

Safe use instructions and the SCIP database – Stakeholder views and current practices

1. Introduction

1.1 Background and scope

This report has been prepared under contract ECHA/2018/338 and constitutes the output of Work package 4, Task 2 concerning safe use instructions.

REACH Article 33 provides for communication of enough information to allow the safe use of articles containing substances of very high concern (SVHCs) in quantities above 0.1% (w/w), namely via safe use instructions. Information to allow safe use is therefore an information requirement in the SVHC database (SCIP database) provided for in the waste framework directive (WFD) Article 9(2)¹.

The activities described in this document have been carried out from February to October 2019, in parallel with ECHA developing the general information requirements for the prototype of the SCIP database published in September 2019,² after receiving input from stakeholders³.

During the development of the information requirements, some stakeholders questioned whether safe use instructions should cover the entire article life cycle (from being placed on the market up until the reuse/recycling/disposal). The SCIP database requirements cover enough information to allow the safe use of the article in its entire life cycle⁴, including information to ensure proper management of the article once it becomes waste.

This note explores which safe use instructions, already exist in general and across sectors and reflects the input provided by stakeholders on their view on experience and essential requirements for safe use instructions, covering the full article life-cycle.

It has not been the purpose of the current task to interpret, nor to research, legal interpretation of what is required in terms of safe use instructions, but merely to review existing knowledge and to obtain stakeholder views/input on what could be relevant safe use instructions throughout the article life cycle, including whether a library of safe use instructions standard phrases could be developed.

It should be noted that the way to report safe use instructions for the SCIP database prototype may be amended for later versions of the database, e.g. by developing a list of standard phrases.

¹ <https://echa.europa.eu/scip-database>

² https://echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf/9715c4b1-d5fb-b2de-bfb0-c216ee6a785d

³ Reported here: https://echa.europa.eu/documents/10162/28213971/shd_consultation_info_req_report_en.pdf/6a01a7fa-b95c-9406-fa1e-2727b3c2e3ec

⁴ See section 3.4.1 of the Guidance on requirements for substances in articles (https://echa.europa.eu/documents/10162/23036412/articles_en.pdf/cc2e3f93-8391-4944-88e4-efed5fb5112c).

1.2 Objective

The purpose of the current work is to explore, via desktop research and stakeholder dialogue, the availability of existing libraries or examples of safe use instructions and to obtain ideas/inputs from stakeholders on needs/options for providing information on safe use instructions in the SCIP database.

Some of the early results of the current project have already been considered by ECHA during development of the information requirements for the prototype of the database, and the results of this final reporting might inspire possible future refinements to better structure the information to be submitted in the future versions of the SCIP database.

1.3 Approach

The following activities have been carried out:

1. Desktop research. The purpose of the desktop research has been to identify available libraries and examples of safe use instruction phrases via Internet searches and input from stakeholders.
2. Written stakeholder consultation (online questionnaire). An online questionnaire was launched on 22 July 2019, inviting stakeholder input on safe use instructions with a deadline of 28 August. The response deadline was later extended until 19 September 2019. The questionnaire also included questions related to a parallel activity investigating options for material categorisation. The questionnaire was therefore originally mainly circulated to article suppliers and their associations, but a range of other stakeholders also responded. The full questionnaire can be seen in Appendix A. Section 3 of the questionnaire covers questions related to safe use instructions.
3. Interviews with a selected number of stakeholders. 15 stakeholder interviews were carried out during September and early October 2019. The interviews took the questionnaire questions from the written consultation as the starting point but were otherwise open to any input from the stakeholders interviewed.
4. Analysis of the applicability of CLP precautionary statements (P-phrases) and phrases from an SDS and exposure scenario standard phrase library. ECHA and some stakeholders suggested that the precautionary statements (P-phrases) associated with hazard classification according to CLP, as well as some standard safety phrases from safety data sheet (SDS) and exposure scenario libraries might inspire or be reused for the purpose of the SCIP database. Therefore, an initial analysis of possible applicability of these phrases was carried out. The P-phrases are specified in the CLP regulation, whilst the EuPhraC library of SDS and exposure scenarios standard phrases⁵ was also reviewed.

⁵ <http://content.euphrac.eu/Default.aspx?Language=en>

2. Findings

2.1 Desktop research

The desktop research revealed that some examples of safe use instructions can be found in sector specific guidance and support systems⁶.

While formats for communication of safe use instructions can be found in these documents, no standard phrase systems that could potentially be applied or adapted to be generally applicable safe use instructions in the SCIP database were identified in these information sources.

In 2015 the German Environment Agency (Umweltbundesamt – UBA) published the results of studies concerning SVHC in articles as well as a resulting guidance⁷:

These UBA documents present a limited number of examples with safe use instructions and also discuss and present formats for communication. Furthermore, some ideas for generally applicable standard phrases are presented. Those safe use instructions appear to be rather generic, but could possibly provide some inspiration for a starting point for developing a standard library. However, the workability and relevance of these phrases using concrete examples is not available.

2.2 Targeted stakeholder consultation

The ECHA call for evidence in October 2018⁸ and the general stakeholder consultation on the draft information requirements for the SCIP database³ provided some valuable feedback concerning safe use instructions for the SCIP database.

In order to further consult stakeholders on existing and possible practices regarding safe use instructions, a targeted consultation was carried out from July to September 2019. The consultation covered written responses (16) to a questionnaire (see appendix A, Part 3) and interviews with 15 stakeholders⁹.

The following summarises the feedback received.

Instructions to consumers

All stakeholders note that use of consumer articles should as a starting point be safe for the consumer. Thus, possible exposure to SVHC should be negligible or not possible at all. This is a requirement in the General Product Safety Directive (GPSD) and in various other product specific legislation such as for toys and food contact materials.

