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**CDX Supports You in SCiP (Substances of Concern in Products)
Dossier Creation and Reporting**

It has been more than a year since the SCiP database requirements were introduced. However, many of the requirements are just starting to become understandable and transform into necessary adaptations of business processes. ECHA has started to explain its requirements and approaches to fulfill the legal requirements to the community. One year is a short period of time in the area of material compliance reporting, and industries should already have addressed the requirements as set by the amendment of the Waste Framework Directive (WFD).

The challenges

The TARIC/CN Code is the first of these challenges. The TARIC code is defined as a tariff code meant for the classification of goods at customs used with a purpose of declaration of goods, the calculation of duties and the recording of statistics. It contains information on the conditions for the exchange of goods in other markets, because although the TARIC is used by EU member countries, it is also used internationally for product identification. Therefore, accurate product classification and categorization is extremely important for you since an inaccurate or incomplete description can lead to costly error. Duties can be vastly different across codes with similar descriptions and you may incur an unplanned for charge from customs if you are not careful.

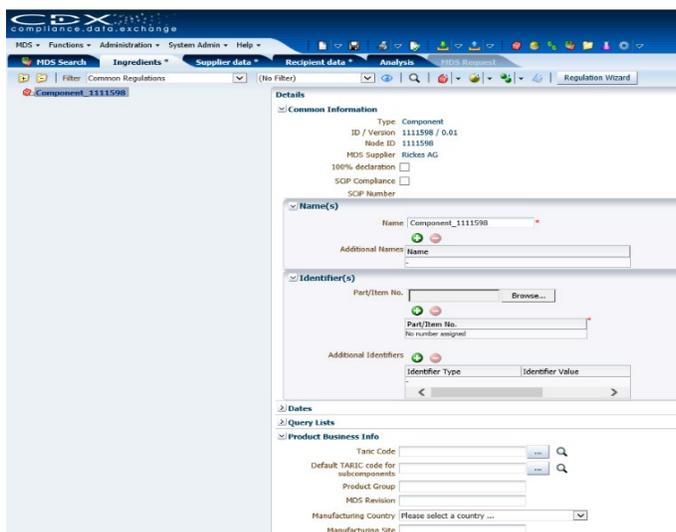
Surely, large corporations have a customs department that knows about these codes. But the process of automatically – essential, as we are discussing 10s of thousands of Dossiers to be created for the product range of one company – connecting customs information with material compliance information is not a trivial one. Typically, this information is only available for parts that are sold, but many articles are not. Sometimes, these are within the manufactured structure of a given part and never directly sold. Or they are locally sourced, potentially in economical areas outside the EU. How to understandably inform suppliers – or your own manufacturing department – about this requirement? This might become difficult, when it comes to languages which are not subject to EU regulations and where the requirements must be translated first. Or is it expected by the ECHA / EU that the importer of complex manufactured products from non-EEA suppliers enters TARIC codes for any such article?

The second challenge is the material categories as introduced by ECHA. It is true that the European Product Categorization System (EuPCS) nomenclature is known and it is as well true that none of the material categories newly introduced by ECHA is hard to understand. But they have not been part of the sourcing process in CDX or other such contexts before. In theory, updating the properties of any of the materials in CDX would either be addressed by the CDX chemical service, or by the respective provider of materials. This would lead to massive data streams and update activities in the downstream supply chain, because everyone would now have to understand the new properties of the materials used.

The solution

First of all: CDX supports direct System-to-System communication with the SCIP database.

Dossiers will be directly transferred and managed behind the scenes using CDX Queue and Collection Management (QCM), CDX will add mass-upload of Dossiers and support for Web Services integration for the SCIP Submissions. With a click, all transfer is done and SCIP numbers are associated with MDSs, while the Dossier will end up in the SCiP database.



A large amount of the information required is already part of CDX. Primary identifiers (part number), product name, articles (lowest level components), substances ("concern elements"). Those can easily be translated into respective SCiP Dossier attributes / data structures.

TARIC codes are the more difficult data. In order to allow reporting in spite of missing supplier data, CDX does not only support per Article TARIC codes, but also allows to configure "default" TARIC codes, which will be used whenever an article in a complex object structure does not have a proper code reported.

CDX Queue and Collection Manager (QCM)

While the MDS explorer was already renamed a while back, now it is more and more becoming the central management tool for all CDX communication. In Release 7.1. the QCM is the central place where users can view and manage their SCIP notifications. Whenever a Dossier is submitted, the QCM will show the current status of the transaction. CDX will try to mitigate technical error conditions at the ECHA side (such as Service not Available, temporary service failures etc.) but there are also circumstances that will require user interaction.

Register in CDX today for free, and convince yourself:

<https://www.cdssystem.com/cdx/faces/login>

Useful links:

CDX System: <https://public.cdssystem.com/en/web/cdx/material-reporting>

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

If you have any questions or comments, please contact the CDX team: cdx-info@dxc.com.