD)

SCIP notification

*"**Member States shall take measures** to prevent waste generation… ensure that any supplier of an article as defined in point 33 of Article 3 of REACH provides the information pursuant to Article 33(1) of that Regulation to the European Chemicals Agency as from 5 January 2021"*

SCIP database

- ECHA to establish a database for the information to be notified and maintain it
- Database access to waste operators and consumers (upon request) → ECHA: Public database!!

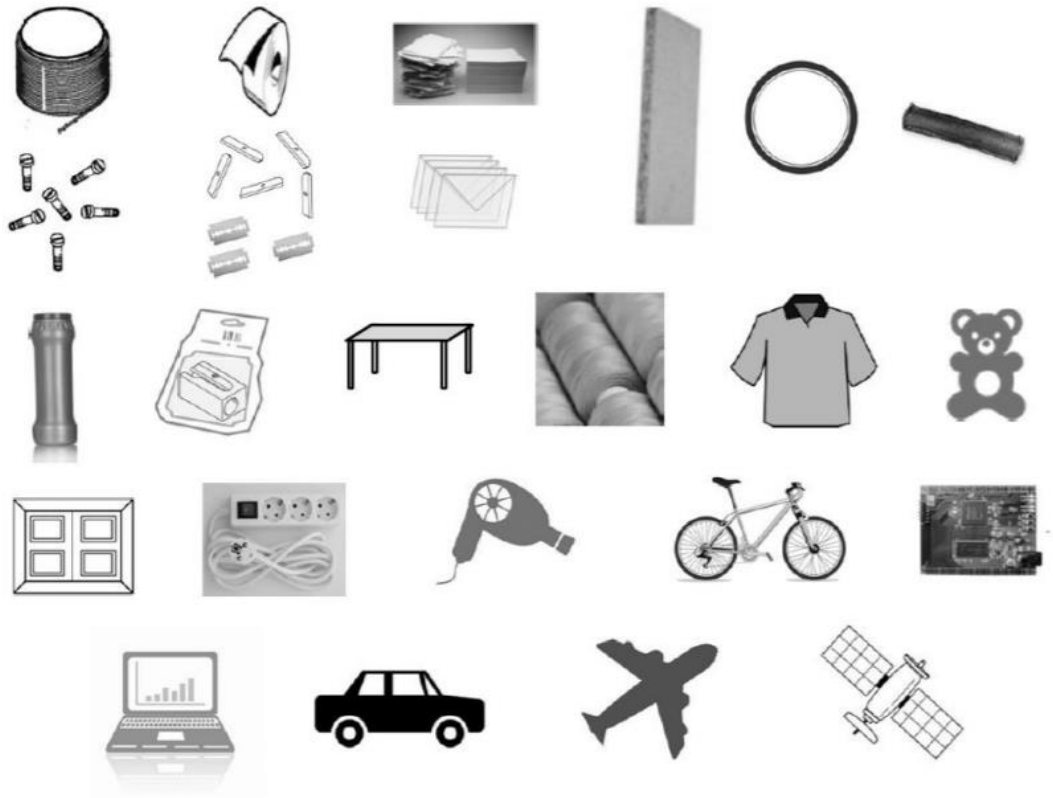
ECHA objectives

Support the Circular Economy by (1) decreasing hazardous waste generation by supporting the substitution of SVHCs in articles; (2) making information available to further improve waste treatment processes, namely recycling; (3) increasing authorities' information basis on SVHCs in articles. Complement and re-inforce – *not replace!* - REACH Article 33 and 7(2).

SCIP notification and database update

Potential scope of SCIP notifications

Figure 5: Illustration of the potential very broad scope of the SCIP notification duty.
(The examples are shown for illustration purposes only. It does not necessarily mean that the articles as such shown usually contain Candidate List substances or that some simpler complex objects shown usually incorporate articles containing such substances)



- Applies to articles/complex objects only, not substances/mixtures supplied
- **No** exemption with regard to RoHS (EEE)
- **No** exemption recognized by the European Commission for Space Products (even if they do not result in waste in EU!)
- Possible national exemptions in the interest of defence (see EDA study 2020, Chapter 3)

Source: https://echa.europa.eu/documents/10162/28213971/Information_requirements_for_scip_notifications_en.pdf/db2cf898-5ee7-48fb-e5c8-4e6ce49ee9d2

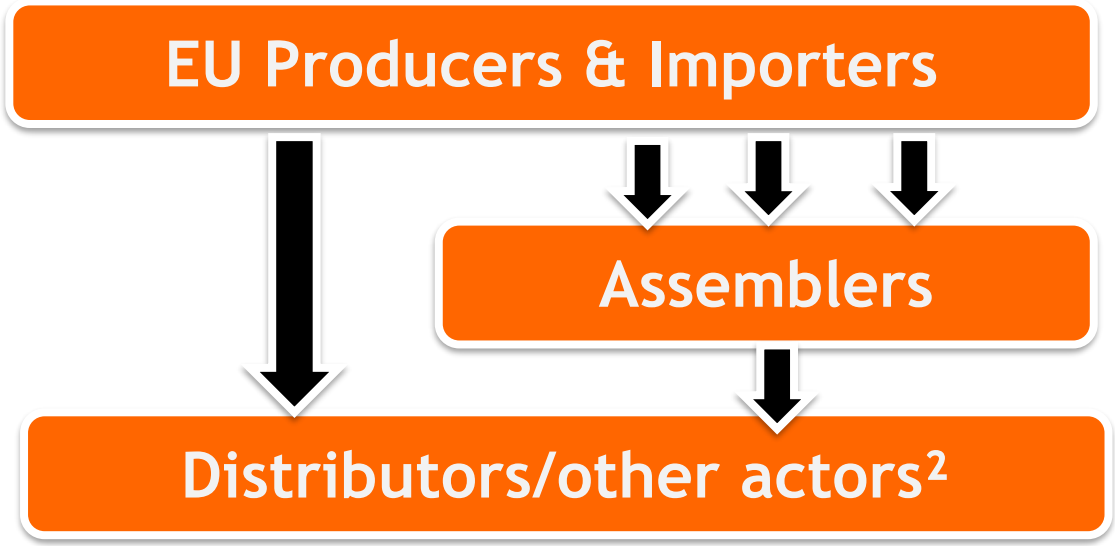
SCIP notification and database update

Who has to notify?

*"… any natural or legal person (established within the Community) who…" (**legal entity according to national law**)*

SCIP notification applies to **any EU[1] supplier of an article** as such or in a complex object containing a Candidate List substance above 0.1%, irrespectively of the position of that supplier in the supply chain. Article 3(33) of the REACH Regulation defines 'supplier of an article' as *"any producer or importer of an article, any distributor or other actor in the supply chain who places an article on the market"*.

[1]Application in Norway, Iceland and Liechtenstein is subject to incorporation into the EEA Agreement.



