WFD SCiP, AEM

Context, News, Requirements and CDX
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Who is talking to you

Marcus Schneider
Senior Consultant
DXC.technology

- Responsible industries contact aviation, shipbuilding, plastics
- 20 years as a consultant with DXC (then EDS, HP(E))
- Focus on compliance & sustainability information management in the supply chain
- Background in software development, architecture and B2B integration

This webinar will be recorded.
WFD & SCiP – Setting Context

The WFD (Waste Framework Directive) of the EU (Directive (EU) 2018/851 amending the Waste Framework Directive) is targeted at creating effective policies to regulate usage of substances in the EEA so as to establish closed loop economies. As a first step, substances as regulated under REACH are in focus. Industries shall be enabled to better understand and work on recyclable goods, and design for sustainability…

SCiP (Substances of Concern in articles as such or in complex objects (Products)) serves the purpose of the WFD to enable dissemination of information on SoC to the recycling industries as well as the end consumers in the EU, entitled by their right to know. Reporting duties start 5, Jan, 2021 SCiP is mandated by WFD to ECHA, as well as establishing what is “required data”
Important to Know - Policy Context

- 7th EAP
- Circular economy Action Plan
- Communication on the Interface between chemicals, waste and products legislation
- EU Plastics Strategy
- REACH
- EU waste legislation
Important to Know - Legal Context

• Various legislations analysed and „interfaced“
  – Chemicals
  – Waste
  – Products

• Ecodesign Directive

• Upcoming reviews Packaging and Packaging Waste, ELV, Batteries Directive

LED TO

  – Reinforce the waste hierarchy
  – Facilitate recovery through decontamination
  – New Article 9 on waste prevention objectives/measures, including a new ECHA database
  – Extended producer responsibility – modulation of fees
SCiP and ECHA’s Mission

• According to §9(2) of the WFD, its purpose is
  – „To establish and maintain a database for information down in the supply chain on substances in articles“
  – „To provide access to the database to 'Waste Treatment Operators', and to consumers (upon request)“

• This activity has been mandated to ECHA, including the needed definition of „what is required“ to
  – Enable submission on articles and contained substances
  – Disseminate information, so that the purpose of the directive can be adhered to (RECYLABILITY)

• This leads to a situation, where „what is required“ exceeds requirements from REACH §33
Current important discussions
No news since May…

• Group reportings to reflect multi-sourcing concerns (variety of SVHC in articles)
• Allow for 150% Dossiers for extremely complex objects (cars, airplanes, trucks, heavy equipment) to avoid huge amount of data and extreme cost
• Exemptions for industries that already have established re-use waste streams (automotive, aviation), or where no waste is generated (Space…)
• Exemptions for export-only articles, as they will in no way contribute to the WfD goal
• Covid-19 pandemic related actions and decisions
Transposition to National Law

- CARACAL to meet on July 9th
- It is expected that EU Commission will ask member state on status of transition
- ECHA handed out a proposal on how transpose to national law could be formulated on April 16, 2020

>“Any supplier of an article as defined in point 33 of Article 3 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council shall provide the information pursuant to Article 33(1) of that Regulation to the European Chemicals Agency as from 5 January 2021 using the format(s) and submission tool(s) provided by this Agency for that purpose.“

- Several member states mostly took over or are planning to take over this recommendation: Belgium, Bulgaria, Finland, Latvia, Greece, Ireland, Lithuania, Luxembourg, Spain, Sweden
- Germany has made a proposal in different language, but eventually same content
SCiP is EEA only - but

- SCiP reporting duties affect those companies placing products on the EEA market
- No companies outside the EEA may register in SCiP
- Importers are responsible to create a valid SCiP dossier

- Importer obligations will be forwarded as business requirements to non EEA supply chains in order to be enabled to sell to EEA
- Importer may create „foreign user“ in SCiP, allowing to report on their behalf
- The full article reporting requirement applies / level playing field…

- All SCiP requirements as laid in the following slides affect global supply chain reporting requirements
SCiP Requirements & CDX 7.0

SCiP is about collecting information on substances of concern in articles respectively products containing articles. While the initial scope is enforcement of REACH §33 reporting, it is important to understand, that WFD does not talk about SVCH, but SoC – which will include in future iterations reporting of scarce materials, plastics in regard to their recyclability quota etc. etc.

