



SCIP (ECHA) – AskREACH databases: Separate ways, similar goals

Introduction and background

According to the EU chemicals regulation REACH¹, consumers have the right to ask companies whether an article they supply contains substances of very high concern (SVHCs) on the Candidate List above a 0.1% threshold [Art. 33(2)]. In the framework of this “Right-to-know” for consumers, the EU project LIFE AskREACH, that started off on September 2017, is developing IT tools to facilitate the communication of this information to consumers. LIFE AskREACH is an EU project that helps companies to easily comply with REACH Art. 33 and also helps consumers to easily access SVHC article information. A database is developed, where suppliers of consumer products can voluntarily submit their article information to have it readily accessible upon request to consumers via a smartphone application. Data submission is already possible and the scheduled official launch was in November 2019. The project will run until August 2022.

Almost one year after the start of the AskREACH project, the revised Waste Framework Directive² (WFD) entered into force in July 2018. Article 9 (waste prevention) links this Directive to Art. 33 of the REACH Regulation (communication of SVHCs in articles) and tasked ECHA to develop and maintain a new database, where suppliers will submit information about all the articles they supply containing an SVHC (>0.1%). The legislation stipulates that the database shall be ready on the 5th of January 2020 and all relevant information shall be submitted as from the 5th of January 2021.

Separate ways, similar goals

The teams of the two projects (AskREACH and ECHA SCIP) came into contact already in the final phase of the WFD amendment and explored possibilities for joint development aiming primarily at simplification and saving EU and industry resources.

Common ground was investigated as both databases serve the overall legislative aim of promoting SVHC substitution in articles and the implementation of/compliance with REACH Art. 33. The ECHA database (named SCIP – Substances of Concern in Products) serves the additional specific purpose of disseminating the information to waste treatment operators and recyclers. Both databases have in common that suppliers of articles³ are the actor group that provides the information. Common user groups of both databases, moreover, are consumers and professional recipients of articles.

¹ Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), OJ L 396, 30.12.2006, p.1

² Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives, OJ L 312, 22.11.2008, p. 3–30

³ As defined in Art. 3 (33) REACH. “supplier of an article: means any producer or importer of an article, distributor or other actor in the supply chain placing an article on the market”; thus retailers are included in the definition since they place articles on the market (see Art. 3 (12) REACH).





Both should be empowered to make informed purchasing decisions⁴ with regards to SVHCs in articles.

In addition, data collected in the ECHA database will only cover articles containing SVHCs on the Candidate List >0.1%, while AskREACH collects information on all articles, with or without SVHCs >0.1%, but with a focus on off-the-shelf products (not all components). Data submission to SCIP will only be mandatory to the extent that is required by the legislation. Moreover, both databases feature bulk upload functions to facilitate data submission.

Nevertheless, several important impediments were identified that necessitated the separate development and existence of both databases:

- The AskREACH project ends in 2022. The AskREACH partners postponed the launch of the app with a view to the new developments triggered by the WFD amendment. However, the timelines are still different and AskREACH cannot postpone further to match developments concerning the SCIP database.
- It is more complicated and time consuming to implement the WFD mandate (SCIP) as it requires harmonisation of the data submission process at Member State level: Legal enforcement can be an issue. The transposition and subsequent awareness-raising and enforcement of the obligations set up in WFD are tasks for the Member States. Therefore, ensuring the industry's compliance falls onto them by legislative and administrative means.
- Information requirements are not common among the two databases: AskREACH focuses on the final marketed articles, i.e. the complete and packaged final product available to the consumers and thus uses barcode as well as brand and article name for identification. SCIP does not specifically ask for barcode identification as the scope of the ECHA database is to link the article itself to the SVHC information and not only the complete and packaged end-product that is sold on the market. The packaging is considered separately in SCIP. The same article may be sold in different packages (e.g. screws in packages of 10, 50, 100 pieces) and thus, under different barcodes and probably under different brand/article names. For SCIP, the information according to REACH Art. 33 should still refer to the same article, but not necessarily for the AskREACH database. ECHA collects all relevant components' information within the supply chain, i.e. their database aims at collecting information at a much more granular level in comparison to AskREACH. For example, a final article/complex object will appear as one entry in the AskREACH database, but in SCIP there is also information about the articles/complex objects that constitute the final product in each step of the supply chain. Suppliers may use different identifiers.
- The ECHA database will, given that all suppliers comply with their obligations, contain all articles with an SVHC >0.1%. It is expected that the AskREACH database, in so far as it is used by companies on a voluntary basis and focuses on information for consumers, will mostly contain articles with SVHCs <0.1%.