Non-EU suppliers of articles

- Not allowed to submit SCIP notifications
- Possibilities to support the EU importers:
  - Create SCIP dossiers/datasets
  - Be appointed as "Foreign User" to notify on behalf of EU importer
  - Provide SCIP data to EU importers

[2]Except retailers/other supply chain actors that supply directly and exclusively to consumers

SCIP notification and database update
When to notify?

- **The obligation - *practically to be fulfilled before placing on the market* - applies to articles placed on the EU market from 5 January 2021 onwards, with regard to the Candidate List at that time.**
  - In some Member States it may be sufficient to notify without undue delay after placing on the market – have to check the situation at the national level.

- If the Candidate List is updated subsequently, a new SCIP notification or update of an existing one is required only if and when the product is then placed on the market again by the submitter

Further information: Section 1.4 '*Timelines*' and Section 2.4 (regarding updates) of ECHA '*Requirements for SCIP notifications*', October 2020 (link)

SCIP notification and database update
ECHA information requirements

Category	SCIP information requirement for submission	Submission classification
Common requirements for both articles as such and complex objects	**Article name** (complex object/article as such, top level entity)	Mandatory
	Other name(s), e.g. brand, model	Optional
	Primary Article Identifier (EAN, part no, …)	Mandatory
	Other article identifier(s)	Optional
	Article category (based on CN/TARIC codes and descriptions on function/use)	Mandatory
	Production in the European Union (option *„no data"*)	Required
	Characteristics and picture(s)	Optional
	Safe use instruction(s), if necessary (option *"identification of CL substance is sufficient to allow safe use of the article…"*)	Required
	Disassembling instructions	Optional
Additional requirements for complex objects only	**Complex object components, if applicable** (*data as above*)	Mandatory
	Number of units of concerned complex object components	Optional
Additional requirements for articles as such only (concern elements)	**Candidate List (CL) substance** (name; EC and CAS no., if available), using a IUCLID reference substance identity part of ECHA's 'Candidate List (Reference Substances) Package' (link)	Mandatory
	CL substance concentration range, incl. > 0.1% w/w and ≤ 100% w/w	Required
	Material category for the article containing the CL substance **and/or Mixture category (EuPCS)** containing the CL substance in article	Mandatory
	Additional material characteristics	Optional
	CL substance no longer present (indicate as part of voluntary update)	Optional

Mandatory = data must be provided for the submission to pass

Required = an input is required but can be fulfilled without data (e.g. if not available)

Optional = data not required but its submission may be encouraged, depending on the objectives of SCIP

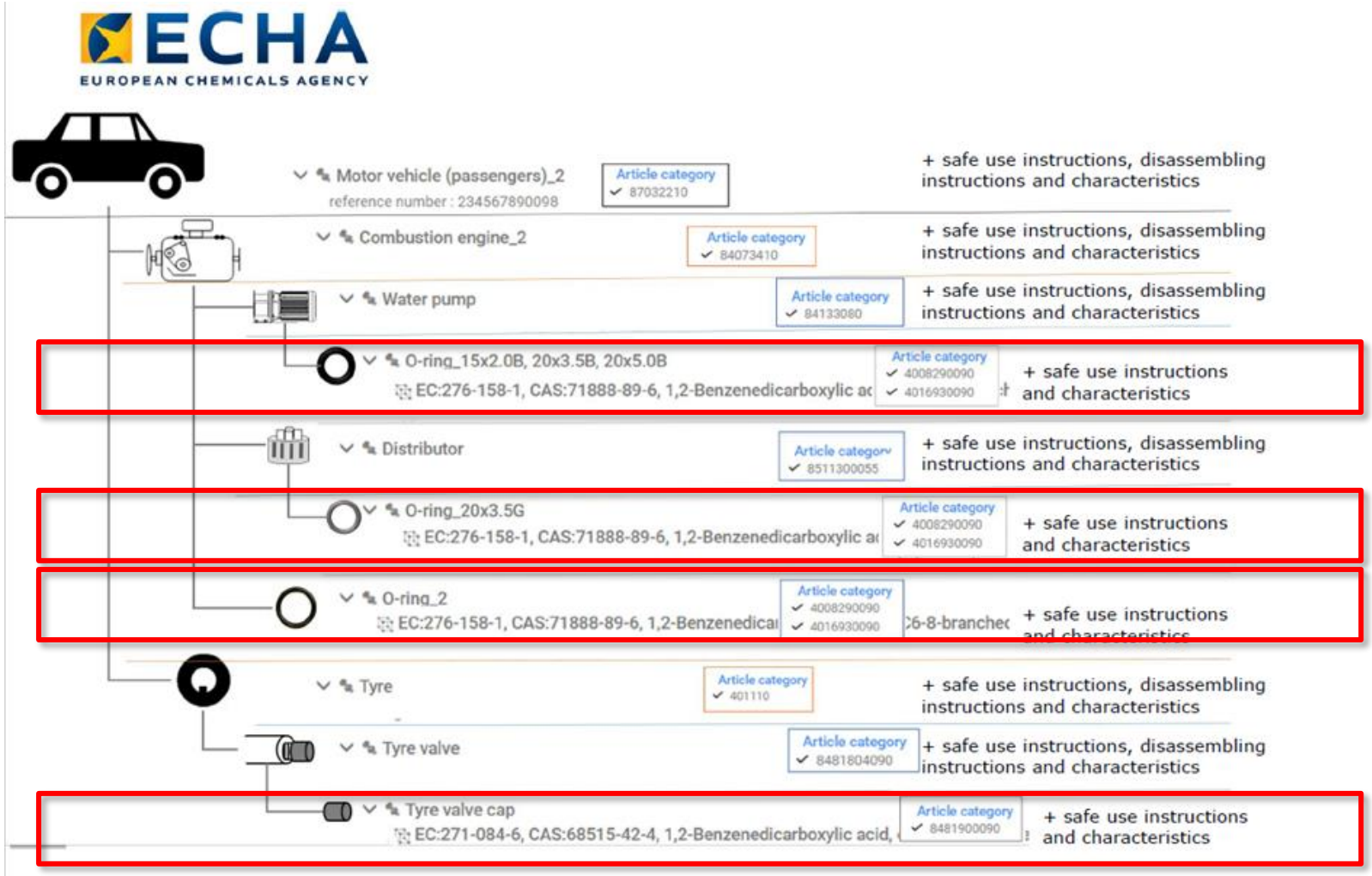
Important note: Additional data beyond REACH Art. 33(1) are needed !

