

SCIP Database

Does it enhance transparency on Substances of Concern in a Circular Economy?

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sofia



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Introduction

The Substances of Concern In articles as such or in complex objects (Products) database (SCIP) was established under the Waste Framework Directive with the main objective to “promote the reduction of the content of hazardous substances in materials and products” by **improving access to information on substances of very concern (SVHCs) in articles to waste operators and consumers.**¹ It was launched in October 2020 to receive notifications from suppliers of articles² and has been running since then. SCIP data from notifications has been published since 14 September 2021.³

The undersigned signatories fully support this initiative in its attempt to increase the transparency of information on chemicals by giving full effect to the right to know – as well as the duty for suppliers to organize their supply chain communication – under REACH Article 33 and the EU promise to substitute hazardous substances.

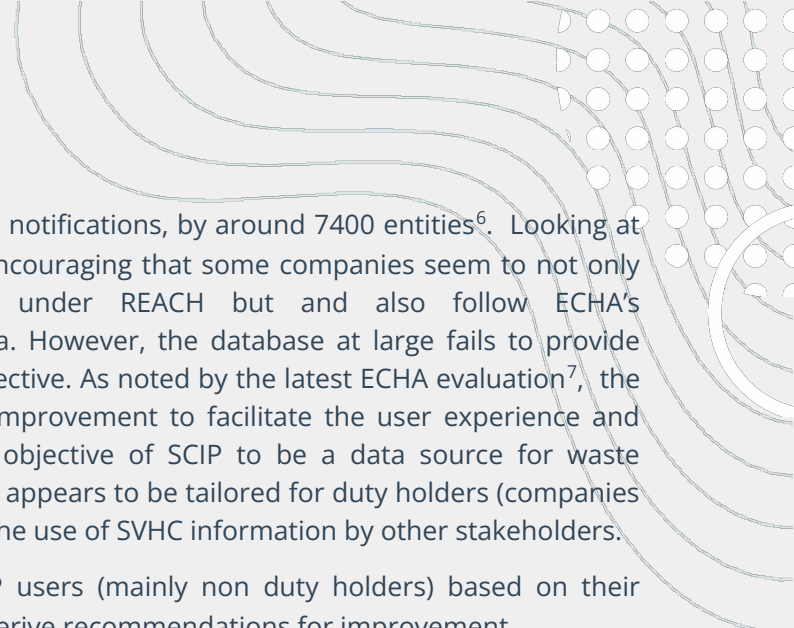
Furthermore, SCIP is expected to deliver, in interplay with other policies and instruments, on political commitments in the realms of the European Green Deal. “Achieving safe products and non-toxic material cycles” is one centerpiece goal of the Chemical Strategy for Sustainability (CSS). Specifically, the Commission commits to “ensure availability of information on chemical content and safe use, by introducing information requirements in the context of the Sustainable Product Policy Initiative and tracking the presence of substances of concern through the life cycle of materials and products”⁴, while adding in a footnote that this shall build, among other policies, on the SCIP database and the Digital Product Passport developed under the Ecodesign for Sustainable Products Regulation (ESPR) that is currently prepared by the EU legislators.⁵

Because of its ambition, SCIP has also raised a number of expectations from the perspective of non-duty holders:

- it will push companies to comply with their duty to communicate on the presence of SVHCs in articles;
- it will make information available, accessible and intelligible to waste operators, and thus improve waste treatment;
- it will make information available, accessible and intelligible to citizens and interested civil society organisations, and in particular help consumers make more informed choices;
- it will constitute a comprehensive database for competent authorities who monitor the use of SVHCs and support potential future regulatory action.
- it will more generally support enforcement activities.

Unfortunately, as this report will show, most of these expectations fail to be met.

1. See Article 9(1)(i), 9(2) of [Directive 2008/98/EC](#) on waste and repealing certain Directives, amended by [Directive \(EU\) 2018/851](#) of 30 May 2018.
2. See https://echa.europa.eu/documents/10162/6755610/scip_database_to_be_launched_28102020_en.pdf/5d714dba-26e2-b58d-50f0-183287607e4a?t=1615543871527.
3. See [All news - ECHA \(europa.eu\)](#).
4. [COM\(2020\) 667](#), p. 6.
5. See procedure [2022/0095/COD](#).



