Paris, 8 October 2024

Addendum of 3 March 2025

BEST-PRACTICE GUIDANCE FOR THE EUROPEAN SPACE SECTOR TO COMPLY WITH *SCIP* NOTIFICATION

Recommendations for compliance with Article 9 (1) (i) of the revised Waste Framework Directive 2008/98/EC – as nationally transposed – for EU suppliers of equipment designed to be sent into space and related means of transport which do not result in waste for treatment on Earth/in EU

The *Waste Framework Directive Task Force of the European Space Sector addressing Substances of (Very High) Concern in Products "SCIP"* [1] *(WFD/SCIP Task Force)* – represented by *ASD-EUROSPACE* – collaborating with European and national space agencies – wishes to share this Best-Practice Guidance to facilitate legal compliance with the SCIP notification requirement pursuant to Article 9(1)(i) of Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste (hereafter also referred to as the revised Waste Framework Directive/WFD) – as nationally transposed.

The WFD/SCIP Task Force is a splinter group of the *Materials and Processes Technology Board of the European Space Components Coordination (ESCC MPTB)*. The MPTB is a partnership between the *European Space Agency (ESA)*, national space agencies, and space industry represented by ASD-Eurospace; it is chaired at present by ESA.

PREFACE

ADDRESSEES OF THE GUIDANCE

This Guidance is primarily addressed to EU suppliers of equipment designed to be sent into space and related means of transport (spacecraft, such as satellites for telecommunication, navigation, earth observation or space exploration and launch vehicles) which do not result in "waste" for treatment on Earth / in EU (hereafter "**Space Products**"). Space Products are highly complex assemblies, that may consist of millions of articles. The corresponding supply chains leading to their production are complex, multi-tier and global. The space industry operates with demanding qualification requirements and very long lifecycles from design and production to exploitation phases (long-length programmes).[2]

[1] **S**ubstances of **C**oncern **I**n articles, as such or in complex objects (**P**roducts), see https://echa.europa.eu/fi/scip-database.

[2] See further description in ASD-Eurospace, European Space Sector feedback on the CSS REACH Revision – Position Paper of 13 April 2022, available at https://eurospace.org/wp-content/uploads/2022/04/eurospace_sfg_position-paper_reach-rev_opc_13042022.pdf.

This Guidance does not affect the ongoing compliance of actors in the European Space Sector with REACH, its Article 33(1) and the specific legal regime for space activities, which includes environmental objectives. Space activities are governed by international agreements[3] and national space law.[4] The space law framework contains specific and very stringent rules and safety requirements.[5]

REFERENCE DOCUMENTS

This Guidance draws on the following key references documents, as applicable:[6]

- *ASD Sectoral Guidance for WFD/SCIP implementation*, Version 1.1, 14 April 2022 (hereafter: **"ASD SCIP Guidance"**) – available here;
- *ASD SCIP Guide in brief*, April 2022 (hereafter: **"ASD SCIP Brief Guide"**) – available here;
- *ECHA Requirements for SCIP notifications*, October 2020 (hereafter "**ECHA SCIP requirements**") – available here;[7]
- *ASD Sectoral Guidance for Substances in Articles under RE*ACH, Version 1 – November 2017 (hereafter "**ASD SiA Guidance**") – available here;
- *ECHA Guidance on Requirements for Substances in Articles*, Version 4.0, June 2017 (hereafter "**ECHA SiA Guidance**"), available here.

LEGAL DISCLAIMER

This document aims to assist users in complying with their obligation pursuant to Article 9(1)(i) of the revised Waste Framework Directive 2008/98/EC, as transposed in the EU Member States. It is based on the compliance approach already applied under Article 33(1) of the EU REACH Regulation (EC) 1907/2006, as interpreted following the judgment of the Court of Justice of the European Union (CJEU) of 10 September 2015 in case C-106/14, and in line with applicable sectoral guidance.

Users are reminded that the legal texts of the EU Member States national provisions transposing Article 9(1)(i) of the revised Waste Framework Directive are the only authentic legal reference and that the information in this document does not constitute legal advice. Usage of the information remains under the sole responsibility of the user. ASD-Eurospace and the WFD/SCIP Task Force participants do not accept any liability with regard to the use that may be made of the information contained in this document. This being understood, the review of the available national provisions transposing WFD Article 9(1)(i) has shown that this Guidance is consistent with those.[8]

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[3] See *United Nations Treaties and Principles On Outer Space, related General Assembly resolutions and other documents* (ST/SPACE/61).

[4] Concerning launches from CSG (launcher and spacecraft), the French Space Act (Loi n° 2008-518 du 3 juin 2008 relative aux opérations spatiales – « L.O.S. ») applies.

[5] See also Space Industry Position on WFD Article 9 and its Addendum 1 on *'Space Debris Mitigation'*.

[6] In reverse chronological order. Only European level documents are mentioned.

[7] Translated versions of this document can be found at https://echa.europa.eu/scip-database.

[8] The *ASD SCIP Guidance* (Section 13.4 / Appendix 4) provides a comprehensive overview of the national transposition measures for Article 9(1)(i) of Directive (EU) 2018/851. Further information communicated by the Member States may be available at https://eur-lex.europa.eu/legal-content/EN/NIM/?uri=celex:32018L0851.

LEGAL CONTEXT

Article 9 of the revised WFD (titled *'Prevention of waste'*) foresees (par. 1) that ***'Member States shall take measures to prevent waste generation. Those measures shall, at least:*** […] *(i) promote the reduction of the content of hazardous substances in materials and products, without prejudice to harmonised legal requirements concerning those materials and products laid down at Union level, and* ***ensure that 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 provides the information pursuant to Article 33(1) of that Regulation to the European Chemicals Agency as from 5 January 2021****'*.