Based on: ECHA, Requirements for SCIP notifications, October 2020, link to English version

SCIP notification and database update

Reporting for Complex Objects (layers/hierarchy)

- Information requirements for ‘article’ should be seen as a recurrent block until the data is filled in regarding the concern element, i.e. the CL SVHC for the *article as such*
- ECHA recommends to follow the components placed on the market and incorporated in complex objects at each assembling stage through their name and **article category**, but keeping a clear and simple ‘hierarchy’
- Important: **Include only articles containing CL SVHCs, not the whole BOM!**

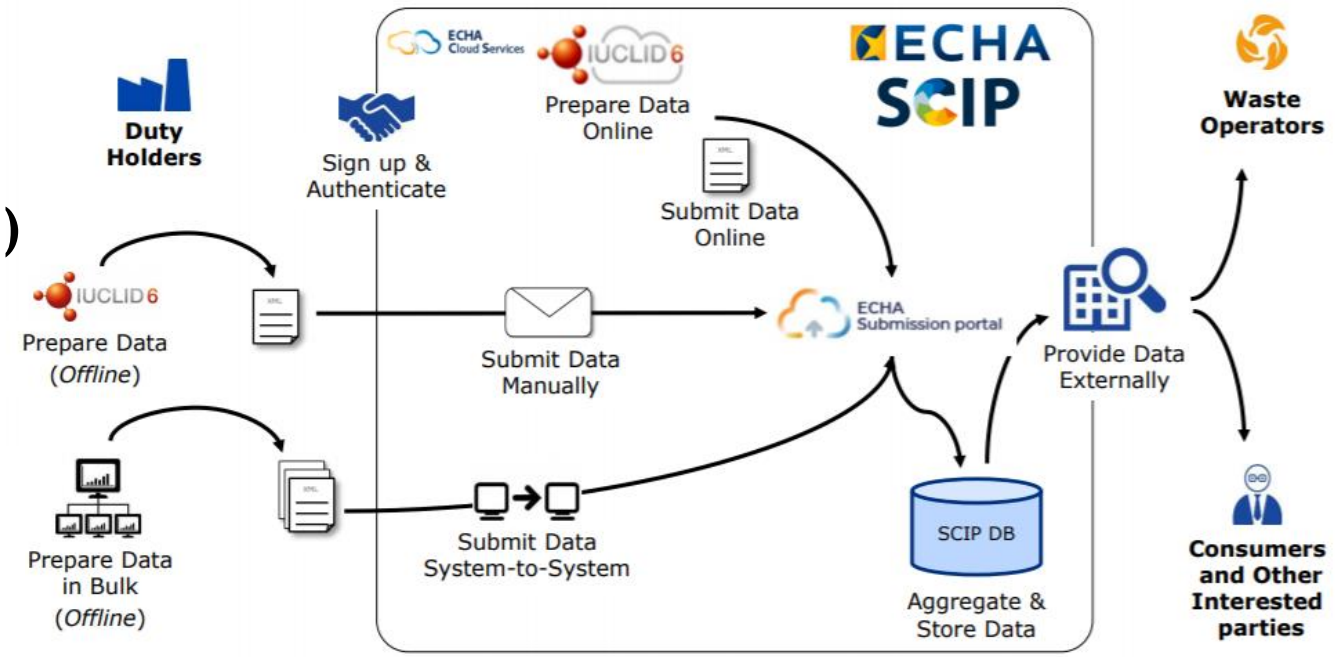


SCIP notification and database update

How? Technical process (SCIP format and IT tools)

1. Create ECHA account (per Article Supplier legal entity)
2. Prepare dossier in IUCLID (offline or online in IUCLID cloud)*
3. Submit: ECHA Submission Portal (manually/online/System-to-System)
4. Submission Report → SCIP number
5. Publication on the ECHA website

*Available simplifications (voluntary):
Simplified SCIP notification (SSN) for identical products
'Referencing' for complex object components



SCIP format, tools and information flow. Source: ECHA (link)

If a company does not submit a SCIP notification using the ECHA SCIP system, no proof of submission is issued by ECHA / data are not processed!

SCIP notification and database update

Public database access and protection of confidential information

All data as submitted in SCIP notifications are to be published *as received*, except*

- Identity of the submitters
- Component identifiers/names (e.g. brand, model) other than their article name and category



Search tool based on different criteria (e.g. article identity, categories, substance of concern, SCIP number TBC)