In March 2022, ECHA had received 17 million SCIP notifications, by around 7400 entities⁶. Looking at the quality of information available in SCIP it is encouraging that some companies seem to not only provide the minimum information required under REACH but and also follow ECHA's recommendations to make more use of the data. However, the database at large fails to provide useful and usable information as per its initial objective. As noted by the latest ECHA evaluation⁷, the SCIP database is a promising tool but it needs improvement to facilitate the user experience and deliver on true transparency. Despite the legal objective of SCIP to be a data source for waste operators and consumers, in its current form SCIP appears to be tailored for duty holders (companies submitting notifications) rather than for enabling the use of SVHC information by other stakeholders.

Our paper collects feedback from different SCIP users (mainly non duty holders) based on their experience with the tool. From that feedback we derive recommendations for improvement.

Methodology

The analysis is based on the assessment of main database features (database front-end, search function, results, etc.) by the different user groups. It is a non-exhaustive study, based on real users from the stakeholder groups public/civil society organisations representing the environment and consumers, waste operators, downstream users, and academia.

Stakeholders reflect briefly on their experience as users, on the relevance of the information that the database provides for their work and to provide recommendations for improving the tool.

6. See PWC, European Chemicals Agency. [First ex-post Evaluation of SCIP](#), May 2022.

7. See PWC, European Chemicals Agency. [First ex-post Evaluation of SCIP](#), May 2022.

User	Environmental NGO	Consumer NGO	Waste handler	Academia	Downstream user
General overview/ expectations	The SCIP database can be an excellent tool to improve transparency on chemicals present in articles and waste streams, and therefore support policies to ensure toxic free products, clean material cycles and reach the toxic-free ambition of the EU Green Deal.	It is great to have a database of SVHCs in products, however it would be good to link it to the LIFE " AskREACH " database to empower consumers to make informed decisions. The expectation for consumers is to be able to easily access the information on SVHCs in products at the point of sale. This information should be easy to understand, in the native language.	As waste handler, we need information about the content of substances of concern in order to decide which route is the most appropriate for treatment. Is direct recycling possible, is there a need for sorting, dismantling in order to separate the SVHCs contaminated fractions from the rest of the waste, is there a need for more advanced decontamination steps, or is the only current solution disposal? Consequently, waste handlers really welcome the implementation of the SCIP Database which is a first step to get accurate information on contamination by chemicals.	Researchers need data on the presence of chemicals in products to evaluate the risks for human health and the environment and develop appropriate measures for risk mitigation and governance. Such information also facilitates the allocation of research resources. SCIP is a unique data source in this respect.	



User	Environmental NGO	Consumer NGO	Waste handler	Academia	Downstream user
<p>Ranking user experience?</p> <p><i>Satisfactory - Promising but needs improvements - Confusing/insufficient</i></p>	<p>Confusing/ <i>insufficient</i> as the information provided is not useful for NGOs. It is not possible to identify in which articles the notified SVHC are found as the product categories search is complex and does not allow to consult overall categories of materials or of articles. It is also not possible to infer which waste streams may contain the notified SVHC.</p>	<p>Confusing/insufficient as consumers cannot find the product they are interested in. Eg searching for a barcode with known SVHCs does not give a result, which could have multiple reasons (i.a. no legal requirement to provide barcode). It is not intuitive and there is no guidance on how to find products. The website is not easily accessed on the smartphone in a shop.</p>	<p>Confusing/insufficient as the database is not usable in its current format.</p> <p>The search items are relevant in their denominations, search by article, by article category, by material and mixture category or by SVHC. But 1- the identifiers used by the manufacturers are useless for the waste handlers, the article category are too broad and can't allow accessing the specific expected category and the material and mixture category demands a very high expertise to be useful.</p> <p>Nevertheless, the database could become promising and finally very satisfactory if improvements are made based on user experience.</p>	<p>Promising but needs improvements: SCIP is a good start but functions do not facilitate research activities and the rather low number of notifications (factsheets) raises doubts as to the representativeness of data.</p>	<p>Confusing / insufficient, as regards integration of the data. It takes a lot of time to understand how to use the tool (our colleague had to watch many webinars to be able to make the first notifications).</p>

