

Paris, 30 September 2020

BEST-PRACTICE GUIDANCE FOR THE EUROPEAN SPACE SECTOR TO COMPLY WITH *SCIP* NOTIFICATION

Recommendations for compliance with Article 9 (1) (i) of the revised Waste Framework Directive 2008/98/EC to EU suppliers of equipment designed to be sent into space and related means of transport which do not result in waste on the EU territory

The *Waste Framework Directive Task Force of the European Space Sector (WFD Task Force)* – represented by *ASD-EUROSPACE* – collaborating with European and national space agencies – wishes to share this Best-Practice Guidance to facilitate legal compliance with the new ‘*SCIP*’¹ notification requirement according to Article 9(1)(i) of Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste (hereafter also referred to as the revised Waste Framework Directive/WFD).

The WFD Task Force is a splinter group of the *Materials and Processes Technology Board of the European Space Components Coordination (ESCC MPTB)*, a partnership between the *European Space Agency (ESA)*, national space agencies, and space industry represented by *ASD-Eurospace*; it is chaired at present by *ESA*.

PREFACE

ADDRESSEES OF THE GUIDANCE

This Guidance is primarily addressed to EU suppliers of equipment designed to be sent into space and related means of transport (launch vehicles and spacecraft, such as satellites for telecommunication, navigation or space exploration) which do not result in “waste” on the EU territory (hereafter “**Space Products**”). Space Products are highly complex assemblies, that may consist of millions of articles. The corresponding supply chains leading to their production are complex, multi-tier and global. The space industry operates with demanding qualification requirements and very long lifecycles from design and production to exploitation phases (long-length programmes).²

This Guidance does not affect the ongoing compliance of actors in the European Space Sector with REACH, its Article 33(1) and the specific legal regime for space activities, which includes

¹ Substances of Concern In articles, as such or in complex objects (Products), see <https://echa.europa.eu/fi/scip-database>.

² See further description in *ASD-Eurospace, REACH REFIT 2017 Position Paper of 27 January 2017*, available at <https://eurospace.org/wp-content/uploads/2018/09/eurospace-position-paper-reach-refit-2017-27jan2017.pdf>.

environmental objectives. Space activities are governed by international agreements³ and national space law.⁴ The space law framework contains specific and very stringent rules and safety requirements.⁵

REFERENCE DOCUMENTS

This Guidance draws on the following key references documents, as applicable:⁶

- *ASD-Eurospace Position regarding Article 9 of the revised Waste Framework Directive 2008/98/EC*, September 2019 (hereafter “**Space Industry Position on WFD Article 9**”);⁷
- *ECHA Detailed information requirements for the SCIP database*, September 2019 (hereafter “**ECHA SCIP requirements**”);⁸
- *ASD Sectoral Guidance for Substances in Articles under REACH*, Version 1 – November 2017 (hereafter “**ASD SiA Guidance**”);⁹
- *ECHA Guidance on Requirements for Substances in Articles*, Version 4.0, June 2017 (hereafter “**ECHA SiA Guidance**”).¹⁰

LEGAL DISCLAIMER

This document aims to assist users in complying with their obligation under Article 9(1)(i) of the revised Waste Framework Directive 2008/98/EC, as transposed in the EU Member States. It is based on the compliance approach already applied under Article 33(1) of the EU REACH Regulation (EC) 1907/2006, as interpreted following the judgment of the Court of Justice of the European Union (CJEU) of 10 September 2015 in case C-106/14, and in line with applicable sectoral guidance.

Users are reminded that the text of the revised Waste Framework Directive and EU Member States national provisions transposing the Directive are the only authentic legal reference and that the information in this document does not constitute legal advice. Usage of the information remains under the sole responsibility of the user. ASD-Eurospace and the WFD Task Force participants do not accept any liability with regard to the use that may be made of the information contained in this document. This being understood, the review of the available national provisions transposing WFD Article 9(1)(i) has shown that this Guidance is consistent with those.¹¹

³ See [United Nations Treaties and Principles On Outer Space, related General Assembly resolutions and other documents \(ST/SPACE/61\)](#).