**National enforcement authorities could make specific requests to ECHA for such data*

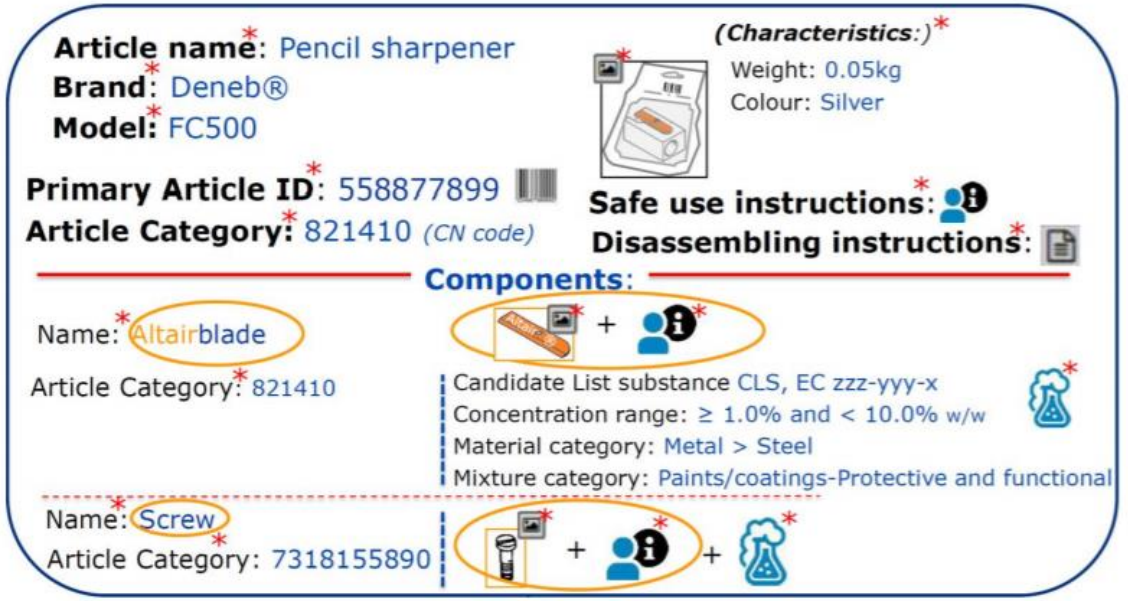


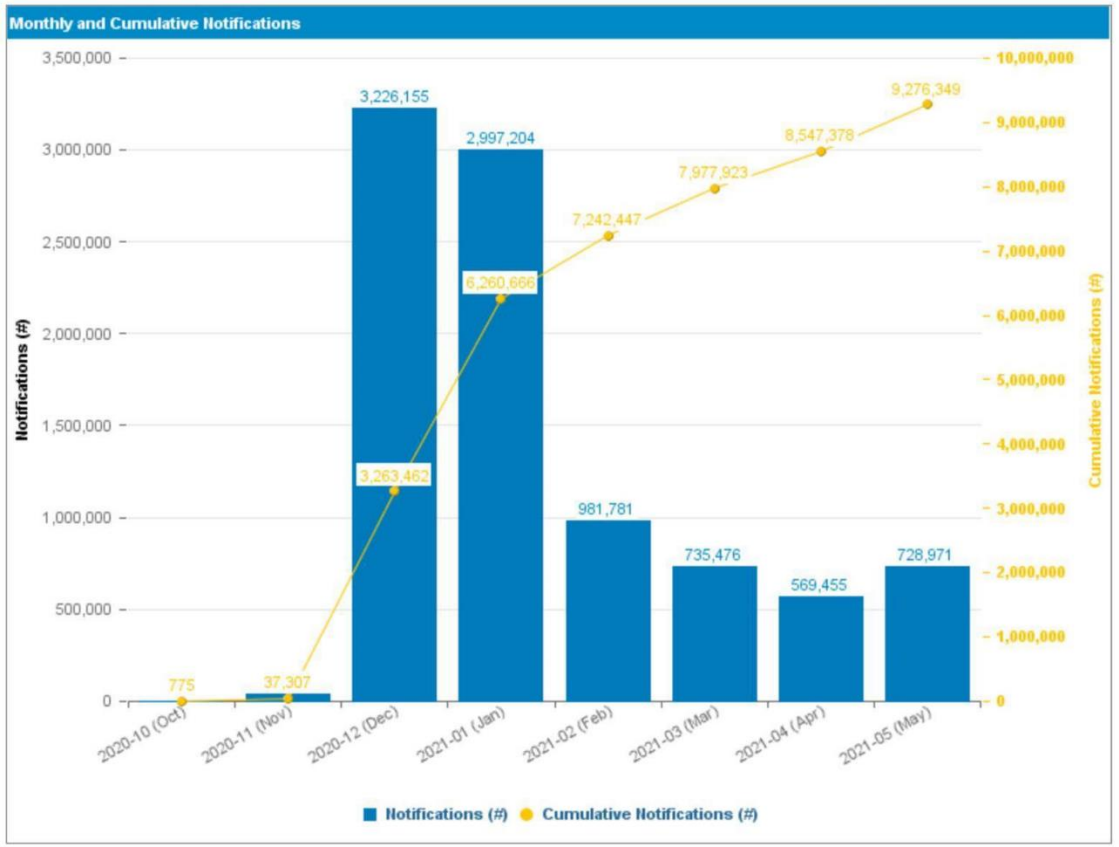
Figure 3: SCIP and CBI principles. Illustrates the data in the fields that will be made public for a hypothetical example.

Responsibility for confidentiality of the data reported in fields that will be made public* lies with the duty holder. = picture; = document; = safe use instructions; = concern elements.

Source: ECHA, Dissemination and confidentiality in the SCIP Database, July 2020 (link)

SCIP notification and database update

EU/ECHA level implementation



Source: ECHA

ca. 4,700 legal entities

ECHA
EUROPEAN CHEMICALS AGENCY

No of Submissions and No of Legal entities submitting SCIP notifications by Member State

Top 5 reported substances

- Lead
- Lead monoxide
- Diboron trioxide
- 4,4'-isopropylidenediphenol
- Lead titanium trioxide

Legal Entity Country	Submissions (#)	Legal Entities (#)
Austria	510,099	142
Belgium	474,792	151
Bulgaria	295,052	39
Croatia	252,032	30
Cyprus	12,108	8
Czech Republic	514,335	131
Denmark	530,405	126
Estonia	270,348	25
Finland	487,247	88
France	1,336,741	320
Germany	1,666,330	1,252
Greece	259,258	48
Hungary	478,253	81
Ireland	393,810	89
Italy	629,833	805
Latvia	165,632	21
Lithuania	196,058	33
Luxembourg	15,282	11
Malta	600	7
Netherlands	772,765	287
Poland	573,606	165
Portugal	430,676	60
Romania	444,153	51
Slovakia	381,013	59
Slovenia	227,571	40
Spain	572,929	188
Sweden	653,008	229
Total	**12,543,936**	**4,486**

Period (from) 26/Oct/2020 (to) 10/May/2021

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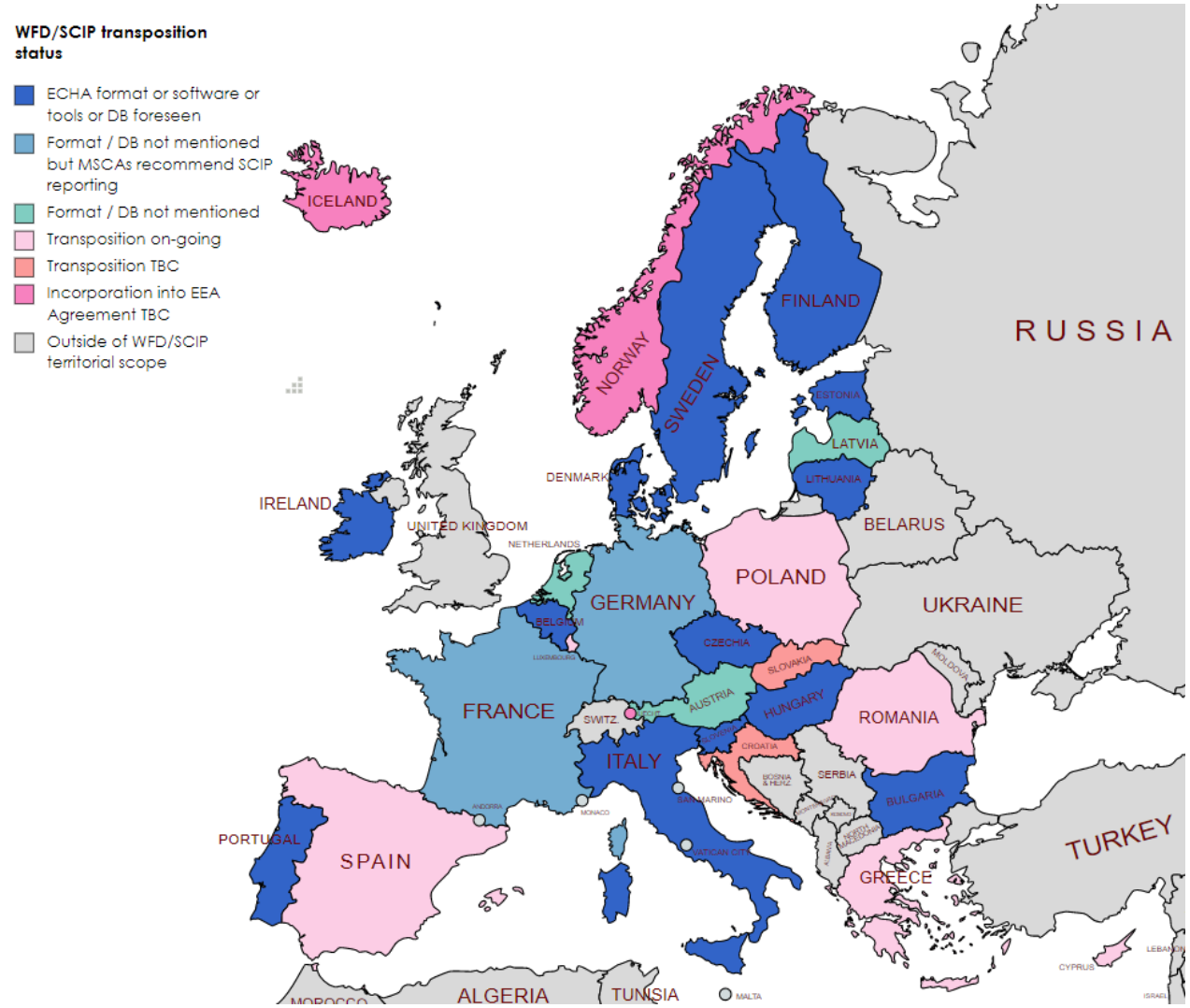
National transposition
Status overview

