



Health and Environment Justice Support (HEJSupport), Swedish Society for Nature Conservation (SSNC), and groundWork South Africa (gW SA) express serious concern about the European Commission's proposal to discontinue the SCIP database without a fully operational replacement in place.

SCIP is the only EU-wide, legally mandated system that provides structured information on hazardous substances in articles, supporting the right-to-know for recyclers, waste workers, consumers, and public authorities. With more than 16,8 million articles currently registered in the SCIP database, it is clear that many materials placed on the market are unsuitable for material recovery, underscoring the need for robust systems to support informed decision-making. Phasing out SCIP before alternative systems are operational risks undermining chemical safety, circular economy objectives, and worker protection.

**We urge members of the European Parliament to fully reject the proposal by the European Commission to repeal the SCIP database, as suggested in the [Environment Omnibus \(COM\(2025\) 986 final 2025/0394 \(COD\)\)](#), page 2f (Headline: Directive 2008/98/EC on Waste / Repeal of the SCIP database).**

The Commission argues that future tools – such as the common chemicals data platform and the Digital Product Passport – will eventually replace SCIP. However, official timelines indicate that the chemicals data platform will not be operational until around 2030, and the Digital Product Passport will be introduced gradually from 2027, likely starting with textiles only. By contrast, the SCIP database covers all product types, not just a fraction of products.

Therefore, repealing the SCIP database will create a multi-year transparency gap during which no equivalent, enforceable mechanism will be in place. Moreover, it is not clear what the new mechanism will cover.

Removing SCIP would:

- Weaken protections for workers in recycling and waste management, who rely on SCIP information to avoid exposure to hazardous substances.
- Undermine the EU's right-to-know and chemical transparency commitments.
- Deprive authorities and academia of a key tool for monitoring product composition trends and the prevalence of substances of concern, thereby hindering evidence-based policymaking and risk management.

- Contradict circular economy goals by depriving recyclers of essential chemical information.
- Risk of increasing contamination of secondary raw materials with substances of concern.
- Encourage fragmented, bilateral reporting arrangements with customers or waste operators to meet REACH communication obligations on articles containing SVHC, creating new administrative burdens, inefficiencies, higher costs, and inconsistent compliance across Member States.

**Rather than dismantling the database, the Commission should focus on improving data quality, accessibility, user-friendliness and enforcement, while ensuring full interoperability with future digital systems.**

We therefore call on the European Parliament and the Council of the European Union to:

1. Reject the premature phase-out of SCIP.
2. Maintain SCIP until an equivalent or stronger replacement or an enhanced version is fully operational.
3. Guarantee legal continuity of the right-to-know for substances of concern in products.
4. Ensure that the Digital Product Passport covers all substances of concern, as defined in the Ecodesign for Sustainable Products Regulation (ESPR), and at a minimum, delivers the same level of protection and accessibility currently provided by SCIP.

Simplification must not come at the expense of health, environmental protection, and workers' safety. Eliminating a functioning transparency tool before a proven alternative exists risks undermining EU chemicals policy at a critical moment for the circular economy and the non-toxic environment agenda.

If you have questions regarding our recommendations, please contact us.

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