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FOREIGN USER FUNCTION IN SCIP DATABASE PLATFORM

SCIP is the database for information on **S**ubstances of **C**oncern **I**n articles as such or in complex objects (**P**roducts) established under the Waste Framework Directive (WFD).

Companies supplying articles containing substances of very high concern (SVHCs) on the Candidate List in a concentration above 0.1% weight by weight (w/w) on the EU market have to submit SCIP notifications on these articles to ECHA, as from 5 January 2021.

The SCIP database ensures that the information on articles containing Candidate List substances is available throughout the whole lifecycle of products and materials, including at the waste stage. The information in the database is then made available to waste operators and consumers.



For enquiries, please contact our Customer Service team!

However, in order to facilitate the work, ECHA has implemented the "foreign user" feature - making possible for duty holders to add a "foreign user" to their accounts to submit data on their behalf.

Such "foreign user" can perform actions on behalf of the account holder, such as submitting a SCIP notification on a duty holder's behalf. Under the "foreign user" concept, a duty holder can assign a third party to do the relevant SCIP notification obligations for them. A foreign user does not necessarily need to be based within the EU. However, it is important to consider that:

- The duty holder will remain responsible for the submitted data and any possible clarification needed by national enforcement authorities, independently of whether this information is provided by the duty holder or an external foreign user.
- The "foreign user" will have access to the portfolio of the duty holder as available in the ECHA submissions portal.
- The duty holder can break technically the foreign user link at any point in time.

The national authorities based on every Member State within the EU will determine any liabilities applicable due to the infringement of the provisions within the national law transposition of the Waste Framework Directive. As a key and first element, it is important to consider the presence of SVHC substances in articles subject to notification to the SCIP database (above 0,1 w/w). As a second element, it is important to carefully consider the adequacy of the information to be provided.

SGS offers a wide array of services for both SVHC and SCIP database to help our customers comply with their obligations under the REACH legislation, from SVHC screening and confirmation testing, to SCIP database training and creation of data files, to support ongoing compliance.

*Through our global network of laboratories and highly trained specialists, **SGS** offers a one-stop-shop for services to ensure that your production and distribution systems support your compliance with REACH legislation.*