User	Environmental NGO	Consumer NGO	Waste handler	Academia	Downstream user
<p>Generally, does the user access the information it deems relevant?</p> <p><i>Yes/no</i></p>	<p>No, as it is not possible to identify the articles, meaningful groups of articles, materials or waste streams that contain SVHCs.</p>	<p>No, as a consumer is interested if products they buy or possess contain harmful substances with an easy-to-understand explanation on the hazard in their native language.</p>	<p>Taking as an assumption that the user gets the result he expects from a search, it is still very challenging to access the relevant information since results are provided line by line and, for each line, the cascade format of the factsheets requires several "clicks" before getting the information about the SVHCs and its concentration in the article.</p>	<p>By providing article specific information SCIP gives an idea about the relevance of SVHCs in article categories. The tool does however not support quantitative analysis within search results.</p>	<p>There is a lot (maybe too much) documentation that helps to understand the tool but is very time consuming.</p>



User	Environmental NGO	Consumer NGO	Waste handler	Academia	Downstream user
<p>Main recommendations from the user?</p>	<p>Improve the categorisation of uses. Allow to search for materials (e.g., plastics in general).</p> <p>Ensure that the factsheets display the specific article and specific instructions on safe use.</p>	<p>Consumers need a simplified search interface accessible with the smart phone and via website at the point of sale. The infrastructure exists in the LIFE AskREACH Database, which should receive the information. Article identifiers need to be harmonized eg Barcode (GTIN) number for easy product identification.</p>	<p>The format of the database has been designed to facilitate its use by the manufacturers without thinking about the downstream users like the waste handlers. In order to transform the database to a downstream user-friendly tool, it shall be necessary, at least, to review the identifiers in the search by article and allow to download the results of a search under a usable format like .csv or .xlsx. Other recommendations are important and are provided in the feedback from experience.</p>	<p>ECHA:</p> <p>Develop use cases for researchers.</p> <p>Allow export of search results for proper evaluation.</p> <p>Incentivize provision of more specific safe use instructions.</p> <p>Link the information with relevant context data (e.g. Eurostat, ECHA estimates on expected notification numbers)</p> <p>Commission: Clarify minimum “safe use instructions” in REACH</p> <p>Member States:</p> <p>Make SCIP notification requirement a priority for enforcement</p>	<p>We would recommend as an improvement, to make a collective integration for items that are similar (e.g., main use).</p>

Feedback from experiences

User 1 experience: Environmental Organisation (European Environmental Bureau)

This feedback represents the user experience of a Civil Society Organisation dedicated to the environment. Such organisations do not have access to the SCIP interface to input information but are interested in understanding which articles, materials and waste streams contain SVHCs to support their advocacy work towards cleaning material cycles and achieving a toxic-free environment.

The database should also facilitate these important tasks by Civil Society Organisations.

Overall landing page: The overall landing page of the SCIP database is not user-friendly from the civil society perspective. There should be a way to access a different interface dedicated to a “non-professional public” (comprising civil society and consumer uses). This portal should only feature basic information such as the name of the article, the substance(s) concerned, and the location of the substance(s) concerned. Some features of the database are welcomed: the feedback option; the help section, the “about” explaining what SCIP is about. This contributes to making the database slightly more accessible for the public.

Search function: The search function enables searches by article category, materials and mixtures, substances of concern, concern and this is a welcomed feature. The search function is mostly hampered by the article categories. Search instructions are not clear.

Article category: Article categories are not accessible: the vocabulary is technical; the search proposals are complex; it is not possible to conduct a search by overall categories of materials or of articles, for instance plastics in general, or for clothes.