⁴ Concerning launches from CSG (launcher and spacecraft), the French Space Act ([Loi n° 2008-518 du 3 juin 2008 relative aux opérations spatiales](#) – « L.O.S. ») applies.

⁵ See also Space Industry Position on WFD Article 9 and its Addendum 1 on ‘*Space Debris Mitigation*’.

⁶ In chronological order. Only European level documents are mentioned.

⁷ Available at <https://eurospace.org>.

⁸ Available at <https://echa.europa.eu/scip-database>; taking into account subsequent updates by ECHA in the frame of its SCIP database development.

⁹ Available at <https://www.asd-europe.org>.

¹⁰ Available at https://echa.europa.eu/documents/10162/23036412/articles_en.pdf.

¹¹ National transposition measures for Directive (EU) 2018/851 communicated by the Member States are available at <https://eur-lex.europa.eu/legal-content/EN/NIM/?uri=celex:32018L0851>. The available national

LEGAL CONTEXT

Article 9 of the revised WFD (titled ‘*Prevention of waste*’) foresees (par. 1) that **‘Member States shall take measures to prevent waste generation. Those measures shall, at least: [...] (i) promote the reduction of the content of hazardous substances in materials and products, without prejudice to harmonised legal requirements concerning those materials and products laid down at Union level, and ensure that any supplier of an article as defined in point 33 of Article 3 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council provides the information pursuant to Article 33(1) of that Regulation to the European Chemicals Agency as from 5 January 2021’**.

This SCIP notification requirement was to be transposed into national laws in the EU Member States by 5 July 2020.

Article 9(2) of the revised WFD further stipulates: ‘*The European Chemicals Agency shall establish a database for the data to be submitted to it pursuant to point (i) of paragraph 1 by 5 January 2020 and maintain it. The European Chemicals Agency shall **provide access to that database to waste treatment operators**. It shall also provide access to that database to consumers upon request.*’ ECHA goes even beyond this provision as it plans to provide **public access** to this ‘SCIP database’.

Recital (38) of Directive (EU) 2018/851 elaborates on the rationale of these provisions as follows: **‘When products, materials and substances become waste, the presence of hazardous substances may render that waste unsuitable for recycling or the production of secondary raw materials of high quality. Therefore, in line with the 7th Environment Action Programme, which calls for the development of non-toxic material cycles, it is necessary to promote measures to reduce the content of hazardous substances in materials and products, including recycled materials, and to ensure that sufficient information about the presence of hazardous substances and especially substances of very high concern is communicated throughout the whole life cycle of products and materials. In order to achieve those objectives, it is necessary to improve the coherence among the law of the Union on waste, on chemicals and on products and to provide a role for the European Chemicals Agency to ensure that the information about the presence of substances of very high concern is available throughout the whole life cycle of products and materials, including at the waste stage.’**

Importantly, the scope of the SCIP notification pursuant to WFD Art. 9(1)(i) is intrinsically linked to specific REACH legal provisions, as further interpreted by the CJEU:

- Duty holder is any ‘*supplier of an article*’, i.e. **‘any producer or importer of an article, distributor or other actor in the supply chain placing an article on the market’** (REACH Art. 3(33)). ‘*Placing on the market*’ means ‘*supplying or making available, whether in return for payment or free of charge, to a third party*’ (REACH Art. 3(12)).
- The scope of information to be notified refers to REACH Article 33(1), which stipulates: ‘*Any supplier of an article containing a substance [included in the [REACH Candidate List](#)] in a concentration above 0.1 % weight by weight (w/w) shall provide the recipient of the article with **sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance.***’

provisions implement the SCIP notification requirement pursuant to WFD Article 9(1)(i) and in some cases also mandate the use of ECHA’s formats and submission tools. This is also recommended in this Guidance.