- Transposition deadline expired 5.7.2020
- Delays in numerous Member States – EC infringement proceedings started
- Where transposed: Differences on
  - Reference to SCIP format / database (DB)
  - Allowance for defence exemptions*
  - Notification due date / trigger
  - Sanction provisions
- Challenges for cross-border activities
- Enforcement lies with Member States too

*See latest ASD Sectoral Guidance for WFD/SCIP implementation, Version 1.0 – 16 July 2021, Section 4.2 and Section 13.5 / Appendix 5



Created with mapchart.net

DISCLAIMER: The purpose of the mapping is to illustrate the current diversity in Europe as regards the national implementation of WFD in relation to SCIP. It is based on an assessment of publicly available sources. No translation agency has been used when reviewing the national transpositions. The reader is invited to check the relevant national laws and latest status in relation to WFD/SCIP prior to taking related action on compliance.

National transposition
Status in the Nordic countries

Country	WFD/SCIP transposed	SCIP notification possible	Defence exemptions	Other specifics
DENMARK	YES (May 2020)	YES	CASE-BY-CASE UPON REQUEST	POSSIBLE FINES AND IMPRISONMENT SPECIFIED
FINLAND	YES (July 2021)	YES	GOVERNMENTAL DECREE PENDING	EXCLUSION FOR "CONSUMER" SUPPLIES
ICELAND	TBC	NO(T YET) - PENDING INCORPORATION INTO EEA AGREEMENT (ECHA Q&A ID 1661)	TBC	
NORWAY	YES (April 2021)		CASE-BY-CASE UPON REQUEST: CRITERIA PENDING	EXCLUSION FOR "CONSUMER" SUPPLIES UNLESS SUPPLIER = IMPORTER/MANUFACTURER
SWEDEN	YES (July 2020)	YES	CASE-BY-CASE UPON REQUEST (DEFENCE EXEMPTION PROVISION UPDATED IN MARCH 2021)	- EXCLUSION FOR "CONSUMER" SUPPLIES - SPECIAL DEFINITION OF "PLACING ON THE MARKET" (EXCL. IMPORT FOR OWN FINAL USE) - ONLY REPRESENTATIVE OPTION - UPDATING OBLIGATION CLARIFIED

Possible different WFD/SCIP compliance approaches due to non-harmonisation depending on product, country of incorporation and placing on the market!

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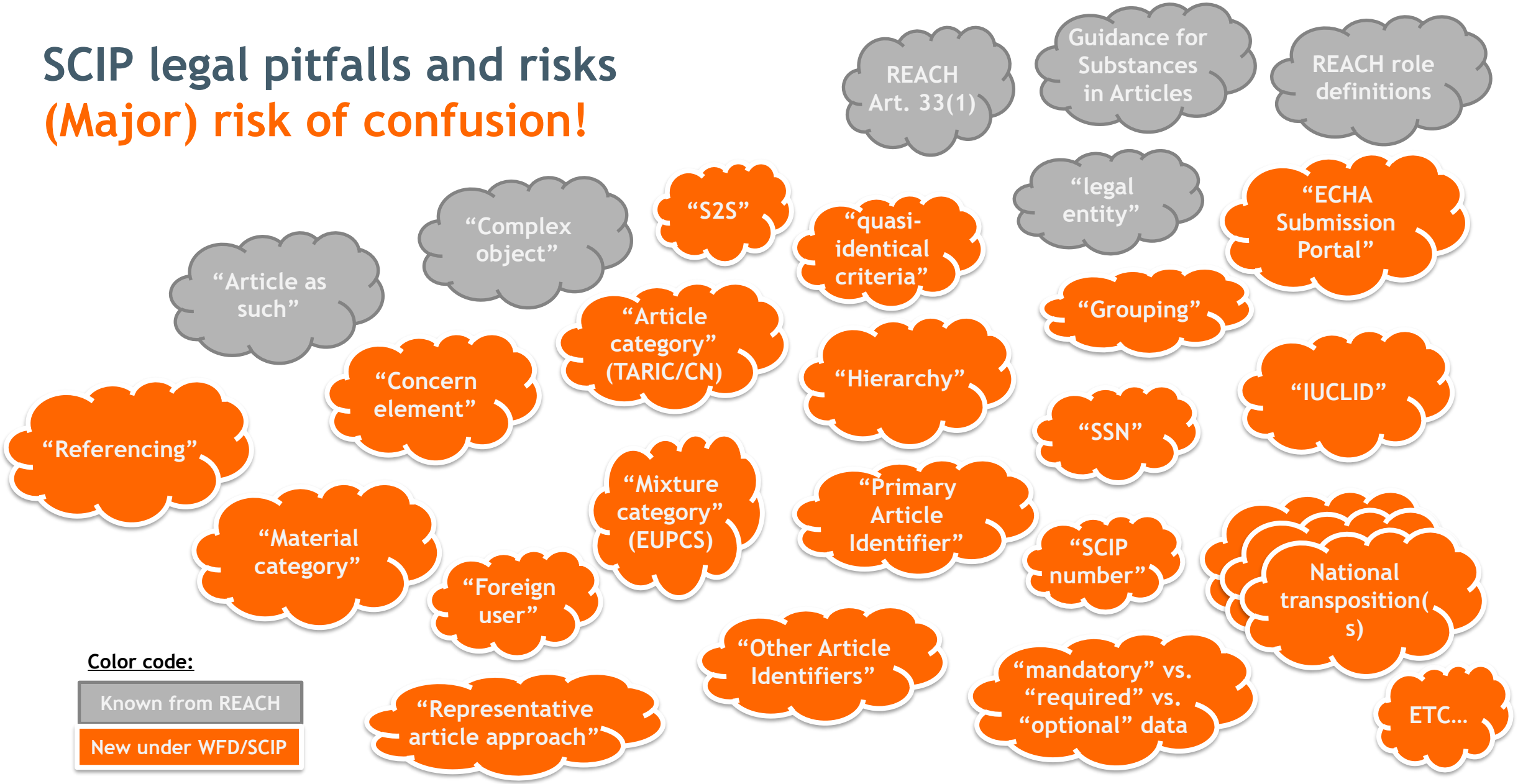
SCIP legal pitfalls and risks
(Major) risk of confusion!



