

Products Containing SVHCs: A Step by Step Checklist

The following information provides a high-level checklist for companies placing products on the market that contain Substances of Very High Concern (SVHCs). As an importer, manufacturer, or supplier of products and materials containing SVHCs in a concentration greater than 0.1% w/w per article/component, there are several obligations to fulfil and things to consider.

1) REGISTER YOUR PRODUCT IN THE SCIP DATABASE

Starting January 2021, the SCIP Database ["Substances of Concern In articles, as such or in complex objects (Products)"] will force manufacturers and suppliers of products containing SVHCs to submit information concerning their presence.

2) INFORM YOUR B2B CUSTOMERS

You must provide enough information to your B2B customers to facilitate the safe use of the article for the recipients of the article. At a minimum, the name of the substance in question has to be communicated to your customers.

3) DISCLOSE THE PRESENCE OF SVHCs

Disclose the presence of SVHCs in products within 45 days upon request from consumers or customers.

4) SUBMIT A NOTIFICATION TO ECHA

In the event that the total amount of the SVHC present in all articles produced and/or imported contains more than 0.1% (w/w) and exceeds 1 tonne per year, you will have to submit a notification to the European Chemicals Agency (ECHA).

5) CHECK OTHER APPLICABLE LAWS

Check whether there are other restricted substances laws applicable for the SVHC to ensure that you are compliant. Example: DEHP is not only a substance listed on the REACH Candidate list, but it is also restricted for several uses according to the REACH Annex XVII under the RoHS Directive.

6) MONITOR REGULATORY CHANGES

Closely monitor regulatory changes for the substance of concern as the substance is a "candidate" to be included in Annex XIV of the REACH regulation. The use of the substance may require an authorisation procedure in the future. **Please Note: The SVHC Candidate list is updated twice a year.**

If you have any questions regarding REACH SVHC, contact us today!

Intertek's regulatory experts have extensive experience in helping companies address the REACH SVHC regulatory requirements by helping to streamline the approach, mitigate risks and implement the necessary processes.

