

Tools to refer to SCIP data already submitted to ECHA

December 2021

ABC

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Version	Changes	
1.0	First version	August 2020
2.0	Addition of the "Simplified SCIP Notification(s) for one or more Legal Entities" feature, of hypothetical examples, and of further information on how the data will be disseminated in the SCIP database and on the content of submission reports.	December 2021

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1. Introduction

The SCIP database is the database for information on **S**ubstances of **C**oncern **I**n articles as such or in complex objects (**P**roducts) established under the Waste Framework Directive (WFD). Article 9(1)(i) of the WFD requires any EU supplier of articles containing substances of very high concern (SVHCs) on the [Candidate List](#) in a concentration above 0.1% weight by weight (w/w) to submit information, pursuant to REACH Article 33(1), on these articles or on complex objects incorporating such articles to ECHA, as from 5 January 2021. The required information is submitted to ECHA according to the SCIP format through the ECHA Submission Portal.

The information that needs to be included in a SCIP notification dossier is explained in detail in the document "[Requirements for SCIP Notifications](#)" and in the "[SCIP Notification Format - SCIP data model](#)" document available on the dedicated [SCIP webpage](#) on the ECHA website.

The SCIP notification obligation applies to articles as such containing a Candidate List substance above 0.1% w/w and to complex objects incorporating such articles.

This document describes technical solutions that can be used on a voluntary basis to make possible for suppliers of articles (e.g. distributors, 'assemblers', companies within the same corporate group) to refer to data already submitted to ECHA by the same company or other duty holders. These tools facilitate the submission of SCIP notifications to ECHA, while keeping consistency on the information submitted to the SCIP database and avoiding multiple reporting of the same data and thereby limiting unnecessary administrative burden for duty holders.

The two tools that can be used to refer to information already successfully submitted to the SCIP database are:

1. The simplified SCIP notification (SSN)
2. "Referencing" in a SCIP notification dossier.

Section 2 of this document focus on SSN, which has been primarily developed to be used by distributors (who are not importers and/or producers) or by companies within the same corporate group, while section 3 focuses on "referencing" in a SCIP notification dossier, which has been primarily developed to be used by "assemblers" who place complex objects (products) on the EU market. An "assembler" is an actor in the supply chain who makes complex objects (i.e. objects made up of more than one article)¹.

SSN and 'referencing' are simplified solutions to submit SCIP notifications to ECHA on a voluntary basis, instead of submitting a "full" SCIP notification dossier including all the required information.² In this document, the term "full" SCIP notification is used to refer to a SCIP notification that contains an IUCLID dossier including all the required information for an article as such or a complex object, without referring to data already submitted to ECHA by the same company or other duty holders.

The Simplified SCIP notifications (SSN) do not require the submission of an IUCLID dossier.

The use of 'referencing' in a SCIP notification dossier allows the creation of a "light-weight" SCIP notification dossier, since the information related with one or more of the complex object

¹ See subchapter 2.4 of the "[Guidance on requirements for substances in articles](#)".

² See chapter 2 of the document "[Requirements for SCIP Notifications](#)".

components³ is included in SCIP notification dossier for that complex object by referencing to data that has already been submitted to ECHA for one or more of those components.

After successfully submitting a SCIP notification through the ECHA Submission Portal, suppliers of articles receive an alphanumeric identifier – the SCIP number – included in the submission report. The SCIP number is a unique identifier of the SCIP notification made by a submitter for an article as such or a complex object. It identifies the set of information submitted to ECHA by a submitter for an article or complex object under Article 9(1)(i) of the WFD.

The SCIP number remains the same in the case where the duty holder submits an update⁴ of the SCIP notification for an article as such or complex object, i.e. when an updated SCIP notification dossier is submitted to ECHA.



 The SCIP number [*SCIP number*] is included in the submission report for a successful submission of a SCIP notification as shown in Figure 1.

Figure 1: Submission report for a SCIP notification containing a dossier

Submission status: Succeeded 			
Dossier type:	SCIP notification	Submitted by:	Company 1
Submission number:	RMH864896-90		
Submitted IUCLID version:	6_4		

Submission information		Submission events	
SCIP number	5b136626-b763-4238-8014-79e5e50f57b9	28/07/2020 01:07	Dossier submitted
Article name	Bicycle A	28/07/2020 01:07	Dossier passed validation checks
EAN (European Article...)	56#####1		
Dossier name	Bicycle A SCIP dossier		
Dossier UUID	160f1c43-c8ff-4c39-93e3-99cb970cb17e		
File name	160f1c43-c8ff-4c39-93e3-99cb970cb17e.i6z		
Notification type	Initial		

The SCIP number is not disseminated by ECHA, unless a submitter includes that number under the identifiers of the article or complex object being notified. Both SSN and 'referencing' tools require the communication on a voluntary basis of the SCIP number of a notification for an article or complex object by the submitter to another duty holder, e.g., when relevant, together with the information communicated under REACH Art 33(1).

By providing the SCIP number of the submitted notification to ECHA to the recipients of the article as such or complex object, for instance as an element of the information to be

³ A complex object component may be an article (as such) or a complex object made of articles. For more information, see chapter 2 of the document "Requirements for SCIP Notifications" and subchapter 2.4 of the "Guidance on requirements for substances in articles".

⁴ If the SCIP information for an article needs to be updated, you can edit the information included in the dataset of the article and create a new dossier. The primary article identifier in the dossier needs to remain exactly the same.

The submission, by the same Legal entity, of this new dossier with exactly the same primary article identifier will be received as an **update of the SCIP notification** of this article or complex object.

communicated under REACH Article 33(1), a direct upstream supplier is contributing to facilitate the SCIP notification submission by its customers.

SSN and "referencing" may only be used if the articles as such or complex objects received are the same as the articles or complex objects which are supplied down the supply chain, either on their own or incorporated in complex objects, and therefore the information to submit to the SCIP database is exactly the same. In order to be the same, the article or complex object, which is notified via SSN or "referencing" as a complex object's component, needs to have the same chemical composition and physical form (shape, surface and design). Additionally, in the case of SSN, the reported identifiers in the SCIP notification dossier (either "full" or "light-weight") are required to be kept the same and made available as "commercial" identifiers to all downstream actors.⁵

When a duty holder updates a SCIP notification, by submitting a new dossier, which has been referred to by other duty holders using SSN and "referencing", all these notifications which refer to that SCIP notification are updated as well. Therefore, the duty holders using SSN or "referencing", in principle, do not need to update their submitted SCIP notification(s). However, in certain situations, the duty holder using the SSN or "referencing" will have to update its SCIP notification. If an update was to be needed in such situations, then in the case of SSN, it would require for instance the submission of a new SCIP notification including a SCIP notification dossier, and in the case of "referencing", it would require for example the replacement of the SCIP number for the complex object component by another SCIP number or by inserting data for that complex object component in the SCIP notification dossier.

A duty holder is always responsible for the accuracy of the information submitted to ECHA to comply with the SCIP notification obligation. The responsibility for the content of each notification to comply with the SCIP notification obligation continues even when using SSN or 'referencing' tools, as reflected in chapter 3.2.1 of the [Guidance on requirements for substances in articles](#) which states the following concerning the communication obligations under REACH Article 33: 'The communication obligations arise from the presence of the Candidate List substance in the article. These obligations apply regardless of whether or not the supplier is aware of the presence of the substances. Therefore, it is in the interests of the supplier to seek information on the presence of Candidate List substances.'

It is up to the individual actors in the supply chain, or otherwise, to enter into the necessary arrangements, if considered needed, to use these voluntary tools (SSN and "referencing") to fulfill the SCIP notification obligation.

⁵ For more information, see chapter 3.1 of the document "[Requirements for SCIP Notifications](#)".

2. Simplified SCIP Notification

Simplified SCIP notification (SSN) is a tool developed by ECHA to facilitate the fulfilment of the SCIP notification obligation without preparing a IUCLID dossier. It is a simplified solution to be used by certain duty holders to refer, on a voluntary basis, to information already submitted by another submitter to ECHA by including the relevant SCIP number(s) in their SCIP notifications submitted to ECHA through the ECHA Submission portal.

The most common scenario for the use of SSN is the case of a distributor making reference to a SCIP notification that already includes all required information and has previously been submitted by an upstream actor in the supply chain that has the primary knowledge of the article or complex object.

Actors in the supply chain with a role of producer, importer or assembler of an article as such or complex object should have the primary knowledge of the required information to be included in an SCIP notification dossier to be submitted to ECHA. This is, for example, the case in the following situations:⁶

- a producer of an article producing an article as such containing a Candidate List substance or by incorporating such substance in the article from a mixture containing that Candidate List substance in its composition,
- a producer or assembler that incorporates a Candidate List substance in one or more articles in a further processing step, including the situation of using a mixture containing that substance,
- or an assembler who incorporates components and subcomponents with articles as such containing a Candidate List substance.

