

Paris, 6 May 2026

EUROPEAN SPACE SECTOR FEEDBACK ON COMMISSION PROPOSAL TO REPEAL THE OBLIGATION TO REPORT SCIP-RELATED DATA

**Reference: Simplification of administrative burden in environmental legislation
("Environmental Omnibus")¹**

PREFACE

This is the joint contribution of the European Space Industry, represented by ASD-EUROSPACE – with the support of European Space Agency (ESA), national space agencies and the European Defence Agency (EDA) as an observer – to the European Commission proposals on the Simplification of administrative burdens in environmental legislation, namely the proposal to repeal the obligation to report SCIP-related data pursuant to Article 9(1)(i) and the SCIP Database established by the European Chemicals Agency (ECHA) under Article 9(2) of the Waste Framework Directive 2008/98/EC (WFD).

This contribution has been prepared by the participants of the **Waste Framework Directive Task Force of the European Space Sector addressing Substances of (Very High) Concern in Products "SCIP" (WFD/SCIP Task Force)** under the Materials and Processes Technology Board of the European Space Components Coordination (ESCC MPTB).²

This contribution follows on and recalls our recent contributions as follows:

- Contribution of 20 March 2025 (ref. MPTB-ES-PO-0181)³ to a survey on reporting costs data as part of an assessment of environmental reporting and the potential for simplification conducted for the Commission's Directorate General for Environment;
- European Space Sector feedback on Commission Call for Evidence: Simplification of Administrative Burdens in Environmental Legislation of 8 September 2025 (ref. MPTB-ES-PO-0204, COM ref. Ares(2025)7489659 - 09/09/2025).⁴

¹ Available at <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14794-Simplification-of-administrative-burdens-in-environmental-legislation-en>.

² A list of WFD/SCIP Task Force participants can be found at the end of this contribution.

³ Contribution ID: 628c40e3-4231-4e14-9063-7aac6a4307c3.

⁴ Available at <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14794-Simplification-of-administrative-burden-in-environmental-legislation/F3698765-en>.

COMMISSION PROPOSAL TO REPEAL THE OBLIGATION TO REPORT SCIP-RELATED DATA AND THE ECHA SCIP DATABASE

We welcome the present initiative by the European Commission to reduce unnecessary administrative burden stemming from environmental legislation. In particular, we **strongly support** the Commission proposal to repeal the obligation to report SCIP (substances of concern in products)-related data as well as ECHA's SCIP Database by amending the WFD.⁵

As already mentioned in our previous contributions mentioned above, we have always questioned the benefit of the SCIP Database and **have been experiencing a disproportionate effort** compared to the promised benefit from WFD and ECHA, even more for space products which do not result in waste for treatment on Earth/in the EU/EEA, as now also reflected in the Commission Staff Working Document of 10 December 2025 (SWD(250)990, page 7)⁶ and the Commission proposal (page 3).⁵

CALL TO EUROPEAN PARLIAMENT, COUNCIL AND MEMBER STATES FOR A SPEEDY REPEAL OF SCIP RULES

We herewith ask the *European Parliament* and the *Council* as the co-legislators to **adopt and bring into effect** the required amendments of the WFD to discontinue SCIP reporting and the SCIP Database **as early as possible**.

We further urge the *Member States* to prepare for **timely and coherent transpositions of the forthcoming WFD amendment** repealing SCIP reporting. It should be noted that the legal obligation for SCIP reporting is grounded in the national laws transposing the WFD across the EU/EEA. **Any situation in which SCIP reporting continues to be required under national law after the WFD amendment repealing it has entered into force must be avoided.**

The need for a speedy repeal of the SCIP rules by the co-legislators and the Member States is not only motivated by the **continuous administrative burden**, but also by the fact that SCIP notifications to ECHA's public database keep on posing **risks of uncontrolled disclosure of classified data as well as know-how / confidential and business sensitive information (CBI)** on advanced space technologies, especially for missions with strategic, defence and/or dual use nature (such as European launch vehicles or Galileo, EGNOS, Copernicus and other European space programmes). To address the latter risks, the **SCIP Database needs to be fully removed from publicly accessible domains as early as possible.**

⁵ COM(2025) 986 of 10.12.2025, available at https://environment.ec.europa.eu/document/download/b45b4ac2-7f40-4b82-acb3-815e134807b6_en?filename=COM_2025_986_1_EN_ACT_part1_v6.pdf.