Fact sheet: The idea of a fact sheet containing an overview and a rather visual description of the components is good for civil society users. However, the information displayed is of little use when the name of the article and brand are not displayed (because the notifier chose to waive this information). The description of the article category that is displayed is too wide, eg 4202920000- SECTION VIII (41-43), not allowing users to understand in most of the cases which article contains the SVHC. The description presented in the “help” interface indicated by a question mark is useful but could be made more explicit (e.g. indicating “general explanations”). Also, the European country of production should be displayed instead of indicating EU.

Data/content: The current information covers REACH candidate list substances. An information system on substances in articles (or “chemicals in products”) should include, by 2025, the traceability of substances of concern. Full traceability by 2030 (as requested by EEB in 2018).

It is also not clear whether articles relevant for civil society (those where high environmental impacts or exposure to public/consumers) have been uploaded on SCIP.

Format of the data: The data featured on SCIP should be extractable, and downloads from groups of entries should be made possible; this could enable the download of entries covering for instance “Tableware, kitchenware, other household articles and hygienic or toilet articles, of plastics”.

Safe use instruction: Most of the entries we consulted displayed a standard phrase of “The identification of the Candidate List substance is sufficient to allow safe use of the article throughout the whole life cycle including service life, disassembly and waste/recycling stage”. This information is not useful for consumers or waste handlers.

Overall ranking experience: The page is confusing/insufficient as the information provided is not useful for NGOs. It is not possible to identify in which articles the notified SVHC are found as the product categories search is complex and does not allow to consult overall categories of materials or of articles. The instructions on safe use that are displayed are useless.

User 2 experience: Consumer Organisation (BUND)

The consumer identified for this study is part of the civil society wanting to make informed consumer decisions for purchasing new products and scanning products e.g. already present at home. They have limited to no knowledge on harmful substances and chemicals in general, however have an awareness for the potential presence of these substances in products. They use Apps on their smartphones like Scan4Chem or ToxFox to use their REACH Art. 33 right to know.

Overall landing page: The landing page of the SCIP database is not intuitive for consumers. It is only accessible in English and difficult to access on the smartphone if a consumer is in a store. Consumers need a different landing page for the purpose of getting information on harmful substances in a product they want to purchase or have at home. Such an interface was developed in the LIFE AskREACH project with Apps ([Scan4Chem](#) and [ToxFox](#)) as well as the web interface. Connecting the SCIP database to this existing project would make the data more accessible to consumers. Instead of displaying a lot of text on the categories, for consumers to access the information of interest it would be good to display the SVHC notified at the overview page as well.

Search function: As a consumer, it is not intuitive how to quickly find information on a specific product. Once the consumer found the article identifier field, it helps that hovering with the mouse over the “identifier” describes which identifiers could be inserted here for the search. Looking at the results however, this is at the same time very misleading, as the consumers think they can insert either barcode or brand or article name etc. and will receive the same results. There is no explanation for what the reasons could be that a product is not found.

Article category: The article categories are not accessible. The wording is technical⁸ and their prominent display in the results is confusing. The many sub subcategories are confusing and the language does not help consumers to identify products with SVHCs for making informed consumer decisions. In a consumer interface, the focus needs to be on categories of manufactured articles in an easy-to-understand way.

Factsheet: It is good for consumers to have an overview page on the product with more detailed information on the SVHC and safe use instructions (which in brief should already appear on the overview page). However, it needs to be more intuitive to grasp the important information at one glance. The hazard information needs to be easier to understand in the native languages. Also, at the moment the page does not sufficiently identify the product. Consumers need to be able to compare the brand, the product name, and the barcode and ideally a photo to be sure to be looking at the correct product. Also, the concentration in the product should be visible on the main page without clicking.

Data/content: For a consumer, it is difficult to judge the quality of the information. When a product is not found in a search, it is not clear whether it means the product is without problematic substances or simply not found under the e.g. barcode, product name or brand name. Consumers want to know if and which harmful substances are in their products. This goes beyond SVHCs above 0,1%, but includes, e.g., which biocides were used or whether hormone disrupting substances are included at all. It needs to be described in simple language, what the consumer can find in the database and what not.