It is also the case for importers, because they are the first actor in the supply chain having the obligation to gather all the necessary information to comply with their duties, namely the required information to be communicated down the supply chain under REACH Article 33(1) and to be submitted to ECHA in a SCIP notification dossier under Article 9(1)(i) of the WFD.

A duty holder who submits a simplified SCIP notification (SSN) remains responsible for the information referred to in the submitted SSN.

A pre-condition for using SSN is to have received the SCIP number of the article as such or complex object's SCIP notification that has already been submitted to ECHA.

SSN may only be used if the (e.g. received) article as such or the complex object subject to the SCIP notification is the same, and therefore all required information² has already been submitted by other or others submitter(s) to ECHA, as the article or complex object (e.g. that is supplied) notified in the SSN:

- An article as such subject to the SCIP notification (e.g. received) is the same as the article (e.g. supplied) notified in the SSN if there is no change in the physical form (shape, surface and design) and in its chemical composition.
- The complex object subject to the SCIP notification (e.g. received) is the same as the complex object (e.g. supplied) notified in the SSN if:
 - o the articles as such incorporated in it have no change in the physical form and in their chemical composition;
 - o and its components and subcomponents (complex objects), incorporating those articles as such, are kept the same.

⁶ See for instance the scenarios in Table 5 under subchapter 3.2.3.1 of the "[Guidance on requirements for substances in articles](#)".

In addition to these criteria, the identification elements (identifiers),⁷ i.e. names, alphanumeric identifiers, and article category, of the article as such or complex object (product) supplied must be the same.

If those criteria are met, the supplier of the article or complex object can submit an SSN, by referring to the data successfully submitted to ECHA by other duty holder (e.g. an upstream supplier) through the submission in the ECHA Submission Portal of the SCIP number received⁸.

The main target users of the simplified SCIP notification (SSN) are **distributors**. However, other duty holders supplying articles or complex objects fulfilling the above mentioned criteria may also use this tool.

Submitted simplified SCIP notifications (SSNs) for a specific article or complex object does not impact the information disseminated by ECHA for that article or complex object since ECHA will not make available the information about the submitters (Legal Entities (LEs)) that submit each notification.

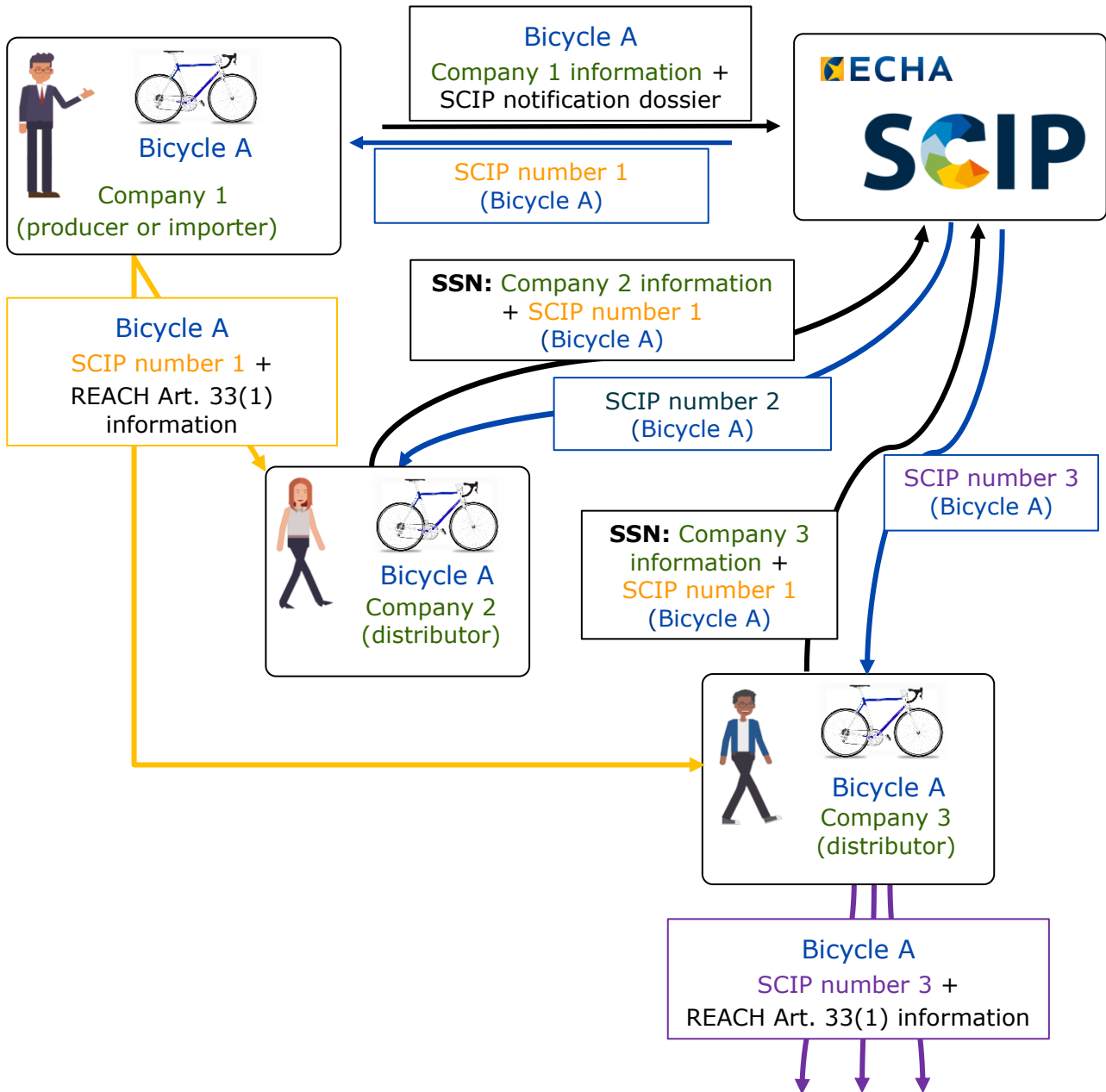
⁷ See Table 2 under chapter 2.1.1 and subchapters 2.1.1.1 to 2.1.1.5 of the document "[Requirements for SCIP Notifications](#)".

⁸ It is up to the individual actors in the supply chain, or otherwise, to enter into the necessary arrangements, if considered needed, to use these voluntary tools to fulfill the SCIP notification obligation.

2.1 How does a simplified SCIP notification work?

To better understand how the simplified SCIP notification (SSN) may work in practice, sequential steps are listed and explained in detail below with the support of a hypothetical example (bicycle supplied-received-supplied... within the same supply chain) as shown in Figure 2.

Figure 2: Simplified SCIP notification overview for the hypothetical bicycle (Bicycle A) example.




1. Company 1 (e.g. 'assembler' or importer of Bicycle A) places on the EU market Bicycle A, which incorporates at least one article as such containing a Candidate List substance in a concentration above 0.1% w/w.

Company 1 submits a SCIP notification dossier for Bicycle A in the ECHA Submission Portal.⁹

As a result of a successful submission, Company 1 receives from ECHA, in the submission report (see Figure 1), the SCIP number 1 for the notification of 'Bicycle A'. The submission report includes, among others:


- the status of the notification [*Submission status*];
- the attributed SCIP number of the notification (for Bicycle A) [*SCIP number*];
- the submission number [*Submission number*];
- the name [*Article name*], primary article identifier type and value of the Bicycle A;
- the notification type: initial or update [*Notification type: Initial/Update*];
- and the submission events [*Submission events*].

If Company 1 submits an updated SCIP dossier for 'Bicycle A' to ECHA, the SCIP number 1 for the updated SCIP notification remains the same in the submission report. However, another submission number is attributed to that update and the notification type appears as 'Update'.

 Additional information on how to create a dossier and how to update a notification is available on the documents "SCIP Database Notifications - How to prepare and submit a SCIP notification" and "Requirements for SCIP Notifications" available at the dedicated [SCIP support webpage](#) on the ECHA website.

2. Company 1 (e.g. 'assembler' or importer of Bicycle A) provides SCIP number 1, received in the SCIP notification report, to customers, Company 2 and Company 3, the next recipients of Bicycle A in the supply chain. SCIP number 1 is then communicated on a voluntary basis by Company 1 to these companies, e.g. together with the information communicated down the supply chain under REACH Art. 33(1). This now makes it possible for Company 2 and Company 3, which are distributors, to submit an SSN, in the case where they supply the same Bicycle A further down in the supply chain.
3. Company 2 and Company 3, which are distributors, need to submit a SCIP notification for Bicycle A to ECHA. Since they received the SCIP number 1 from Company 1, corresponding to its notification to ECHA with a SCIP notification dossier with the necessary information for Bicycle A, and are supplying further down in the supply chain the same Bicycle A received, they can submit an SSN. Therefore, Company 2 and Company 3 submit a simplified SCIP notification (SSN) by submitting the SCIP number 1 received from the supplier (Company 1) in the ECHA Submission Portal. Companies 2 and 3 do not need to prepare and submit an IUCLID dossier with the information for Bicycle A, because that information has been already submitted to ECHA by Company 1.