⁶ Such as: The Aerospace and Defence Industries Association of Europe (ASD) sectoral guidance for substances in articles under REACH: https://www.asd-europe.org/sites/default/files/atoms/files/ASD%20SiA%20Guidance_v1_Nov2017_1_0.pdf; The International Dismantling Information System (IDIS): <https://www.idis2.com/>; The automotive industry (ACEA) REACH guidance: https://www.acea.be/uploads/publications/AIG-4.0_English.pdf

⁷ These are: UmweltBundesamt (UBA). Enhancement of the REACH requirements for (imported) articles - Options for improvement of the chemicals regulation. Texte 41/2015; UmweltBundesamt (UBA). Feasibility Study „Supply chain communication on SVHC in Articles“. Texte 10272015; UmweltBundesamt (UBA). Guidance on Communication on Substances in Articles. UBA Texte 103/2015.

⁸ Available here: <https://echa.europa.eu/da/-/workshop-on-waste-framework-directive-database-22-23-10-2018>

⁹ Article supplier companies, article supplier organisations, consultants for articles suppliers, associations with members covering article suppliers and recyclers/waste treatment operators, recyclers/waste treatment operator companies, recyclers/waste treatment operator associations, NGOs and one member state authority, although member state competent authorities were not specifically targeted as ECHA is liaising with them directly.

A member state authority suggests considering whether instructions for correct use should be supplemented with advice against misuse and unintentional uses. This could for example be unintended consumer repair of consumer products to avoid potential SVHC exposure. At the same time, it is realised that such information must be concise and that there is a risk that such information may be lost amongst other consumer information associated with a product. The issue of possible consumer information overflow is also highlighted by some article suppliers and some of their associations. It is also acknowledged by an NGO as an issue to be addressed.

NGOs believe that the consumer should be instructed in avoiding exposure to the SVHC, including during possible misuse. Furthermore, two NGOs state that consumers should be informed about hazards/risks associated with possible exposure. One of these NGOs notes that such information is particularly important as many SVHCs may contribute to multiple exposure / cocktail effects. One NGO suggests that a phone number (*à la* a poison centre) should be provided in case exposure happens (even if through unintentional exposure).

Some NGOs also suggest that the consumer should be instructed in how to safely dismantle and repair articles. The reason is that the NGOs find that article suppliers of some high-end consumer products (such as electronics) deliberately advise consumers not to repair the articles themselves and at the same time offer very expensive repairs themselves. It is thought that this is deliberately done in order to trigger consumers to give up on repairs and buy new products. The NGOs suggest that SVHC content should not be misused by suppliers to further trigger this development i.e. the NGOs find that this repair issue shall be seen in a wider circular economy context.

Some NGOs find it very important to inform consumers about SVHC content to allow them to choose alternatives without SVHCs.

Some article suppliers suggest that advice should be provided on good hygiene practice in relation to handling some articles (e.g. washing hands after use and avoiding food intake while handling the product).

Some suppliers of electronics state that consumers via packaging, websites and manuals are instructed in correct disposal (including a take back option) and in where to send the device for repair. They also confirm that (in this case) consumers are also instructed not to repair themselves. Thus, under normal use, consumers should not be exposed to SVHC contained within such products.

In general stakeholders find it relevant to provide the consumer with advice for correct/optimal disposal of articles. Suppliers of EEE refer to the 'crossed-out wheeled bin marking' as sufficient for EEE, but note that this does not need to be in the database as it is not in their view linked to REACH Article 33 requirements.

Professionals/industrial users – operators/repair

As for the consumer situations, most stakeholders are of the opinion that, under 'normal use', it should generally be safe to use the article in workplaces.

However, it is also acknowledged that the risk for SVHC is potentially higher in some situations. For example, a mechanic fixing a car is more likely to be exposed than the driver of the car, and generally operators might fit the article, e.g. by sanding or grinding, which could lead to dust generation. Other similar situations which could lead to exposure, e.g. heating (soldering), corrosion, etc. would also require special attention. Some stakeholders note that in these situations, safety instructions along with those applied via CLP P-phrases and in SDS and exposure scenarios might be relevant e.g. risk management measures such as ventilation and use of relevant personal protective equipment (PPE). Some article supplier associations argue that the OHS legislation and not the SCIP database should address such issues.

As for consumer use, one article supplier suggests that advice should also be provided to professionals on good hygiene practice in relation to handling some articles (e.g. washing hands after use and avoiding food intake while handling the product).

Some suppliers of electronics note that they advise that their products should only be repaired by operators trained in correct repair, and that correct repair would lead to negligible risk of being exposed to SVHCs contained in products.

A supplier of (very) complex articles notes that detailed manuals for operators are provided along with the product. These manuals provide instructions for correct and safe handling, including how to avoid/reduce possible exposure to hazardous chemicals. Several article supplier organisations also note that manuals for appropriate professional handling are provided along with the products (and/or available on web-sites) and that it makes no sense to also provide such information via a database.

Stakeholders in general find it relevant to provide the professional/industrial user with advice for correct/optimal disposal of articles. Suppliers of EEE refer to the 'crossed-out wheeled bin marking' as sufficient for EEE, but note that this does not need to be in the database as it is not in their view linked to REACH Article 33 requirements. Several articles supplier associations refer to the above-mentioned manuals and instructions which provide advice on how to dispose of the articles.

Waste stage

Most of the recyclers/waste treatment operators note that the name of the SVHC is the most important information for the recycling stage.

The member state authority and the three NGOs find it relevant to provide precise information about the concentration range. Article suppliers generally oppose this view and note that it is also not required by the legal basis. Recyclers and waste treatment operators are bit split in their view on the importance of knowing concentration ranges.

Some recycling industry representatives note that the most important issue for possible exposure during handling in the end-of-life stage is the *availability* of the substance which is affected by issues such as solubility, physical state at room temperature, whether the SVHC is enclosed in a matrix (e.g. alloy or polymer), and whether in is powder or pellet form. Such issues are generally much more important than the concentration of the SVHC according to these stakeholders.

The recyclers/waste treatment operators in general do not think that the article suppliers can provide relevant instructions about avoiding worker exposure or release to the environment for the actual recycling/waste handling processes.