Safe use instruction: This field is very important to consumers and needs explanation in simple, native language how to deal with the product. As consumers will be unsettled when finding a product, it is important to give context regarding the safe instructions. For example: why is it sufficient to know about the lead to guarantee safe use? Will I be in touch with this reprotoxic substance and what do I have to take care of when disposing of the product? Other instructions such as “do not use indoors”, “avoid eye, skin and clothing contact” need to be displayed more prominently (and should also be mandatory to be stated on the product) with more clear advice and examples on how to follow these instructions correctly.

Overall ranking experience: It is good to have a database on chemicals in products which is accessible for consumers, as the interest to make informed consumer decisions based on this exists in Europe. So far, Art. 33 in REACH made consumers wait for 45 days for an answer if they even got one. The SCIP database has the potential to give consumers faster information rights at the point of sale. At the moment this still fails on the interface, which is not optimised for non-professional consumers all over Europe. A link to the LIFE [AskREACH](#) database could easily make the data accessible to millions of App users.

8. SCIP refers to the nomenclature established by CN/TARIC. According to the Agency, during the development of the SCIP database, the feedback ECHA received from stakeholders pointed towards the adoption of the CN/TARIC list as the best harmonised classification approach for articles/products.

User 3 experience: Waste handlers (Hazardous Waste Europe)

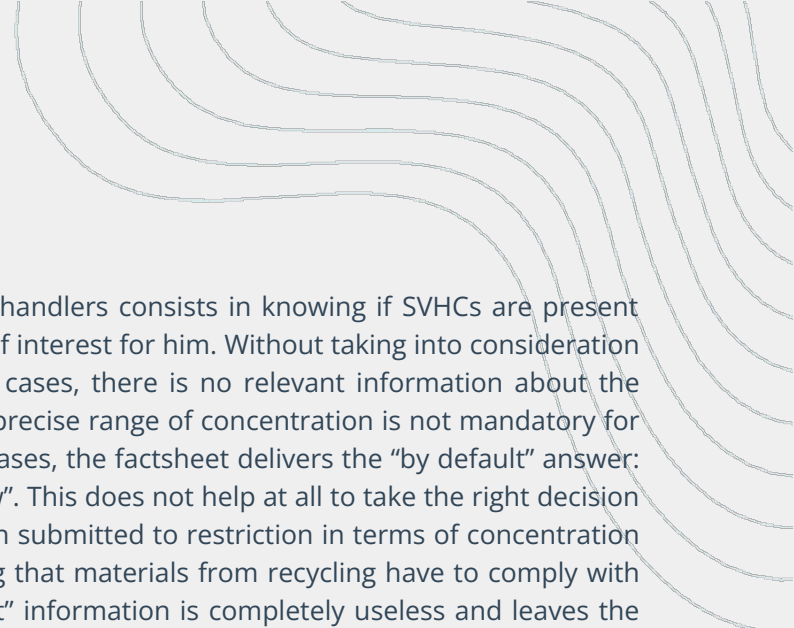
For the purpose of this report, waste handlers sharing their experience of the SCIP database are hazardous waste operators who have a very good background in chemistry and who are experienced in handling waste containing or contaminated with substances of concern. The SCIP database is expected to be used as a forecasting tool in order to appropriately design the waste management.

Overall landing page: The overall landing page is fine for the waste handlers. We don't need a responsive format as the database will not be used for instantaneous requests but from time to time in order to consolidate an overall information on the presence and content of SVHCs by waste stream.

Search function: The usability of the search function is key. Within the list of search items, article, article category, material, and mixtures and SVHCs are relevant. The two last reasons for inclusion and SCIP number are completely useless. The 2 most relevant search items are by article or by SVHC. Nevertheless, the identifiers under "article" are often far from the identifiers used by the waste handlers to define articles. The reason for that is that identifiers are those suitable for the manufacturers which are, in general, unknown for the waste handlers. There are 17 different types of identifiers which impede homogeneity. For the same article, manufacturers can use a serial number, a catalog number or whatever within the list of 17 identifiers, consequently it is impossible to get complete information regarding a specific type of article just with one request. In addition, the waste handler cannot know which kind of identifier is the most appropriate from a manufacturer perspective.