By submitting an SSN to ECHA, Company 2 and Company 3 are referring to the data included in the successfully submitted SCIP notification to ECHA by Company 1, their upstream supplier. These companies are still responsible for the content of the notification, i.e. for the information submitted to ECHA and by complying with the SCIP notification obligation.

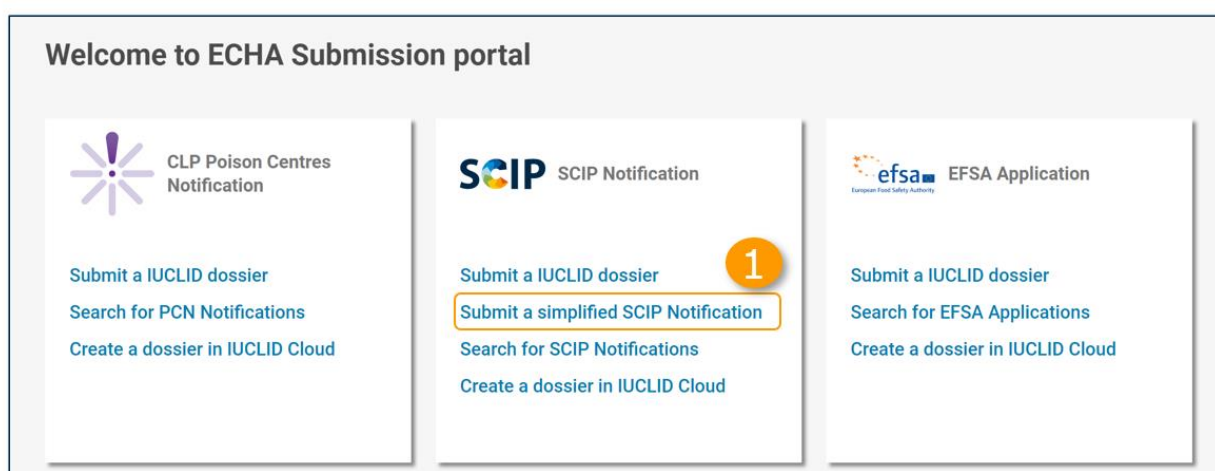
 Figure 3 shows how to make an individual submission of a simplified SCIP notification (SSN) in the ECHA Submission Portal: (1) go to the dedicated section identified as

⁹ See documents: "SCIP Database Notifications - How to prepare and submit a SCIP notification" (available at <https://echa.europa.eu/scip-support>) and 'SCIP Notification Format - Preparing a SCIP dossier' (available at <https://echa.europa.eu/scip-format>).

'Simplified SCIP notification' (Simplified SCIP notification) by clicking over "Submit a simplified SCIP notification" (Submit a simplified SCIP notification); (2) in the new window, insert the SCIP number (UUID format) communicated by the upstream supplier in the 'SCIP number' field under the 'Submission of a simplified SCIP notification for an individual SCIP number' (submission of a simplified SCIP notification for an individual SCIP number) section and click 'Submit' (submit) button.

Figure 3: ECHA Submission Portal (A) and 'Simplified SCIP notification' (simplified SCIP notification) section (B) views, as well as the submission of a simplified SCIP notification for an individual SCIP number (B)

(A)



(B)

☰ Simplified SCIP notification

Upload and submission of simplified SCIP notifications in bulk

Please upload information on the articles you wish to notify using an excel file including in each row

- A SCIP number (mandatory information)
- An Article name (optional)
- A Primary article identifier type (optional)
- A Primary article identifier value (optional)

● Please note that only Excel files are allowed to be uploaded and, currently, only simplified SCIP notifications can be submitted

Drop file to upload or Browse


Submission of simplified SCIP notifications for an individual SCIP number

Please enter the SCIP number of the article you wish to notify and click "Submit" to send your Simplified SCIP notification

● Only one SCIP number can be submitted at a time.

SCIP number Submit

4. After submitting a successful Simplified SCIP notification (SSN), Company 2 and Company 3 receive their own SCIP numbers in their submission reports (see Figure 4), the SCIP number 2 and the SCIP number 3 respectively. No data for Bicycle A is being submitted by these companies in their SSNs, they are just referring to the data included in the SCIP notification successfully submitted to ECHA by Company 1.

-  The submission report of a SSN includes, among others:
- the status of the notification [*Submission status*];
 - the attributed SCIP number of the notification submitted via SSN [*SCIP number*];
 - the SCIP number used to submit the SSN - Referenced SCIP number [*Referenced SCIP number*]
 - The name [*Article name*], primary article identifier type and value of the article that the notifier has referred to.

SSN submitters, companies 2 and 3 are recommended to confirm the identifiers, including the primary article identifier type and value, included in the submission report to cross-check that this information is the same to the information provided by their upstream supplier, company 1 under REACH Article 33(1).





 Potential SSN submitters have the possibility to consult the information submitted via the SCIP number received and which they are referring to in their SSN in the SCIP database available at <https://echa.europa.eu/scip-database>.

Figure 4: Submission report for a successful Simplified SCIP Notification (SSN)

Submission status: Succeeded 			
Dossier type:	SCIP notification	Submitted by:	Test_Company2
Submission number:	RMH148726-13		
Submitted IUCLID version:	N/A		
Submission information		Submission events	
SCIP number	1ac20926-89bd-4023-8d9a-f5ea6290d27d 	29/07/2020 18:45	Dossier submitted
Referenced SCIP num...	5b136626-b763-4238-8014-79e5e50f57b9	29/07/2020 18:45	Dossier passed validation checks
Article name	Bicycle A		
EAN (European Article...	56#####1		
File name			
Notification type	Initial		

5. Company 2 and Company 3 may provide respectively the SCIP number 2 and the SCIP number 3, received in their SCIP notification reports concerning their SSNs for Bicycle A, to their customers, i.e. the next recipients of Bicycle A in the supply chain, as illustrated in Figure 2 for Company 3. The SCIP number 2 or 3 are communicated respectively on a voluntary basis by Company 2 or Company 3 to their customers e.g. together with the information communicated down the supply chain under REACH Art. 33(1) to those customers to make use of the SSN, in case they supply the same Bicycle A further down in the supply chain (e.g. if they are distributors).

 ECHA strongly discourages communicating or disclosing inadvertently SCIP numbers other than those provided to duty holders in their own submission reports of their SCIP notifications or Simplified SCIP Notifications.

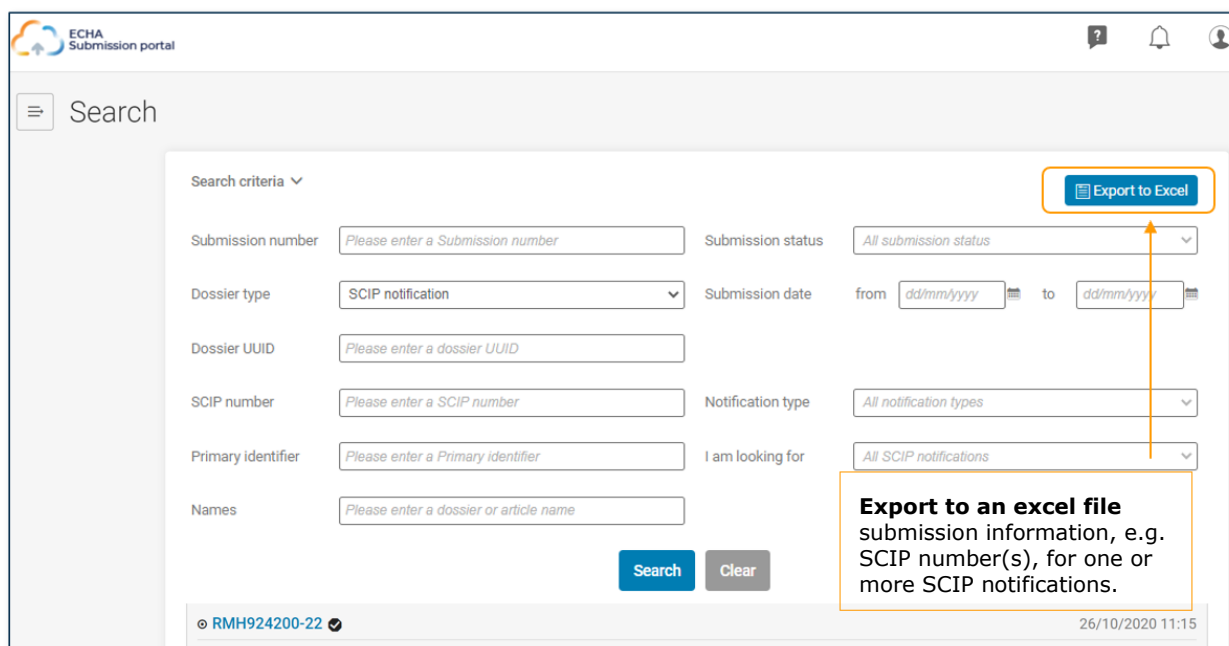
6. The customers of Company 2 and Company 3 which are for instance distributors provide respectively the SCIP numbers they received in their SCIP notification reports concerning their SSNs for Bicycle A, to their customers, i.e. the next recipients of Bicycle A in the supply chain, to make it possible for them to use the SSN, and so on.