- With regard to the latter duty to communicate information on substances in articles down the supply chain the CJEU has ruled in a landmark judgment of 10 September 2015 in case C-106/14,¹² that the application of REACH Art. 33 is **triggered** by the presence of the Candidate List substance **in each constituent article** part of a complex product.
- With regard to the scope of information to be reported the CJEU has stated that the information pertains to the **presence of that substance** by providing, as a minimum, its name. According to the CJEU *‘the REACH Regulation does not contain any provisions governing specifically the situation of a complex product containing more than one article. That legislative silence must be construed in the light of the **principal objective pursued by the regulation, which is not to regulate all manufactured products, but to monitor the chemical substances present** by themselves or in a mixture as well as, in certain cases, particularly those listed restrictively in Article 7 thereof, when they are contained in articles’* (par. 49).
- With regard to the principle of proportionality the CJEU has highlighted in the said judgment, that the scope of the duty to provide information is *‘limited by Article 33 [of REACH], which states that ‘sufficient information, available to the supplier, to allow safe use of the article [in question]’ must include, **as a minimum, the name of that substance. That requirement, which is minimal in nature,** cannot be regarded as being an excessive burden’* (par. 81).

Therefore, the review of the legal background in the revised WFD and REACH clearly shows that:

1. WFD Article 9 has been added **with specific regard to the waste stage**;
2. The scope of SCIP notification is **delimited by REACH Article 33(1)**;
3. The reporting duty pertains to the **presence** of a substance in the (complex) product, and does not need to extend to a product breakdown and identification of the constituent article(s), unless to the extent that this information is available to the supplier **and** also deemed to be required for the safe use of the product supplied under REACH Article 33(1).

THE SPECIAL CASE OF SPACE PRODUCTS

As elaborated in detail in the Space Industry Position on WFD Article 9, Space Products should be **outside the scope** of the revised Waste Framework Directive and its Article 9. They do not form part of the Circular Economy as the underlying revision objective. SCIP notification and database requirements are interpreted widely by the European Commission and ECHA with special regard to the **waste stage / operators**, which is **not relevant for Space Products**.¹³ However, an explicit exemption for Space Products in the Directive and its Article 9(1)(i) was omitted.

Therefore, the recommendations in this Best-Practice Guidance aim at providing proportionate and practical recommendations for any required SCIP notifications tailored to Space Products.

¹² The judgment is available in English at <http://curia.europa.eu/juris/document/document.jsf?text=&docid=167286&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=3712794>.

¹³ See Becker T., The SCIP Database under Directive (EU) 2018/85, International Chemical Regulatory and Law Review, Volume 2, Issue 4 (2019), pp. 147 – 156; available at <https://doi.org/10.21552/icrl/2019/4/4> and www.reachlaw.fi. The article provides a critical legal review of ECHA’s SCIP information requirements.

The recommendations also take into account that a detailed disclosure of data to the SCIP database would raise serious concerns with regard to intellectual property rights, confidentiality requirements and the vital protection of the European Space Sector’s know-how on advanced space technologies. It could also lead to serious conflicts with other national legislation and sovereign rights. A Bill-of-Materials-like disclosure of the product breakdown to the SCIP database must be strictly avoided.¹⁴

RECOMMENDATIONS FOR SCIP NOTIFICATIONS

The following key recommendations to SCIP notification compliance for Space Products are made:

1. EU-based entities are advised to analyse carefully whether they are a duty holder for SCIP notification (see REACH Article 3(33) “*supplier of an article*”), i.e. whether they are “*a producer or importer of an article, distributor or other actor in the supply chain placing an article on the market*” which contains one or more Candidate List substances above 0.1% weight by weight. This is the case at least for products placed on the market by a company for which it should already provide information according to REACH Art. 33(1) to its customers.
2. The aggregation approach in the ASD SiA Guidance can be followed also for SCIP notifications, i.e. substance-level reporting may be done at the assembly / supplied product level, unless a further breakdown / localisation is exceptionally required to ensure safe use of the product.
3. Duty holders make use of compatible SCIP notification formats (ECHA account, IUCLID), following the advice on the [ECHA SCIP webpages](#).
4. Data for SCIP notifications do not need to go beyond what is legally required under REACH Article 33(1), i.e. as “available to the supplier”. The information may be limited to what is strictly mandatory or required for a successful submission (see [Annex 2](#)).
5. SCIP notifications can be made on a “*can build*” basis rather than a unique notification for each minor variant “*as built*”, following a typical or worst-case SVHC content model (Representative Model approach) based on available information and expert judgment.¹⁵
6. If a SCIP notification obligation is confirmed, but the duty holder has defence or security related concerns with regard to the SCIP database submission, it is advised to turn to the Member State(s) where the product is placed on the market, to consult the national provisions transposing WFD Article 9(1)(i) and discuss any available options to effectively deal with such concerns. Especially for concerns that may be linked with interests of defence, such options may include also the possibility to seek defence exemption(s), as foreseen under Article 2(3) of the REACH Regulation, if deemed appropriate and necessary.
7. In the specific case of products and components acquired from outside the EU, the legal responsibility for SCIP notification is with the EU customer, if he qualifies as “*supplier of an article*”. Non-EU companies are not eligible to make SCIP notifications, but they can be

¹⁴ See also Space Industry Position on WFD Article 9 and its Addendum 2 on ‘*Implications of ECHA database inclusion for space products*’.

¹⁵ ECHA has pointed out that it is up to the Member State competent authorities to agree with such approach to submit SCIP notifications.

appointed as a ‘foreign user’¹⁶ to manage SCIP notifications on behalf of their EU customers. The companies involved in such non-EU transactions are advised to analyse such specific voluntary instruments and – if considered viable – make the necessary arrangements.

Practical examples of how a SCIP notification for Space Products could look like in line with these recommendations are given in Annex 3.

¹⁶ E.g. ECHA Q&A ID 1610, Version 2.0 of 30/01/2020, available at <https://echa.europa.eu/de/support/qas-support> (last viewed on 21/09/2020).

ANNEX 1: LIST OF KEY ACRONYMS

CJEU	Court of Justice of the European Union
CN	Combined Nomenclature (Annex I to Council Regulation (EEC) No 2658/87) on the tariff and statistical nomenclature and on the Common Customs Tariff
ECHA	European Chemicals Agency
ESA	European Space Agency
EUPCS	European Product Categorization System. EuPCS webpage
IUCLID	International Uniform Chemical Information Database
L.O.S.	Loi n° 2008-518 du 3 juin 2008 relative aux opérations spatiales, the French Space Act
MPTB	Materials and Processes Technology Board
PCB	Printed Circuit Board
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals (Regulation (EC) No 1907/2006)
SCIP	Substances of Concern In articles, as such or in complex objects (Products)
SiA	Substances in Articles
SVHC	Substance of very high concern (see REACH Article 57)
TARIC	TARif Intégré Communautaire: The integrated Tariff of the European Union database
WFD	Waste Framework Directive (Directive 2008/98/EC on waste, as amended by Directive (EU) 2018/851)

ANNEX 2. BEST PRACTICE FOR FULFILLING SCIP INFORMATION REQUIREMENTS

According to this Guidance the data for SCIP notifications do not need to go beyond what is legally required under REACH Article 33(1). The information may be limited to what is strictly mandatory for a successful submission. The following table provides an overview of the latest ECHA information requirements for SCIP and guidelines how they can be addressed for Space Products in a proportionate and pragmatic way.

