AskREACH and the SCIP database

according to the Waste Framework Directive

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2021/10/21
No. LIFE16 GIE/DE/000738

AskREACH and SCIP background

-Database

- Proposal submission: 2016
  Kick-off: September 2017

- European app Scan4Chem,
  linked to AskREACH database

- Support from ECHA, national public
  authorities, etc.

- Positive feedback received from
  presentations at
  national/international events

SCIP -Database

- Revised WFD (EU 2018/851) since July 2018 into force.
  Article 9 (waste prevention) linked with REACH Art.33

- ECHA: database with SVHC-article information. Publicly
  available for waste operators/recyclers and consumers

- Public call for input (Fall 2018), Workshops (2018/9),
  Beta-testing version (Summer 2020)

- SCIP IT User Group (AskREACH participation)

- SCIP v.1 release: Oct. 2020

- SCIP notification legal obligation (5.1.2021): 16 mil.
  dossier submissions (Sept. 2021) by 5600 companies
  (1/4 → updates)

- SCIP dissemination portal (Sept. 2021)

Databases – similarities and differences

	LIFE ASK REACH	SCIP
Focus	SVHC substitution Art. 33 implementation/compliance	SVHC substitution, prevention of hazardous waste generation, support circular economy
Content	Products with/without SVHCs >0.1%	Products with SVHCs >0.1%
Target groups	Consumers and suppliers (incl. retailers)	Waste handlers, recyclers, consumers and suppliers (excl. retailers)
Data submission	Voluntary Bulk upload Barcode range declaration	Mandatory Bulk as well as system-to-system upload (IUCLID)
Dissemination of information	Scan4Chem smartphone app Automatic response to SVHC information requests	Platform within the ECHA website (using existing ECHA IT infrastructure) System-to-system approach (API)?
Identifiers	Barcode (GTIN, Proprietary), Article Name, Brand	ECHA UID (voluntary). Identifiers already in use (EAN, UPC, Catalogue Nr., etc.)
Data responsibility	Information is publicly available. Responsibility for data correctness and updating lies with the supplier	

Cooperation

Explored synergies

- **Common database**
- **2 harmonised databases with common, synchronised frontend** for data submission (resource efficiency)

- **Smartphone-App: potential add-on** for disseminating information to consumers

- Released document **"Similar goals, separate ways"**

Obstacles

- **Different timelines**
- ECHA **legally mandated** to develop and maintain SCIP

- **Different information requirements** between consumers and waste handlers: **"Article definition"**
  - AskREACH: End-product with barcode on (may differ in each packaging of the same item)
  - SCIP: Item and packaging considered separate articles

- **Identifiers.** GTIN usage is voluntary for SCIP

Umwelt Bundesamt

LIFE · ASK REACH

Life

Cooperation

Future cooperation

- **Regular meetings and information exchange** between the projects
- **AskREACH access to SCIP data**
  - Originally envisaged for end of 2021, now further delayed (after 2022)
  - Access to non-confidential information
  - Possibly development of API – implementation will be discussed with ECHA
  - Proper identifiers → GTIN/EAN
  - Articles not present in SCIP don't necessarily correspond to articles with SVHC <0.1%!
- ECHA role to AskREACH **"After-LIFE" plan** under discussion

Lessons learned

1. Right-to-know widely unknown to the public
   Difficult to exercise: Whom to ask? Long response period (45 d)

2. Information requests: <50% answered – many inadequately
   No answer=uncertainty

3. Lack of motivation: Consumers want to have information immediately
   Companies don't fill database voluntarily

4. Supply chain information flow: suboptimal
   Many companies not aware of their information duties

5. Importers: often no (reliable) information about chemicals

6. Constant changes to complex articles with varying
   components → Complicated to notify

7. Information update of large portfolios requires
   extensive resources

Source: Remy Gros/Fotolia

Lessons learned

8. FMD would be a partial solution: increasingly being recognized by the industry – already existing initiatives (e.g. Proactive Alliance)

9. Online trading issue: Direct purchases outside EU
   → Art.33 implementation? Online shopping platforms

Quelle: Mediamodifier, Pixabay

10. Companies: preparations for SCIP dossier submissions

11. REACH Art. 33 needs improvement, IT tool can't fix this
    Letter to COM concerning policy options supported by the project experiences

Database and app benefits

- Active consumers: Sending requests, making purchasing decisions → **SVHC substitution**

- Consumers receive the requested information **automatically and immediately**

- Possibility to obtain **additional information** about articles and their **safe use**

- Consumers can **manage and follow up** on their requests. **Statistics** are also available

- Suppliers **do not have to answer requests** individually!

- Delivery of SVHC requests to the **proper e-mail address**

Source: Pixabay

- **Marketing opportunity** through transparency/being proactive

- SCIP compliance - communication of the **"bad" article information** ≠ AskREACH promotes the **"good" article information**

- SVHC article information can be **uploaded in bulk** in one step and **updated easily** when necessary. **Barcode Range Declaration** for articles with SVHCs < 0.1%

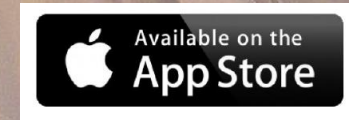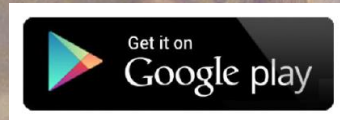- **Access to statistics** over article scans and consumer requests
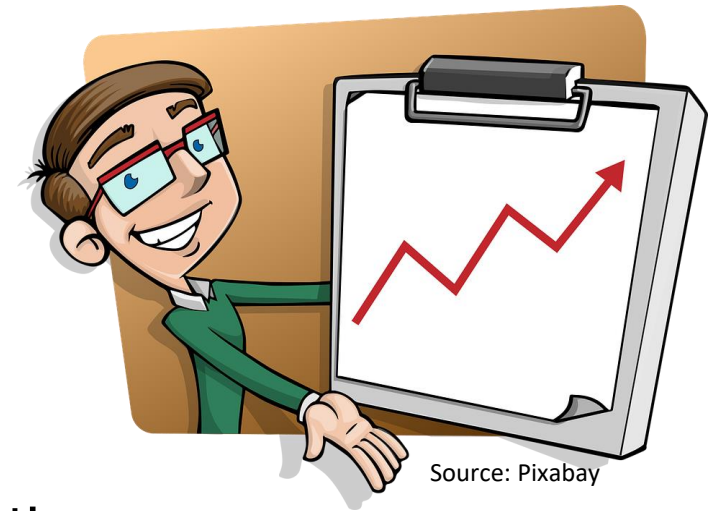
THANK YOU
FOR YOUR ATTENTION!

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