⁴ See, i.a, recitals 69 and 117 REACH.





Taking into account these restrictions there still is room for manoeuvre in order to gain synergies between both databases and the respective user frontends.

Synergies under investigation

With the AskREACH app the European citizens are enabled to play an active role in the European chemicals policy arena. Based on the high numbers of consumers that already have downloaded the "Tjek Kemien" and "ToxFox" apps in Denmark and Germany it is likely that the AskREACH app that will be available in all EU Member States has the potential to reach out to several millions of EU citizens. This valuable asset provides a good basis to further involve consumers during and after the end of AskREACH. Taking into account the corporate ownership of data supplied to the databases, access of AskREACH to SCIP non-confidential information through a mapped data transformation that would aggregate all data to the final article SVHC information will be explored. The AskREACH app would thus be fed by two databases simultaneously, offering a better information basis for consumers.

A potential future addition of the AskREACH smartphone application as an add-on to the SCIP system could be investigated after both databases have reached a stable enough state after release. This option would ensure continuation of the AskREACH project results after project end. The smartphone application would enable easy and immediate SVHC information dissemination to consumers as well as recyclers and waste handlers. Implementation would first require a clear mandate and resource allocation from the European Commission. In this case it could be visible to the app user that the route of database access is directed towards the SCIP database of ECHA.

Why should suppliers voluntarily feed the AskREACH database?

- Indirect marketing opportunity: Articles not submitted in the AskREACH database will return an "unknown" status to the consumer who scans on-the-spot. The submission of article information may influence consumers' purchasing decisions in their favour. AskREACH is unique in this sense, by increasing visibility for articles with SVHCs <0.1% and thus contributing to a positive customer relationship.
- Consumers call for transparency and better information when it comes to problematic chemicals in articles and AskREACH provides suppliers a ready-to-use tool which effectively connects suppliers to their customers. Consumers will appreciate the provision of information as a valuable customer service. Regarding the needs of consumers AskREACH goes beyond the scope of SCIP.
- Companies have the possibility to promote their SVHC-substitution and green article policy to consumers and thereby demonstrate that they take environmental protection seriously.
- Companies can provide additional information to their customers, e.g. instructions for safe use, information about the SVHC location (e.g. in an inner part) or even advertising/promotional material.



The Project LIFE AskREACH (No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



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- Compliance with legislative obligations (REACH Art. 33): Consumers will have immediate access to article information, which means customer support will not have to deal with every individual consumer information request separately, thus saving time and effort for both parties.
- Statistics on the requests for the company's articles will be provided.
- Minimal additional effort: Companies will anyhow have to establish supply chain information flow mechanisms for the ECHA SCIP database according to the legislation. Given the bulk upload functionality, the additional effort to submit information also to the AskREACH database appears quite limited.
- A reminder will be sent to companies each time the REACH candidate list gets updated with new substances, so that their articles can be (bulk) updated to the latest candidate list version.
- The AskREACH system can be used by retailers to gather information for their articles from previous actors within the supply chain, thus helping them to comply with their legislative obligations under REACH.

While both databases may seem to put a large burden on the companies, the aforementioned points would increase and create benefits both for the respective databases as well as for companies, consumers and the society. At the least we can expect better market opportunities for innovative companies. Even though the overall goal of the databases is similar, the details differ and the target groups are not fully identical. However, via cooperation between the developing teams behind the databases, challenges in terms of administrative and technical issues can be further minimised leading to (even) more synergies in the future.



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