This SCIP notification requirement was to be transposed into national laws in the EU Member States by 5 July 2020. Table 1 below provides an overview of national transpositions in some ESA Member States.[9]

Table 1 WFD/SCIP transposition status in major ESA Member States

Country	National SCIP Law	Special provisions
Belgium	*Arrêté royal relatif aux informations communiquées par tout fournisseur d'un article à l'Agence européenne des produits chimiques 23.3.2020*, Article 2 (LINK)	-
France	*Ordonnance n° 2020-920 du 29.7.2020 relative à la prévention et à la gestion des déchets, Article 1 – III. ajouté à l'article L. 521-5 du code de l'environnement* (LINK)	• Exemptions for defined war material and dual-use items: *Décret n°2023-925 du 5.10.2023 relatif à l'obligation de communication des informations prévues à l'article 33 du règlement (CE) n° 1907/2006 à l'Agence européenne des produits chimiques (ECHA)* (LINK). • Penalties for failure to transmit information as a "5th class fine" (up to €1,500). The same sanction will be applied in the event of the transmission of information covered by a notification exemption.
Germany	*Gesetz zum Schutz vor gefährlichen Stoffen 1 (Chemikaliengesetz - ChemG), § 16f Informationspflicht der Lieferanten* (LINK)	• 10-point catalogue of data to be provided to ECHA as part of SCIP notification inserted in § 16f(1)1 ChemG through a law published on 23.11.2023 (LINK); the latter law also introduces explicit provisions to allow for administrative fines for violations of the SCIP notification duty (§ 26(1) No. 6a. ChemG); the offence may be sanctioned with a fine of up to ten thousand euros (§ 26(3) ChemG) • Automatic exclusion from SCIP for articles intended for military use (§ 16f(1)2 ChemG)
Italy	*DECRETO LEGISLATIVO 3 settembre 2020, n. 116, Art. 3* (LINK)	-
Spain	*Ley 7/2022, de 8 de abril, de residuos y suelos contaminados para una economía circular, Artículo 18 (5)* (LINK)	• Fourth additional provision. Application of the laws regulating National Defence. Point 2 (LINK): The MoD shall establish the instruments and means to implement a defence exemption mechanism in accordance with REACH Article 2(3).
UK	Revised WFD 2018 incl. SCIP not transposed	-

Article 9(2) of the revised WFD further stipulates: *'The European Chemicals Agency shall establish a database for the data to be submitted to it pursuant to point (i) of paragraph 1 by 5 January 2020 and maintain it. The European Chemicals Agency shall* ***provide access to that database to waste treatment operators****. It shall also provide access to that database to consumers upon request.'*

[9] See also references under footnote 8.

ECHA went even beyond WFD Article 9(2) as it provides **public access** to this 'SCIP database', subject to some limitations[10]; it is available at https://echa.europa.eu/scip-database.

Recital (38) of Directive (EU) 2018/851 elaborates on the rationale of these provisions as follows: *'**When products, materials and substances become waste**, the presence of hazardous substances may render that waste unsuitable for recycling or the production of secondary raw materials of high quality. Therefore, in line with the 7th Environment Action Programme, which calls for the development of non-toxic material cycles, it is necessary to promote measures to reduce the content of hazardous substances in materials and products, including recycled materials, and to ensure that sufficient information about the presence of hazardous substances and especially substances of very high concern is communicated throughout the whole life cycle of products and materials. In order to achieve those objectives, it is necessary to improve the coherence among the law of the Union on waste, on chemicals and on products and to provide a role for the European Chemicals Agency to **ensure that the information about the presence of substances of very high concern is available throughout the whole life cycle of products and materials, including at the waste stage**.'*

Importantly, the scope of the SCIP notification pursuant to WFD Art. 9(1)(i) is intrinsically linked to specific REACH legal provisions, as further interpreted by the CJEU:

- Duty holder is any *'supplier of an article'*, i.e. *'**any producer or importer of an article, distributor or other actor in the supply chain placing an article on the market**'* (REACH Art. 3(33)). *'Placing on the market'* means *'supplying or making available, whether in return for payment or free of charge, to a third party'* (REACH Art. 3(12)).

- The scope of information to be notified refers to REACH Article 33(1), which stipulates: *'Any supplier of an article containing a substance* [included in the REACH Candidate List] *in a concentration above 0.1 % weight by weight (w/w) shall provide the recipient of the article with **sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance.**'*

- With regard to the latter duty to communicate information on substances in articles down the supply chain the CJEU has ruled in a landmark judgment of 10 September 2015 in case C-106/14,[11] that the application of REACH Art. 33 is **triggered** by the presence of the Candidate List substance **in each constituent article** part of a complex product.

- With regard to the scope of information to be reported the CJEU has stated that the information pertains to the **presence of that substance** by providing, as a minimum, its name. According to the CJEU *'the REACH Regulation does not contain any provisions governing specifically the situation of a complex product containing more than one article. That legislative silence must be construed in the light of the **principal objective pursued by the regulation, which is not to regulate all manufactured products, but to monitor the chemical substances present** by themselves or in a mixture as well as, in certain cases, particularly those listed restrictively in Article 7 thereof, when they are contained in articles'* (par. 49).

[10] Not published are the identity of the notifying entity, the SCIP number and for complex object components specific names (e.g. brand, model) or alphanumerical identifier; see ECHA guidelines of October 2021 (link).

[11] The judgment is available in English at http://curia.europa.eu/juris/document/document.jsf?text=&docid=167286&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=3712794.

- With regard to the principle of proportionality the CJEU has highlighted in the said judgment, that the scope of the duty to provide information is *'limited by Article 33* [of REACH], *which states that 'sufficient information, available to the supplier, to allow safe use of the article [in question]' must include,* ***as a minimum, the name of that substance. That requirement****, which* ***is minimal in nature****, cannot be regarded as being an excessive burden'* (par. 81).