! In the example illustrated in Figure 2, if Company 1 updates its notification for Bicycle A, Companies 2 and 3 and all other duty holders down the supply chain who submitted a Simplified SCIP Notification do not need to re-submit or update their notifications, as long as the update is relevant for them. However, Company 1 should communicate the changes in the updated dossier submitted to ECHA for instance as part of the information communicated under REACH Article 33(1) to Companies 2 and 3. These companies should pass on this information to the next actors in the supply chain, and so on.

2.2 Submission of simplified SCIP notifications in bulk

A supplier of articles as such or complex objects may often place on the EU market several articles or complex objects subject to the SCIP notification obligation. When a supplier has submitted multiple SCIP notifications corresponding to those articles or complex objects, this actor can export relevant submission information for one or several SCIP notifications to an excel file in the ECHA Submission Portal, as shown in Figure 5.

Figure 5: 'Export to Excel' (Export to Excel) functionality in ECHA Submission Portal allows to export SCIP numbers of one or more submissions, as well as other submission information



The screenshot shows the ECHA Submission Portal search interface. The search criteria section includes fields for Submission number, Dossier type (set to 'SCIP notification'), Dossier UUID, SCIP number, Primary identifier, and Names. There are also dropdown menus for Submission status, Submission date (with date pickers), Notification type, and I am looking for. A blue 'Export to Excel' button is highlighted with an orange box. A callout box with an orange border and arrow points to the button, containing the text: 'Export to an excel file submission information, e.g. SCIP number(s), for one or more SCIP notifications.' The interface also shows a 'Search' button, a 'Clear' button, and a status bar at the bottom with the text 'RMH924200-22' and the date '26/10/2020 11:15'.

The submission information exported to the excel file from the ECHA Submission Portal includes for example the SCIP number, the name of the article or complex object, the primary article identifier type and value, the submission number, the submission date and the submission type.

A supplier of articles as such or complex objects (e.g. producer, importer, assembler, distributor) can provide, on a voluntary basis, the SCIP numbers of those articles or complex objects to customers, the recipients of the articles or complex objects, e.g. as part or together with the information communicated down the supply chain under REACH Art. 33(1). The SCIP numbers and other relevant submission information associated to each of those numbers, such as the name of the article or complex object, the primary article identifier type and value, included in the excel file generated by using the 'Export to Excel' functionality can be provided in bulk to customers.

Actors in the supply chain who receive several SCIP numbers for articles as such or complex objects which have been supplied to them, and who can submit simplified SCIP notifications (SSN) (see section 2.1), for instance distributors, can upload an excel file including many SCIP numbers at once and submit SSNs in bulk.

In the ECHA Submission Portal, under the section '*Simplified SCIP notification*' - Simplified SCIP notification, a company (e.g. distributor) that submits simplified SCIP notifications for several articles as such or complex objects has two possible ways of submitting the simplified SCIP notifications:

1. submit simplified SCIP notifications in bulk by uploading an excel file under the section '*Upload and submission of simplified SCIP notifications in bulk*' (Upload and submission of simplified SCIP notifications in bulk) (see Figure 6) and click '*Submit*' (submit) button in the new window (see Figure 7 (1))
2. submit an individual simplified SCIP notification (SSN) for each article or complex object at a time, by inserting a single SCIP number in the respective field ('*SCIP number*') under the '*Submission of a simplified SCIP notification for an individual SCIP number*' section and click '*Submit*' button (see Figure 3).

Figure 6: View of the '*Simplified SCIP notification*' section in the ECHA Submission Portal and submission of simplified SCIP notifications in bulk

The excel file to be uploaded to submit simplified SCIP notifications in bulk contains at least in each row the SCIP numbers received of the articles or complex objects notified which are being referred to. It is also possible to include in each row, the name of the article or complex object, the primary article identifier type and the primary article identifier value, but including this information is optional. That optional data is for the submitter's own record (e.g. in ECHA submission portal), but not used by SCIP. SCIP only takes into account the SCIP number and the respective information you are referring to associated to that number. After the file is uploaded, as shown in Figure 7 (number 1), the content of the uploaded excel file is shown in the ECHA Submission Portal window. If the information displayed is correct, the user can click on '*Submit*' button to submit its simplified SCIP notifications. After submitting Simplified SCIP Notifications (SSNs) in bulk, a list of submission numbers is displayed in the ECHA Submission Portal window as shown in the same Figure (number 2).

In order to know whether the submissions in bulk were successfully submitted and to find the SCIP numbers attributed to the successfully submitted simplified SCIP notifications, the submitter should go to the submission report of each SSN or to the 'Search' (Search) section (landing page) of the ECHA Submission Portal as shown in Figure 8. From that section, the submitter can also access to the submission report (see Figure 4) concerning each SSN submitted, i.e. for each article or complex object notified to ECHA.

SSN submitters are recommended to confirm the identifiers, including the primary article identifier type and value, included in the submission report by cross-checking that this information is the same to the information provided by their upstream supplier, Company 1 under REACH Article 33(1).

Figure 7: Submitting a simplified SCIP notification in bulk on ECHA Submission Portal

(1)

File search_results_export_1621435900429.xlsx has been successfully uploaded.

5 records found

SCIP number	Article name	Primary article identifier type	Primary article identifier value
ff08f404-79e3-4cfc-802b-6f1c05e5b4a5	Dossier 2, Tires_EE	EAN (European Article Number)	2699577-898989-96
34a99676-b2be-4123-908b-b6bd21eff056	Flexible doughnut- shaped tube_DD	EAN (European Article Number)	1211-66-99-365
a01c195a-6d2d-4978-8ad6-a2c9e3764c2b	Dossier V3, plastic cap_CC	EAN (European Article Number)	7878-89-89-2211
99a5ad86-c2b9-45fd-b261-cfff3bdddbaa	Dossier 19_05_2021, Inner tube BB	EAN (European Article Number)	5599-66-66-98-36
2c27f9bb-cd59-4057-a2a4-7f23c35dad9b	Dossier 1, Wheel AA	EAN (European Article Number)	966985755-20

Cancel You are about to submit 5 simplified SCIP notifications [Submit](#)

The system will display the records uploaded from the excel file. If the list includes the correct values, click on 'Submit'.

(2)

Thank you for your submission!

5 out of 5 simplified SCIP notifications submitted [Export to Excel](#)

Legal entity	Submission number	Reference SCIP number	Article name	Primary a
LE Name ECHA-e0cf7ec0-dfa5-4ad5-8ca6-d23708fe140e	RMH246280-14	ff08f404-79e3-4cfc-802b-6f1c05e5b4a5	Dossier 2, Tires_EE	EAN (Euro
LE Name ECHA-e0cf7ec0-dfa5-4ad5-8ca6-d23708fe140e	RMH187190-09	34a99676-b2be-4123-908b-b6bd21eff056	Flexible doughnut- shaped tube_DD	EAN (Euro
LE Name ECHA-e0cf7ec0-dfa5-4ad5-8ca6-d23708fe140e	RMH090412-35	a01c195a-6d2d-4978-8ad6-a2c9e3764c2b	Dossier V3, plastic cap_CC	EAN (Euro
LE Name ECHA-e0cf7ec0-dfa5-4ad5-8ca6-d23708fe140e	RMH898339-93	99a5ad86-c2b9-45fd-b261-cfff3bdddbaa	Dossier 19_05_2021, Inner tube BB	EAN (Euro
LE Name ECHA-e0cf7ec0-dfa5-4ad5-8ca6-d23708fe140e	RMH592841-12	2c27f9bb-cd59-4057-a2a4-7f23c35dad9b	Dossier 1, Wheel AA	EAN (Euro

Following submission, a **Submission Number** is assigned. By clicking on the submission number you can access to the submission report.

Figure 8: Summary of the status of Simplified SCIP Notifications submitted in the ECHA Submission Portal.

(The red square highlights a failed SSN submission marked as ❌).

The screenshot shows a search results page in the ECHA Submission Portal. At the top left, there is a search bar with a hamburger menu icon and the text 'Search'. Below this, the search criteria are displayed as 'Search criteria >'. On the right side, there is a blue button labeled 'Export to Excel'. The page indicates 'Page 1 of 52 results' and a 'Sort by' dropdown menu set to 'Newer first'. The results are presented in a table with two rows. The first row is for notification RMH247797-98, which is successful (marked with a checkmark). The second row, for notification RMH025032-32, is highlighted with a red square and marked with a failure icon (❌). The table columns include notification ID, submission date, SCIP number, names, EAN, dossier type, and status.