⁶ Available at https://environment.ec.europa.eu/document/download/9cc9e1e8-13c4-45f3-b9bc-90e7e1b8133e_en?filename=SWD_2025_990_1_EN_autre_document_travail_service_part1_v3.pdf.

OTHER MEANS OF SVHC REPORTING IN PRODUCTS: REACH ARTICLE 33, DIGITAL PRODUCT PASSPORTS

We wish to recall, that a discontinuation of the SCIP database would not negatively affect the information about Substances of Very High Concern available in the supply chain, as the reporting requirements under REACH Article 33(1) will fully continue to apply.

Regarding the use of digital product passports and in the future more comprehensive product labels as cited by the Commission we wish to stress that the introduction of any related requirements for complex products must be underpinned by **in-depth impact assessments** with **industry consultation**.

ADDITIONAL INFORMATION SUPPORTING THE REPEAL OF SCIP (REMINDER)

Launchers, satellites or infrastructures designed to be launched into space need to be excluded from the SCIP requirements in the first place because the rationale to inform waste operators does not apply. In addition, **on-ground equipment**, whether not launched or returning to Earth for possible reuse, is in fact managed on the basis of the waste classification also due to its hazardous nature as regulated by the European List of Wastes (LoW), i.e. a catalogue adopted by Commission Decision 2000/532/EC of 3 May 2000 within which all waste is identified, divided into categories (Waste Categories), through an European Waste Code (EWC) and certainly not through the SCIP database which in fact is marginally consulted by disposers and those who treat wastes and becomes a duplicate of said regulation.

Early on after the surprising introduction of the SCIP requirements through the revised WFD in 2018, ASD-EUROSPACE had called on regulators to recognise, that space products should be considered to fall out of scope of the WFD.⁷ Since no support could be obtained at the time from the Commission nor Member States when transposing the SCIP notification requirement given the strict wording of WFD Article 9, the Space Sector had to engage in cumbersome SCIP notification work to ensure compliance. To support this costly and tedious effort for space products being highly complex assemblies, ASD-EUROSPACE with the support of the WFD/SCIP Task Force engaged in the preparation of a Best-Practice Guidance: It was first released on 30 September 2020 and has been updated three times ever since to take into account ECHA's requirements for SCIP notification and evolving national transpositions. The Best-Practice Guidance is currently available in its version 1.3 (ref. MPTB-ES-GD-0158, incl. last addendum of 3 March 2025: <https://eurospace.org/download/6975/?tmstv=1741010064>). In addition, the REACH Article 33 declaration template had to be updated to allow for the transmission of SCIP-related data: <https://escies.org/download/webDocumentFile?id=70709>.

⁷ <https://eurospace.org/spaceindustry-position-regarding-article-9-of-the-revised-waste-framework-directive-2008-98-ec/>.

LIST OF SPACE WFD/SCIP TASK FORCE PARTICIPANTS

This contribution has been prepared by REACHLaw Ltd. in the frame of the Space WFD/SCIP Task Force, which includes the following members:

The European Space Industry, represented by ASD-EUROSPACE, and the following corporations:

AIRBUS DEFENCE AND SPACE

ARIANEGROUP

AVIO

BEYOND GRAVITY

MT Aerospace

OHB

TESAT-SPACECOM

THALES ALENIA SPACE

the EUROPEAN SPACE AGENCY (ESA) and the following national space agencies:

AGENZIA SPAZIALE ITALIANA (ASI)

CENTRE NATIONAL D'ETUDES SPATIALES (CNES)

GERMAN AEROSPACE CENTER (DLR)

the EUROPEAN DEFENCE AGENCY (EDA) as an observer;

REACHLaw Ltd. as consultancy.