Therefore, the review of the legal background in the revised WFD and REACH clearly shows that:

1. WFD Article 9 has been added **with specific regard to the waste stage**;
2. The scope of SCIP notification is **delimited by REACH Article 33(1)**;
3. The reporting duty pertains to the **presence** of a substance in the (complex) product and does not need to extend to a product breakdown and identification of the constituent article(s), unless to the extent that this information is available to the supplier and also deemed to be required for the safe use of the product supplied under REACH Article 33(1).

THE SPECIAL CASE OF SPACE PRODUCTS

As elaborated in detail in the *Space Industry Position on WFD Article 9,* Space Products not resulting in waste for treatment on Earth / in EU should be **outside the scope** of the revised Waste Framework Directive and its Article 9. However, SCIP notification and database requirements are interpreted widely by the European Commission and ECHA with special regard to the **waste stage / operators**, which is **not relevant for Space Products**.[12] Yet, an explicit exemption for Space Products in the Waste Framework Directive and its Article 9(1)(i) was omitted.

Therefore, the recommendations in this Best-Practice Guidance aim at providing proportionate and practical recommendations for any required SCIP notifications tailored to Space Products.

The recommendations also take into account that a detailed disclosure of data to the SCIP database would raise serious concerns with regard to intellectual property rights, confidentiality requirements and the vital protection of the European Space Sector's know-how on advanced space technologies. It could also lead to serious conflicts with other national legislation and sovereign rights, as well as export control, security and defence interests (e.g. for dual use products). A Bill-of-Materials-like disclosure of the product breakdown to the SCIP database must be strictly avoided.[13]

[12] See Becker T., The SCIP Database under Directive (EU) 2018/85, International Chemical Regulatory and Law Review, Volume 2, Issue 4 (2019), pp. 147 – 156; available at https://doi.org/10.21552/icrl/2019/4/4 and www.reachlaw.fi. The article provides a critical legal review of ECHA's SCIP information requirements.

[13] See also Space Industry Position on WFD Article 9 and its Addendum 2 on *'Implications of ECHA database inclusion for space products'*.

GENERAL RECOMMENDATIONS FOR SCIP NOTIFICATIONS

The following key recommendations for SCIP notification compliance for Space Products are made:

1. EU-based entities are advised to analyse carefully whether they are a duty holder for SCIP notification (see REACH Article 3(33) *"supplier of an article"*), i.e. whether they are *"a producer or importer of an article, distributor or other actor in the supply chain placing an article on the market"* which contains one or more Candidate List substances above 0.1% weight by weight. This is the case at least for products placed on the market by a company for which it should already provide information according to REACH Art. 33(1) to its customers.

2. The aggregation approach in the *ASD SiA Guidance* can be followed also for SCIP notifications, i.e. substance-level reporting may be done at the assembly / supplied product level, unless a further breakdown / localisation is exceptionally required to ensure safe use of the product (see also *ASD SCIP Guidance*, especially Section 8.1).

3. Duty holders make use of ECHA SCIP notification formats, tools and software (ECHA account, IUCLID for SCIP, ECHA Submission portal, etc.), following the advice on the ECHA SCIP webpages.

4. Data for SCIP notifications do not need to go beyond what is legally required under REACH Article 33(1), i.e. as "available to the supplier". The information may thus be limited to what is strictly "mandatory" or "required" for a successful submission (see Annex 2).

5. SCIP notifications can be made on a *"can build"* basis rather than a unique notification for each minor variant *"as built"*, following a typical or worst-case SVHC content model ('representative article approach') based on available information and expert judgment. For further information (incl. challenges and risks) please consult the *ASD SCIP Guidance*, in particular Section 7.2.

6. If a SCIP notification obligation is confirmed, but the duty holder has defence, export control or security related concerns with regard to the SCIP database submission, it is advised to turn to the Member State(s) where the product is placed on the market, to consult the national provisions transposing WFD Article 9(1)(i) and discuss any available options to effectively deal with such concerns. Especially for concerns that may be linked with interests of defence, such options may include also the possibility to seek defence exemption(s), as foreseen under Article 2(3) of the REACH Regulation, if deemed appropriate and necessary. For further information on available national defence exemptions / application procedures please consult the *ASD SCIP Guidance*, in particular Section 4.2 and Section 13.4 / Appendix 4: National transposition of WFD/SCIP (Table 9 with specific column on Defence exemption).

7. In the specific case of products and components acquired from outside the EU, the legal responsibility for SCIP notification is with the EU customer, if he qualifies as *"supplier of an article"*. Non-EU companies are not eligible to make SCIP notifications, but they can be appointed as a 'foreign user'[14] to manage SCIP notifications on behalf of their EU customers.

[14] E.g. ECHA Q&A ID 1610, Version 3.0 of 12/09/2023, available at https://echa.europa.eu/de/support/qas-support (last viewed on 20/09/2024). For further, sectoral recommendations on the foreign user concept please consult the *ASD SCIP Guidance*, Section 7.6.

The companies involved in such non-EU transactions are advised to analyse such specific voluntary instruments and – if considered viable – make the necessary arrangements.

Practical examples of how a SCIP notification for Space Products could look like in line with these recommendations are given in Annex 4 for microwave communication equipment (example 1) and a telecommunication satellite (example 2). In addition, the *ASD SCIP Guidance* provides real SCIP notification examples of a solar generator system for satellites (Section 9.5.3, top-level approach) and a chemical propulsion system (Section 9.5.1, two-level approach with reporting at subsystem level).

SPECIFIC RECOMMENDATIONS FOR DUAL USE PRODUCTS

Dual-use items include products which can be used for both civil and military purposes (Article 2(1) of Regulation 2021/821 of 20 May 2021[15]). The classification as a dual-use item as well as the scope of defence-related exemptions from SCIP notification (incl. in relation to dual use) may be different from one Member State to the other. This may pose the question whether a SCIP notification is needed in case of cross-border transfers of such items between Member States with different rules, resulting in a conflict of laws.