SCIP legal pitfalls and risks

SCIP simplifications recommended / discussed by ECHA

ECHA option	Simplification	Key prerequisite(s)	(Other) challenges / risks
Simplified SCIP Notification (SSN)	No need for a IUCLID dossier	SCIP Number for full SCIP notification for identical product available from your supplier / company group	- Not applicable to Non-EU suppliers - No automatism: Have to agree transmission of SCIP number - Lack of data control while retaining legal responsibility - Possible disclosure of sensitive info (depending on DB dissemination) - External vs. Internal
'Referencing'	No need for a full dataset	SCIP Number for complex object component available from your supplier / company	
Grouping	Cover many similar products in a single SCIP notification	Fulfill ECHA "sameness" criteria for grouping	- Identification of group members potentially cumbersome
'Hierarchy'	Reduce the number of layers to be reported for very complex objects	Allow the localization of the CL SVHC in a (very) complex object	- Data collection from supply chain - ECHA 1,000 components limit
'Representative Article Approach' (*described but not recommended by ECHA*)	Report a product with different possible compositions	Has to be a highly or extremely complex or customised object (e.g. electronic devices, motor vehicles, airplanes)	- Not recommended by ECHA - Need to verify with Member State Competent Authorities
'Foreign user'	Support the duty holder	Duty holder agreement (normally a contract)	- CBI protection

SCIP legal pitfalls and risks
Protection of confidentiality & security

- Can control
  - Preparation of own dataset (article identifiers, categories, breakdown structure)
  - Exemption requests (e.g. defence exemptions) – decision is with the Member State

- Cannot (fully) control
  - Data encrypted in SCIP numbers (SSN, referencing)
  - Submissions by other duty holders
  - ECHA IT system security
  - Possible aggregation of data at SCIP DB / dissemination

Recommendation: Be as specific as possible if you wish to abstain from reporting with regard to CBI/security concerns; turn to your Member State



SCIP legal pitfalls and risks
Enforcement and sanctions

Commercial sanctions

- Main pressure expected from customers in the short/medium term
- ECHA SCIP numbers are needed from upstream EU suppliers for SSN and referencing → Need for contractual arrangements
- Possible loss of customers / contractual penalties if SCIP reporting requests (e.g. provision of SCIP numbers or specific SCIP data) are not fulfilled
- Possible activities by NGOs and competitors

Public enforcement

- Lies with the Member States / competent authorities in the regions
- Sanction provisions on SCIP only partly available today, e.g.
  - Denmark: fine to criminal liability
  - Czechia: fines of up to CZK 500,000
  - Slovenia: fine up to EUR 20,000
- but mind REACH (Art. 33) sanctions and enforcement in place! ECHA Forum Project in 2017/18 revealed major non-compliances with Article 33 (link to project report)

SCIP legal pitfalls and risks
Imported products

- Non-EU actors are not bound by REACH/WFD – Need for contractual arrangements and added communication / training to enable data provision
- Limited availability of ECHA tools to simplify/streamline SCIP notification
- 'Importer' definition according to REACH: "responsible for the physical introduction into the EU customs territory" – Not always the physical recipient
- Open questions of applicability, e.g.
  - Import for own (final) use or re-export?
  - Distinct SCIP notification for imported complex object components?

SCIP legal pitfalls and risks
Change management

- Currently no possibility to delete notifications, but they may (have to) be updated
- Address past (improve notifications) and future supplies (update/new notifications)
- Updates may be legally required or “only” recommended
- Different triggers for updates or new notifications, especially:
  - Relevant updates of the Candidate List
  - Relevant changes of product composition
    - New components containing Candidate List substances
    - Candidate List substance no longer present → voluntary update
  - New information received from suppliers (e.g. component SCIP numbers) or internally
  - New products supplied
  - Rectification of errors / removal of CBI

SCIP notification management is a continuous exercise

SCIP legal pitfalls and risks
Key takeaway for SCIP

- Large scope with global impact, beyond Article 33 requirements (ECHA)
- A massive job underway/ahead for industry, incl. a steep learning curve (see ECHA requirements, national implementation) and data gathering challenge
- Need structured approach with possible sector-level/cross-sector alignment
- A pragmatic and documented response is better than none!
- We recommend use of the ECHA formats and tools where possible (even where not explicitly required (yet)), otherwise no proof of submission will be issued by ECHA
- **We are (still) only at the beginning, awaiting ECHA DB dissemination**

Directive requirement applies since 5 January 2021 (if transposed)

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Best Practices

Managing SCIP Compliance in Your Organization

Assent

Lacking a Strategic View of Supply Chain Risk

84% of businesses still do not have visibility of risks in their supply chain while outsourcing the majority of their production.[1,2]