Notification ID	Submission Date	SCIP number	Names	EAN (European ...)	Dossier type	Status
RMH247797-98	19/05/2021 18:30	01b99c67-1826-4636-85f6-8f03064fe1e6	Wheel AA	966985755-20	SCIP notification	SCIP
RMH025032-32	26/05/2021 22:43	00ba0ef5-3387-4f44-ba28-fcfe79bd7983			SCIP notification	❌

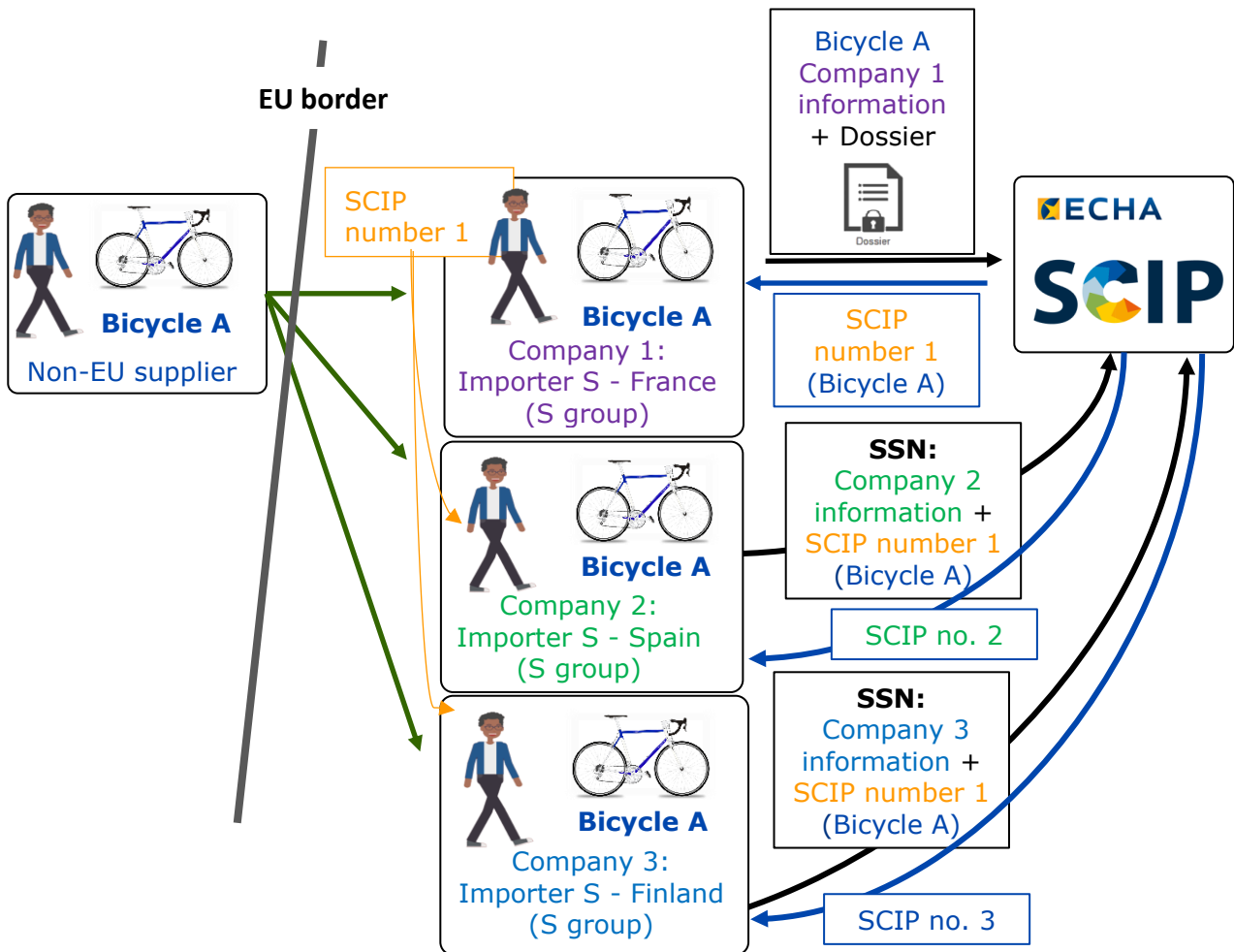
2.3 Use of simplified SCIP notifications by companies in different supply chains

The Simplified SCIP Notification (SSN) can also be used by duty holders at the top of different supply chains that receive and supply an article or complex object whilst not performing any change to it, e.g. companies belonging to the same corporate group that place on the market the same article or complex object in each respective EU country. In this case, the principle which assumes that at the top of each EU supply chain there is a duty holder with a role of producer or importer of the same article or complex object who is responsible for gathering all the information about substances incorporated in that article or complex object does not prevent the use of SSN by duty holders at the top of different supply chains who import or produce the same article or complex object, for example importers who are companies belonging to the same corporate group. However, those duty holders at the top of different supply chains need to establish the necessary arrangements, if needed, where one of them submits a SCIP notification containing a dossier with the required information for the article or complex object, and the other duty holders use the SSN to refer to the information submitted by the duty holder submitting the dossier to ECHA.

Note that each duty holder remains responsible for the SCIP notification containing the dossier and its content. Finally, it is up to the individual duty holders, or otherwise, to enter into the necessary arrangements, if considered needed, to use such tools to fulfil the SCIP notification duties.

To better understand how the simplified SCIP notification (SSN) may work in practice, Figure 9 shows an overview of a hypothetical example for the specific case of importers who are companies belonging to the same corporate group.

Figure 9: Hypothetical example illustrating the use of Simplified SCIP notifications (SSNs) by importers belonging to the same corporate group.




1. Company 1, Company 2 and Company 3 belonging to the same corporate group, who are importers and place the same Bicycle A on the EU market supplied by a non-EU supplier, enter in the necessary arrangements if needed, where one of them submits a SCIP notification containing a dossier with the required information, and the other companies use the SSN to refer to the information submitted in that dossier to ECHA.
2. Company 1 submits a SCIP notification dossier for Bicycle A in the ECHA Submission Portal.⁹ As a result of a successful submission, Company 1 receives from ECHA, in the initial submission report (see Figure 1), the SCIP number 1 for the notification of 'Bicycle A'.
3. Company 1 provides the SCIP number 1, received in the initial SCIP submission report, to Company 2 and Company 3, as described in the points above.
4. Company 2 and Company 3 submit a simplified SCIP notification (SSN) for Bicycle A to ECHA using the SCIP number 1 (see Figure 3) received from Company 1.
5. After submitting a successful SSN, Company 2 and Company 3 receive their own SCIP numbers in their submission reports (see Figure 4), the SCIP number 2 and the SCIP number 3, respectively (Figure 9). No data for Bicycle A is being submitted by these companies in their SSNs, they are just referring to the data included in the SCIP notification that was successfully submitted to ECHA by Company 1.

6. Company 2 and Company 3 may provide respectively the SCIP number 2 and the SCIP number 3 received in their SCIP notification reports concerning their SSNs for Bicycle A, to their customers, i.e. the next recipients of Bicycle A in the supply chain e.g. together with the information communicated down the supply chain under REACH Art. 33(1) to those customers to make use of the SSN, in case they supply the same Bicycle A further down in the supply chain (e.g. if they are distributors).

2.4 Simplified SCIP Notification(s) for one or more Legal Entities

The ECHA Submission portal includes a feature on the '*Simplified SCIP Notification*' (Simplified SCIP Notification) section to allow a '*foreign user*' (foreign user)¹⁰ to carry out the submission of simplified SCIP notification(s) for one or more duty holders (legal entities¹¹) in one submission.

 This feature can be useful when the simplified SCIP notification (SSN) is used by companies belonging to the same corporate group placing on the EU market the same article or complex object as it is described in section 2.3 of this document. One company within a corporate group can submit data on behalf of other companies of the group.

The use of this feature entails the following pre-conditions:

1. A foreign user link using ECHA Accounts is established between one or more duty holder account(s) and the company responsible for the submission of SCIP notification on behalf of the duty holder(s).
2. A SCIP number must exist, i.e., SCIP notifications (in principle with a SCIP dossier) have been submitted successfully to the SCIP database by a company within the corporate group.

The foreign user functionality in ECHA Accounts allows a third party to create and/or use an ECHA account to submit data to the SCIP database on behalf of a duty holder. This functionality is based on intra-party arrangements. Additional information related with the foreign user functionality is available in Q&A 1665, Q&A 960 and '*ECHA Accounts manual*' (ECHA Accounts Manual).

In order to be able to use this feature to submit Simplified SCIP Notification(s) for one or more Legal Entities (duty holders) the foreign user needs to set up the needed rights for the interested Legal Entities.

