

## Chemical Compliance Outlook 2023

### Q&A

No.	Questions	Answers
1	Are any regulations or standards on management of chemicals in plastics planned for 2023? For example, what work if any is to go on in line with the international Plastics Treaty?	The negotiations for the Global Plastics Treaty are on and the finalization of the treaty is due in the year 2024.
2	The cosmetic guidance shared for China, would it be applicable for cosmetic additives?	Yes, Cosmetics Safety Assessment Technical Guidelines (2021) applies to all cosmetic ingredients and cosmetic end products. Thus, for cosmetic additives, it has to follow this guidance also.
3	What should companies do in case they are working on new cosmetic additives this year? What are the registration requirements for them?	If the new additives fall under the scope of new cosmetic ingredients in China, then it has to comply via registration or record filling according to the functions of the additives. For special functions such as Preservatives, sunscreens, colorants, hair colorants, registration applies to them. While for the rest without special functions, record filling applies. Dossier requirements vary between registration and record filling.
4	Do polymer additives require registration under EU REACH?	No, but monomers do. However, any manufacturer or importer of a polymer shall submit a registration to ECHA for the monomer substance (s) or any other substance (s), that have not already been registered by an actor up the supply chain.
5	Is EU REACH Registration required only for new substances? If our additive products contain registered substances as per the EU list, do we still need to register if our tonnage is more than 1 ton? E.g. Silver is already registered. If our additive product contains silver, do we still need to register?	Registration is required for all new substances under the EU REACH if they are not already registered under EU REACH and exceed the volume of 1t/a. In the case of mixtures, the same principle applies - for all substances in a mixture that are already registered under EU REACH there is no requirement for a new registration. Like the case of silver, no new registration is required for silver in your example. However, for all substances that are not registered and exceed the volume of 1t/a, registration is compulsory. If there is a change in the

		<p>tonnage band, an update to the registration will be required.</p> <p>However, if the additive product contain both registered and not registered substances, then the not registered substance will invite EU REACH registration provided it exceed 1 t/a threshold.</p>
6	<p>Hi, many thanks for the presentation. Regarding the EU updates on revisions on CLP. I would like to ask; Is there a prioritization in terms of sectors or product category? thank you.</p>	<p>No kind of prioritization of sectors or category is mentioned in the published revision document by the Commission. If adopted without any changes, the new CLP will apply to all chemical categories and sectors.</p>