Article suppliers and some recyclers of EEE refer to WEEE in relation to handling EEE waste. If further focus on SVHC is needed during EEE reuse, recycling and waste disposal, they argue that it should be further pursued under the measures and guidance implementing WEEE and not via the SCIP database.

In this context, some article suppliers and waste operators refer to the I4R-platform¹⁰ providing recycling/waste treatment information for EEE at a more aggregated level, which is thought to be more applicable for waste treatment operators. Instructions under the SCIP database are deemed not necessary (and even not legally required), but if a system is developed, they argue that it should be complementary to the I4R-platform.

The member state authority and the three NGOs find it important to provide information about the location of the SVHC in the (complex) article to better assist dismantling before the articles end up in mixed waste

¹⁰ <https://i4r-platform.eu/about/>

streams. Some article suppliers and some waste treatment operators confirm that location in complex articles could be relevant (a recycler even notes that it is 'essential' to know in order to be able to sort out parts/articles with SVHCs), whereas other recyclers/waste treatment operators find it needless as technology such as cameras or IR would in any case always be used to identify such substances.

Many stakeholders find it important to provide information about proper dismantling of especially complex articles. This is important for sorting out SVHC-containing parts which could otherwise pollute the waste stream. This information could be provided as drawings, pictures, schemes, instructions, videos, etc. One stakeholder refers to dismantling passports as e.g. used for many medical devices as a possible component of dismantling instructions. Some stakeholders note that such instructions should not only focus on SVHCs but have a broader circular economy perspective in order to support closing the material loop long before articles become waste. Some stakeholders highlight that if such instructions are to assist across EU, they need to be in multiple languages. Some recyclers note that dismantling is often not economically feasible and articles would thus go directly for e.g. shredding. In these situations, dismantling instructions are of no current use.

Some articles suppliers and some recyclers note that, for some (very) complex articles, dismantling is carried out by specialised companies. In these situations, close cooperation between the article supplier and the dismantler/recycler is needed. This cooperation might be improved in some situations to better address content of SVHC. However, a passive database would not assist in this.

In relation to wood (containing) articles, some stakeholders make reference to an ongoing project aiming at classifying waste wood and suitable end uses for such waste. Findings from that project should be conveyed to users (consumers and professionals) of such products to ensure that they are discarded in an optimum way, and collectors, dismantlers and recyclers should also be informed about optimal re-use/recycling of such waste wood.

Need for and use of information in the SCIP database

Articles supplier associations in particular strongly argue against the need for safe use instructions in the database. Reasons include: They argue that most of the information requested is not required by REACH Article 33, or that other legislation addressing risks is already in place, and finally when additional safe use instructions are needed. They suggest that information should rather follow the article than being stored in a passive database.

Some NGOs representing consumers note that safe use instruction information in the database might not be used by consumers and sometimes not by other article supply chain actors, but they still find it relevant to include such information as it could support organisations acting on behalf of consumer groups and it could be used by authorities for enforcement purposes.

One NGO notes that the database output format should be considered. The use of e.g. digital Apps as opposed to 'dead' pdfs seems beneficial in terms of reaching potential users of the information.

Two NGOs also note that the database should not be too static. It should be flexible in terms of future shifts towards a more circular economy, including:

- That there will be increased product responsibility.
- That re-use and recycling systems and options will evolve (what is a good option today might not be an optimal option in two years).
- It should be made flexible in terms of interface with AskREACH

One NGO suggests that the database could e.g. be developed to support QA/bar codes which could be placed on problematic SVHC containing (parts of) articles.

Another NGO suggests that the database could be further expanded to cover entire product declarations (at least contained hazardous substances) in order to better support substitution. The database could also contain information about valuable components (such as information about rare and precious metals) as this would further boost incentives for closing the material cycle.

In general, it is believed by many waste operators and by many other stakeholders that recyclers / waste handlers would normally not consult the SCIP-database, at least not for daily activities. Some article suppliers and waste handlers do not think that the safe use instructions information will be useful at all, whereas other suppliers, recyclers and a member state authority do see some potential for using high-level aggregated/grouped information by recycling technology developers.

A recycling association notes that it would be beneficial if the further development of the database could add 'alert' functionalities, e.g. alerting recyclers when a new SVHC-containing product within a product category enters the market.

A supplier of very complex articles notes that parts are often changed and that it would not be possible to update the SCIP-database properly, e.g. a certain part will be changed in some complex articles but not in others at the same time, for a given type of article. The stakeholder asks whether the database should be updated when the part is first changed or when all articles have been upgraded. Furthermore, it might not be necessary to change the same part on all complex articles (as the need might depend e.g. on use, wear and tear).

In line with this, an association representing article suppliers as well as recyclers note the risk of information being outdated:

- Article composition might change over time. How will the recycler know whether it is an 'old' or a 'new' version of the article?
- How is the database updated for articles which have been on the market for a while when new SVHC contained in such articles are included in the candidate list?
- For articles on the market for a while, dismantling and recycling instructions in the database might become outdated.

Several stakeholders note that the content of some SVHC in some articles will disappear when the article is thermally converted or degraded during recycling or final waste disposal. In these cases, there might not be exposure to the SVHC if strongly bound in the matrix being recycled/thermally degraded.

Risk assessment principles applied today

The stakeholders were asked which principles are used today for assessing risk and securing safety of articles in the article supply chain. This question was generally answered at a rather generic level, including reference to 'General principles for product safety' or by making reference to existing guidance/regulations/standards including: the REACH Regulation, REACH guidance, safety of toys Directive, food contact materials legislation, general product safety Directive, construction products Regulation (including provisions on VOCs), Directive for medical devices, RoHS Directive, machinery Directive, Directive for drinking water, UNECE World Forum for harmonization of vehicle Regulations (WP.29), EN ISO 12100 "Safety of machinery - General principles for design - Risk assessment and risk reduction" (ISO 12100:2010). One article supplier notes that (with a few exemptions) risk assessments of articles are only carried when legally required.

Some stakeholders also referred to information in safety data sheets (and associated exposure scenarios) for the SVHC and to the REACH registrations for the SVHC.

