Commentary

Overshooting the mark

SCIP database called into question ...

Berlin, 28 May 2020 - The importance of the environment and human health should be beyond question in these times. In addition to COVID19 , other environmental issues that are of pressing concern to the electronics market, even if they currently seem to have receded into the background, affect the electronics market. As part of the EU Action Plan for the recycling industry adopted in 2015, the revised Waste Framework Directive came into force in July 2018. In this context, the EU has commissioned ECHA to create a SCIP (Substances of Concern in Products) database.
ECHA? Exactly, this organisation was also responsible for the Guide to the REACh Regulation (EG1907/2006) of the EU - and thus for a riot in the industry in May 2017 (!) because: "The Guide 4.0 is not clearly understandable. And - even worse - contains regulations whose implementation is effectively not possible". This was confirmed by ORGALIME (the umbrella organisation of the European capital goods industry) in note 578 (Appendix 5, Example 2) using the example of a printed circuit board: 'not feasible' or 'not for discussion'. In fact, a closer look at the handling revealed that - if each component of a complex object (e.g. printed circuit board) has to be broken down to its original product level - a separate BOM is necessary for each level. So with three levels, this makes three BOMs or one BOM-BOM-BOM list.

So here's another one... The EU again commissioned ECHA to create a database with information on articles containing substances of very high concern (SVHCs on the candidate list): Birth of the SCIP database. From 5.1.2021 onwards, companies manufacturing articles containing SVHCs will have to submit information on these articles to the SCIP database. These articles can be produced in the EU or imported from non-EU countries. As importers of articles, component distributors automatically assume the obligations of a manufacturer and thus also the responsibility.
According to a survey of FBDi member companies conducted in advance, they expect very different levels of effort - from negligible to several man-years, regardless of the one-off IT expenditure. The reason for this is that the information provided by manufacturers for more

complex assemblies does not reach down to the component level and therefore SVHCs are not correctly indicated. Especially distributors with a higher share of more complex modules in their product portfolio expect a significantly higher workload than estimated by the EU when it decided on the SCIP database.

Déjà vu... Again, it's all about ambiguity and disproportionate effort. This is because the SCIP database requires information that effectively goes beyond what is required by legislation. Also missing is the possibility to link to or copy already registered components and to consider the specification of all variants of an end product as a separate product. The distributors ask themselves: Have the responsible persons of ECHA ever thought about the additional effort and the increasing data volume? Is that necessary?

It is clear that FBDi association supports the EU efforts to protect the internal market from SVHCs. Also, the disposal of not only critical chemical substances is to be made ecological within the framework of the Waste Framework Directive.
Nevertheless, clear doubts remain about the SCIP database - and more: we do not consider its implementation to be feasible, but see its introduction as both critical and questionable. Other associations such as Bitcom, VDMA and ZWEI also rate it as critical and exaggerated. It would be desirable that the current COVID19 pandemic postpones the SCIP project. And it would also be desirable for those responsible to take a closer look at the structure of the database during this period - and to improve it. After all, there is no shame in making improvements and optimising in good time, before immature projects go public.

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About FBDI e. V. (www.fbdi.de):
The FBDi e.V. – Fachverband der Bauelemente Distribution e.V. (Professional Association of Component Distribution), founded in 2003, is well-established in the German association community and represents a large portion of distributors of electronic components with operations in Germany. In addition to the preparation and advancement of numerical data and statistics concerning the German distribution market for electronic components, work group engagement and reporting on important industry themes (amongst others, education, liability and rights, traceability, and environmental themes) form essential pillars of the association's work. The FBDi is a member of the International Distribution of Electronics Association (IDEA).

Member companies (as per January 2020):
Regular members: Acal BFi Germany; Arrow Europe; Avnet EMG EMEA; Beck Elektronische Bauelemente; Blume Elektronik Distribution; Bürklin Elektronik; CODICO; Conrad Electronic; Distrelec; Ecomal Europe; Endrich Bauelemente; EVE; Future Electronics Deutschland; Glyn; Gudeco Elektronik; Haug Components Holding; Hy-Line Holding; JIT electronic; Kruse Electronic Components; MB Electronic; MEDI Kabel; Memphis Electronic; Menges Electronic; MEV Elektronik Service; mewa electronic;

Mouser Electronics; Neumüller Elektronik GmbH; pk components; Püplichhuisen; RS Components; Rutronik Elektronische Bauelemente; Ryosan Europe; Schukat electronic; TTI Europe.
Supporting members: TDK Europe, Recom.

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