No.	SCIP data field (IUCLID)	Requirement (ECHA) ¹⁷	Best Practice for Space Products
1	Article name (complex object)	Mandatory	Mandatory according to REACH Article 33(1)
2	Other names (brand, model)	Optional	<i>Not needed</i>
3	Primary article identifier	Mandatory	Select suitable type option and value, e.g. (company) 'part number'
4	Other identifiers	Optional	<i>Not needed</i>
5	Article category (CN/TARIC code)	Mandatory	Select suitable CN/TARIC code for top level category, in particular the section 'Spacecraft (including satellites) and suborbital and spacecraft launch vehicles 88 02 60 00 00'; see https://trade.ec.europa.eu/tradehelp
6	Production in European Union	Required	Select suitable option: 'EU produced'; 'EU imported'; 'both EU produced and imported'; 'no data'
7	Characteristics (picture, dimensions, colour, weight, ...)	Optional	<i>Not needed</i>
8	Safe use instruction(s)	Required	Mandatory according to REACH Article 33(1). Possible option to select: 'No need to provide safe use information beyond the identification of the Candidate List substance'
9	Disassembling instructions	Optional	<i>Not needed</i>
10	Linked article	Mandatory, if applicable	<i>Not needed/applicable (assembly level reporting), unless required for safe use. In the latter case, provide mandatory/required article identifiers above for each linked article containing the Candidate List substance.</i>

¹⁷ "Mandatory" = not data will fail submission; "required" = input needed but can be waived/no additional information for a successful submission; "optional" = voluntary.

No.	SCIP data field (IUCLID)	Requirement (ECHA)	Best Practice for Space Products
11	Number of units	Optional	<i>Not needed</i>
12	Candidate List substance	Mandatory	Mandatory according to REACH Article 33(1)
13	Concentration range	Required	Possible option to select > 0.1% w/w and ≤ 100% w/w
14	Material category and/or Mixture category (EUPCS)	Mandatory	Select suitable category. In the absence of a more specific category or in case of multiple choices a possible fall-back option is Material category 'Other'.
15	Additional material characteristics	Optional	<i>Not needed</i>

Table 1 SCIP information requirements - Best Practice for Space Products

ANNEX 3: PRACTICAL EXAMPLES OF SCIP NOTIFICATION APPROACH FOR SPACE PRODUCTS

The practical examples below are provided merely to illustrate the SCIP notification approach according to this Guidance for Space Products, based on some background information on their product composition and supply chain. They do not imply that a SCIP notification duty would actually exist for the example products mentioned.

EXAMPLE 1: MICROWAVE COMMUNICATION EQUIPMENT

Microwave communication equipment for telecom satellites (see [Figure 1](#)) are probably the most common equipment supplied by external producers within the supply chain for telecom satellites since they tend to be somewhat standard, at least when compared to for example the antenna subsystem which is always customized for the mission. The producer of microwave equipment delivers to the supply chain actor in charge of the satellite payload which could be the Prime (system integrator) itself or a separate supplier that supplies the full, tested payload to the Prime.



Figure 1 Microwave communication equipment for telecom satellites

The microwave equipment supplier supply chain is very similar to that of other electronics equipment manufacturers in defence, aerospace and other industrial sectors. The equipment is produced using electronics components, both active and passive, and metal alloys.

A typical microwave equipment has close to 1,000 parts of about 300 different types, including everything from electrical components, Printed Circuit Boards (PCBs) and mechanical parts to adhesives, wires and tapes. Given that many of these parts (such as PCBs) are themselves complex objects, the total number of constituent articles (undefined) is even higher. Typically, the SVHCs included are metallic lead and chromium trioxide, both in < 0.1% w/w of the product sold, but possibly > 0.1% w/w per constituent article or complex object (depending on the reference object) making up the product.

In its SCIP notification the equipment supplier provides the following mandatory/required data:

No.	SCIP data field (IUCLID)	Microwave communication equipment
<i>Article identifiers</i>		
1	Article name (complex object)	<i>E.g. Telecom FSS-BSS Frequency Converters / Receivers</i>
2	Primary article identifier	<i>E.g. item number</i>
3	Article category (TARIC/CN code)	<i>'88039021 - Vehicles, aircraft, vessels and associated transport equipment > Aircraft, spacecraft, and parts thereof > Parts of goods of heading 8801 or 8802 > Other > Of spacecraft (including satellites) > Of telecommunication satellites'</i>
4	Production in European Union	<i>'EU produced'</i>
<i>Safe use information</i>		
5	Safe use instruction(s)	<i>'No need to provide safe use information beyond the identification of the Candidate List substance'</i>
<i>Concern element(s)</i>		
6a	Candidate List substance	<i>Lead (CAS 7439-91-1)</i>
6b	Concentration range	<i>> 0.1% w/w and ≤ 100% w/w</i>
6c	Material category and/or Mixture category (EUPCS)	<i>Material category: metal > lead (and alloys of) > lead alloy</i>
7a	Candidate List substance	<i>Chromium trioxide (CAS 1333-82-0)</i>
7b	Concentration range	<i>> 0.1% w/w and ≤ 100% w/w</i>
7c	Material category and/or Mixture category (EUPCS)	<i>Mixture category: PC-TEC-12 Metal surface treatment products</i>

Table 2 SCIP information requirements – Example of microwave communication equipment

The actual entry of these data in IUCLID6 is illustrated at the end of this Annex.

EXAMPLE 2: TELECOMMUNICATION SATELLITE

A telecom satellite is a super complex object. Its simplified product breakdown consists of more than 7 levels ranging from ~10-100 parts at the lowest identifiable complex object level (electronic component) to ~1,000 000's parts at telecom satellite level (see [Figure 2](#)). In line with the ASD SiA Guidance the information on REACH Article 33(1) is typically provided in the supply chain at the assembly level, i.e. identifying the list of all Candidate List substances (potentially) present above 0.1% weight by weight on a component level in the assembly as supplied.