Example: A dual-use item produced in Member State A is supplied to a customer in Member State B. Member State A foresees an exemption from SCIP notification only for articles for military purposes, which are procured by its ministry of defence. However, in Member State B (country of destination) the same item is classified as a military product, also when acquired for dual use / civil purpose. The national law in Member State B contains a mandatory exemption from SCIP notification for military and dual-use products, whereas SCIP reporting in violation of this exemption may be subject to a fine.

In this case the product supplier from Member State A to Member State B is advised to consider both national regimes. Since the supplier cannot be required to violate a legal provision, even more if subject to possible sanctions (here: in Member State B), it may decide to abstain from SCIP reporting to ECHA due to the conflict of laws and document the reasons for this approach. It is thus recommended that the company issues a "justification note" explaining the conflicting legal situation and justifying why SCIP notification has not been done. In addition, the company may consider prior consultation of the national competent authorities in both Member States.

The *ASD SCIP Guidance* provides further advice on dual use vs. SCIP, esp. Q&A #14, which states:

> *Question*:
> *How to handle the SCIP notification for products subject to export control regulations (e.g. an imported US article covered by ITAR [International Traffic in Arms Regulations] or EAR [Export Administration Regulations] restrictions or a product that is subject to military or dual-use licensing), when a company may face a legal conflict due to contradictory legal obligations?*
>
> *Answer:*
> *According to ECHA, US regulations are outside of its remit, and it is the responsibility of companies to take the necessary steps to certify that they are in compliance with these regulations.*
> *Please note that all national export control legislation (military articles) and that all EU export control legislation (dual-use articles) must be observed. Before any SCIP notification, the impact of the general digital dissemination of data in SCIP's public portal must be considered carefully. Therefore, according to this Guidance, such protected data should not be disclosed as part of WFD/SCIP notifications under any circumstances, noting that the penalties for a data*

[15] Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021 setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items (recast)

breach may apply to individuals as well as companies and that a gross breach could result in extradition proceedings.

The Member State authority (e.g. the authority which handles exports, whether in tangible or intangible form, of military equipment and of dual-use items) and in some cases also from the third country (e.g. US) authority would need to be consulted regarding export control Personal Security Clearance, licenses or authorisations. If a SCIP notification is not possible due to conflicting export control regulations, the duty holder may seek a defence exemption as a primary recourse.

IMPLICATIONS OF ECHA 'REQUIREMENTS FOR SCIP NOTIFICATIONS' (OCTOBER 2020)

In October 2020 ECHA has published a document 'Requirements for SCIP notifications'. In this document ECHA has highlighted the potential very broad scope of the SCIP notification duty, including Space Products, taking the example of satellites (page 34). For those 'specific extremely complex and customised products', as well as for certain highly complex objects (e.g. certain electronic devices) 'only temporarily, at a company's own risk […]', ECHA has clarified that more far-reaching 'grouping' approaches, such as the 'representative article approach'[16], may be allowed to be used by duty holders in each individual EU Member State. ECHA has pointed out that it is up to the Member State competent authorities to agree with such approach to submit SCIP notifications.

Prior to this on 12 October 2020, the European Commission replied to a joint industry letter co-signed and supported by 40 EU and non-EU industry associations (including ASD) that it understands the diversity and complexity of supply chains of industries, the heavy impact of the pandemic crisis and the challenges that businesses are facing in fulfilling the obligation mandated by Article 9 of the WFD, encouraging companies *"to do what is possible within these limitation"*[17]. The present Guidance reflects this best effort and space industry commitment, taking into account the special case of Space Products.

DOCUMENT HISTORY

- Initial version of 30 September 2020
- 1st update 'version 1.1' of 3 February 2021 (ref. MPTB-ES-GD-0047), to take into account the document ECHA 'Requirements for SCIP notifications' of October 2020 and the progress on national transposition of WFD Art. 9(1)(i)
- 2nd update 'version 1.2' of 19 September 2022 (ref. MPTB-ES-GD-0110), to take into account publication of SCIP Database, the sectorial ASD Guidance on WFD/SCIP (as of April 2022) and provide clarifications / recommendations on SCIP notification for dual use products; new Annex 3 'Space-relevant categories for SCIP notifications';
- **Present 3rd update 'version 1.3.' of 8 October 2024 (ref. MPTB-ES-GD-0158), updating links to reference documents, adding Table 1 'WFD/SCIP transposition status in major ESA Member States', Annex 3 – change of heading from 8803 to 8807. *With addendum of 3 March 2025 the actual entry of the data in IUCLID6 has been added for Example 1 and Example 2 (see Annex 4).***

This Guidance will be maintained as a 'living' document. Hence it will be further updated as needed in the future to take into account the evolution of requirements and industry best practices.

[16] See above Recommendation 5.

[17] European Commission, letter ref. Ares(2020)5424145 of 12 October 2020.

ANNEX 1: LIST OF KEY ACRONYMS

CJEU	Court of Justice of the European Union
CN	Combined Nomenclature (Annex I to Council Regulation (EEC) No 2658/87) on the tariff and statistical nomenclature and on the Common Customs Tariff
ECHA	European Chemicals Agency
ESA	European Space Agency
EUPCS	European Product Categorization System. EuPCS webpage
IUCLID	International Uniform Chemical Information Database
L.O.S.	Loi n° 2008-518 du 3 juin 2008 relative aux opérations spatiales, the French Space Act
MPTB	Materials and Processes Technology Board
PCB	Printed Circuit Board
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals (Regulation (EC) No 1907/2006)
SCIP	Substances of Concern In articles, as such or in complex objects (Products)
SiA	Substances in Articles
SVHC	Substance of very high concern (see REACH Article 57)
TARIC	TARif Intégré Communautaire; The integrated Tariff of the European Union database
WFD	Waste Framework Directive (Directive 2008/98/EC on waste, as amended by Directive (EU) 2018/851)

ANNEX 2. BEST PRACTICE FOR FULFILLING SCIP INFORMATION REQUIREMENTS

According to this Guidance the data for SCIP notifications do not need to go beyond what is legally required under REACH Article 33(1). The information may be limited to what is strictly necessary for a successful submission. The following table provides an overview of the latest ECHA SCIP information requirements for submission and guidelines how they can be addressed for Space Products in a proportionate and pragmatic way.

