



WHAT IS A SCIP DATABASE NOTIFICATION?

SCIP is the database for information on Substances of Concern in articles as such or complex objects (Products) established under the Waste Framework Directive (WFD). SCIP notification covers all articles placed on the EU Market containing a substance of very high concern (SVHCs) on the Candidate List in a concentration above 0.1% weight by weight (w/w) (irrespective of tonnage). **From 5 January 2021, article information should be communicated.** The SCIP database ensures that the information on articles containing Candidate List substances is available throughout the whole lifecycle of products and materials, including at the waste stage. Consumers can use this information to find out more about the SVHCs in the products they buy and make informed choices. This will also increase pressure to substitute substances of concern.

WHO IS CONCERNED?

SCIP Database Notifications can be issued by:

- EU producers and assemblers;
- EU importers;
- EU distributors of articles;
- Other actors in the supply chain placing articles on the market (Assemblers);

The WFD also allows third parties to submit data on your company's behalf, based on intra-party arrangements – the 'foreign user' concept.

HOW CAN GPC HELP YOU?

- Compiling and preparing an inventory of the substances going into your article.
- Pre-assessment of the presence of SVHC into your article and decide upon the SCIP notification requirements.
- Provide a third-party certificate for non-presence of SVHC and also exemption from SCIP notification requirements.
- Compile the data required for SCIP notification.
- Notification on behalf of your company.

ACTION POINTS

- Know your portfolio of articles or complex objects
- Start collecting the information and inventory preparation
- Get familiar with the SCIP database, starting with the prototype and all the supporting material
- Identify the key competent person within organization to do this activity or identify the competent consultant who can help you to compile the information
- Do the initial screen of the material for SVHC presence
- Identify which articles or complex articles containing SVHC on candidate list in an concentration above 0.01 w/w
- Prepare the information for doing the submission
- Maintain the records



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WHAT IS UK REACH?

The EU REACH Regulation was brought into UK law, **as amended by the REACH (EU Exit) Regulations 2019**, on 1st January 2021 and is now known as UK REACH. UK REACH will now regulate the market access to Great Britain (GB) i.e. England, Scotland and Wales.

UK REACH has been described as mirroring its EU counterpart. With the aim of assisting the many exporters likely to be affected by the repeal of EU REACH in the United Kingdom, UK REACH provides for comprehensive transitional arrangements. Such arrangements concern both EU and non-EU based exporters dealing with substances which are already registered under EU REACH and now wishing to maintain access to the UK. Transitional provisions are, however, not applicable to those who will place the substances for the first time in the GB market.

In order to secure your access to the GB market, you should consider getting in touch with a GB-based OR without delay.

We already have a GB-based OR facility, 'GPC-UK', to support our existing and new clients in addressing the challenges posed by Brexit on substance exports to the UK.

The benefits of DUIN

Maintaining access to the GB market while securing time to complete full registration of the substance within the deadline of 2, 4 or 6 years which is dependent on the tonnage band and hazardous properties.

DUIN is not a pre-registration

DUIN only needs to be done once per legal entity and covers all substances that are EU REACH registered.

DUIN must include, among other information:

The identity of the manufacturer/importer, the identity of the substances, the registration no. of the substances under EU REACH....

WHO IS CONCERNED?

- Non-GB based exporters and GB-based importers of an EU-registered substance who placed their substance on the GB market before the end of the Transition period:
 - By completing a **Downstream User Import Notification (DUIN) by 27 October 2021**, they will maintain access to the GB market while postponing the registration deadline of their substance by 2, 4 or 6 years.
- Non-GB based exporters who wish to place an EU-registered substance on the GB market for the first time:
 - A **simplified registration process** allows them to place their substance on the GB market after submission of an art. 26 Inquiry, some initial substance information, and the registration fees. The full registration dossier must then be submitted within 2, 4 or 6 years
- Non-GB based exporters and GB-based importers of a non-EU-registered substance wishing to place their substance on the GB market for the first time:
 - They must **register** their substance under UK REACH before they can place it on the GB market. They may appoint a GB-based OR to complete the full registration of the substance.