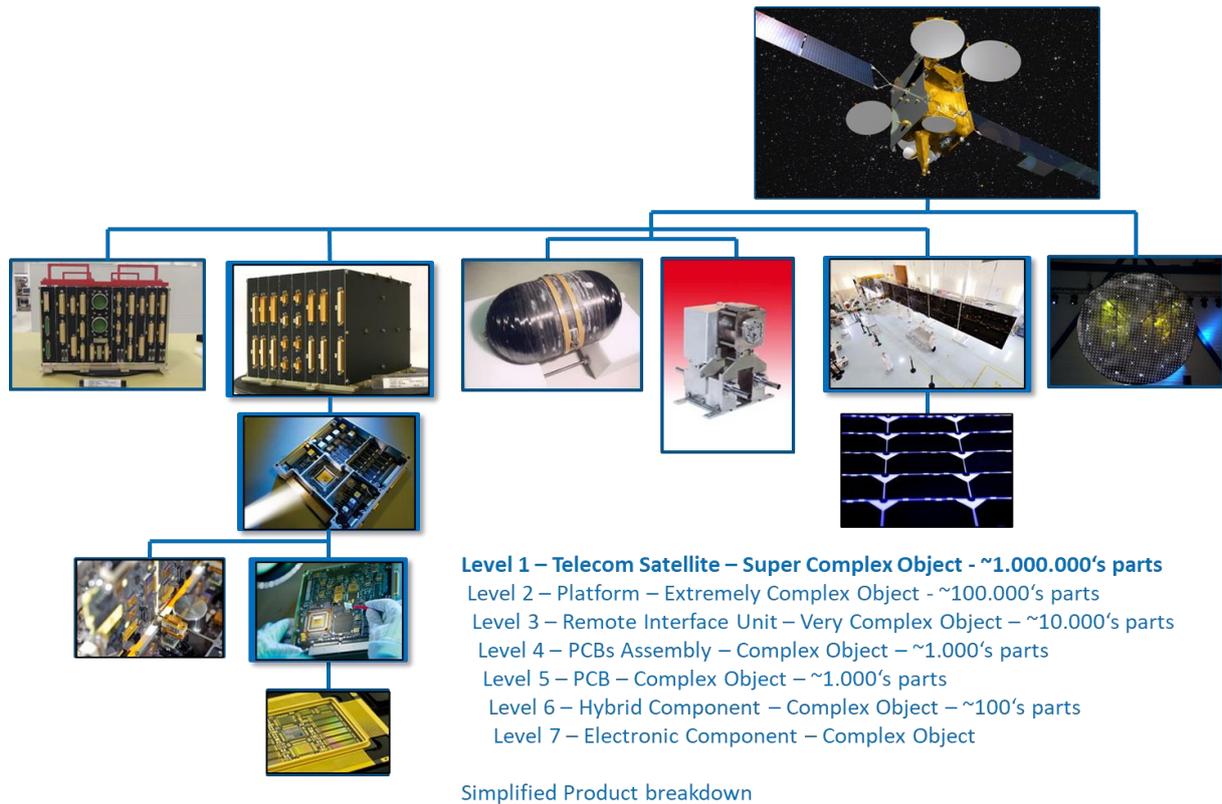


Figure 2 Telecom Satellite. Photo © Airbus SAS 2017 – All rights reserved. Breakdown: [ASD SiA Guidance](#)

In the multi-layer supply chain for the telecom satellite, the top layer, the systems integrator, or Prime as they are usually known, has the contract for the supply of the satellite to the end customer and is always responsible for the final satellite integration and testing. The Prime typically produces the satellite platform and some of the platform and payload subsystems.

In some contracts the satellite is delivered to the end customer before launch and in others it is delivered once in orbit (IOD: In Orbit Delivery). The nominal lifetime of a typical telecom satellite is 15 years in its geostationary orbit at 35,786 km. Geostationary satellites require some station keeping to maintain their position, and once they run out of thruster fuel they are retired to a graveyard orbit. For satellites in geostationary orbit the graveyard orbit is a few hundred kilometers above the operational orbit where they are expected to have an orbital lifetime of millions of years.

In its SCIP notification the EU satellite supplier provides the following mandatory/required data:

No.	SCIP data field (IUCLID)	Telecom Satellite
<i>Article identifiers</i>		
1	Article name (complex object)	<i>Insert satellite name</i>
2	Primary article identifier	E.g. item number
3	Article category (TARIC/CN code)	'88026011 - Vehicles, aircraft, vessels and associated transport equipment > Aircraft, spacecraft, and parts thereof > Other aircraft (for example, helicopters, aeroplanes); spacecraft (including satellites) and suborbital and spacecraft launch vehicles > Spacecraft (including satellites) and suborbital and spacecraft launch vehicles > Spacecraft (including satellites) > Telecommunication satellites'
4	Production in European Union	'EU produced'
<i>Safe use information</i>		
5	Safe use instruction(s)	'No need to provide safe use information beyond the identification of the Candidate List substance'
<i>Concern element(s)</i>		
6a	Candidate List substance	Lead (CAS 7439-91-1)
6b	Concentration range	> 0.1% w/w and ≤ 100% w/w
6c	Material category and/or Mixture category (EUPCS)	Mixture category: PC-TEC-24 Welding, soldering and flux products
7a	Candidate List substance	Chromium trioxide (CAS 1333-82-0)
7b	Concentration range	> 0.1% w/w and ≤ 100% w/w
7c	Material category and/or Mixture category (EUPCS)	Mixture category: PC-TEC-12 Metal surface treatment products
8a	Candidate List substance	4,4'-isopropylidenediphenol (CAS 80-05-7)
8b	Concentration range	> 0.1% w/w and ≤ 100% w/w
8c	Material category and/or Mixture category (EUPCS)	Mixture category: PC-PNT-5 Automotive and aerospace coatings

Table 3 SCIP information requirements – Example of Telecom Satellite

The actual entry of these data in IUCLID6 is illustrated at the end of this [Annex](#).

The data for the SCIP notification have been determined through in-house searches and REACH Article 33 declarations received from suppliers (in relation to the Candidate List substance).

Information on 'linked article(s)' is not considered as legally required nor relevant by the supplier, because affected components are not accessed by the customer, the product is sent into space and will remain there after the end of its service life.