Although it is stated that the initial scope is REACH §33, this is not an exact reflection on the requirements. Substances from the candidate list, the 0.1% threshold, the article definition are all derived from §33, but there is data beyond, as envisioned by ECHA.
SCIP planned timeline

- Initial Q&A and public material
  - Sept 2019
  - IT User group WebEx
  - Workshop open to all

- IUCLID Format publication
  - Nov 2019

- Prototype release
  - Q1 2020

- Legal requirements into local law
  - Q2 2020

- SCIP submission version 1.0
  - 5 Jul 2020

- IUCLID major update
  - Nov 2020

- Full reporting & manual Dossier creation
  - 05 Jan 2021

- Full SCIP S2S integration
- SCIP Dossier Batch Processing
- Webservices for SCIP Uploads

Availability on CDX Production
SCiP – Identifying Articles

- Article name
- Other names
- Brand*
- Model*
- Type*

Complete and distinct name is required for articles for consumers*

If an article is a consumer good, the additional identifiers might be required for identification

Article category: TARIC/CN code + description (TARIC list)

73 18 1582

73181582 - Base metals and articles of base metal > Articles of iron or steel > Screws, bolts, nuts, coach screws, screw hooks, rivets, cotters, cotter pins, washers (including spring washers) and similar articles, of iron or steel > Threaded articles > Other screws and bolts, whether or not with their nuts or washers > Other > With heads > Hexagonal heads > Other, with a tensile strength > Of less than 800 MPa


This information is required. The nomenclature is an up to 5-level nested picklist of about 16,000 entry codes + exhaustive description

Information from Oct, 1st 2019

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Article Category support in CDX

If you know the TARIC, just start typing right away. Else you will soon get a tree like view for drill down as in https://trade.ec.europa.eu/tradehelp/
Article / Product Identifiers

- ECHA Article ID
- GTIN (Global Trade Item Number)
- EAN (European Article Number)*
- GPC (Universal Product Code)
- JAN (Japanese Article Number)
- UDI (Unique Device Identification)
- ISBN (Int. Standard Book Number)
- Catalogue Number
- Batch Number
- Part Number

A distinct and recognizable identifier is required for articles for consumers*
Safe use instructions

CDX will initially only support Option 2

ECHA discussed plans about providing a nomenclature picklist for safe use instructions, this might be implemented in CDX

If safe use instructions are provided as a document, these will be used, if appropriate (user may select)

Information requirements

Safe use instruction(s):
- **Option 1**: Provide safe use instruction(s) (free text)
- **Option 2**: Select ‘No need to provide safe use information beyond the identification of the Candidate List substance’
- Disassembling instructions

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Yellow = required (input needed, but can be waived/no additional information) for a successful submission
Concern Element

- Candidate list substance

- Concentration range: ECHA provides picklist of valid ranges, at least 0.1% to 100% is required

- Material category and/or Mixture category: The category scheme level 2 from ECHA does not 100% match existing classification schemes used in the industries, i.e. in IMDS or IEC, causing massive effort for repeated reporting, unless the "other" category might be applicable.
SCiP Material Categories

Material Categories are a conditional mandatory and to be provided if no mixture category is provided

- For REACH §33, materials (and categories) are beyond scope
- This implies either re-reporting or maintenance of material categories by the assembler, which is NOT RECOMMENDED
- ECHA Categories can not be mapped to other nomenclatures, such as IMDS, JAMP, ISO22628 to full extend, preventing automated translation

ECHA confirmed that use of CAT 11 / other is restricted to those contexts where the proposed nomenclature does not adequately match. Known material classifications from other schemes rule out use of CAT 11. Therefore: CDX will provide default mappings where possible. If not possible, it will not be possible to create a SCiP Dossier without express consent on CAT 11 usage!

The role of the Materials Categories

Concern element(s)
- Candidate list substance
  - Concentration range, incl.
    - > 0.1% w/w and ≤ 100% w/w
  - Material category and/or Mixture category (EUPCS)
- Additional material characteristics

Different standards – how to establish correlations?

