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## Technical Guideline for the PVC Window Value Chain

### What is SCIP & Why is it relevant?

SCIP is the database for information on Substances of Concern in articles established under the Waste Framework Directive (WFD). Any supplier of an article containing a substance of very high concern (SVHC) on the Candidate List for Authorisation in a concentration above 0.1% weight by weight (w/w) on the EU market is required to submit information on that article to ECHA since January 2021.

This manual prepared by EPPA is dedicated to window manufacturers, assemblers, importers, and distributors. They have the responsibility to notify to SCIP windows that contain SVHCs in line with the above.

The document specifies in detail the information requirements for SCIP notifications to be submitted to ECHA.

### Purpose of the database

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

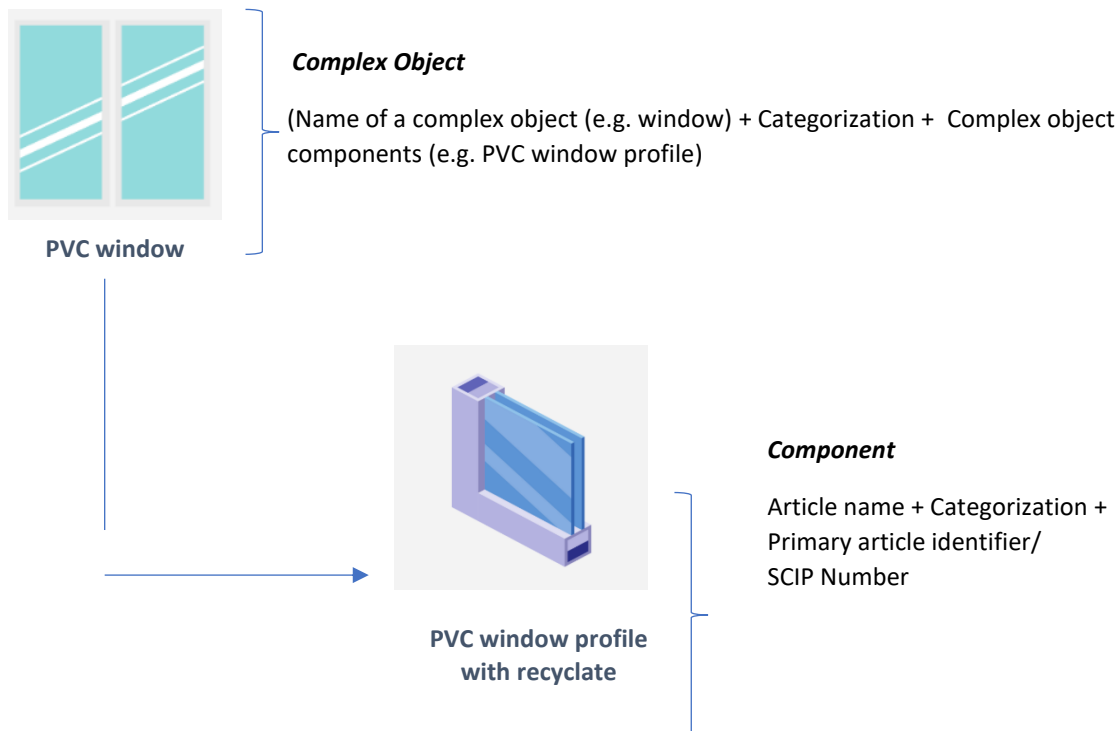


### Information flow

The obligation to provide information to ECHA starts with the first supplier (producer/importer) producing an article with a substance on the candidate list > 0.1%. This information should be passed to the next actor in the supply chain, who can reference the information already submitted by the upstream supplier. The more complex the product is, the more numerous the information.

SCIP requires cooperation and communication by all parties of the supply/chain (downstream and upstream).

### Example of a window with a PVC window profile with recycle



## Article 33 vs. SCIP



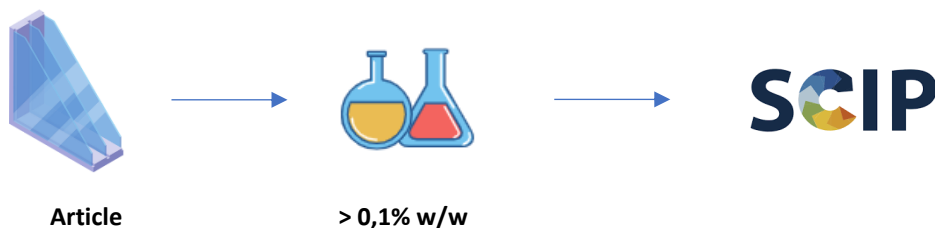
Companies are still required to comply with their communication and notification obligations under Articles 33 and 7(2) of the REACH Regulation. A supplier of an article that contains such a substance of very high concern in the Candidate List in a concentration above 0.1% (weight by weight) must provide enough information to allow the safe use of the article to customers, as the minimum name of the substance, according to REACH Art. 33(1). Consumers can request similar information. The supplier of the article has to provide this information within 45 days, free of charge.



