Securing WFD/SCIP Compliance In Your Organization Webinar

Questions & Answers

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#	Question	Answer
1	Are there big differences in national transposition in other EU markets?	The differences are not too big in general, but you have to be careful especially for questions of scope and exemptions. Additionally, each Member State follows own rules on non-compliance fines connected to the national transposition & requirements.
2	What's the typical size of a compliance team dedicated for SCIP/reach compliance?	There is no one fits all answer on how to best organize or manage SCIP compliance. It depends on company structure, existing systems, complexity of supply chain, complexity of products. Also, this question connects to what approach a company wants to follow - manual data management up to automated system processing. Making a reference, a typical approach we have seen in the market is that with growing complexity in products, supply chain and company structure / size the compliance teams managing naturally get larger or companies move from manual processes to automated / SW bound solutions. To the level that with a highly automated system landscape (using state of the art SW solutions like Assents) SCIP can be managed with little internal resources (1-2 People) - even in large and complex operations. A reference what we found is that up to 100 SCIP submission can still be handled manually - if enough proper trained internal resources are available. Already starting for very low number of submissions, data collection and dossier creation for SCIP can be cumbersome. With higher complexity in the organization more resources need to be included --> transition to a SW solution makes sense quickly.
3	Can SCIP be managed through different separate departments, or it would be more beneficial to centralize in a dedicated compliance department?	Concerning centralized vs decentralized organization - both are possible. It is advisable to define on central owner/coordinator that defines rules, requirements, procedures and gives rights to system users + interlocks with a potential service provider.
4	How are big companies handling these challenges?	At certain point in the growth of a company it can make sense to move responsibility into a dedicated department. Compliance requirements have become a

		key business topic that can be extremely impactful to a company success. Resources should be allocated according to the risk identified for the business.
5	I fill out many Assent Compliance requests for my company's customers. We market and sell products only for the North American market. We DO NOT REACH or RoHS Test because we don't want our products incorporated into other company's products (we've had liability issues in the past due to this). How does your software accept Declarations of Non-compliance?	Suppliers can indicate whether their parts are compliant by submitting the information through the supplier portal. Our system accepts any declaration - whether it indicates compliance, or non-compliance.
6	By the way, our suppliers know nothing about REACH (China suppliers).	Part of Assent's solution is the education of suppliers. Whether through free Assent University courses or conversations with our team. If suppliers in China have questions Assent's team will be able to address them in their native language as part of the declaration process. REACHLaw can also provide support with suppliers education and communication part.
7	How do we fill out a RoHS declaration if our product is not electronic or electrical?	Theoretical any company can create a declaration of conformity that their products comply with the requirements of RoHS if these requirements can be applied (e.g., material restrictions). For Products not in scope of RoHS, companies are not required by law to provide a declaration of conformity to RoHS. In this case companies could provide a short statement / company declaration that states products not to fall in the scope of RoHS.
8	For importers of e.g., chemicals products for the industry, is SCIP notification mandatory if the packaging material for the chemical mixture/substance (e.g. a drum) contains > 1% SVHC? In DK? In Sweden? In Finland? In Norway?	Any packaging or packaging components employed to package a substance, mixture or article is an article itself or a complex object and is subject to SCIP notification if that article or any of the articles incorporated in that complex object contains a Candidate List substance in a concentration above 0.1% w/w (see ECHA, Q&A ID 1662, Version 1.0, 10/07/2020). The national transposition is not leading to a different result, if you send the drums onwards to the industrial customers.
9	Do you know if there is somewhere clear step by step instructions to make SCIP notification to UICLID?	This is the most specific manual: https://echa.europa.eu/documents/10162/6205986/scip_database_notifications_en.pdf . If you have further questions, please feel free to contact us.
10	Does a sales office that only processes sales in a country, but the goods are shipped from a Distribution Center that performs SCIP notifications, also need to perform SCIP Notifications (SSN°?	You have to determine whether the sales office or Distribution Center qualify as an “article supplier” (REACH Art. 3(33)). We recommend further legal analysis - You may contact us to this end.
11	And would the response differ if the Sales Office is an affiliate of the distributor?	Not by principle, but it is possible. We recommend further legal analysis. - You may contact us to this end.

12	Is SCIP registration only applicable for products with an SVHC above threshold 0,1% W/W?	Yes, but with reference to the (smallest) component article containing the candidate list substance ("once an article, always an article").
13	SCIP is not the same for all European countries the SCIP database is required like France and Italy, and in others like Germany and the Netherlands, it is not required. Is this a true statement?	Yes, there are differences especially regarding the scope. But essentially the transposition laws are mandating SCIP notifications to ECHA, unless exemptions can be applied.

CONTACT FOR FURTHER QUESTIONS

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