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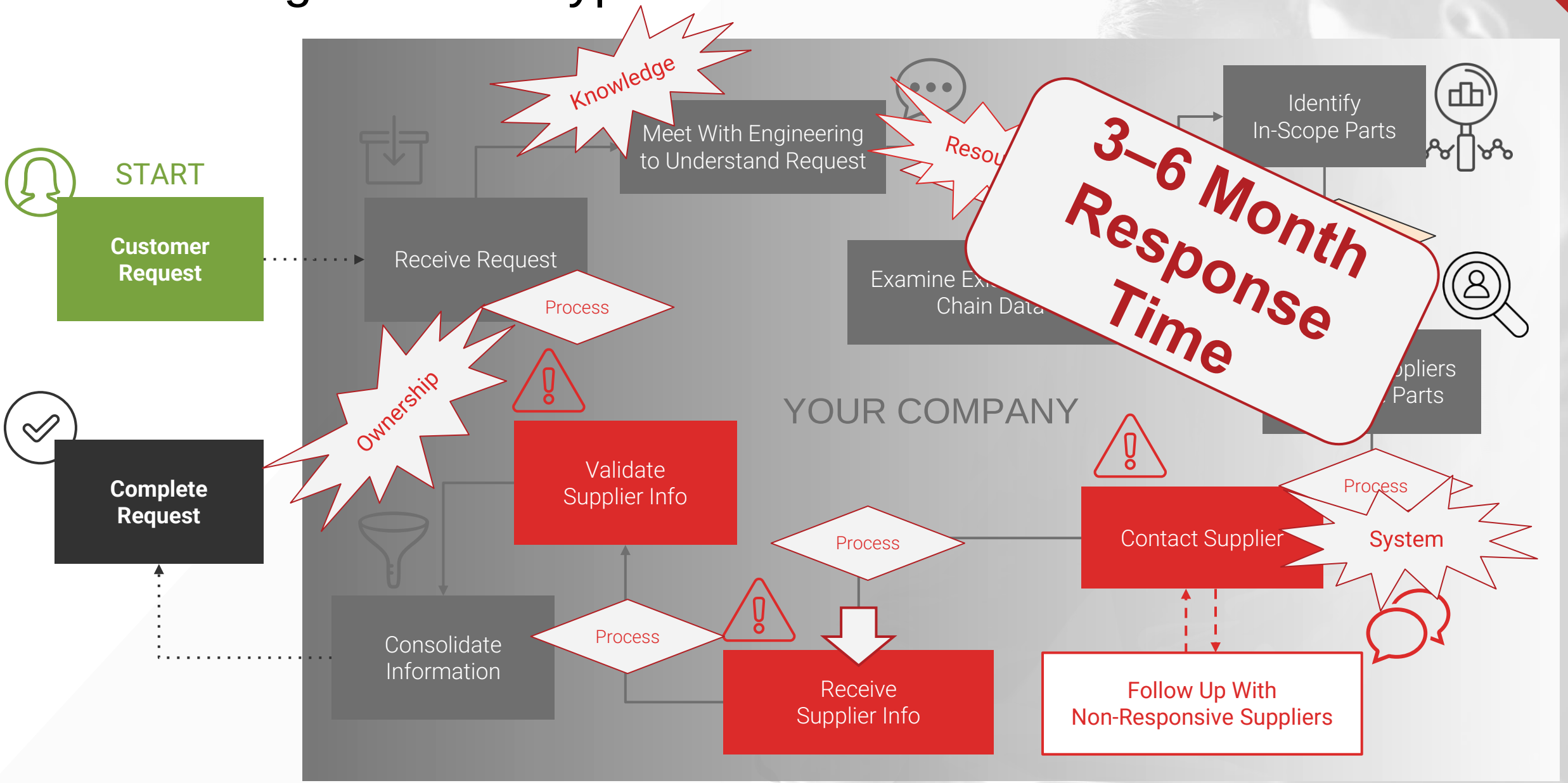
Data Management — Typical Process



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→ NOT COMPLIANT! → NOT EFFICIENT! → Missing Opportunities

Internal Structure

- Lack of Knowledge
- Lack of Ownership
- Lack of Resources
- Lack of Processes
- Lack of System

Perceived Risk

- Fines & Penalties

Hidden & True Risk

Company

- Brand & Reputation Damage
- Lost Selling Time
- Customer Satisfaction & Loss

Development & Procurement

- Re-Design & Re-Testing
- Changing Components
- Finding Alternative Suppliers

Production & Sales

- Rework & Retesting
- Stop-Ship
- Product Recalls/Withdrawn
- Market Access

Opportunities

- Market Differentiation
- Improved Supply Chain Transparency
- Meeting Green Targets
- Cost Savings Potentials
- Early Adopter
- Customer Satisfaction (CX)
- Investor Attraction
- Talent

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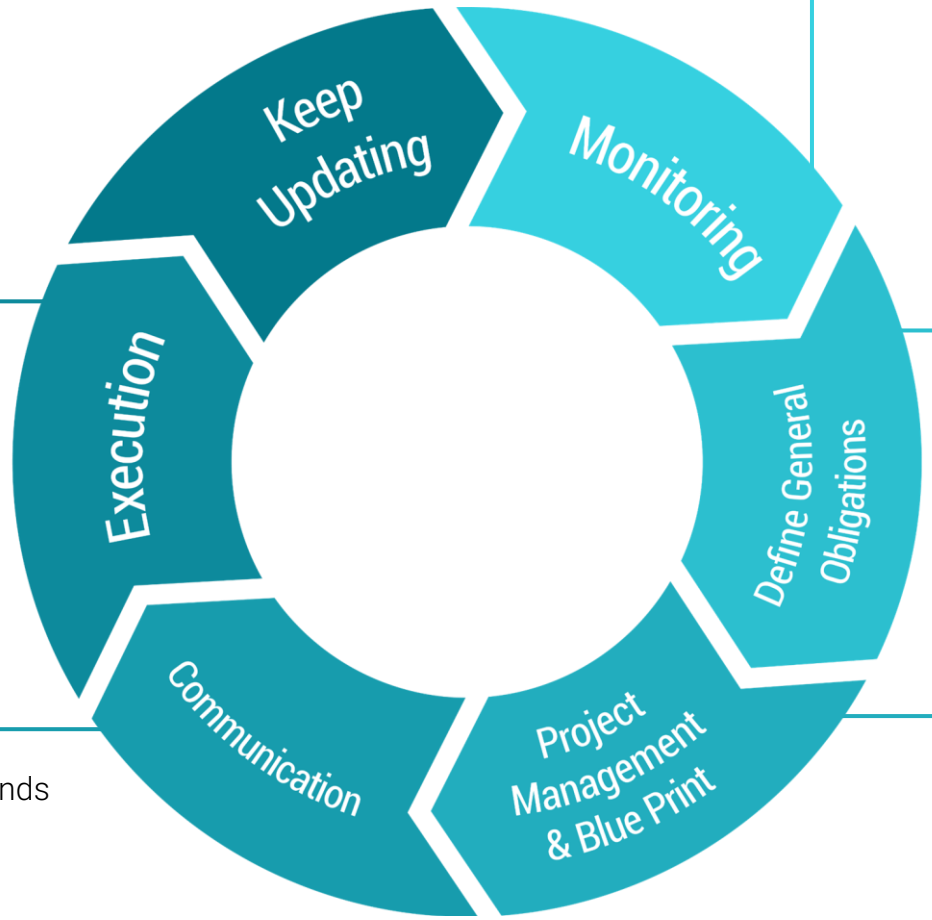
Compliance Program Setup Cycle

How Things Go Round



What's coming next?

Stay ahead of developments before they overrun your organization!

SCIP: *Are you aware of the requirements?*

Transpose the general requirements into actual company related issues.

SCIP: *Are you in scope — where, why, how?*

1. Define actions required and people to be involved.
2. Create a company action plan/business plan.

SCIP: *Who needs to be involved? Targets? Data?*

1. Pitch compliance demands company internal.
2. Define requirements to external partners.

SCIP: *Engage resources. Budget? Audience?*

Execute against the defined plan and drive operational excellence.