However, this information does not reach waste operators at the waste stage once those articles become waste at the end of their service life. The SCIP notification obligation under the Waste Framework Directive complements the existing communication and notification obligations for Candidate List substances in articles under Articles 33 and 7(2) of REACH and should reinforce compliance with it.

### Why is SCIP relevant for EPPA members?

For PVC windows, EPPA has created a generic entry for PVC window profiles with recycle containing lead > 0,1 % (w/w). Separate notifications may become necessary for other window components depending on their SVHC content.



### Why is SCIP relevant for window manufactures?

A window manufacturer puts the complete window to the market he is responsible for merging all the notifications received from the suppliers of articles via referencing, e.g. window profiles, foils, gaskets, adhesives, and more.

### Why is SCIP relevant for window distributors?

If the article is only distributed, a distributor has to create a notification by referring to an existing SCIP notification. For that, he can use the Simplified SCIP notification - SSN.

### The guideline is structured as follows:

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## 1. Articles and Complex Objects

Articles are objects which during production are given a special shape, surface, or design, for example, components. A window profile is an article. Articles can be assembled to become a 'complex object'. A window is a complex object containing multiple articles such as profiles, foils, and gaskets. The articles remain articles when incorporated in 'complex objects' which means that SCIP notifications of articles have to be cascaded downstream to all industrial or professional users in the supply chain.

## 2. Grouping approach

Identical or quasi-identical articles or complex objects should be grouped in a single SCIP notification to limit the number of entries. Quasi-identical articles are articles placed on the EU market, which are fully identical in terms of their chemical composition, but might have different sizes or colors. These quasi-identical articles can be submitted in the same SCIP notification to ECHA, provided that the right elements for the identification (e.g. names and article identifiers) are provided.

EPPA used the grouping approach to place all PVC window profiles with recyclate from its members into the database. PVC window profiles with recyclate qualify as quasi-identical articles as their function and chemical composition are the same, all of them may contain lead as a legacy additive.

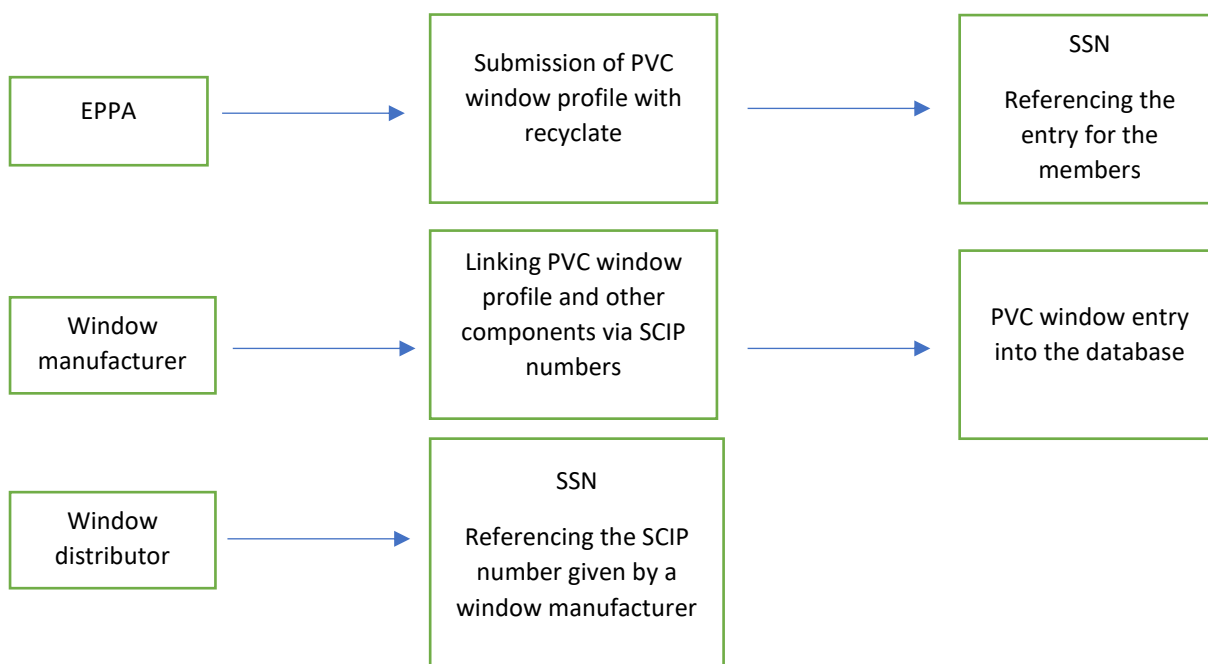
## 3. Referencing

'Referencing' can be used to prepare the IUCLID<sup>1</sup> dataset for the creation of a SCIP dossier of a complex object (an object made up of more than one article) and allow to **introduce the information of a complex object component by reporting a SCIP number/primary article identifier which refers to information already submitted to the SCIP database.**

EPPA made the generic submission of a quasi-identical object "PVC profile containing recyclate". Afterwards, EPPA used the Simplified SCIP Notification (SSN) to reference this entry for all members.