Table 2 SCIP information requirements for submission - Best Practice for Space Products

No.	SCIP data field (IUCLID)	Submission requirement (ECHA)[18]	Best Practice for Space Products
1	**Article name (complex object)**	Mandatory	Mandatory according to REACH Article 33(1) for the "top level" entity (as placed on the market)
2	**Other names (brand, model)**	Optional	*Not needed*
3	**Primary article identifier**	Mandatory	Select suitable type option and value, e.g. (company) 'part number'
4	**Other identifiers**	Optional	*Not needed*
5	**Article category (CN/TARIC codes and descriptions)**	Mandatory	Select suitable SCIP article category for top level entity, in particular the section 'Spacecraft (including satellites) and suborbital and spacecraft launch vehicles 88 02 60 00 00' A non-exhaustive shortlist of space-relevant SCIP article categories is available in Annex 3 (Table 3) of this Guidance.
6	**Production or import in European Union or EEA**	Required	Select suitable option: 'EU or EEA produced'; 'EU or EEA imported'; 'both EU or EEA produced and imported'; 'no data'
7	**Characteristics (picture, dimensions, colour, weight, …)**	Optional	*Not needed*
8	**Safe use instruction(s) (SUI)**	Required	Mandatory according to REACH Article 33(1). Possible option to select ECHA/SCIP standard clause if no specific SUI needs to be provided: *"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".*

[18] "Mandatory" = not data will fail submission; "required" = input needed but can be waived/no additional information for a successful submission; "optional" = voluntary.

No.	SCIP data field (IUCLID)	Submission requirement (ECHA)[18]	Best Practice for Space Products
9	**Disassembling instructions**	Optional	*Not needed*
10	**Linked article**	Mandatory, if applicable	*Not needed/applicable (assembly level reporting), unless required for safe use.* In the latter case, provide mandatory/required article identifiers above for each linked article containing the Candidate List substance.
11	**Number of units**	Optional	*Not needed*
12	**Candidate List substance**	Mandatory	Mandatory according to REACH Article 33(1)
13	**Concentration range**	Required	Possible option to select > 0.1% w/w and ≤ 100% w/w
14	**Material category and/or Mixture category (EUPCS)**	Mandatory	Select suitable category. In the absence of a more specific category or in case of multiple choices a possible fall-back option is Material category 'Other'. SCIP Material and Mixture Categories can be roughly correlated with equivalent European Cooperation for Space Standardization (ECSS) Material Class numbers using the suggestions in Annex 3 (Table 4) of this Guidance.
15	**Additional material characteristics**	Optional	*Not needed*

For more detailed recommendations on each 'mandatory' or 'required' SCIP submission data field – especially with view to protecting sensitive product information – please consult Section 8.3 of the *ASD SCIP Guidance*.

ANNEX 3: SPACE-RELEVANT CATEGORIES FOR SCIP NOTIFICATIONS

This Annex provides additional guidance for the identification of appropriate categories (article, mixture and material categories) for SCIP notifications for space products.

A non-exhaustive shortlist of space-relevant SCIP **Article categories** can be seen below, based on the chapter 88 (Aircraft, spacecraft, and parts thereof) TARIC codes. Please note that some TARIC codes do not have a corresponding SCIP Article Category (denoted as "Not selectable").

Table 3 Non-exhaustive shortlist of space-relevant SCIP Article Categories

TARIC Code	SCIP Article Category	Code Description
880260	8802600000	Spacecraft (including satellites) and suborbital and spacecraft launch vehicles
88026011	*Not selectable*	Spacecraft (including satellites)
88026011	8802601100	Telecommunication satellites
88026019	8802601900	Other (spacecraft)
88026090	8802609000	Suborbital and spacecraft launch vehicles
88079021	8807902100*	[Parts] of telecommunication satellites
88079029	8807902900*	Other [parts of spacecraft, incl. satellites]
88079030	8807903000*	[Parts] of suborbital and spacecraft launch vehicles

*Please note that these SCIP Article Categories have changed in 2023, based on the January 2022 update of the TARIC database (see SCIP IT User Group of 28 April 2022, page 8 of ECHA presentation): This update deleted heading 8803 and instead introduced a new heading 8807 (see latest TARIC database here). This change can be validated by the duty holder with the next update of its SCIP notification (if any) using the (future) IUCLID format based on the changed SCIP article categories.

SCIP **Material and Mixture Categories** can be roughly correlated with equivalent *European Cooperation for Space Standardization (ECSS)* Material Class numbers using the suggestions below. Note where the category has multiple sub-categories, the appropriate most equivalent sub-category will need to be selected when preparing the dataset.