Article category: The article category could have been a streamlining identifier to solve the issue of the search item via article. Nevertheless, it is a very obscure item for the waste handlers and even though they might be sufficiently expert to use it, it is impossible to connect the result to real waste entering a waste treatment installation as the fact sheets provide a complete information but with an article identifier which is not usable to identify the waste that could be concerned.

Factsheet: The factsheets are very detailed with potentially relevant information for the waste handlers. Nevertheless, a fact sheet corresponds to one line of a search which can be constituted by thousands of lines. This means that it will be necessary to enter into each factsheet to get a complete answer. In addition, the information about the content of SVHCs in an article requires opening secondary pages (one per SVHC present in the article) in order to access the information about the concentration of SVHCs in an article. Consequently, it can take hours or even days before succeeding in consolidating the complete picture.



Data/content: The main objective for the waste handlers consists in knowing if SVHCs are present and in which concentration in the waste streams of interest for him. Without taking into consideration all the gaps previously identified, in most of the cases, there is no relevant information about the concentration of the identified SVHCs. As a more precise range of concentration is not mandatory for the manufacturer to be provided, in most of the cases, the factsheet delivers the “by default” answer: “Concentration range: > 0.1% w/w and ≤ 100% w/w”. This does not help at all to take the right decision for the treatment of the waste. As SVHCs are often submitted to restriction in terms of concentration and/or uses in different materials and considering that materials from recycling have to comply with the same rules as virgin materials, the “by default” information is completely useless and leaves the waste handlers in the current ignorance. It does not help to avoid toxic recycling.

Safe use instruction: It may be interesting to get this instruction, nevertheless, the current status of the information provided is unclear and useless: “The identification of the Candidate List substance is sufficient to allow safe use of the article throughout the whole life cycle including service life, disassembly and waste/recycling stage”. It would have been much more informative to access information in terms of occupational safety.

Overall ranking experience: Even though waste handlers are very supportive of the SCIP database, we fail to use it for the expected purpose due to its complexity in the search items and the absence of options to download results in a consolidated way.

User 4 experience: Academia (Research group sofia, Darmstadt)

Definition: Researchers need data on the presence of chemicals in products to evaluate the risks for human health and the environment and develop appropriate measures for risk mitigation and governance. Such information also facilitates the allocation of research resources.

Overall landing page: The landing page is overall fine.

Search function: The search function helps identifying individual articles with SVHCs (see feedback below). From a researcher perspective it is also important to analyze the “bigger picture”, to identify patterns. The search tools do not support such analysis: It is not possible to save search results online. Neither is it possible to export larger data sets from search inquiries in a readable format (e.g., xls). The latter would facilitate the cross analysis of patterns within search results.

Article category: The granularity of the categories (as such) support getting a very precise picture of SVHC relevance for article groups. With a view to getting the “bigger picture” it is unfortunately not possible to select entire article category sections (e.g., Section VII, plastics/rubber and articles thereof) for targeted searches.

Factsheet: The factsheet and the article structure tree in particular are useful for research purposes.

Data/content: It is striking that the database contains only roughly 9 million factsheets. How representative is the information vis-à-vis the total figure of articles placed on the EEA market? Do articles not notified indeed not contain SVHCs above the threshold? To run the system and maintain IT capacities, ECHA must have developed estimates about the expected notifications figures. Sharing this information would help evaluate the accuracy of the data.

Safe use instruction: The phrase "Identification of the Candidate List substance is sufficient to allow safe use of the article" appears to be the predominant safe use instruction provided by notifiers. ECHA defined this standard phrase as a default in the notification procedure. It is doubtful though whether this phrase is accurate, considering exposure scenarios when dismantling articles at their EoL.

Overall ranking experience: Lack of data impedes research in the assessment and governance of risks linked to chemicals in products. SCIP is indeed a unique data source that is however not optimized for scientific evaluation.