The sequential steps which need to be followed are:

1. Set up the foreign user rights of the interested legal entities
2. Compile the SCIP numbers needed to submit SSNs on behalf of the interested legal entities

¹⁰ See definition chapter 6.12 of the '*ECHA Accounts Manual for Industry Users*' ("ECHA Accounts Manual for Industry Users") available under '*Related*' at <https://echa.europa.eu/support-echa-accounts-and-eu-login>.

¹¹ In this context, a duty holder is a legal entity who has the duty to submit a SCIP notification. However, the general concept of legal entity ('*legal entity*') is broader as explained in the definition under chapter 2.1 of the '*ECHA Accounts Manual for Industry Users*'. It covers other entities who are not duty holders required to submit a SCIP notification (e.g. a third party).

3. Access the ECHA submission portal and select '*Submit a simplified SCIP notification*' (see Figure 3).
4. If you are interested in submitting simplified SCIP notifications in bulk upload an excel file with two or more SCIP numbers under '*Upload and submission of simplified SCIP notifications in bulk*' section or if you are interested in submitting an individual simplified SCIP notification for an article or complex object, insert a single SCIP number in the respective field ('*SCIP number*') under the '*Submission of a simplified SCIP notification for an individual SCIP number*' section.

Note: The next points cover only the explanation of the process to submit simplified SCIP notifications in bulk as the subsequent steps for both processes are very similar.

5. The excel file to be uploaded needs to include in the first column the list of SCIP numbers of the articles and complex objects to notify.
6. The system will display the SCIP numbers and other records uploaded (Figure 10) from the excel file. Figure 10 also shows the area to select one or more Legal Entities for which you are interested in submitting simplified SCIP notifications, namely those for which you are submitting on their behalf as a foreign user, for the displayed SCIP numbers. Please select one or more Legal Entities from your list of Legal Entities under the section '*Submission of simplified SCIP notifications for one or more Legal Entities*' (Submission of simplified SCIP notifications for one or more Legal Entities) to submit simplified SCIP notifications in bulk, for the SCIP numbers displayed.

Figure 10: View of the SCIP numbers and other records uploaded from the excel file and the section '*Submission of simplified SCIP notifications for one or more Legal Entities*' to select relevant Legal Entities

Simplified SCIP notification

File search_results_export_1621435900429.xlsx has been successfully uploaded.

5 records found

SCIP number	Article name	Primary article identifier type	Primary article identifier value
ff08f404-79e3-4cfc-802b-6f1c05e5b4a5	Dossier 2, Tires_EE	EAN (European Article Number)	2699577-898989-96
34a99676-b2be-4123-908b-b6bd21eff056	Flexible doughnut- shaped tube_DD	EAN (European Article Number)	1211-66-99-365
a01c195a-6d2d-4978-8ad6-a2c9e3764c2b	Dossier V3, plastic cap_CC	EAN (European Article Number)	7878-89-89-2211
99a5ad86-c2b9-45fd-b261-cfff3bdddbaa	Dossier 19_05_2021, Inner tube BB	EAN (European Article Number)	5599-66-66-98-36
2c27f9bb-cd59-4057-a2a4-7f23c35dad9b	Dossier 1, Wheel AA	EAN (European Article Number)	966985755-20

Submission of simplified SCIP notifications for one or more Legal Entities

Please select one or more Legal Entities (from your list of Legal Entities) to submit simplified SCIP notifications for the above SCIP number(s). To select multiple Legal Entities, hold down the Ctrl (Windows) or Command (Mac) key. Then click on your desired Legal Entities to select. All of the Legal Entities you have selected will be highlighted with a different- colored background.

2 legal entities found

- ECHA-2f9027ea-a3cc-4bb1-9269-d92733fe9428 | LE name A
- ECHA-26e64a92-d973-4615-8a2c-1e2f5aa31336 | LE name B

2 legal entities selected

- ECHA-2f9027ea-a3cc-4bb1-9269-d92733fe9428 | LE name A
- ECHA-26e64a92-d973-4615-8a2c-1e2f5aa31336 | LE name B

Cancel

You are about to submit 10 simplified SCIP notifications **Submit**

The system displays the records uploaded from the excel file.

Select one or more Legal Entities from your list and click 'Submit'

7. After submitting the SSNs for the selected Legal Entities by clicking on the '*Submit*'

button, a list of submissions sent by each legal entity selected is displayed, where you can access the respective submission reports, by clicking on each submission number as shown in Figure 11.

Figure 11: View of the list of submissions sent by each Legal Entity

Thank you for your submission!

10 out of 10 simplified SCIP notifications submitted Export to Excel

Legal entity	Submission number	Reference SCIP number	Article name	Primary a
LE name B ECHA-26e64a92-d973-4615-8a2c-1e2f5aa31336	RMH957429-98	ff08f404-79e3-4cfc-802b-6f1c05e5b4a5	Dossier 2, Tires_EE	EAN (Europ
LE name B ECHA-26e64a92-d973-4615-8a2c-1e2f5aa31336	RMH997854-89	34a99676-b2be-4123-908b-b6bd21eff056	Flexible doughnut- shaped tube_DD	EAN (Europ
LE name B ECHA-26e64a92-d973-4615-8a2c-1e2f5aa31336	RMH239227-14	a01c195a-6d2d-4978-8ad6-a2c9e3764c2b	Dossier V3, plastic cap_CC	EAN (Europ
LE name B ECHA-26e64a92-d973-4615-8a2c-1e2f5aa31336	RMH362166-17	99a5ad86-c2b9-45fd-b261-cfff3bddbbaa	Dossier 19_05_2021, Inner tube BB	EAN (Europ
LE name B ECHA-26e64a92-d973-4615-8a2c-1e2f5aa31336	RMH686821-07	2c27f9bb-cd59-4057-a2a4-7f23c35dad9b	Dossier 1, Wheel AA	EAN (Europ
LE name A ECHA-2f9027ea-a3cc-4bb1-9269-d92733fe9428	RMH101411-41	ff08f404-79e3-4cfc-802b-6f1c05e5b4a5	Dossier 2, Tires_EE	EAN (Europ
LE name A ECHA-2f9027ea-a3cc-4bb1-9269-d92733fe9428	RMH886585-90	34a99676-b2be-4123-908b-b6bd21eff056	Flexible doughnut- shaped tube_DD	EAN (Europ
LE name A ECHA-2f9027ea-a3cc-4bb1-9269-d92733fe9428	RMH950605-18	a01c195a-6d2d-4978-8ad6-a2c9e3764c2b	Dossier V3, plastic cap_CC	EAN (Europ
LE name A ECHA-2f9027ea-a3cc-4bb1-9269-d92733fe9428	RMH164054-22	99a5ad86-c2b9-45fd-b261-cfff3bddbbaa	Dossier 19_05_2021, Inner tube BB	EAN (Europ
LE name A ECHA-2f9027ea-a3cc-4bb1-9269-d92733fe9428	RMH247797-98	2c27f9bb-cd59-4057-a2a4-7f23c35dad9b	Dossier 1, Wheel AA	EAN (Europ

[New Submission](#)

By clicking on a submission number, you can access the respective submission report.

SCIP numbers used to submit SSNs.

- Verify the status of your submissions, in the submission reports, to ensure that new SCIP numbers have been assigned to your submissions.


3. "Referencing" in a SCIP Notification

ECHA also developed a tool to make it possible for certain suppliers of complex objects, i.e. objects made up of more than one article, to refer, for one or several components in the complex object, to data already submitted to ECHA. This is dubbed "referencing" in a SCIP notification.

"Referencing" aims at facilitating the management of data concerning the components (either articles as such or complex objects) of a complex object on the creation of an IUCLID dossier to submit a SCIP notification for the complex objects. For example, a bicycle is a complex object with several components such as a wheel (complex object) and the handlebar grips (articles as such). The main target users of 'referencing' are assemblers or complex object producers that make complex objects and place them on the EU market.

The use of "referencing" in a SCIP notification makes it possible for duty holder, in particular an assembler, on a voluntary basis, to refer to information on the complex object components (either articles as such or complex objects) already submitted to ECHA by an upstream supplier of the assembler or by the duty holder itself, in the SCIP notification of its assembled complex object.

An assembler using "referencing" can create a "light-weight" SCIP notification dossier of a complex object, where the complex object component information can be incorporated in the dossier by just inserting the SCIP number referring to the data already submitted to ECHA for that complex object component.

 Additional information on how to create a dossier and how to update a notification is available in the document "SCIP Database Notifications - How to prepare and submit a SCIP notification" and "Requirements for SCIP Notifications" available at the dedicated [SCIP support webpage](#) on ECHA website.

The duty holder (e.g. assembler) is still responsible for the information submitted to ECHA in a SCIP notification and the compliance with the SCIP notification obligation, namely for the information referred to by using "referencing".