Table 4 ECSS Material Classes and their suggested equivalent SCIP Material or Mixture Category / Sub-Category

ECSS Mat. Class	Description	Equivalent SCIP Material Category / Sub-Category *Equivalent SCIP Mixture Category / Sub-Category*
1	Aluminium and aluminium alloys	aluminium (and alloys of)
2	Copper and copper alloys	copper (and alloys of, except bronze and brass)
3	Nickel and nickel alloys	nickel (and alloys of)
4	Titanium and titanium alloys	titanium (and alloys of)
5	Steels	steel
6	Stainless Steels	stainless steel
7	Filler metals: welding, brazing soldering	*PC_TEC-24 Welding, soldering, and flux products*
8	Miscellaneous metallic materials	other non-ferrous metal (and alloys of)
9	Optical materials	optical glass
10	Adhesives, coatings, varnishes	*PC-ADH Adhesives and sealants*
11	Adhesive tapes	*PC-ADH-OTH Other adhesives and sealants*
12	Paints and inks	*PC-PNT Paints and coatings (and related auxiliaries)*
13	Lubricants	*PC-TEC-11 Lubricants, greases, release agents*
14	Potting compounds, sealants, foams	*PC-ADH Adhesives and sealants*
15	Reinforced plastics (including PCBs)	plastic (and polymers)
16	Rubbers and elastomers	rubber and elastomers
17	Thermoplastics	plastics (and polymers)
18	Thermoset plastics (including PCBs)	plastics (and polymers)
19	Material aspects of wires and cables	polyvinylchloride (pvc), soft
20	Miscellaneous non-metallic materials	[multiple possibilities: select appropriate category]

ANNEX 4: PRACTICAL EXAMPLES OF SCIP NOTIFICATION APPROACH FOR SPACE PRODUCTS

The practical examples below are provided merely to illustrate the SCIP notification approach according to this Guidance for Space Products, based on some background information on their product composition and supply chain. They do not imply that a SCIP notification duty would actually exist for the example products mentioned.

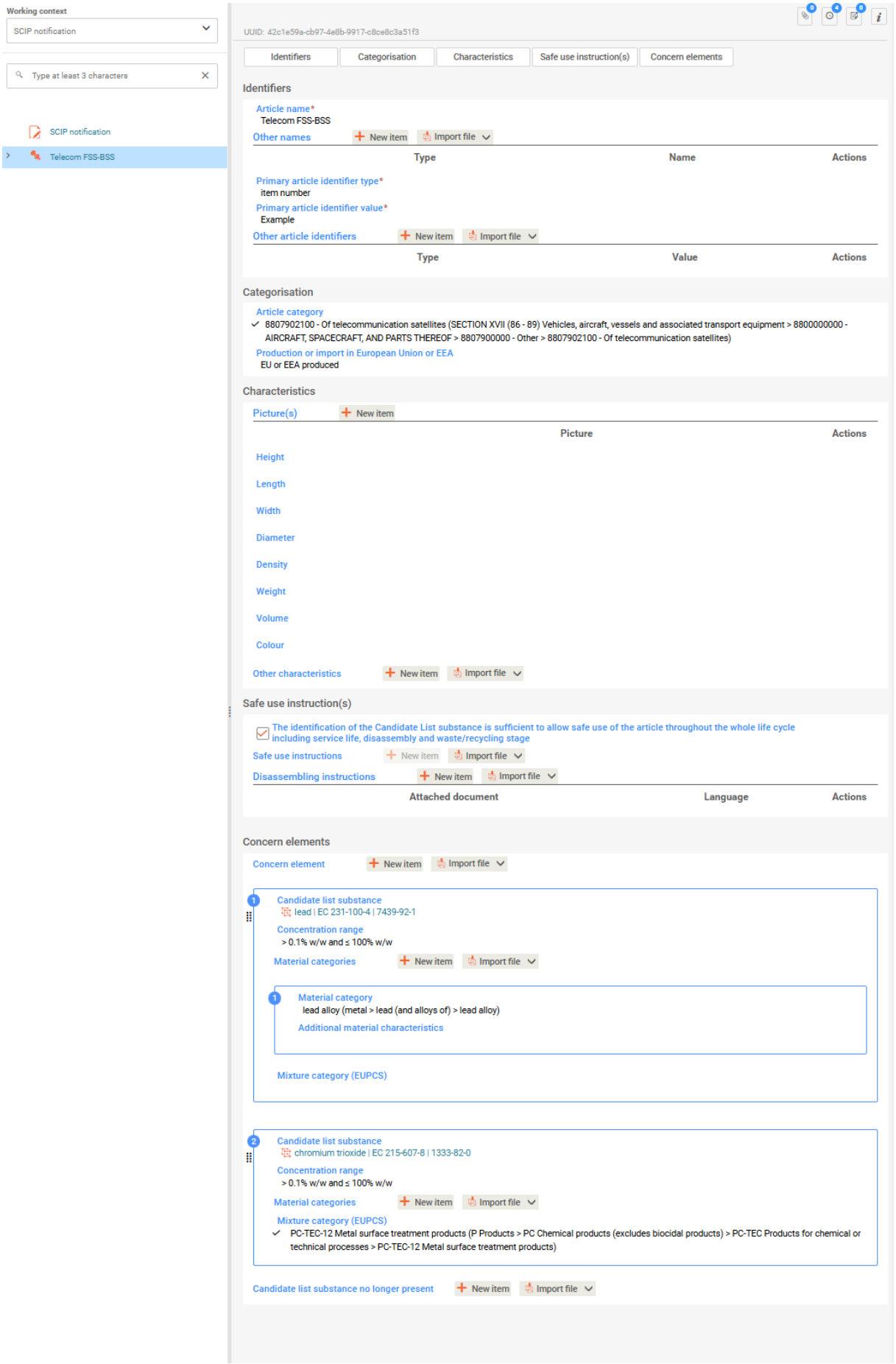
EXAMPLE 1: MICROWAVE COMMUNICATION EQUIPMENT

Microwave communication equipment for telecom satellites (see Figure 1) are probably the most common equipment supplied by external producers within the supply chain for telecom satellites since they tend to be somewhat standard, at least when compared to for example the antenna subsystem which is always customized for the mission. The producer of microwave equipment delivers to the supply chain actor in charge of the satellite payload which could be the Prime (system integrator) itself or a separate supplier that supplies the full, tested payload to the Prime.