Design for safe handling and recycling

Article suppliers and their associations responded to the question related to design for safe handling and recycling. Some article suppliers mention that companies attempt to avoid substances that are on lists of prohibited substances, but that this must be done without compromising other safety issue related with the articles. Another supplier notes that standard risk assessment procedures for product development are in place. A fourth article supplier stresses the importance of addressing safety aspect during development, but does not specify details.

One article supplier association describes in generic terms what their sector is doing in this respect, not the least in terms of reducing content of SVHCs in their sector. This description is very specific to that sector and cannot be used for generalisation.

Another article supplier association notes that their members design for safety, including inter alia complying with ISO 14001:2004 (Environmental management systems), EN ISO 12100 (Safety of machinery including risk assessment and risk reductions), IEC 62430:2009 (Environmentally conscious design for electrical and electronic products), and the Machine Directive 2006/42/EC.

Standard phrases and standard systems

Most article suppliers (companies and associations) argue that development of a library with standard phrases for safe use instructions is not feasible and not desirable. They argue in particular that instructions when needed are very product specific.

A few stakeholders note that development of libraries for standard phrases would be beneficial and that this would require a substantial dialogue with relevant stakeholders to identify what is relevant for articles. One argument for developing a library is that today in >99% of the situations, only the SVHC name is passed down the supply chain. The following is suggested by them if development of standard libraries is to be taken forward:

- For consumers: Standard phrases should be developed as an integrated part of other product safety information and therefore in close cooperation with product safety stakeholders and authorities. It is noted that this should be done intelligently as there is already information overload on many labels and in instructions for consumer products.
- For workplace handling of articles with SVHC: Standard phrases should be developed to be in line with CLP, SDS and exposure scenario standard phrases and in close cooperation with OHS stakeholders and authorities.
- For the waste stage: It is noted that further dialogue with recyclers/waste operators (and waste authorities) is needed to understand what and how to communicate. Other stakeholders point out that CLP and SDS/ES standard phrases do not address advice for the dismantling, reuse and recycling of (complex) articles.

Some stakeholders also refer to information in safety data sheets (and associated exposure scenarios) for the SVHC and to the REACH registrations for the SVHC. These documents can already contain relevant information on safe use of articles in the service life, and development of an approach, e.g. a library with standard phrases for safe use instructions should, where relevant, follow current risk assessment guidance, tools and principles. This applies for general as well as for sector-specific risk assessment principles and tools, for example sector-specific information on assessing plastic products as available on ECHA's web-site.

In terms of content, format and standardisation of safe use instructions information, various proposals have been tabled, including considering the template and decision logic for providing information as described in Annex M of the ACEA guidance¹¹ as well as the IEC and IPC.172XX standards.

2.3 CLP P-phrases and SDS and exposure scenario standard phrases

Some of the stakeholders consulted suggested that CLP precautionary phrases (P-phrases) and standard phrases for safety data sheets and exposure scenarios could potentially be relevant for developing a standard library for safe use communication for SVHCs in articles.

Therefore, the CLP P-phrases and the EuPHRAC library¹² with standard phrases for safety data sheets and exposure scenarios were reviewed by the study team. This review involved identifying phrases which are potentially relevant for providing safe use instructions for articles in the context of the database.

The outcome of this review is presented in Appendix B.

It should be noted that the results represent a subjective identification by the authors of the phrases that appear to be relevant. However, during the review, the team attempted not to overly limit the selection of potentially relevant phrases, so some phrases may be more relevant than others.

The appendix illustrates that, even with a rather open-minded approach, a relatively limited number of phrases are assessed as being potentially relevant and some of these are rather generic.

Many phrases such as 'Avoid using indoors' and various phrases specifying risk management measures, such as personal protective equipment, must be considered generally inappropriate for normal use of articles. These were originally developed and are appropriate for substances and mixtures classified as hazardous. Articles placed on the market should generally not require such strict safety instructions. As all stakeholders generally point out, such articles would be illegal or should generally not be placed on the market. These types of phrases might, however, in some situations be relevant, e.g. if professionals need to cut, grind, drill or otherwise mechanically fit an article containing SVHC, or if people can be exposed due to corrosion or heating of the article. The phrases might also be relevant if the safe use instructions as suggested by some NGOs are intended to address possible misuse of the articles, which could lead to SVHC exposure.

Furthermore, the phrases in general merely address consumer, worker and environmental safety rather than providing instructions for proper disposal, collection, sorting and disassembly of SVHC-containing articles.

Overall, these types of phrases might inspire the development of standard phrases for safe use instructions for articles, but are assessed to have limited direct applicability in themselves.

3. Summary of findings

Note: In addition to the results presented in the current report, feedback relevant for safe use instructions received from previous consultations and already available on ECHAs website^{3, 8} are considered in this summary.

Overall, the activities carried out have shown that limited practical/illustrative experience with providing safe use instructions are (publicly) available. Furthermore, there seems to be quite some different views among stakeholders about when and what information is required or relevant in the various steps of the article life cycle, including waste stage once the article becomes waste. This includes disagreement between different

¹¹ <https://www.acea.be/publications/article/reach-automotive-industry-guideline>

¹² <http://content.euphrac.eu/Default.aspx?Language=en>

types of stakeholder (NGOs, article suppliers and recyclers/waste operators), but also sometimes different article suppliers and recyclers have diverging views from other stakeholders within the same group.

The following is an attempt to sum-up the findings. It should be kept in mind that the stakeholder input covered relatively few stakeholders for each article life cycle step.

