



FBDi Commentary

### **SCIP Database: Added Value or Extra Work?**

*New EU SCIP database for SVHC substances - reporting obligation under the REACH Regulation*

**Berlin, 14 January 2021** – Since January 5, manufacturers and suppliers are obliged to report information about substances of very high concern (SVHC) in their articles in the EU, which contain SVHCs (substances of the REACH candidate list) with a content of more than 0.1%, also to the ECHA (European Chemicals Agency). Based on Article 9 of the Waste Framework Directive (WFD (EU) 2018/851), this agency has been commissioned by the EU to set up a European database for this purpose - the SCIP database. It supplements the notification and reporting obligations under the REACH Regulation for substances on the candidate list, and is therefore intended to enable uniform collection of information at European level. The required information relates to the safe use of articles and products with a certain SVHC content. With the SCIP database, ECHA aims to improve knowledge about hazardous chemicals contained in articles and products throughout their life cycle - including disposal. The reported information should lead to transparent supply chains, drive recycling and the development of pollutant-free products.

The following information must be provided for the entry:

- Identification data of the article.
- Name, concentration range and location of the candidate list substance contained in the article in question.
- Other information on the safe use of the article, in particular on its proper treatment as waste.

In the absence of an implementing regulation from the German Federal Ministry for the Environment, however, there is currently a lack of clarity regarding 'mandatory' and 'optional' data. Already in the run-up, several associations (e.g. FBDi, VDMA) asked for postponement and structural improvement, which were not granted. The FBDi association supports its members with special white papers, which are developed in working groups and are tailored to the specific needs of distribution.

The FBDi would like to see more legal certainty here, as this unclear situation is not sustainable and forces many companies into a European quandary due to differing or missing national implementing regulations: "Such unclear framework conditions are poison for the economy, Europe and the environment. Those who take the requirements seriously incur extra work and costs and lose competitive advantages compared to those who unilaterally exploit the definition gaps in their favor. This makes it all the more difficult to understand why the database is being expanded at the same time to include query fields beyond REACH §33.1, which even the recycling industry does not consider useful. The sauce will be much more expensive than the roast, all the more so as the structure of the database is not sustainable due to a lack of ergonomics, but a lot of energy is "burned". What sticks is: "Another European Moloch! That is at least as wrong as it is bad for Europe! But also for Europe it is not the first time that a good idea is condemned because of poor implementation."

Author: Andreas Falke, Managing Director of FBDi association

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**About FBDi e. V. ([www.fbdi.de](http://www.fbdi.de)):**

The FBDi e.V. – Fachverband der Bauelemente Distribution e.V. (Professional Association of Component Distribution), founded in 2003, is well-established in the German association community and represents a large portion of distributors of electronic components with operations in Germany. In addition to the preparation and advancement of numerical data and statistics concerning the German distribution market for electronic components, work group engagement and reporting on important industry themes (amongst others, education, liability and rights, traceability, and environmental themes) form essential pillars of the association's work. The FBDi is a member of the International Distribution of Electronics Association (IDEA).

**Member companies (as per January 2021):**

**Regular members:** Acal BFi Germany; Arrow Europe; Avnet EMG EMEA; Beck Elektronische Bauelemente; Blume Elektronik Distribution; Bürklin Elektronik; CODICO; Conrad Electronic; Distrelec; Ecomal Europe; Endrich Bauelemente; EVE; Future Electronics Deutschland; Glyn; Gudeco Elektronik; Haug Components Holding; Hy-Line Holding; JIT electronic; Kruse Electronic Components; MB Electronic; MEDI Kabel; Memphis Electronic; Menges Electronic; MEV Elektronik Service; mewa electronic; Mouser Electronics; Neumüller Elektronik; pk components; Püplichhuisen; RS Components; Rutronik Elektronische Bauelemente; Ryosan Europe; Schukat electronic; TTI Europe.

**Supporting members:** TDK Europe, Recom.

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