Brussels, 22 October 2026

Joint statement for the repeal of the SCIP database – Environmental Omnibus

Key message

The Substances of Concern In articles as such or in complex objects (Products) (SCIP) database costs companies about EUR 225 million a year across all sectors, yet the recyclers it was built for barely use it. The Commission itself has acknowledged that waste operators find the data unusable. In practice, most EU companies lack the resources needed to submit and maintain the millions of notifications required. The repeal proposed by the Commission in the Environmental Omnibus removes a disproportionate reporting layer on top of existing REACH obligations and delivers immediate, concrete administrative relief that industry has welcomed. The underlying REACH Article 33(1) obligation to inform customers remains.

We **ask co-legislators to confirm the repeal of the SCIP database** as proposed under the Environmental Omnibus and supported in the draft report (PE787.998) of the ENVI Committee rapporteur, MEP Susana Solís Pérez.

Confirm the repeal of SCIP

The undersigned organisations represent a broad range of companies across the value chain, including manufacturers, importers, distributors and retailers of products placed on the EU market, as well as service suppliers. We remain committed to transparency on hazardous substances and to reducing their presence in products, but five years of SCIP reporting show that **the database has failed to deliver on its stated core objective**: giving recyclers usable information on the substances of very high concern in the waste they treat. We therefore ask EU co-legislators to confirm the repeal proposed in the Environmental Omnibus (Article 1(2) of proposal 2025/0394 (COD)) without any amendment that would delay or dilute it.

SCIP is flawed by design

The Commission estimates that ending SCIP reporting saves industry about EUR 225 million a year, and more in future years (Staff working document (2025) 990). Only about 10,000 companies are able to notify each year, a small fraction of the millions of EU businesses that supply articles. Yet even this limited group must cover around 1,500 articles each, for a total of about 15 million articles a year, and IT setup alone costs between EUR 1,000 and EUR 250,000 per company. ECHA also spends several million euros a year running the database. The rapporteur's draft report adds that SCIP delivers no corresponding environmental benefit and is not in line with Better Regulation principles (recital 5). SCIP was also introduced without an impact assessment, despite warnings from several industry associations since 2020.

The actual use of SCIP is low, and its usefulness is contested by most stakeholders. The proposal's explanatory memorandum notes that online consultations are few and the data too complex to be meaningful for most users. The Commission told Council experts in January 2026 that **waste operators "cannot understand or use the data"** (Council working document 889/2026). The problem lies in its design: SCIP records data per article

and supplier code, but recyclers do not sort waste product by product, and their treatment processes are not designed for product- or model-specific handling. They handle mixed streams and need to know what a stream contains. Products reaching recyclers today were placed on the market 10 to 20 years ago, so current data says little about today's waste. Duplicate records, inconsistent identifiers, limited traceability, weak searchability and unverified entries further undermine the reliability of the data. These are structural flaws that technical upgrades or extra guidance cannot fix.

REACH Article 33(1) already requires suppliers to pass on information about Candidate List substances above 0.1% to their customers. SCIP copies this information into a central database without making it more usable. The burden falls hardest on SMEs and on complex products made of many components and materials, from electrical and electronic equipment to vehicles, machinery and textiles. Such products come in many variants, and each minor change in design or supplier triggers new or updated notifications through costly IT systems.

Maintaining information flows on substances of concern

Repealing SCIP would not remove information on substances of very high concern. The obligations that carry information on hazardous substances through the value chain will stay in place, and new ones are coming:

- **REACH Article 33(1)** stays in force. Every supplier must continue to inform its customers about Candidate List substances in its articles.
- **The Delegated Acts** under the Ecodesign for Sustainable Products Regulation (EU) 2024/1781 (ESPR) provide a framework through which substance-related information requirements may be established on a product-group basis, where relevant. This provides a relevant context in which to further investigate information requirements for substances of concern in products, designing them around what recyclers need, rather than around a notification format.
- **Sector rules** already address certain hazardous substances directly. For electrical and electronic equipment, RoHS restricts them at the design stage, and the WEEE Directive Article 15 requires producers to give treatment facilities information on each new type of equipment. Similar requirements exist for vehicles with the new End of Life Vehicle Regulation (ELVR) or are under consideration within the ESPR.

Any future approach should build on existing supply-chain obligations rather than add new reporting layers. The transition to future tools, including the Digital Product Passport (DPP) where relevant, should not result in unnecessary duplication of reporting requirements. We emphasise the strong need for a comprehensive feasibility and impact assessment to see whether a DPP solution is fit for purpose, to avoid repeating the mistakes that have been made with the SCIP database.

Moving the obligation to another platform or simplifying its format would not help either, as the burden lies in updating data product by product, no matter the format. **REACH Article 33(1) should therefore remain the cornerstone** for communicating information on substances of very high concern in articles. Clearer guidance, common data-exchange standards and consistent enforcement would make it a robust traceability tool throughout the supply chain, with data on Candidate List substances provided only once.

This statement is supported by the undersigned organisations.



































