Based on the information available to industry, where could category 11 be used in certain situations (while further harmonisation could be assessed)?
CDX Material Category support: direct setting
If a Dossier is created and no ECHA category is selected, CDX will automap or use 11 – Other, using all available information.
Production in EU

• 'Production in the EU' Picklist options in SCiP
  – 'No information provided'
  – 'EU produced'
  – 'EU imported'
  – 'Both EU produced and imported'

• CDX supports 'Manufacturing Country' attribute
  • If set, CDX will use country mapping for determination of produced vs. Imported
  • 'Both' initially not supported
  • If not set, 'No information provided' will be sent...
Simplified Notification (1)

- Target audience: distributors / resellers of already notified products
- Business Case: distributor / reseller passes through without alteration
  - Provided: no change to the physical product
  - Provided: no change to product metadata
- SCiP Dossier with new SCIP number
  - Internally, this will be mapped against existing Dossier
  - Dissemination will show new SCiP Number, but existing Dossier
  - No disclosure of original supplier
- CDX will support scenario for forwarded MDSes
  - Not initial scope, to be expected H1/2021
Simplified Notification (2)

• When forwarding, CDX creates read-only copies

• There is no means of changing the original declaration

• CDX will maintain reference to the original MDS

• If original MDS provides SCiP number creating a Dossier will create a Simplified Notification

• Technical details in IUCLID format not yet clear
Referencing

If a supplier has already notified their articles, reference to that entry in the SCiP Dossier may be established:

- Still work in progress and to become part of the IUCLID format
- **ECHA SCiP Number** must be known
- SCiP numbers will be part of Submission report – **CDX will take over and store**, if usable from the Submission report
- Creating a Dossier in CDX will allow both for referencing or full submission – up to the discretion of the user
CDX & IPC 1752A CLASS C/D and IEC62474

- **Assemble**
  - Reference IPC / IEC MDS

- **Import**

- **Validate**

**In-house systems**

IPC 1752A / IEC62474
- Import
- Validate

Upcoming Support for IPC 1754 am2, IPC 1752A am3 + IPC 1752B & IEC62474 extended attributes for SCiP reporting

CDX will fully support SCiP relevant attributes / data in its Webservices.
Dossier Preparation

Once data is collected, Dossiers may be prepared and used to feeding the Submission Portal.

ECHA offers various options for that, all include parsing the Dossier against business rules that may override provisions as defined in the IUCLID format definition.

CDX 7.1 will introduce the direct to ECHA submission and batch processing of MDSes, allowing for reporting of already collected data to ECHA, once the submission portal productive system will accept SCiP Dossiers, which is to be expected in October.
SCiP – Process view

Provide their ECHA API key for S2S authentication

CDX will support scenario, provide minimum required information. Technical details partly published by ECHA.
SCiP Checks / business rules

Before being able to create a Dossier, CDX will check for valid content

- Article Category set?
- Reportable content?
- Partnumbers all set?

In addition, CDX takes care of Business Rules as proposed by ECHA, if feasible

- Most CDX rules cover ECHA BR.
IUCLID format – the data exchange standard

- INTERNATIONAL UNIFORM CHEMICAL INFORMATION DATABASE

- “Maintain and exchange data on the intrinsic and hazard properties of chemical substances or mixtures, as well as the uses of these substances and the associated exposure levels”

- Main stakeholders: regulatory bodies and the chemical industry

- Incorporated in OECD Testing Guidelines
IUCLID Updates

- ECHA confirms one major release per year: October
  - Additional service releases for all in April

- A potentially significant format update in October has been announced for testing as of July

- Minor changes are
  - Addition / changes to mixture category picklist
  - Renaming of „ECHA Article ID“ to „SCIP number“
  - Candidate List Version is no longer available
Take the Dossier…
validate data in SCiP
This potentially opens the door for more complex disclosure in the Dossier, including full localization, without danger of exposing CBI/ supply chains

Initially, CDX will only report Top-Level, First reference and all contained Articles with SVHC, but we will add options for disclosing full localization information
Where-Used Analysis – Identify > 0.1% SVHC content
Identify most relevant products, and start working on issues preventing SCiP Dossier creation
Start out immediately – do an interactive approach

Focus on Top Level Information
For the time being: CDX will copy Article categories top down, whenever an article does not provide a category.

Start submitting work in progress
As you can update the SCiP dossier anytime, simply start with what you have to signal that you are working on it.

Do not rely on referencing
CDX will initially not support that mechanism, unless issues are not addressed. We have signals from almost all customers that they cannot envision referencing to produce good enough data.

Get in touch with your suppliers
Inform them on SCiP and the additional requirements. Specifically the Article Category is of concern. All other content is automatically processed by CDX.
CDX 7.x

While 7.0 introduces production ready SCiP functionality and export of Dossiers, its focus is mainly to provide customers the option to test and understand SCiP, Dossiers, and how the ECHA submission works.

ECHA currently does not allow SCiP Dossiers to be pushed to the proposed production environment, only test data can be generated.

