Report on Supply Chain Compliance Volume 3, Number 16. August 20, 2020
SCIP: The biggest database in the world

By Sascha Matuszak

This is part of an ongoing series of articles on the EU Green Deal, the Waste Framework Directive and associated regulations.

When we last discussed the <u>European Union (EU) Waste Framework Directive</u>[1] and the <u>Substances of Concern In articles, as such or in complex objects (Products) (SCIP) database</u>,[2] it was in the context of projects that might fall to the wayside during the COVID-19 pandemic. Now, in August, companies in scope should already be collecting information for eventual submission into the SCIP database or risk being booted from the European market.

SCIP is a massive endeavor by the EU to create a circular economy that reduces the amount of substances of very high concern (SVHC), forces companies to innovate as opposed to creating alternatives based off of the very same SVHC family they were using and, above all, repurposes and recycles materials that end up in the waste stream.

The mechanism behind this endeavor is the SCIP database. Unlike the <u>Registration, Evaluation, Authorisation and Restriction of Chemicals regulation</u>,[3] which only required companies to submit information on SVHCs found within finished products or products as sold—and which was selectively enforced by EU member states—SCIP follows the logic of "<u>once an article, always an article</u>."[4] This logic increases the regulatory burden by multiple orders of magnitude. Instead of asking one supplier about one product, companies in scope—including everyone who sells or imports into the EU market—must scour their entire supply chain for any SVHCs found in any components that go into any product they manufacture, distribute or sell.

This document is only available to subscribers. Please log in or purchase access.

<u>Purchase</u> <u>Login</u>