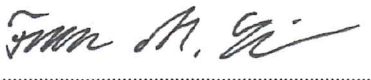
- No standard libraries with safe use instructions phrases corresponding to REACH Article 33 have been identified. A relatively limited number of examples scattered across various types of articles have been identified.
- Some activities, particularly those sponsored by German authorities, have attempted to draw up formats and provided initial thoughts on what standard phrases could look like. These proposals were, however, never tested. The ACEA guidance has also proposed a format for safe use instructions. It contains general wording for general safe instructions, but specific safe use instructions would have to be provided as free text.
- Most article suppliers and articles supplier organisations do not support (or specifically oppose) development of a library with standard phrases. A main argument is that instructions when needed would be very product specific. On the other hand, some organisations working with standardisation and a supplier consultancy seem to support development of standard phrases, which could also form part of standards; e.g. IEC and IPC standards (and, for EEE, reference to the I4R-platform was also made by some stakeholders).
- Generally article suppliers have asked for instructions to be provided via manuals to consumers and professional users, and suggest that direct dialogue between suppliers and the waste handling stage operators would be more efficient than providing information indirectly via a database, which for various reasons can also quickly become outdated. NGOs argue that database information – even if not used or consulted by the consumer or other supply chain actors – would be helpful to organisations acting on behalf of consumers and to enforcing authorities.
- Safe use instructions to consumers:
 - ▶ Consumer safety: There seems to be consensus that articles as a starting point should be safe to use. Article suppliers therefore do generally not foresee the need for further information than the substance name. Several suppliers state that instructions – if needed – are provided along with other instructions in a manual. The member state authority and NGOs consulted would like to see further information, including on what could happen if the product is used unintentionally.
 - ▶ Discarding products: There seems to be consensus that it is very valuable to provide the consumer with instructions for optimal disposal. Some article suppliers indicate that this is not a REACH Article 33 requirement and therefore not an issue to be addressed by the database.
 - ▶ If further guidance or even standard phrases were to be developed for consumer safety, there seems to be support for a stakeholder process involving product safety stakeholders and authorities, as such information would have to be complementary and integrated with current advice about other safety aspects such as electrical safety (for EEE). There also seems to be an understanding among stakeholders that there is a risk of information 'overload' in the safety communication to the consumer.

- Safe use instructions to professional/industrial users:
 - ▶ Worker safety ('normal uses'): There seems to be consensus that articles as a starting point should be safe to use. Article suppliers therefore do generally not foresee the need for further information than the substance name. A screening analysis of current CLP P-phrases and SDS/exposure scenario standard phrases carried out in the current study conclude that those phrases – developed for handling of classified substances and mixtures – are probably too strict for such normal uses.
 - ▶ Worker safety ('uses of concern'): There seems to be agreement that workers in certain situations could be exposed to SVHCs, e.g. during fitting (cutting, grinding, etc.), high temperature processes (e.g. soldering) or if the article is somehow subject to corrosion. In these situations, some article suppliers argue that OHS legislation (and not the SCIP database) should deal with the safety aspects. In line with this, the analysis of P-phrases and SDS/ES phrases does indicate that these phrases to some extent could be applicable in this situation. Several suppliers state that instructions – if needed – are provided along with other instructions in a manual.
 - ▶ There seems to be general agreement among stakeholders that, if a library with standard phrases is to be developed, this should take place via a stakeholder process involving OHS stakeholders and authorities and that the system should be complementary to CLP, SDS and exposure scenario terminology.
 - ▶ Discarding products: There seems to be consensus that it is very valuable to provide the professional/industrial user with instructions for optimal disposal. Some article suppliers suggest that this is not a REACH Article 33 requirement and therefore not an issue to be addressed by the database.
- Dismantling:
 - ▶ Many stakeholders confirm that dismantling instructions for complex articles could assist in closing the loop in a circular economy context. Some stakeholders argue that it (today) would be too expensive to dismantle articles and that they therefore in practice go directly to the recycling/waste stage, e.g. to a shredder. Some stakeholders state that the database needs to be 'future proof' and e.g. point to the fact that reuse/recycling technologies might change in a future, more circular, economy, where such instructions might be more useful than they are today.
 - ▶ There also seems to be a general consensus that standard phrases cannot be developed for dismantling as this is extremely product specific. Depending on the product, instructions could include e.g. drawings, schemes, pictures, videos, etc.
 - ▶ NGOs, the member state authority consulted and some recyclers/waste treatment operators note that location of the SVHC in complex articles is relevant (and is needed in avoiding SVHC ending up in otherwise recyclable waste streams), whereas some recyclers do not find such information relevant (see also discussion below under recycling/waste treatment)
- Recycling/waste treatment:
 - ▶ Worker safety: There seems to be a general consensus among article suppliers and recyclers/waste treatment operators that the article supplier cannot give concrete advice to waste handlers on worker protection and management of SVHC releases to the environment. These risks have to be addressed by the company, OHS and waste legislation.

► Article information:

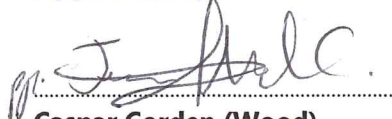
- There seems to be a consensus that SVHC identity information would be useful, although it is a general argument from recyclers that, for the information to be valuable, it would need to be aggregated at waste stream level and not be article centric.
 - Some recyclers argue that they use other means than what the database could provide to identify SVHC content and thus do not foresee any use of the database.
 - Some recycling and waste treatment associations and companies note that the database might support development of new recycling technologies
 - There seems to be disagreement among stakeholders about whether SVHC concentration ranges would be useful. A recycler supported by a recycling association note that information about 'availability' (e.g. freely available or in a fixed matrix) is much more important to them.
- In general, many article suppliers and recycling/waste treatment stakeholders note that existing legislation and practice (e.g. with WEEE) should be used for improving SVHC handling rather than the SCIP database. Furthermore, it is noted that direct dialogue between suppliers and dismantlers/recyclers/waste treatment operators would be more efficient for SVHC handling than a passive database. Some stakeholders note that increased product responsibility would be a very strong tool in reducing SVHC article content and exposure.

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Appendix A

Questionnaire for receiving stakeholder feedback on material categorisation and safe use instructions

Stakeholder survey related to ECHA's database of articles containing Candidate List substances

Introduction and Scope

A team led by Wood Environmental & Infrastructure Solutions UK Limited ("Wood") with partner COWI A/S has been contracted by the European Chemicals Agency (ECHA) to provide support in the establishment and maintenance of a database on articles containing Substances of Very High Concern (SVHCs) in the Candidate List¹.