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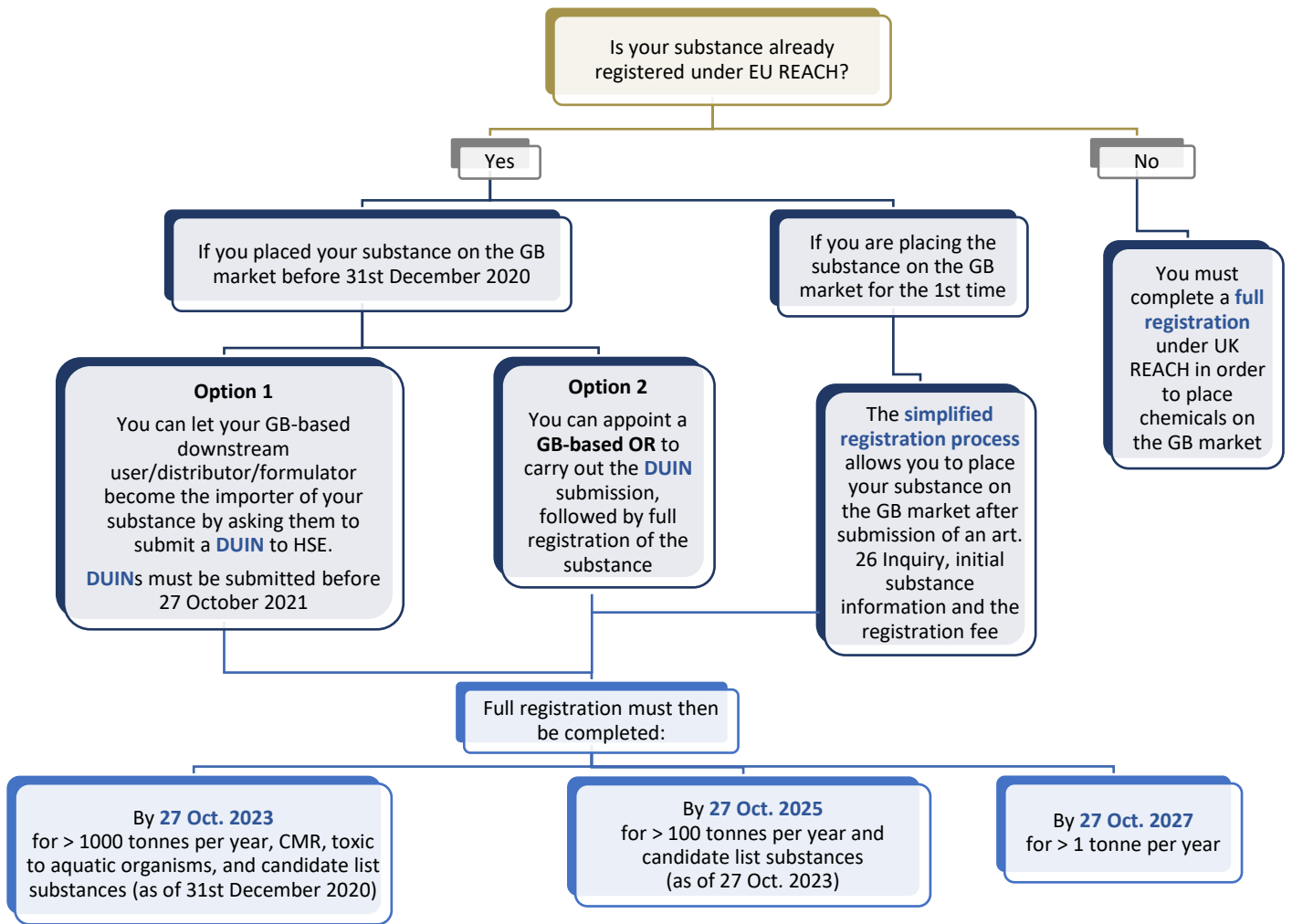


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Which procedure applies to your business?



Q&As – UK REACH (BREXIT)

1. As a non-UK company exporting EU REACH substances, how can I maintain access to the GB market while complying with UK REACH?

You should get in touch with your UK-based downstream user, distributor or formulator and discuss the possibility of them becoming the substance importer in the UK by submitting a DUIN notification. You can also appoint a GB-based OR to carry out the DUIN.