CDX 7.1 will introduce the direct to ECHA submission and batch processing of MDSes, allowing for reporting of already collected data to ECHA, once the submission portal productive system will accept SCiP Dossiers, which is to be expected in October.
Upcoming: S2S batch submissions and management

- Each CDX submission creates one Dossier per MDS
- Dossiers are submitted one by one, the whole submission managed in CDX QCM
- On success SCiP number and Dossier ID will be stored with each MDS

The Queue may be managed and supervised using webservises for In-house integration. Dossier push-through is supported
Upcoming: Webservices integration

CDX to SCiP w/o Inhouse

CDX to SCiP / Inhouse assembly

CDX to SCiP using Inhouse data

Inhouse to SCiP using CDX data
Upcoming: Assembly In-House Report from In-House to SCiP by way of CDX w/o CDX BOM retention

- No BOM stored in CDX
- Webservices will only pipe through
- Dossier prepared based on CDX Upload format
- No additional communication layer required in inhouse system

CDX

- IPC 1752A / IEC62474
  - Import
  - Validate

Assemble
- Reference IPC /IEC MDS

In-house systems

CDX WebServices

- No BOM stored in CDX
- Webservices will only pipe through
- Dossier prepared based on CDX Upload format
- No additional communication layer required in inhouse system
### Referencing

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<td></td>
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- 15mm  
- 20mm  
- 25mm  
| Thickness: |  
- 2.0mm  
- 3.5mm  
- 5.0mm  
| Colour: |  
- Black  
- Grey  
- Black  
| Item No.: |  
- 15x2.0R RJ  
- 15x3.5R RJ  
- 20x5.0R RJ  
| EAN (Barcode): |  
- 944555667 7801  
- 944555667 7812  
- 944555667 7823  
| Article Category*: |  
- 4016 93 00 90  
- 4018 93 00 90  
- 4016 93 00 90  
| Candidate List Substances: |  
- CAS No. 71688-89-6  
- CAS No. 71688-89-6  
- CAS No. 71688-89-6  
| Concentration: |  
- 8% w/w  
- 8% w/w  
- 8% w/w  
| Material: |  
- SBR, vulcanised  
- SBR, vulcanised  
- SBR, vulcanised  
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- SBR, vulcanised  

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**2021**

**Article Category:**

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<td>SBR, vulcanised</td>
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<td>SBR, vulcanised</td>
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</table>

Imagine: Article bought from catalogue, part number does not change, but SVHC content

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**2022**

**Article Category:**

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<td>SBR, vulcanised</td>
<td>SBR, vulcanised</td>
</tr>
</tbody>
</table>
O-Rings built into Product, one version of Product per O-Ring version (component revisions trigger product revision)
One Dossier per Product

The Truck (t.123.123)
The O-Rings…

2021

2022
One Dossier per O-Ring

O-ring (15x2.0B, 15x2.0G, 20x3.5B, 20x3.5G, 20x5.0B, 20x5.0G)
Easy and structured data…

The Truck (t.123.123)

The Front Wheel

The O-Ring

The Back Wheel
Really?

The Truck (t.123.123)

The Front Wheel

The Back Wheel

The O-Ring
Version mashup

• Any version of the dossier of a truck refers to
  – The O-Ring dossier itself (all versions)
  – The front wheel dossier (all versions)
    – Referring to the O-ring dossier (all versions)
  – The back wheel dossier (all versions)
    – Referring to the O-ring dossier (all versions)

• Is it possible to determine for a given delivered truck, what is the corresponding data in SCiP for the front wheel?
• Is it possible to determine the actual SVHC content of any O-Ring used in the truck?
• In 2030: would it be possible to clearly and simply understand the chemical composition of the truck as placed on the market in 2021 by using the envisioned SCiP dissemination portal?
• Would the waste stream be able to make use of the information when all that can be seen is the most current interconnected versions of the single Dossiers?
• Would the average citizen understand that your truck when placed on the market in 2021 contained not only lead, but you also diligently reported on it?
Reporting to Black Box - Risk

• As long as there is no clear relationship between a permutation of a referencing product and the referenced product, there is ambiguous, at least complex and difficult to understand data
• Using referencing therefore may imply a significant risk
• Though legally correct, companies might be perceived as acting incompliant

• At this point in time, it does not seem recommendable to use referencing
• CDX will provide option to use, but per default will not

• Once the reference can be done against a specific submission state of a Dossier, referencing may become an option

• Until then: referencing is reporting against a black box
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