**PRD-37 — EU SCIP & SVHC Management**

**Intent**

Track substances of very high concern (SVHC) across products/BOM, prepare EU SCIP notifications, and ship auditable evidence without slowing normal catalog work.

**Preconditions**

• Product BOM structure available (PRD-05).

• Supplier linkage and certificate hub active (PRD-21).

• Attachment vault with hashing (PRD-11) and lab/QA linkage (PRD-34).

• SVHC list snapshot service (jurisdiction-aware) and trust-stamped snapshots.

**Steps**

• Scope & Overlay: enable the SVHC overlay for target jurisdictions (EU by default); fetch latest SVHC snapshot and cache snapshot\_id.

• Data Capture: per component, store substance presence (yes/no/unknown), concentration ranges, article-as-such threshold applicability, and supporting docs (lab reports, supplier declarations).

• AI Assist (advisory): parse MSDS/CoC to propose substance flags with cited page snippets; reviewer approves or edits.

• Roll-up Logic: compute product-level SVHC presence from components; mark article thresholds and exemptions; flag kits via most-restrictive logic.

• SCIP Package Build: for SVHC>0 products, assemble SCIP payload (product identifiers, article category, SVHC identity/concentration range, safe-use info); sign and store a SCIP Package Receipt (hash + time + signer).

• Publish & Track: optionally push to the importer’s/representative’s registry endpoint; store registry response and status; expose per-product SCIP badge and next-review date.

• Change Hooks: on new SVHC snapshot or BOM/component change, create SCIP Pending Update and emit ImpactDelta with WHY (new substance added/threshold crossed).

**Edge cases**

• Unknown data from suppliers → quarantine the component and open a targeted request with the exact missing fields.

• Conflicting docs (supplier vs lab) → hold at component level; most-restrictive wins until resolved.

• Exemptions claimed without evidence → mark advisory only and require explicit approver sign-off before publish.

**Done when**

• Every SVHC-positive product has a signed SCIP package (or a pending update), registry status (if used), and a reproducible evidence chain (attachments/labs/supplier declarations) tied to the snapshot\_id.