

EU REACH SVHC & SCIP Database

Data Services and Software Solution for SCIP Database Submissions

GreenSoft's SCIP Database Solution



GreenSoft has a solution for **EU REACH Substances of Very High Concern (SVHC)** and 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®** software to deliver a complete SCIP compliance solution 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
- ✓ SCIP Portal Submission Capabilities

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Data Services and GreenData Manager Software

As part of our **Data Services**, we will collect SVHC compliance data from your suppliers, including article and material classifications, and all other information needed for mandatory SCIP data requirements. And we validate that data for accuracy and completeness.

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

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

Developed by engineers and regulatory experts, GreenSoft's comprehensive **Data Services** and **GDM w/ SCIP** software provide the unique ability to validate the contextual context needed for **SCIP Database** submissions. Contact us to learn more and receive a demo.

Data Collection, Validation & Supplier Guidance

As part of our **Data Services**, GreenSoft will collect SVHC compliance data from your suppliers. Since the **SCIP Database** is still new to suppliers, the amount of suppliers who will be capable of providing this complex data (such as article category and material category from a pick list of 20,000 options) without errors is small. We provide guidance and education to suppliers to help improve response rates and data accuracy.

GreenSoft's 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.

Keep Your Part Data Private with Unique Article ID Management

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

This 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's **SCIP Database** solution includes an intelligent **unique article ID assignment and management system** to keep your trade secrets private. **GDM w/ SCIP** 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.

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Your Obligations for SVHCs and the SCIP Database

Both the **EU REACH** regulation and the **EU Waste Framework Directive** require companies to evaluate and communicate or report on the risk of hazardous substances within their products. In order to do this, companies must collect and assess the chemical data of their products and components from their supply chain.

EU REACH Substances of Very High Concern (SVHCs)



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 into the **Substances of Concern in Products (SCIP) Database** as part of the requirements per 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 need to submit the following information to the **SCIP Database**:

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

Who Needs to Comply?

EU producers/assemblers, EU importers, and EU distributors of articles and other parts in the supply chain placing articles on the EU market all need to comply with the **SCIP Database** submission requirements. But even companies that are not directly required to comply will often be requested by their customers to provide the necessary data for them to submit product information to the **SCIP Database**.

Data Classification

Submissions to the **SCIP Database** require data to be classified into article categories and material categories from a list of over 20,000 options.

GreenSoft will work with the suppliers to determine the category of articles and category of materials in your products which contain reportable SVHCs, and if suppliers fail to provide category classifications, we will perform classification assessments on article categories and material categories to fulfill the data requirements for SCIP database.

Comprehensive Article Processing

“**Once an Article, Always an Article**” (O5A) is now an inherent part of compliance with the **EU REACH** regulation, per the EU Court of Justice ruling in September 2015 (C-106/14).

This means that subparts of electronic components are considered articles when complying with **EU REACH** per the ruling of EU Court of Justice. Failing to evaluate products and components all the way through to the article-level puts your company at risk with violating the **EU REACH** regulation, losing market access, and disrupting your sales.

Article processing, which the **European Chemicals Agency (ECHA)** has confirmed is necessary to prepare data for **SCIP Database** submissions, is difficult and tedious. Any software tool used to validate product compliance for 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 w/ SCIP software is able to designate materials within parts as articles, as well as combinations of materials as complex objects. GreenSoft's experts oversee this process and provide the context and designations required to meet O5A standards.

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

GreenData Manager Software

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

GDM w/ SCIP software features include the identification of reportable SVHCs in Bills of Materials (BOM), components, articles, and materials/mixtures. **GDM w/ SCIP** 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 to the SCIP database.

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