User 5 experience: Downstream Users (Decathlon)

Definition: Decathlon is a retail company, and we are considered as downstream user of SCIP. We use SCIP when we need to notify all articles or components that are produced or imported by Decathlon into European Union that contain SVHC above 1000 ppm.

Overall landing page: The idea of having all the information in one gateway is interesting because we can easily access all the information about the articles.

Search function: We can search by brand or model code which seems to be quite helpful for us.

Article category: There is too much information, not so user friendly but at the same time, the database is really complete.

Factsheet: Quite complete and clear.

Data/content: For the future and for the sake of safety for all customers, it would be interesting to require the full traceability of the supplier. For the moment, this part is not mandatory to be filled. Also give the opportunity to indicate if the article is produced in Europe or outside [JS1] (today we can only choose between: EU produced/imported or no data).

Safe use instruction: Today this part is not mandatory to be filled. Companies are not encouraged to give information on the safe use of their articles. It would be interesting to add information about the end of life, e.g. if articles can be recycled or upcycled.

Overall ranking experience: It takes a lot of time to understand how to use the tool (our colleague had to watch many webinars to be able to make the first notifications). The main difficulty with SCIP is the time it takes to integrate the data anyway. We had around a hundred hunting and fishing lead items with a very similar use but otherwise with the same concentration of lead etc. And there was nothing to facilitate the process of inserting products with the same characteristics.

Recommendations

The feedback from stakeholders shows that SCIP largely fails to meet its objectives. The identified lack of availability, accessibility and quality of data are quite concerning and suggest that SCIP, in its current format and level of implementation, may not be expected to be a significant contributor to achieving the Green Deal policy goals related to non-toxic circular economy. Rather, to this end improvements are needed. The report formulates recommendations addressing Industry, ECHA, the European Commission and Member States.

To Industry

Suppliers placing articles on the market:

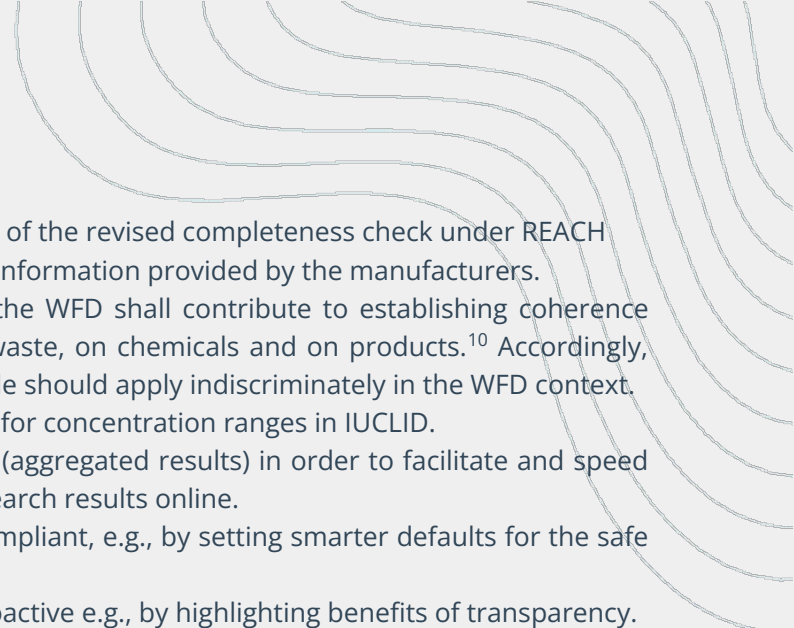
- 1) Invest real effort in supply chain management to identify all SVHCs in their articles – over their entire product life. Establishing full traceability of chemicals – even before they get identified as SVHCs – appears to be the most effective but also efficient management option.⁹
- 2) Notify meaningful data to SCIP that goes beyond the legally required minimum and that is needed by operators (e.g. precise concentration ranges) and consumers (e.g. brand name, barcode).