Figure 1 Microwave communication equipment for telecom satellites

The microwave equipment supplier supply chain is very similar to that of other electronics equipment manufacturers in defence, aerospace and other industrial sectors. The equipment is produced using electronics components, both active and passive, and metal alloys. A typical microwave equipment has close to 1,000 parts of about 300 different types, including everything from electrical components, Printed Circuit Boards (PCBs) and mechanical parts to adhesives, wires and tapes. Given that many of these parts (such as PCBs) are themselves complex objects, the total number of constituent articles (undefined) is even higher. Typically, the SVHCs included are metallic lead and chromium trioxide, both in < 0.1% w/w of the product sold, but possibly > 0.1% w/w per constituent article or complex object (depending on the reference object) making up the product.

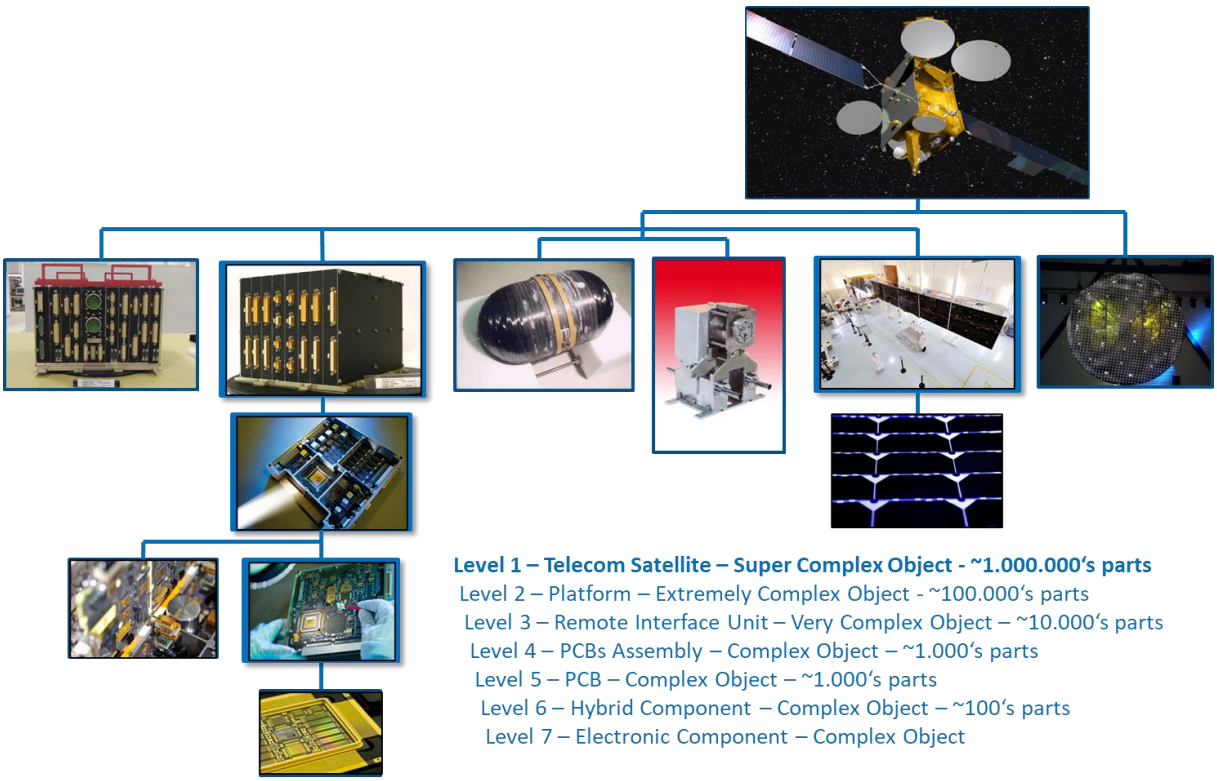
In its SCIP notification the equipment supplier provides the mandatory/required data. The actual entry of these data in IUCLID6 is illustrated on the following page.


Working context
SCIP notification
Type at least 3 characters
SCIP notification
Telecom FSS-BSS
UUID: 42c1e59a-cb97-4e8b-9917-c8ce8c3a51f3
Identifiers
Categorisation
Characteristics
Safe use instruction(s)
Concern elements
Identifiers
Article name*
Telecom FSS-BSS
Other names
New item
Import file
Type
Name
Actions
Primary article identifier type*
item number
Primary article identifier value*
Example
Other article identifiers
New item
Import file
Type
Value
Actions
Categorisation
Article category
8807902100 - Of telecommunication satellites (SECTION XVII (86 - 89) Vehicles, aircraft, vessels and associated transport equipment > 8800000000 - AIRCRAFT, SPACECRAFT, AND PARTS THEREOF > 8807900000 - Other > 8807902100 - Of telecommunication satellites)
Production or import in European Union or EEA
EU or EEA produced
Characteristics
Picture(s)
New item
Picture
Actions
Height
Length
Width
Diameter
Density
Weight
Volume
Colour
Other characteristics
New item
Import file
Safe use instruction(s)
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
Safe use instructions
New item
Import file
Disassembling instructions
New item
Import file
Attached document
Language
Actions
Concern elements
Concern element
New item
Import file
Candidate list substance
lead | EC 231-100-4 | 7439-92-1
Concentration range
> 0.1% w/w and ≤ 100% w/w
Material categories
New item
Import file
Material category
lead alloy (metal > lead (and alloys of) > lead alloy)
Additional material characteristics
Mixture category (EUPCS)
Candidate list substance
chromium trioxide | EC 215-607-8 | 1333-82-0
Concentration range
> 0.1% w/w and ≤ 100% w/w
Material categories
New item
Import file
Mixture category (EUPCS)
PC-TEC-12 Metal surface treatment products (P Products > PC Chemical products (excludes biocidal products) > PC-TEC Products for chemical or technical processes > PC-TEC-12 Metal surface treatment products)
Candidate list substance no longer present
New item
Import file

EXAMPLE 2: TELECOMMUNICATION SATELLITE

A telecom satellite is a super complex object. Its simplified product breakdown consists of more than 7 levels ranging from ~10-100 parts at the lowest identifiable complex object level (electronic component) to ~1,000 000's parts at telecom satellite level (see Figure 2). In line with the ASD SiA Guidance the information on REACH Article 33(1) is typically provided in the supply chain at the assembly level, i.e. identifying the list of all Candidate List substances (potentially) present above 0.1% weight by weight on a component level in the assembly as supplied.