In the case of a **window manufacturer**, the PVC window profile and other window components must be linked in one entry called "PVC window". This linking is done by referencing the SCIP numbers of all components of the PVC window.

**The window distributor** also references the PVC window notification via SSN (Simplified SCIP Notification).



<sup>1</sup> IUCLID is a software to record, store, maintain and exchange data on intrinsic and hazard properties of chemical substances. Under REACH, information submitted to ECHA has to be in IUCLID format. ECHA provides the software for free on the IUCLID 6 website.

## 4. Submission of the notification – step by step

### 4.1 Sign up for ECHA account

In order to have access to ECHA Cloud Services and ECHA Submission Portal, window manufactures and window distributors need to create an ECHA account.

### 4.2. IUCLID system

SCIP Notifications are submitted to ECHA by using IUCLID Dossiers (i6z files). **Go to IUCLID** to prepare and **create SCIP Notification via referencing**.



1. Create a complex object (e.g. PVC window).
2. Reference the SCIP number of complex object components.

If you are referencing generic entry of PVC window profile with recyclate, use this SCIP number: **8ea6738a-3838-43cf-9fbd-740d5e575fb9**.

If you are referencing a **specific PVC window profile with recyclate**, use the relevant SCIP number.

**Aluplast:** 073a0bd9-7238-4da2-9d85-bcfb6693d051

**Deceuninck:** d766a979-1491-4559-b33b-9f423a9733ba

**Gealan:** 5731b158-1532-47c5-8f00-0ad515a8ff87

**Profine:** 7044e55d-f100-4d07-9ed5-d38695636400

**Rehau:** f020d431-41e2-4e54-bafa-c07d1e67b1d7

**Salamander:** 0ab2b440-3dea-4c95-a215-0d54edb12c91

**Schüco:** 90df0c7f-e5f7-4f12-a4a7-c2398499a861

**VEKA:** bc3ea803-0bf4-4aa3-a7c6-0b8c9028c1da

Other component producers (for instance foils) may also generate such a generic entry for quasi identical objects if there are SVHC substances. Add the SCIP numbers of other components.

In case of any doubts, follow the [ECHA manual](#), p. 48 – 76.

### 2.4. Dossier submission

1. Export the dataset to i6z and create the dossier.
2. The ECHA Submission Portal (ECHA Cloud Service) is an online tool to submit SCIP Notification dossiers according to the harmonised IUCLID format. Submit the exported dossier.



## 5. Simplified SCIP notification for window distributors

ECHA offers an option for window distributors to submit a simplified SCIP notification (SSN).

A window manufacturer after setting an ECHA account passes a SCIP notification number of a window to a window distributor.

A window distributor enters the SCIP number given by a window producer to find the existing submission. Further, window manufacturers submit the report.

If you are a distributor of articles, demand the SCIP Number for your products from the manufacturers you are receiving windows from.

## 6. EPPA SCIP & Article numbers

EPPA has prepared the general entry for its members. To help window manufacturers to reference the right PVC window profile EPPA shares all the needed data:

### 1. PVC window profile containing recyclate

a) **Primary article identifier number:** a8f055ac-2189-4763-87fd-a2d563ebdd36

b) **SCIP notification number:** 8ea6738a-3838-43cf-9fbd-740d5e575fb9

It is important to note that the **primary article identifier always remains the same.**

In the case of SCIP number, **each company has its own SCIP number** after submitting the Simplified SCIP Notification, the dossier remains linked to EPPA's entry as all concerns the same article.

## 7. Additional information

### 1. ECHA general guideline

[https://echa.europa.eu/documents/10162/28213971/scip\\_database\\_notifications\\_en.pdf/63a1dbe6-20ce-2e37-46be-4293c809dc2f](https://echa.europa.eu/documents/10162/28213971/scip_database_notifications_en.pdf/63a1dbe6-20ce-2e37-46be-4293c809dc2f)

### 2. ECHA SCIP notification guideline - information & requirements

[https://echa.europa.eu/documents/10162/28213971/Information\\_requirements\\_for\\_scip\\_notifications\\_en.pdf/db2cf898-5ee7-48fb-e5c8-4e6ce49ee9d2](https://echa.europa.eu/documents/10162/28213971/Information_requirements_for_scip_notifications_en.pdf/db2cf898-5ee7-48fb-e5c8-4e6ce49ee9d2)

### 3. Candidate list

<https://echa.europa.eu/candidate-list-table>