To ECHA

In the context of its current mandate:

- 1) Narrow down the list of identifiers usable by the manufacturers for the article item search (serial number, bar code where applicable, brand name, product name).
- 2) Define a table of correspondence between identifiers and common language used by waste handlers to qualify the waste streams they handle (e.g. computer, refrigerator, etc.).
- 3) Find a way to appreciate the representativeness of the search.
 - a) Currently, it is impossible to know if a result regarding a type of article containing a specific SVHC or set of SVHCs is representative of 1, 10 or 90% of the stream concerned. This information is essential for the decision-making process at the waste handler level (sorting/dismantling, decontamination, recycling, disposal).
 - b) Regularly assess the number of articles under each Taric code to check representativeness and level of reporting by manufacturers.

9. In this respect, see the also the [technical recommendations](#) (2021) by the [Proactive Alliance](#) towards a global material reporting standard.

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- 4) Assess quality of notifications in the sense of the revised completeness check under REACH
 - a) Introducing a quality check of the information provided by the manufacturers.
 - b) Adding the SCIP requirement to the WFD shall contribute to establishing coherence among the law of the Union on waste, on chemicals and on products.¹⁰ Accordingly, the REACH “no data no market” rule should apply indiscriminately in the WFD context.
 - 5) Design more meaningful default option(s) for concentration ranges in IUCLID.
 - 6) Allow the download of the search results (aggregated results) in order to facilitate and speed up the use of the data and allow to safe search results online.
 - 7) Support companies in becoming more compliant, e.g., by setting smarter defaults for the safe use instructions.
 - 8) Support companies in becoming more proactive e.g., by highlighting benefits of transparency.
 - 9) Create an option to notify articles without SVHCs above 0.1%, as this would not only increase transparency but also help understand the representativeness of the articles containing SVHC above 0.1%.
 - 10) Link SCIP with the database established in the EU project “LIFE AskREACH”¹¹ to avoid double-reporting and ensure that the information reported to SCIP is easily accessible to consumers and user-friendly.
 - 11) With a view to enhancing transparency, ECHA should be doing more with available information gathered under different regulatory instruments besides SCIP, i.e. information from REACH registration (e.g. the notification of SVHCs in articles pursuant to Article 7(2), (4) of REACH), REACH authorisation (decisions to include SVHC in Annex XIV of REACH, applications for authorisation and their assessment by the Agency’s Committees) and REACH restriction (Annex XV dossier and the assessment by the Agency’s Committees) processes. ECHA should map types of SVHCs (and other substances) in types of articles, integrating data from different sources, and share the results, in appropriate ways, with waste operators and consumers.

To the Commission

- 1) Enhance company compliance with SCIP notification obligations.
- 2) Urgently develop a consistent strategy to address substances (of concern) in products at the interface of legislation on chemicals, products, and waste (inter alia REACH, SCIP database, Ecodesign requirements with the Digital Product Passport currently developed in the framework of the ESPR) in terms of
 - a) unambiguous identification of products and their composition and
 - b) chemical substances in scope of the policies

10. See Recital 38 of Directive (EU) 2018/851.

11. See www.askreach.eu.

- 4) In line with the strategy to be developed, improve, and expand legal instruments, inter alia by using the ongoing revision of REACH and the legislative process on the ESPR, to pave the way towards the full traceability of chemicals as a precondition for non-toxic materials in a Circular Economy.¹²
- 5) In line with the strategy to be developed, expand the Agency's mandate under the WFD (or under REACH) when needed and ensure it has sufficient human and financial resources to fulfill its tasks.

To Member States

As the SCIP database is far from being complete, it is difficult to know, when the result of a search is unsuccessful, if this is due to a lack of data or if there is no SVHC in the article or if the article was placed on the market before the notification requirement kicked-in. Mindful also of the “no data no market” rule should apply indiscriminately in the WFD context,¹³ Member States should

1. Enhance company compliance with notification obligations by intensifying – or starting – enforcement.
2. Stipulate truly dissuasive sanctions for violations against SCIP and REACH communication obligations and implement these rigorously.

12. See the 2018 [NGO position](#) to the Commission “[Interfaces](#)” communication; see also the “Theory of Change” for a non-toxic circular economy [report from a workshop](#) hosted in May 2022 by the LIFE AskREACH project.

13. See above.