A pre-condition to use 'referencing' in a SCIP notification for an assembled complex object is to receive the SCIP number of the complex object component's SCIP notification already submitted to ECHA. For instance, in the case of an assembler, the SCIP number can be provided by the upstream supplier as an element of the information to be provided under REACH Art. 33(1)⁸.

"Referencing" is only applicable if the component (article as such or complex object) to which the referencing is made to is the same as the component for which the referencing is used.⁵ This is not the case, for example, where the component for which the referencing is used underwent any changes in the physical form or chemical composition when incorporated in the complex object.

The most common scenario of use of the "referencing" is the case of an assembler incorporating an article as such or a complex object into a complex object and referring to the data submitted in a SCIP notification by its upstream supplier for the incorporated article as such or complex object. In this case "Referencing" is only applicable if the supplied article remains the same as a component in the assembled complex object, i.e. it does not undergo any changes when incorporated in the complex object:

- An article as such received is the same as the article incorporated in the assembled complex object if there is no change in the physical form (shape, surface and design) and in its chemical composition.
- A complex object (A) received is the same as the one incorporated in the assembled complex (B) if:

- there is no change on the physical form nor composition of any article in the complex object (A) used as a component when assembling complex object (B); and
- the components, subcomponents and articles in the complex object (A) used as a component in the assembled complex (B) are kept the same when assembling complex object (B).



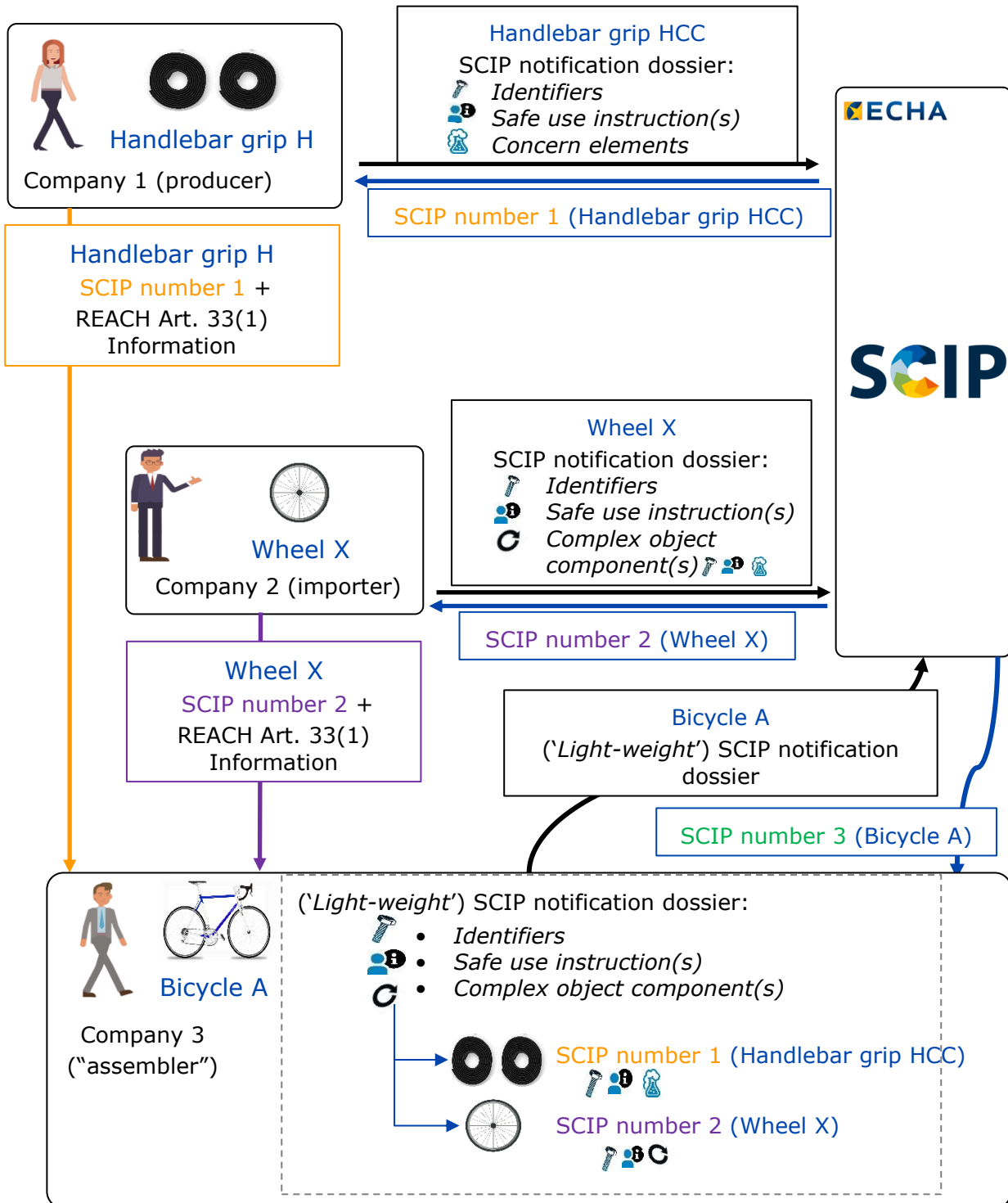
The information disseminated by ECHA concerning a complex object SCIP notification dossier using “referencing” for one or more components of that complex object includes the information contained in the dossiers already submitted to the SCIP database for those components that the dossier is referring to, including the article name of the component (the article name displayed in dissemination will be the name reported in the dossier already submitted to SCIP) ¹².

¹² For more information, section 2.3 of the document “Dissemination and confidentiality in the SCIP database” available at <https://echa.europa.eu/scip-support>.

3.1 How does “referencing” in a SCIP notification work?

To better understand how “referencing” in a SCIP notification works in practice, sequential steps are listed and explained in detail below with the support of a hypothetical example (bicycle A) as shown in Figure 12.

Figure 12: Overview of “referencing” in a SCIP notification for a hypothetical example (bicycle A)



1. Company 1 produces handlebar grips, articles as such containing a Candidate List substance in a concentration above 0.1% w/w and supplies them to Company 3 to be incorporated in a bicycle. Company 1 submits a SCIP notification dossier to ECHA for the Handlebar Grip HCC. As a result of the submission process, Company 1 receives from ECHA a SCIP number 1 in the submission report (see Figure below). The SCIP number remains the same in case Company 1 submits an update of this SCIP notification.

☰ Submission report

Go to search

Submission status: Succeeded ✔

Dossier type: SCIP notification	Submitted by: Company 1
Submission number: RMH713583-07	
Submitted IUCLID version: 6_5	

Submission information

SCIP number	7a6dcfc4-58c1-479b-8fa7-3d3776a40005
Article name	Handlebar Grip HCC
EAN (European Article...)	33669955887584
Dossier name	Dossier HCC
Dossier UUID	91095004-e988-4663-8dbe-4f7991b45139
File name	91095004-e988-4663-8dbe-4f7991b45139.i6z
Notification type	Initial

Submission events

22/03/2021 09:17	Dossier submitted
22/03/2021 09:17	Dossier passed validation checks


Submission history

SCIP number	
7a6dcfc4-58c1-479b-8fa7-3d3776a40005	
22/03/2021 09:17	RMH713583-07 ✔

2. Company 2 imports Wheels (Wheel X), which incorporate at least one article as such containing a Candidate List substance in a concentration above 0.1% w/w and supplies them to Company 3 to be incorporated in a bicycle. Company 2 submits a SCIP notification dossier to ECHA for the Wheel X. As a result of the submission process Company 2 receives from ECHA a SCIP number 2 in the submission report. The SCIP number remains the same in case Company 2 submits an update of this SCIP notification.
3. Company 1 (producer of Handlebar Grip HCC) and Company 2 (importer of Wheel X) provide respectively the SCIP number 1 and the SCIP number 2, received in the initial SCIP submission report, to customers, namely Company 3, the next recipients of the Handlebar Grip HCC and the Wheel X in the supply chain. The SCIP number 1 and SCIP number 2 are communicated on a voluntary basis by Company 1 and Company 2 to Company 3 (assembler of Bicycle A), e.g. together with the information communicated down the supply chain under REACH Art. 33(1), to make it possible for Company 3 to prepare, using "referencing", a SCIP notification dossier for Bicycle A.
4. Company 3, the assembler and supplier of Bicycle A, needs to submit a SCIP notification for Bicycle A to ECHA. Since Company 3 received the SCIP numbers 1 and 2 from Company 1 and Company 2, respectively, concerning their SCIP notifications to ECHA by submitting a SCIP dossier with all the required information for Handlebar Grip HCC and Wheel X, Company 3 can prepare a SCIP notification dossier for Bicycle A using "referencing".