SCIP: *Rollout! Think ahead. Stay scalable!*

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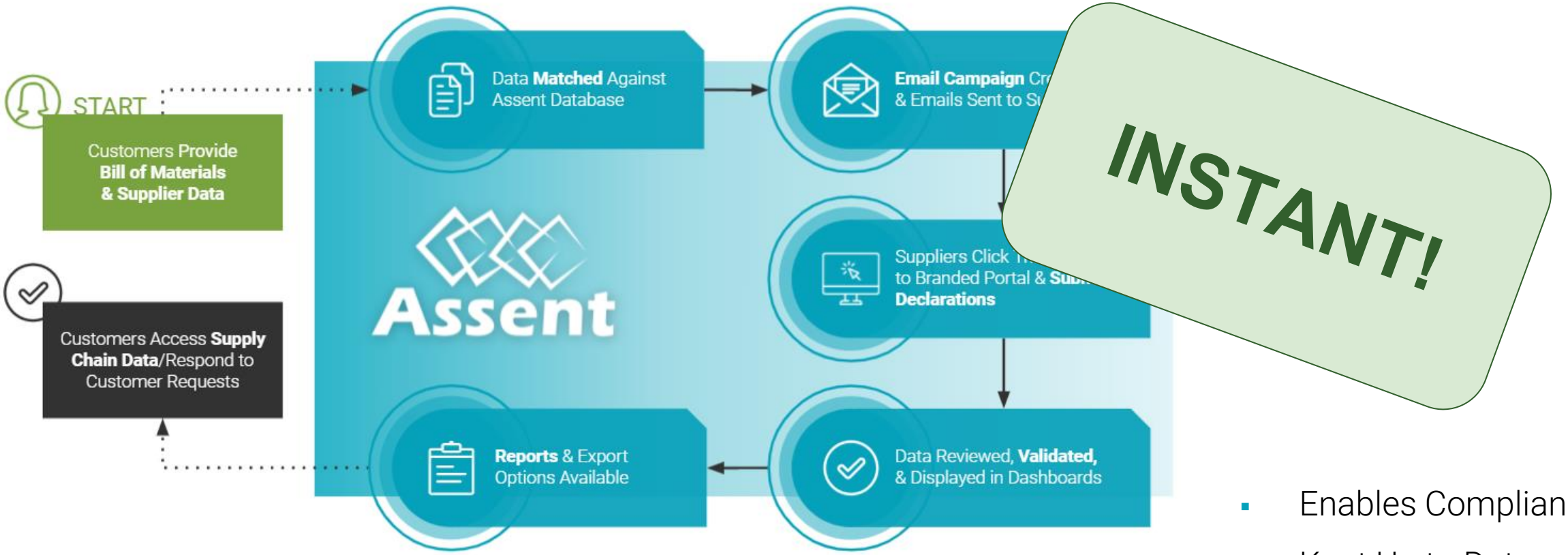
Data Management Software Supported



- Enables Compliance
- Kept Up to Date
- Provides Know-How

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Required Data & Descriptions

- Legal Entity ID
- Article Name
- Safe-Use Instruction
- Article Category
- Production in EU
- Primary Article Identifier
- Candidate List Version
- Candidate List Substance
- Concentration Range
- Material Category or Mixture Category



Usable Simplification

- Entity Hub & Spoke Model
- Referencing
- Grouping
- Representative Article

Required Updates

Supplier Information Changes:

- Chemical Content
- Part Numbers
- Business Information

Client Internal Business Information Changes:

- Customers
- Product Names
- Volumes

ECHA Requirements Change:

- New/Changed Data Fields
- Sunset Dates
- Restrictions

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Internal Pitch — Get Your Buy-In

Pitching a compliance solution inside of a company can be complex because material impacts may be hard to quantify!

Do:	Don't:
▪ Know your audience. ▪ Team up; have others that need your support pitch with you (e.g. sales, procurement, legal). ▪ Focus; be laser sharp on what you show, what you need and the time you have to present ▪ Define the pain then explain the cure (your solution) ▪ Give alternatives ▪ Know ALL your facts: - Reputational Risk - Legal Risk - **Business Requirements** - **Financial Impacts**	▪ Be fuzzy. ▪ Overload with facts. ▪ Come unprepared.

You´re doing inhouse sales! Create a business plan!

If you think compliance is expensive – try non-compliance.

– Former U.S. Deputy Attorney General Paul McNulty

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Budget for Compliance

Budgeting for compliance is a complicated task, and the sooner you begin, the more likely you are to get executive buy-in.

It takes most teams up to six months to figure out their budget and submit it for approval. Assent will help you understand what you should be budgeting for ahead of time — and how much we can help you save.

Book your demo now:
assentcompliance.com/demo

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Questions & Answers

REACHLaw and Assent Compliance are ready to support you with your SCIP notification compliance efforts

Ask for a Quotation!

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Thank You for Your Attention!

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List of key acronyms

Abbreviation	Explanation
CJEU	Court of Justice of the European Union
CL	Candidate List
CN	Combined Nomenclature (Annex I to Council Regulation (EEC) No 2658/87) on the tariff and statistical nomenclature and on the Common Customs Tariff
EEA	European Economic Area (EU MS + Norway, Iceland, Liechtenstein)
EU	European Union (currently 27 Member States, not including the UK)
EuPCS	European Product Categorization System. EuPCS webpage
IUCLID	International Uniform Chemical Information Database
SCIP	Substances of Concern In articles, as such or in complex objects (Products)
SSN	Simplified SCIP notification
SVHC	Substance of Very High Concern (REACH Article 57)
TARIC	TARif Intégré Communautaire; The integrated Tariff of the European Union database. The TARIC list is also known as the EU product classification system.
WFD	Waste Framework Directive (Directive 2008/98/EC on waste, as amended by Directive (EU) 2018/851)

Relevant definitions in REACH Article 3

REACH Article 3	Definition
Point 3	*"**article**: means 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"*
Point 4	*"**producer of an article**: means any natural or legal person who makes or assembles an article within the Community"*
Point 10	*"**import**: means the physical introduction into the customs territory of the Community"*
Point 11	*"**importer**: means any natural or legal person established within the Community who is responsible for import"*
Point 12	*"**placing on the market**: means supplying or making available, whether in return for payment or free of charge, to a third party. Import shall be deemed to be placing on the market"*
Point 17	*"**actors in the supply chain**: means all manufacturers and/or importers and/or downstream users in a supply chain"*
Point 33	*"**supplier of an article**: means any producer or importer of an article, distributor or other actor in the supply chain placing an article on the market"*
Point 35	"**recipient of an article**: means an industrial or professional user, or a distributor, being supplied with an article but does not include consumers"

REACHLAW

We Specialize in Chemical Regulatory Compliance and Sustainability