Figure 2 Telecom Satellite. Photo © Airbus SAS 2017 – All rights reserved. Breakdown: ASD SiA Guidance (2017)



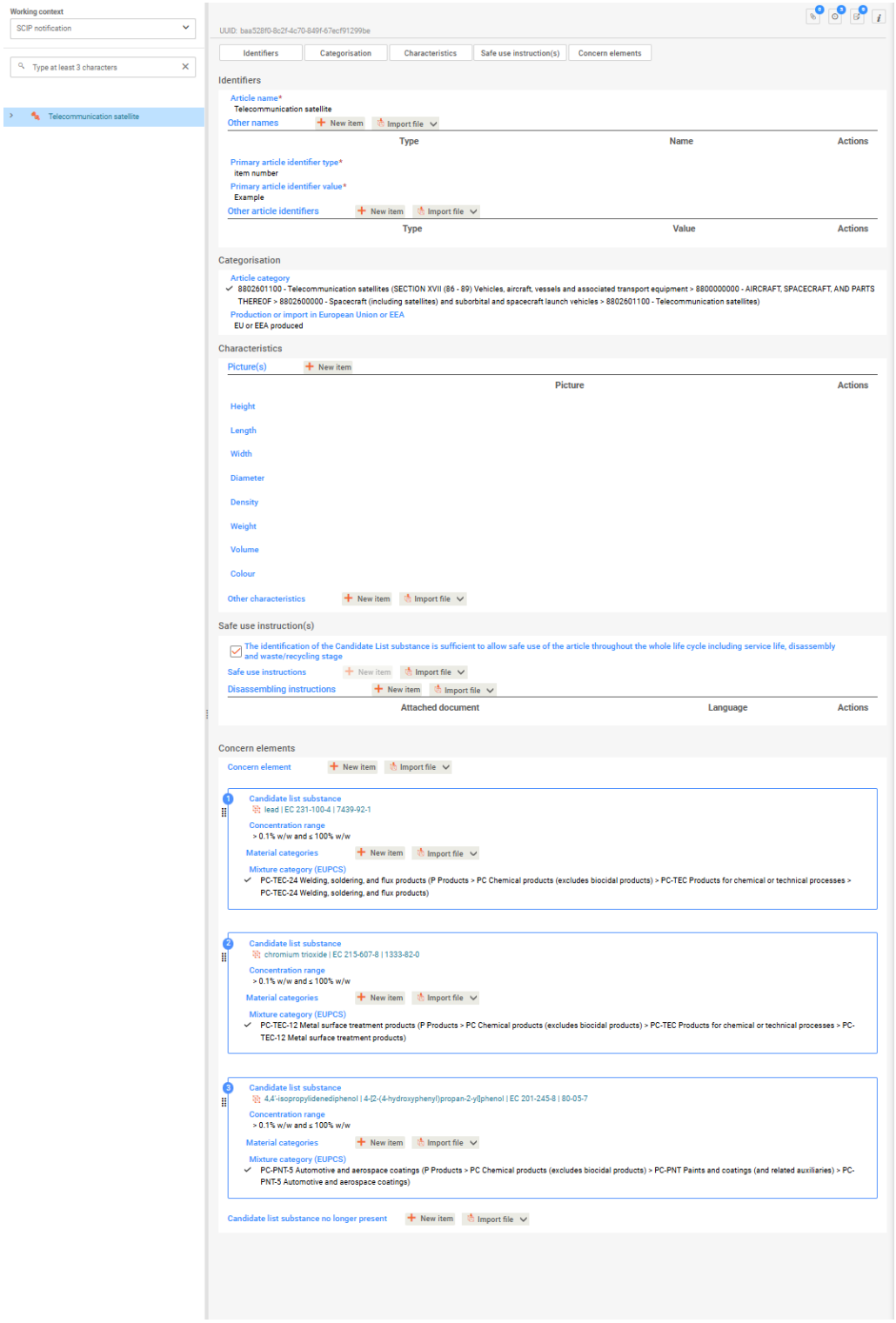
In the multi-layer supply chain for the telecom satellite, the top layer, the systems integrator, or Prime as they are usually known, has the contract for the supply of the satellite to the end customer and is always responsible for the final satellite integration and testing. The Prime typically produces the satellite platform and some of the platform and payload subsystems.

In some contracts the satellite is delivered to the end customer before launch and in others it is delivered once in orbit (IOD: In Orbit Delivery). The nominal lifetime of a typical telecom satellite is 15 years in its geostationary orbit at 35,786 km. Geostationary satellites require some station keeping to maintain their position, and once they run out of thruster fuel they are retired to a graveyard orbit. For satellites in geostationary orbit the graveyard orbit is a few hundred kilometers above the operational orbit where they are expected to have an orbital lifetime of millions of years.

The data for the SCIP notification have been determined through in-house searches and REACH Article 33 declarations received from suppliers (in relation to the Candidate List substance).

Information on ‘linked article(s)’ is not considered as legally required nor relevant by the supplier, because affected components are not accessed by the customer, the product is sent into space and will remain there after the end of its service life.

In its SCIP notification the EU satellite supplier provides the mandatory/required data. The actual entry of these data in IUCLID6 is illustrated hereafter:



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