

ECHA ADDS 4 NEW SUBSTANCES TO THE CANDIDATE LIST

Intertek Supports Manufacturers and Importers in their Compliance with REACH SVHC Requirements



On January 16, the European Chemicals Agency (ECHA) announced the addition of 4 new substances to the Candidate List. With this addition, the total number of Substances of Very High Concern (SVHC) is now 205.

If you manufacture or import products in the European Union (EU), you may have legal obligations if SVHCs are contained within your product at levels greater than 0.1% w/w. If your product contains any of the 205 SVHCs you will have communication requirements to customers down the supply chain and to consumers.

Starting in 2021, companies may be required to input communication information into the SCIP database – “Substances of Concern in Articles, as such or in complex objects (Products)”. Both consumers and waste operators will have access to this information

to see which products ultimately contain SVHCs above the threshold. Find more information at the end of this document pertaining to the SCIP database and its requirements.

With the SVHC list continuing to update, and with the addition of the SCIP database, it's even more critical that organizations stay on top of their requirements and ultimately comply with their Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) obligations.

Intertek works with manufacturers and importers to understand the risks associated with the presence of SVHCs in their products and works with clients to ensure they have the proper compliance documentation in place.

SVHCs ADDED TO CANDIDATE LIST

#	Substance Name	EC	CAS	Reason for Inclusion	Example of Use(s)
1	Diisohexyl phthalate	276-090-2	71850-09-4	Toxic for reproduction [Article 57 (c)]	Not registered under REACH.
2	2-benzyl-2-dimethylamino-4'-morpholinobutyrophenone	404-360-3	119313-12-1	Toxic for reproduction [Article 57 (c)]	The substance is used in polymer production.
3	2-methyl-1-(4-methylthiophenyl)-2-morpholinopropan-1-one	400-600-6	71868-10-5	Toxic for reproduction [Article 57 (c)]	The substance is used in polymer production.
4	Perfluorobutane sulfonic acid (PFBS) and its salts	-	-	Equivalent level of concern having probable serious effects to the environment [Article 57(f) - environment]. Equivalent level of concern having probable serious effects to human health [Article 57(f) - human health].	Used as a catalyst/additive/reactant in polymer manufacture and in chemical synthesis. It is also used as a flame retardant in polycarbonate (for electronic equipment).

SCIP DATABASE

From January 2021, manufacturers and suppliers of products containing SVHCs will be required to submit information on these products to a European database. The SCIP database is to be created to enable a uniform collection of information. The legal basis for this database is the EU Waste Framework Directive (WFD). The information required concerns the safe use of products and "complex objects" (products) with a certain proportion of SVHCs.

The information requirements that define the content of the database have been developed based on legal requirements and consultation with the European Commission, Member States and stakeholders. Item suppliers must provide:

- Information that can be used to identify the item;
- Name, concentration range and location of the SVHC in the article; and
- Additional information on the safe use of the item, as required.

The SCIP database provides waste operators with information on the hazardous substances in the waste they process so that material flows can potentially be "cleaned" prior to recycling and reused in the manufacture of new items to ensure a true and safe circular economy. In addition, increased transparency regarding the presence of hazardous substances will help consumers make more informed decisions when buying products and will provide information on the best possible use and disposal of such items.

ECHA has released a prototype database that supports duty holders to become familiar with the database. They have stated that any information submitted to the portal is only test data and will not be released or used to fulfill legal requirements. The database is setup to utilize an IUCLID format to submit the necessary data.



WHO IS AFFECTED?

- EU producers and assemblers,
- EU importers, and
- EU distributors of articles and other actors in the supply chain placing articles on the market.

If you are a retailer or another actor in the supply chain that supplies these articles directly to the consumer, you are not obligated to submit information. Any duty holders, however, may provide further information on a voluntary basis.

WHAT SHOULD YOU DO?

Understand and assess the chemicals used in your products. You must submit the above stated information via the ECHA Submission portal, which is an online tool to prepare and submit information according to the harmonized format. There will be different ways available to submit the required information to the SCIP database.

INTERTEK'S SOLUTIONS

Intertek can utilize its network of laboratories, auditors and regulatory experts to help assess the risks based on your products and materials and to help mitigate the risk of having SVHCs in your product. Furthermore, Intertek works with you to understand whether you need to provide communication set forth by the EU REACH Regulation and the EU WFD. Our Intertek experts will advise you on the compliance process and how to prepare your notification dossier and submit it.

Material Risk Assessment Solutions

With global regulatory requirements shifting towards risk-based compliance, Intertek's Material Risk Assessment solutions provide our customers with outputs that can provide clarity and direction to mitigate risk when complying with global regulated substances such as Global Restriction of Hazardous Substances (RoHS), EU REACH and California Proposition 65 requirements.

Intertek's risk assignment methodology applies the risk status of a restricted or declarable substance to a specific material or component used in customer products. This risk is adjusted based on available information including declaration of compliance, material declarations, test reports, litigation, etc. With the guidance of Intertek regulatory experts, our customers will have a better understanding of their true inherent risks for their product and/or business. This allows them to take the necessary steps to reduce those risks and achieve product compliance.

Product and Material SVHC Screening

Utilizing Intertek's vast wealth of analytical laboratories worldwide, Intertek provides SVHC screening for a broad range of products including automotive, aerospace, electronics, consumer, building, cosmetics and general preparations. Intertek's global laboratories use modern analytical quantification techniques on soluble and insoluble materials to create a comprehensive fingerprint of each product for use in the SVHC declaration.

If products contain any SVHCs, Intertek can provide regulatory support to identify in which material or component the SVHC is present, create a replacement strategy or prepare REACH disclosure documentation to assure your business is not interrupted.

Supplier Engagement and Management Services

Intertek specializes in assessing and converting Bill of Materials (BoM) into a regulatory compliant state. We perform the required data gathering, assessment and electronic design, and provide replacement options where possible to meet the legal requirements and goals of our customers.

Intertek's BoM services are customizable and applicable to a wide range of global, regional and local health and environmental legislations and requirements including RoHS, REACH SVHC, California Proposition 65 and many other expanding health and environmental legislations and requirements.



IUCLID Data Preparation and Submission

Our vast knowledge of, and experience with, the ECHA IUCLID tool allows Intertek to support our customers with pulling the necessary data and creating the submission file to the ECHA SCIP database. With Intertek already connected with the ECHA systems, we can seamlessly create and submit the necessary IUCLID SCIP Notification Dossier on behalf of our customers.

THE INTERTEK ADVANTAGE

Intertek is a leading Total Quality Assurance provider to industries worldwide. Our network of more than 1,000 laboratories and offices and over 46,000 people in more than 100 countries, delivers innovative and bespoke Assurance, Testing, Inspection and Certification solutions for our customers' operations and supply chains. Intertek Total Quality Assurance expertise, delivered consistently with precision, pace and passion, enabling our customers to power ahead safely.

Total Quality. Assured.

FOR MORE INFORMATION



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