

WW Chemical Regulations Developments
Global Emerging Regulations Update
October 2011



KOREA: REACH Like Act



GER Korea sub-team submitted written position in April
CEFIC hosted a visit for MoE delegates in May to discuss all aspects of the position

MoE will consider the points made.

Next draft expected by end of September/early October

Major differences from REACH: Not all substances will require Pre-registration and Registration. Activities will be limited to priority substances – identified from Evaluation via reporting activities on all chemicals (except polymers) manufactured or imported at $\geq 100\text{kg/annum}$.

Following Registration and risk assessment, certain substances will be restricted or prohibited

Key dates on timing (current understanding):

Enforcement & start of reporting, January 1st 2013.

Pre-registration and Registration expected to commence until Jan 1 2014

2-8 year phase-in period planned for Pre-registered substances



Taiwan

Publication of the inventory expected at the end of 2011 followed by implementation of the new substance notification scheme

Sub-team submitted updated proposals in March 2011

Next steps: To further advise and assist on New Substance Notification Testing including special provisions for polymers.



CHINA

Prepared and submitted concerns on the new law.

The Authorities have requested a translation of our position to more fully appreciate industry's points

Main issues include:

Producers and importers of new chemicals have to report annually and keep records

Only China based companies allowed to submit notifications

Increase in detailed public disclosures and concerns for CBI

Japan



Annual reporting: Following intensive advocacy work (GER JCIA ACC Liaison)

A satisfactory, if not a perfect outcome has been published:

- **Non-domestic manufacturers may now submit their information directly to the Authorities i.e. without having to divulge CBI to the importer.**

Timing: Reporting needs to be completed by 30th June for the previous fiscal year's manufacture/imports.

- **The use of METI/ENCS numbers alone suffices for both reporting and customs clearance procedures.**
- **The first PACS (Priority Assessment Chemical Substances) list is now publically available and will form the basis of future risk assessment activities.**



TURKEY

- **An excellent relationship and professional credibility with local industry group and the authorities continues**

Advocacy work to date has significantly benefited industry:

- **Extension to the notification/registration period from end of June 2009 to end of March 2011**
- **Ability to use 3rd party representatives to submit notification (allays the need to share compositional data with importers who may also be customers & competitors)**

No further advocacy work immediately planned



Malaysia

The EHS Guidance Document was published in mid-March and reviewed by the sub-team. Many of GER's proposals have been adopted:

Volume threshold is now 1MT/annum, rather than 100Kg.

Focus shifted to substances of high concern.

Minimum data now required for EHS listed substances

CBI has been strengthened.

However, still of concern:

Resource intensive annual reporting is still required, and for non-listed chemicals, multi-submissions will lead to different classifications.

Lack of clarity with respect to what DOE is using for basis of CMR Classifications.

Advocacy work continues



Russia

Latest version of the Technical Regulations of the Customs Union on Chemical Safety has recently been released.

Commenting period runs till October 17 and CEFIC GER prepares the comments to be submitted to the Russian authorities.

Advocacy work is being done via EU-Russia WG.