In addition to the feedback already provided during the public call for input² last autumn, ECHA has commissioned Wood and COWI to conduct an informal, targeted consultation to help **the further development of material categories and safe-use instructions which may be used as standardised information**³, upon which the database, the related submission tools, and the dissemination of the information could be designed.

This questionnaire is being circulated to key stakeholders who represent both duty holders and potential users of the database (such as waste and recycling operators) across all relevant supply chains and waste streams.

In some instances, we will follow this up with a short telephone interview (of no more than about 30 minutes) to gain further detailed information. If you are happy to be interviewed, please indicate this in question 1.3 and provide your contact details. If we require further information from your organisation *and* you are happy to be interviewed, we may get in touch.

Confidentiality

We are aware that some of the information you may want to provide could be personal, commercially sensitive and/or confidential. We are committed to working with you and with ECHA to treat such data in an appropriate manner. We will make anonymous all information relevant to specific individuals, organisations and/or facilities within our reporting and Wood, COWI and ECHA will not pass on the information that you provide to any other party without your express permission (question 1.4). Any information you provide will solely be used for the purpose of this study and in provision of a confidential report to ECHA.

Contact details

If you have any questions about this survey or about the organisations conducting the survey on behalf of ECHA, please use contact details below:

For material categorisation

Julius Kreißig
Senior Consultant, Environmental Policy & Economics
Wood
email: julius.kreissig@woodplc.com

For safe-use instructions

Frans Møller Christensen
Chief Market Manager
COWI A/S
email: fmch@cowi.com

¹ As required by Article 9(2) of the recently revised Waste Framework Directive

² Available on the ECHA website <https://echa.europa.eu/-/workshop-on-waste-framework-directive-database-22-23-10-2018>

³ See Sections 3.2.2.3. and 3.4. in ECHA's Technical supporting document to the Draft scenario for the database on articles containing Candidate List substances (available at: https://echa.europa.eu/documents/10162/24198999/technical_annex_en.pdf/fd3dd13c-dc53-d5d4-b1ee-015307ed0331).

1. Information about you and your organisation

1.1 Your details

Contact Name (<i>mandatory</i>):	
Organisation / company name (<i>mandatory</i>):	
Job title (<i>optional</i>):	
Telephone number (<i>please include if you are available for interview</i>):	
E-mail address (<i>mandatory</i>):	

1.2 Your organisation's role

1.2.1 **Please explain your organisation's role relating to the future database** (*mandatory*):

My organisation is a supplier of articles (duty holder)	<input type="checkbox"/>	<i>go to question 1.2.2</i>
My organisation is a waste or recycling company	<input type="checkbox"/>	<i>go to question 1.2.2</i>
My organisation represents other users / stakeholders	<input type="checkbox"/>	<i>Please provide more detail</i>
<i>Please confirm role</i>		<i>go to question 1.2.2</i>

1.2.2 **Please confirm the focus of your input into this survey** (*mandatory*):

My organisation is a trade / membership body representing the views of others	<input type="checkbox"/>	<i>answer 1.2.3 and 1.2.4</i>
I am representing the views of my organisation only	<input type="checkbox"/>	<i>answer question 1.2.3</i>

1.2.3 **Please tell us where your organisation is located** (*mandatory*):

My organisation is based within the EU	<input type="checkbox"/>	
My organisation is based outside of the EU	<input type="checkbox"/>	

1.2.4 **Please tell us where your members are primarily based** (*mandatory for membership/ trade organisations only*):

Our members are based within the EU	<input type="checkbox"/>	
Our members are based outside of the EU	<input type="checkbox"/>	

1.3 Further information

1.3.1 **If we require additional information from you regards your area of interest, might you be available for a short, follow up interview?** (*mandatory*)

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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If you select "yes", you are consenting to a member of our team contacting you at a future date to schedule a short follow-up interview. You may of course decline at any time.

1.4 Anonymisation of your response

By default, we will make anonymous all information relevant to specific individuals, organisations and/or facilities within our reporting and will not pass on the information that you provide to any other party, unless you state otherwise below.

1.4.1 Do you provide your permission for your information to be used without anonymisation in the reporting relating to this survey? Please tick the boxes for the information where you provide your permission.

Your name. job title	<input type="checkbox"/>
Organisation name	<input type="checkbox"/>
Any specific individual sites or facilities referred to in your responses	<input type="checkbox"/>

1.5 Please tell us about your area of interest

1.5.1 This survey is split into two further parts to consider and gather stakeholder input on the material classification system (section 2) and safe-use instructions (section 3) to be used within the database.

Please confirm which category or categories you would like to provide answers on (mandatory):

I would like to answer questions on the material classification system only	<input type="checkbox"/>	<i>answer section 2 only</i>
I would like to answer questions on the safe-use instructions only	<input type="checkbox"/>	<i>answer section 3 only</i>
I would like to answer questions on both categories	<input type="checkbox"/>	<i>answer section 2 and 3</i>



2. Material classification in the database

This section requests feedback from stakeholders on a proposed material classification system to be potentially used by ECHA within their future database. This will be a multi-level approach for classifying materials which aims to be both proportionate for suppliers of articles and appropriate for users of the database (namely waste operators and consumers) to identify articles and material-based waste streams.

Access to the draft material classification using this [link](#).