2. What will happen if I miss the 27 October deadline for DUIN submissions?

You will need to complete a full registration in order to place chemicals on the GB market.

3. What will be the fees for DUIN notification?

HSE will not incur any fees for DUIN notification. However, OR service charges will apply.

ACTION POINTS

1. Identify the substances to be placed in the GB market in qty. ≥ 1 tpa apart from the EU exports earlier
2. Check- if the substance is already registered in EU-REACH as EU Registered substances may make you eligible for **DUIN** or **simplified registration**
3. Check- if the substance will be placed in the GB for the first time - Submit inquiry and registration dossier as soon as possible
4. Early submission means possibility to be a part of substance group so prioritise substances for inquiry submission immediately after DUIN
5. Check- if the SDS is updated or not – the substance classification should be as per the new GB CLP
6. Identify the competent OR to take responsibilities towards your UK-REACH compliances.
7. Be transparent to your OR and give complete information to avoid any non-compliances

WHAT IS AICIS?

The Industrial Chemicals Act 2019 established the Australian Industrial Chemicals Introduction Scheme (AICIS) to regulate the importation and manufacture (introduction) of industrial chemicals in Australia.

AICIS replaced the National Industrial Chemicals Notification and Assessment Scheme (NICNAS) on 1 July 2020. The AICIS regulates chemicals (including polymers) introduced for an industrial use, such as in inks, paints, adhesives, solvents, cosmetics and personal care products, cleaning products, as well as in manufacturing, construction, and mining applications and to promote the safe use of industrial chemicals in order to protect human health and the environment.

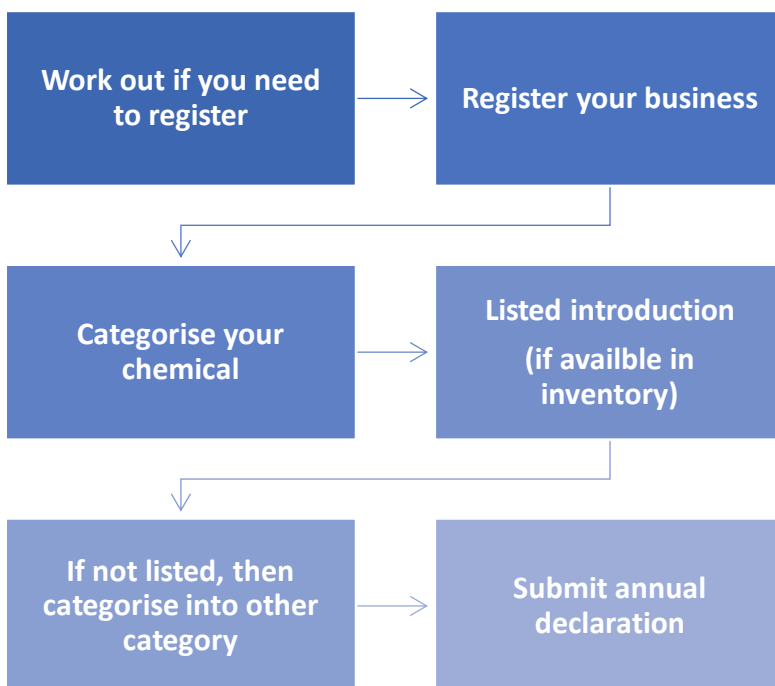
HOW TO COMPLY?

Importers and manufacturers (introducers) of industrial chemicals for commercial purposes need to register their business under this scheme. All industrial chemical introducers must categorise their chemical importation or manufacture (introduction) into the following categories i.e., Listed introduction, exempted introduction, reported introduction, assessed introduction, commercial evaluation before placing into Australian territory.

If the introduction is listed in the Australian Inventory of Industrial Chemicals (the Inventory), then it is categorized as Listed introduction, and can be placed in the market in complying with the regulatory obligations (if any). If the introduction is not in the listed category, then it must be authorized into any one of the other categories.

ANNUAL DECLARATION

Regardless of introduction category, one must submit an annual declaration at the end of every registration year. This declaration is to make about the industrial chemicals imported or manufactured in the previous registration year and confirms that introductions were authorised under Australian laws.




