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Glass and the SCIP database

1) Background

SCIP is the database for information on Substances of Concern in Articles as such or in complex objects (Products)¹. The legal basis for this database is Article 9 of the Waste Framework Directive (WFD). The database is maintained by the European Chemicals Agency (ECHA).

Companies supplying to the EU market articles which contain candidate list substances of very high concern (SVHC) in concentrations above 0.1% will be required to submit information on these articles to ECHA as from 5 January 2021. The SCIP database aims to ensure that information on articles containing candidate list substances is publicly available throughout the life cycle of products and materials, including disposal. The addressees are in particular waste management companies and consumers.

2) Concern of the glass industry

The glass producers are sometimes using SVHC substances as starting materials for the production of their glasses. However, the products of the glass industry consist entirely of the new substance glass. Cullet also do not contain SVHC substances.

Consequently, there is no obligation for articles made of glass to provide information in the SCIP database.

In the case that glass articles contain substances, mixtures or articles other than glass (complex articles), it is the responsibility of individual glass manufacturers to assess whether information obligations and possible notification are required.



¹ <https://echa.europa.eu/de/scip>

3) ECHA's position on glass

In a presentation of ECHA on "Key tips for successful SCIP notifications" (December 2020, v. 1.0)² ECHA confirms this legal position: Taking the glass industry as an example, ECHA explains that there are articles for the production of which SVHC substances are used, but which are no longer contained in the final product. For these articles, no notification to the SCIP database is required.

ECHA reminds that it is the task of the respective company to prove that a substance from the candidate list has been completely consumed in the production of glass and is no longer present in the final product.

Slide 14 of the ECHA presentation:

Only submit notifications for articles containing SVHCs on the Candidate List

- **The SCIP notification only applies to articles containing SVHCs on the Candidate List.**
 - For example: Boron (e.g. diboron trioxide, boric acid and disodium tetraborate) and lead (e.g. lead oxide) substances in the Candidate List used in the production of a **glass article** may not be present as such in that final glass article. In such cases, there is no obligation to submit a SCIP notification for that article, nor to communicate information down the supply chain under Art. 33 of REACH.
 - It remains the responsibility of companies to assess for their specific use of the Candidate List boron and lead substances whether these are completely transformed into glass in the manufacture of the glass substance and are not present as such in the final glass article.

We invite you to consult the Q&A [1218](#) (*Do I need to notify and communicate information down the supply chain for certain boron substances included in the Candidate List, which are involved in the production of boron glass articles but not present as such in these articles?*) which has been developed when certain boron substances are involved in the production of boron glass articles. Similarly to the case covered by that Q&A, certain lead substances (e.g. lead oxide) included in the Candidate List may be involved in processes leading to the production of articles containing a 'glass' substance. In these processes, the lead substances may be first chemically transformed into a manufactured glass substance. The glass substance is subsequently processed into articles. In many cases, the lead substances are completely transformed and are not present as such in the final glass article.

14

² https://echa.europa.eu/documents/10162/28213971/key_tips_for_successful_scip_notification_en.pdf/452a0fb6-2a91-ca37-034e-7b3c09a695be