Illustration Example 1



Submission Type: Please select

[View Dossiers](#)
[Validate](#)
[Create dossier](#)



UID: 8fbcbf3d-c7b8-441c-9698-a1a7201d854b



Identifiers

Article name*

Telecom FSS-BSS

 Other names [+ New item](#)

#	Type	Name	Action
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Primary article identifier type*

item number

Primary article identifier value*

Example

 Other article identifiers [+ New item](#)

#	Type	Value	Action
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Categorisation

Article category

 88039021 - Vehicles, aircraft, vessels and associated transport equipment > Aircraft, spacecraft, and parts thereof > Parts of goods of heading 8801 or 8802 > Other > Of spacecraft (including satellites) > Of telecommunication satellites

Production in European Union

yes

Characteristics

 Picture(s) [+ New item](#)

#	Picture	Action
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Height

None

Length

None

Width

None

Diameter

None

Density

None

Weight

None

Volume

None

Colour

None

 Other characteristics [+ New item](#)

Safe use instruction(s)

 No need to provide safe use information beyond the identification of the Candidate List substance

 Safe use instructions [+ New item](#)

 Disassembling instructions [+ New item](#)

#	Attached document	Language	Action
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Concern elements

Candidate list version

2020/2

 Concern element [+ New item](#)

1 **Candidate list substance**
Chromium trioxide | Chromium trioxide | 1333-82-0

Concentration range
> 0.1% w/w and ≤ 100% w/w

Material categories [+ New item](#)

Mixture category (EUPCS)
 PC-TEC-12 Metal surface treatment products

2 **Candidate list substance**
Lead | Lead | 7439-92-1

Concentration range
> 0.1% w/w and ≤ 100% w/w

Material categories [+ New item](#)

1 **Material category**
metal > lead (and alloys of) > lead alloy

Additional material characteristics
None

Mixture category (EUPCS)
None

 Candidate list substance no longer present [+ New item](#)

Illustration Example 2

Submission Type: Please select

Identifiers

Article name*
Telecommunication satellite

Other names + New item

#	Type	Name	Action
Primary article identifier type* item number			
Primary article identifier value* example			

Other article identifiers + New item

#	Type	Value	Action
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Categorisation

Article category
 88026011 - Vehicles, aircraft, vessels and associated transport equipment > Aircraft, spacecraft, and parts thereof > Other aircraft (for example, helicopters, aeroplanes); spacecraft (including satellites) and suborbital and spacecraft launch vehicles > Spacecraft (including satellites) and suborbital and spacecraft launch vehicles > Spacecraft (including satellites) > Telecommunication satellites

Production in European Union
yes

Characteristics

Picture(s) + New item

#	Picture	Action
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Height
None

Length
None

Width
None

Diameter
None

Density
None

Weight
None

Volume
None

Colour
None

Other characteristics + New item

Safe use instruction(s)

No need to provide safe use information beyond the identification of the Candidate List substance

Safe use instructions + New item

Disassembling instructions + New item

#	Attached document	Language	Action
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Concern elements

Candidate list version
2020/2

Concern element + New item

1 Candidate list substance
Lead | Lead | 7439-92-1

Concentration range
> 0.1% w/w and ≤ 100% w/w

Material categories + New item

Mixture category (EUPCS)
24

PC-TEC-24 Welding, soldering, and flux products ×

2 Candidate list substance
Chromium trioxide | Chromium trioxide | 1333-82-0

Concentration range
> 0.1% w/w and ≤ 100% w/w

Material categories + New item

Mixture category (EUPCS)
 PC-TEC-12 Metal surface treatment products

3 Candidate list substance
4,4'-isopropylidenediphenol | 4,4'-isopropylidenediphenol | 80-05-7

Concentration range
> 0.1% w/w and ≤ 100% w/w

Material categories + New item

Mixture category (EUPCS)
 PC-PNT-5 Automotive and aerospace coatings

Candidate list substance no longer present + New item