2.1 Material types

2.1.1 Considering the key material type(s) which you / your members deal with, please confirm (with a cross in the relevant box) whether each proposed category is suitable for your/ your members' needs (*mandatory*):

Material type (level 1)	Yes, category is suitable	No, category is not suitable	If you answered "No", please suggest an alternative overarching category in the appropriate cell*:
1. Ceramics	<input type="checkbox"/>	<input type="checkbox"/>	
2. Glass	<input type="checkbox"/>	<input type="checkbox"/>	
3. Leather and raw hides	<input type="checkbox"/>	<input type="checkbox"/>	
4. Metals	<input type="checkbox"/>	<input type="checkbox"/>	
5. Paper and board	<input type="checkbox"/>	<input type="checkbox"/>	
6. Plastics (and polymers)	<input type="checkbox"/>	<input type="checkbox"/>	
7. Rubbers and elastomers	<input type="checkbox"/>	<input type="checkbox"/>	
8. Stone, plaster and cement	<input type="checkbox"/>	<input type="checkbox"/>	
9. Textile fibres and other fibres	<input type="checkbox"/>	<input type="checkbox"/>	
10. Wood and cork	<input type="checkbox"/>	<input type="checkbox"/>	
11. Other	<input type="checkbox"/>	<input type="checkbox"/>	

*) Alternatively, if you wish to submit an alternative classification in a file, please send this by email to julius.kreissig@woodplc.com and nikul.pandya@woodplc.com referring to your submission in this table.

2.1.2 Please confirm whether the list supplied in 2.1.1 above is, in your opinion, complete (*mandatory*):

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
If you answered "No" above, please provide a list of any overarching material categories which you think are missing*:			



*) Alternatively, if you wish to submit an alternative classification in a file, please send this by email to julius.kreissig@woodplc.com and nikul.pandya@woodplc.com referring to your submission in this table.

2.2 Material subcategorization – user needs

We are interested in stakeholder views on the subcategories proposed for each material type (level 1) – the proposed subcategories are shown the proposed material classification system ([access here](#)). In particular, we are interested in views on the level of detail to be potentially provided by suppliers of articles within the material categorisation section of the database. This information should meet the needs of different users, including:

- consumers, allowing for informed purchasing choice and improved waste separation behaviours (based on the material(s) an article is made of);
- professional/industrial end users, allowing for informed purchasing and end of life decisions (based on the material(s) an article is made of); and
- waste operators, including recyclers and reprocessors to consider suitability for further processing and to identify material-based waste streams potentially impacted by articles containing SVHCs in the Candidate List.

2.2.1 **Considering again the key material type(s) present in the articles which you / your members deal with, please consider the proposed subcategories proposed for each material type and answer questions on the level of detail proposed.**

Material type (level 1)	Considering the user needs, are the proposed <u>subcategories</u> for this material type adequate for your industry/sector?			If you answered no, please provide a brief explanation why not and (if possible) specify more suitable alternative subcategories*:
	Yes	No	Not relevant	
1. Ceramics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Glass	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Leather and raw hides	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Metals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Paper and board	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Plastics (and polymers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Rubbers and elastomers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Stone, plaster and cement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. Textile fibres and other fibres	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10. Wood and cork	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



11. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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*) Alternatively, you can submit an alternative classification in a file, as explained in Section 2.1.

2.3 Specific feedback from suppliers of articles (including producers and importers) [duty holders]

2.3.1 Considering the proposed material classification system detailed within question 2.2 above ([access here](#)), please confirm whether, at the point of submitting information on articles containing candidate list substances onto the database, the required level information on materials⁴ is expected to be available to suppliers of articles?

Material type (level 1)	Is the required level information on materials available to suppliers of articles in your industry/sector?			If you answered no, please briefly explain what information on material classification you <i>will</i> have available to you at the point of registering or updating entries relating to articles (or complex objects) into the database*:
	Yes	No	Not relevant	
1. Ceramics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Glass	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Leather and raw hides	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Metals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Paper and board	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Plastics (and polymers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Rubbers and elastomers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Stone, plaster and cement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. Textile fibres and other fibres	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10. Wood and cork	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*) Alternatively, you can submit an alternative classification in a file, as explained in Section 2.1.

2.4 Further suggestions

2.4.1 Alternative categorisation systems already used

If your organisation or the sector which your organisation is part of, currently uses, or is required to use, a specific named material categorisation system e.g. as current best practice or to meet particular standards,

⁴ Please note this question only concerns the proposed material classification in submissions to the database. Other types of information in that submission are not in the scope of this consultation.



please tell us about it here. Please provide a web-link to such information or please send by email to:
Julius.Kressig@woodplc.com and nikul.pandya@woodplc.com



3. Safe use instructions in the database

The purpose of the following questions is to collect input for the foreseen “safe use instruction” functionality of the database of articles containing SVHCs on the Candidate List. This includes ideas and examples of safe use instructions for the various stages in the article life cycle, including the waste stage. Please be as concrete as possible in your answers. You do not need to resend input on this issue already forwarded in previous consultation rounds.

3.1 Information to ensure safe use of articles under REACH [all stakeholders]

As a starting point, beyond the name of the Candidate List substance, safe use instructions should address possible means of controlling exposure to / release of Candidate List substances in the article(s). ECHA’s implementation of this information requirement will address the current authoritative understanding of this issue, which is that exposure/release along the entire article life cycle, including the waste stage, should be addressed as advised in subchapter 3.4.1 of ECHA’s Guidance on requirements for substances in articles.

In your view, what is the essential safe use instruction information for the following population groups and life cycle steps (fill only in where relevant for you):

Safe use instructions for consumers	
Safe end-use/operation of the article	[add where relevant for you]
Instructions for discarding the article (e.g. indication of a specific waste stream or waste stream to be avoided)	[add where relevant for you]
Safe use instructions for professional/industrial end-users	
Safe end-use/operation of the article (protecting the worker)	[add where relevant for you]
Instructions for correct installation (e.g. cover/coating of a brick flooring to avoid migration of SVHCs)	[add where relevant for you]
Instructions for discarding the article (e.g. indication of a specific waste stream or waste stream to be avoided)	[add where relevant for you]
Safe use instructions for various operators during article service life	
(Re)packaging, transport and storing	[add where relevant for you]
Maintenance, repair, overhaul, and/or reuse	[add where relevant for you]
Further processing of the article and assembly	[add where relevant for you]
Safe use instructions for workers at the waste and recycling stage	
Safe waste separation, collection, transport and storage	[add where relevant for you]

Safe separation/dismantling/preparation of the article (for subsequent reuse, recycling, recovery or other disposal)	[add where relevant for you]
Safe reuse, recycling, recovery or disposal (e.g. incineration and landfill)	[add where relevant for you]

3.2 Examples of safe use instructions

Do you have any knowledge of:

- Examples of safe use communication in the article supply chain,
- Existing libraries with standard phrases for safe use instructions for articles, and/or
- Systems which could be relevant for developing such a library? This could e.g. be existing safe use instructions for other physical and chemicals risks, which would also lead to control of SVHC exposure and release.