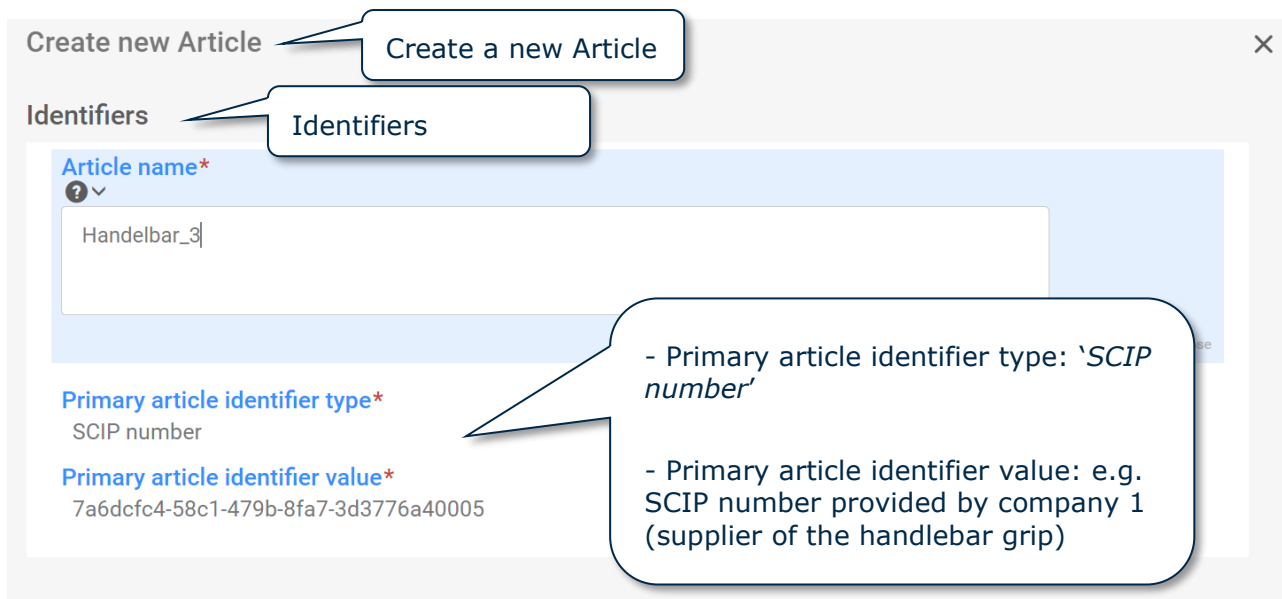
The preparation of a SCIP notification dossier for Bicycle A is done by creating an article dataset in IUCLID as explained in the document "SCIP Database Notifications - How to prepare and submit a SCIP notification". When using "referencing" for Bicycle A SCIP

notification dossier, Company 3, instead of inserting all the information concerning the Bicycle A components (Handlebar Grip HCC and Wheel X) under the complex object component(s) section, reports only the SCIP numbers 1 and 2 for these components received from Company 1 and Company 2, respectively, as shown in Figures 12 and 13, and explained in the above mentioned document.


 Figure 13 shows the data that must be inserted for a complex object component by Company 3, when using “referencing” in IUCLID. Company 3 must:

- include the article name for the complex object component (potentially meaningful name for the company preparing the data, Company 3, but irrelevant for dissemination by ECHA) in the ‘*Article name*’ field;
- select ‘*SCIP number*’ from the ‘*Primary article identifier type*’ list;
- and insert the SCIP number provided by the upstream supplier of respective complex object component under the ‘*Primary article identifier value*’ field, i.e., SCIP number provided by company 1 and company 2, respectively for the handle bar grip HCC and the Wheel X).

Figure 13: Required data for the complex object component when using “referencing”



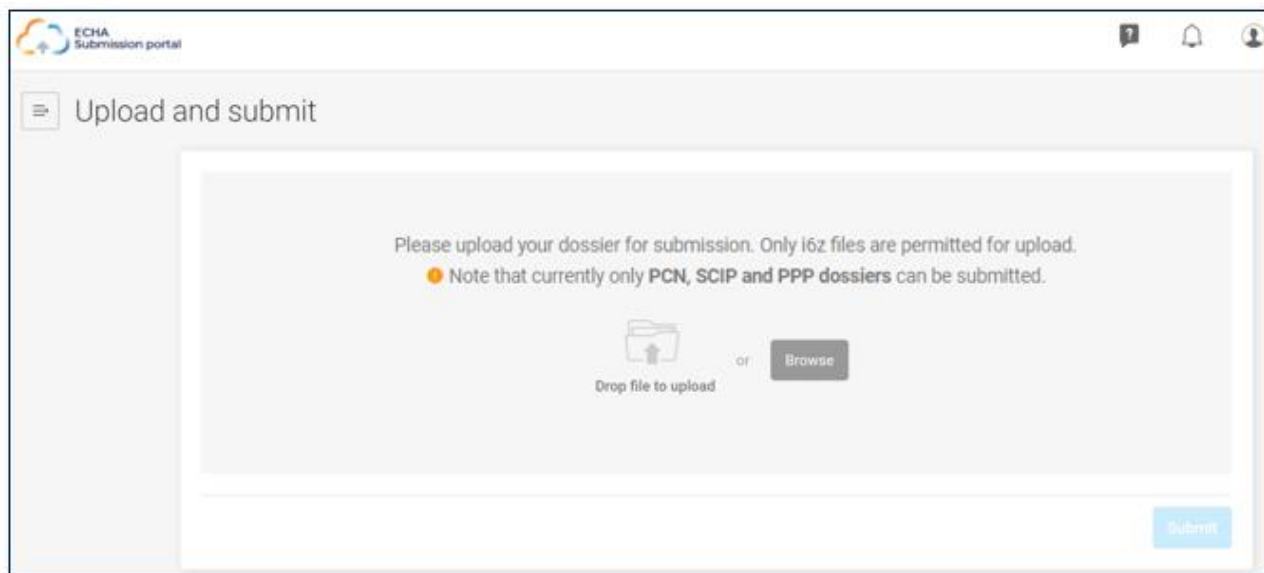
The screenshot shows the 'Create new Article' form in IUCLID. The 'Identifiers' section is highlighted. The 'Article name*' field contains 'Handelbar_3'. The 'Primary article identifier type*' dropdown is set to 'SCIP number'. The 'Primary article identifier value*' field contains the alphanumeric string '7a6dcfc4-58c1-479b-8fa7-3d3776a40005'. Callout boxes provide additional context: one points to the 'Article name' field, and another points to the 'Primary article identifier type' and 'Primary article identifier value' fields, explaining that the type is 'SCIP number' and the value is the SCIP number provided by the upstream supplier (company 1).

 Note: The name of the component (under ‘*Article name*’) you are reporting is meaningless for effects of dissemination, i.e. ECHA makes available on its website (SCIP database) the **name** as it was provided in the dossier containing the required information for the component that a company is referring to.¹² In this example the identifier that will be available on the SCIP database is the component name reported by Company 1: Handlebar Grip HCC (i.e. **not** the article name that Company is using to report it - Handelbar_3 (see Figure 13)).

5. Once the article dataset in IUCLID has been finalised for Bicycle A, i.e. all the required information has been inserted, including “referencing” to the complex object components, Company 3 creates a SCIP notification dossier (“*light-weight*”) for Bicycle A and submits it to ECHA in the ECHA Submission Portal (see Figure 14).

Figure 14 shows the 'Upload and submit' (Upload and submit) section on the ECHA Submission Portal, where the submitter, Company 3, uploads and submits the created 'light-weight' SCIP notification dossier.

Figure 14: View of the 'Upload and submit' section on the ECHA Submission Portal



6. After a successful submission of the SCIP notification dossier ('light-weight') for Bicycle A in the ECHA Submission Portal, Company 3 receives from ECHA, in the submission report (see Figure 1), the SCIP number 3 for the notification of 'Bicycle A'. This submission report includes, among others:
 - the status of the notification [*Submission status*];
 - the attributed SCIP number of the notification (for Bicycle A) [*SCIP number*];
 - the submission number [*Submission number*];
 - the name [*Article name*], primary article identifier type and value of the Bicycle A;
 - the notification type: initial or update [*Notification type: Initial/Update*];
 - and the submission events [*Submission events*].
7. After receiving from ECHA, in the submission report of a successful submission, the SCIP number 3 for the notification of 'Bicycle A', Company 3 can provide on a voluntary basis this SCIP number to customers, e.g. together with the information communicated down the supply chain under REACH Art. 33(1), to make it possible for them to make use of the simplified SCIP notification (SSN), in case they supply the same Bicycle A further down in the supply chain (e.g. if they are distributors), as explained in section 2 of this document.

⚠ In the example illustrated in Figure 12, if Company 1 updates its notification for handlebar grip HCC, Company 3 does not need to re-submit or update their notification for Bicycle A, as long as the update is relevant for him. However, Company 1 should communicate the changes in the updated dossier submitted to ECHA for instance as part of the information communicated under REACH Article 33(1) to Company 3. These companies should pass on this information to the next actors in the supply chain, and so on.

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