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

If yes, please provide a web-link to such information or please send by email to: fmch@cowi.com

3.3 Product safety under other legislation [question relevant for producers, importers and suppliers of articles]

Risk assessments

If applicable to your organisation or sector, could you please describe how risk assessments are usually carried out (and potentially criteria used) for your products to ensure a high level of protection of the health and safety of persons and of the environment required under product/waste legislation (e.g. General Product Safety Directive 2001/95/EC, Machinery Directive 2006/42/EC, Construction Products Regulation 305/2011, Toy Safety Directive 2009/48/EC) or existing standards, in particular regarding risks resulting from the presence of hazardous substances?

Safe product/material design

If applicable to your organisation or sector, could you please describe how safety for human health and the environment are considered at the conception/design stage of the products and/or provide examples of features that are incorporated in the products to ensure their safety?



3.4 Other

Please provide any other information you find relevant

Thank you very much for your time.

Appendix B

Outcome of analysis of CLP P-phrases and the EuPHRAC library for standard phrases potentially relevant for the SCIP database

The outcome of the analysis is presented in the table below. The table illustrates that, even with a rather open-minded approach, a relatively limited number of phrases are assessed as being potentially relevant.

Several of the sentences such as 'Read label before use', 'To avoid risks to human health and the environment, comply with the instructions for use', 'Use personal protective equipment as required' and 'Observe instructions for use' are not in themselves instructions, but rather refer to instructions provided elsewhere.

Other sentences such as 'Avoid release to the environment' and 'Avoid generation of dust' can be relevant, but are rather generic instructions which do not specify how to avoid release/dust generation.

Some of the phrases such as 'Store ...' and 'Dispose of contents/container to.....' require addition of free-text.

Many phrases such as 'Avoid using indoors' and various phrases specifying risk management measures, such as personal protective equipment, must be considered generally inappropriate for normal use of articles. These were originally developed and are appropriate for substances and mixtures classified as hazardous. Articles placed on the market should generally not require such strict safety instructions. As all stakeholders generally point out, such articles would be illegal or should generally not be placed on the market. These types of phrases might, however, in some situations be relevant, e.g. if professionals need to cut, grind, drill or otherwise mechanically fit an article containing SVHC, or if people can be exposed due to corrosion or heating of the article. The phrases might also be relevant if the safe use instructions as suggested by some NGOs are intended to address possible misuse of the articles, which could lead to SVHC exposure.

Furthermore, the phrases in general merely address consumer, worker and environmental safety rather than providing instructions for proper disposal, collection, sorting and disassembly of SVHC-containing articles.

Overall, these types of phrases might inspire the development of standard phrases for safe use instructions for articles, but are assessed to have limited direct applicability in themselves.

	CLP Precautionary statements		EuPhraC version 4.0.0 08.02.2019; link: http://content.euphrac.eu/Default.aspx?Language=en
End-use/operation of the article by consumers	P103 EUH401	Read label before use To avoid risks to human health and the environment, comply with the instructions for use.	SDS phrases: Observe instructions for use. (SECTION 7: Handling and Storage) Avoid generation of dust. (SECTION 6: Accidental release measures) ES – Consumer Use – Consumer protection: 04.02.10.02.06.1000 (ConsRMM6): Avoid using without gloves. 04.02.10.02.06.6000: Ensure that direct skin contact is avoided. 04.02.10.02.06.9000: Keep away from children 04.02.10.02.06.15000: No specific measures identified. ES – Consumer Use – Outdoor/IndoorActivity: 04.02.10.02.10.00: Avoid using indoors.
	P202	Do not handle until all safety precautions have been read and understood	
	P250	Do not subject to grinding/shock/.../friction	
	P273	Avoid release to the environment	
	P281	Use personal protective equipment as required	
	P401 P402	Store ... Store in a dry place	
	P410	Protect from sunlight	
	P411 P412	Store at temperatures not exceeding ... °C/... °F Do not expose to temperatures exceeding 50 °C/122 °F	
End-use/operation of the article by professional/industrial end-users)	As above		SDS phrases: Observe instructions for use. (SECTION 7: Handling and Storage) Avoid generation of dust. (SECTION 6: Accidental release measures) ES – WorkerUse – Personal protection: 04.02.09.02.10.00.1000: Wear suitable gloves tested to EN374. 04.02.09.02.10.00.3000: Wear an impervious suit. 04.02.09.02.10.00.13000: Wear suitable coveralls to prevent exposure to the skin. ES – WorkerUse – Additional conditions: 04.02.09.02.12.01.13000: Avoid skin contact area greater than
Discarding of the article by consumers (e.g. indication of a specific waste stream)	P501	Dispose of contents/container to....	SDS phrases: Properties of waste which render it hazardous:....(SECTION 13: Disposal considerations)
Discarding of the article by professional/industrial end-users	As above		As above
Installation, maintenance, repair, overhaul, and/or reuse,	Here many of the above phrases related to professional users may also be relevant. In case of mechanical impact on the article such as drilling, grinding etc. a more extensive part of the P phrases and SDS-ES phrases related to technical and personal risk management options might be relevant.		
Further processing of the article and assembly,	As above		
Waste handlers: Safe waste (separate) collection	Here many of the above phrases related to professional users may also be relevant.		
Waste operator/recycler: Safe dismantling of the article	As above in relation to protection of workers and the environment. The phrases are not applicable to giving instructions on the actual disassembly in terms of removing parts/materials with the SVHC.		
Safe treatment at waste stage: preparing for reuse, recycling, recovery or disposal (e.g. incineration and landfill)	Here many of the above phrases related to professional users may also be relevant.		