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Fig. 1: compliance flow chart

Introduction Categories

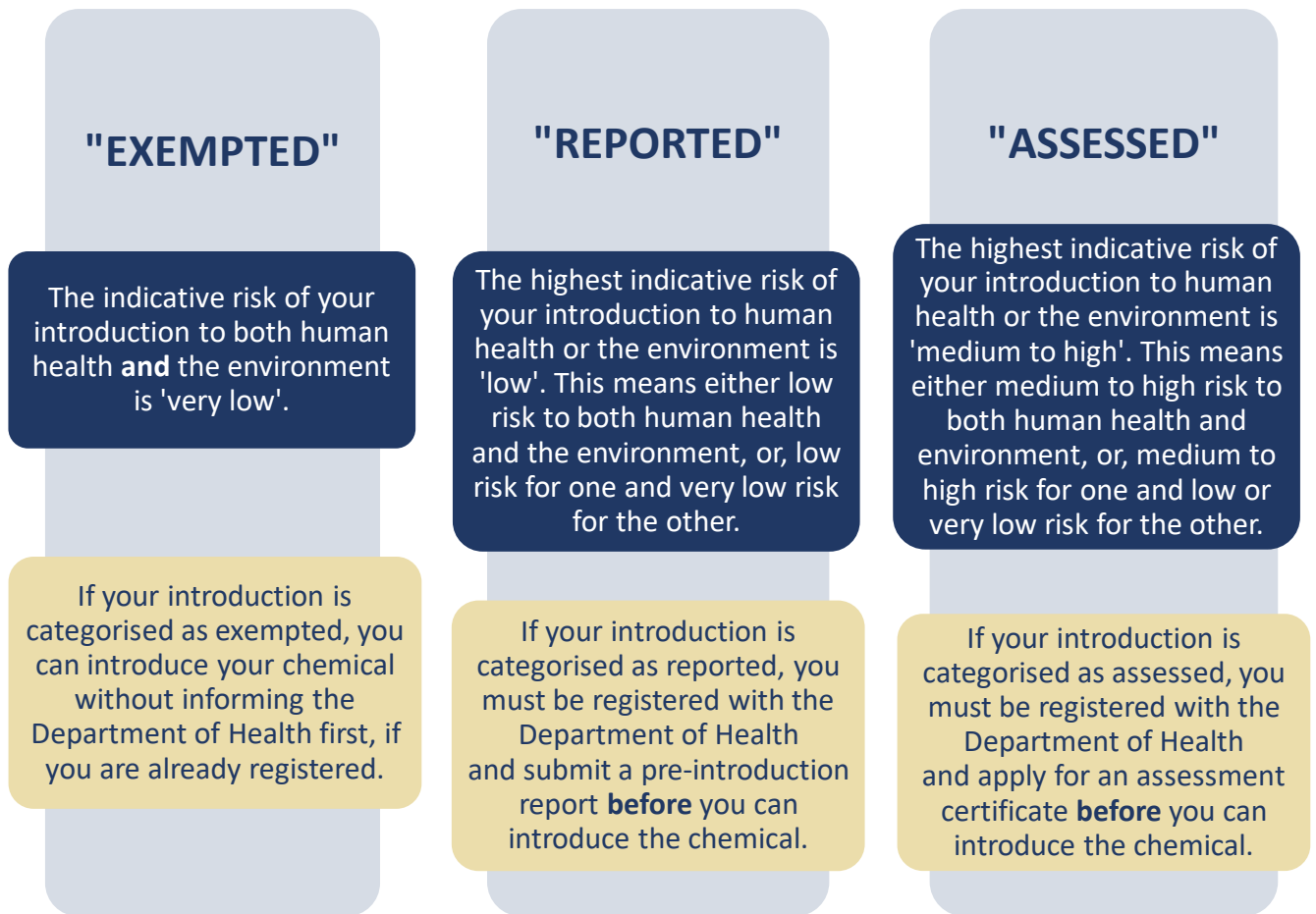


Fig. 2: introduction categories for chemicals regulated under AICIS

OBLIGATIONS FOR NON-AUSTRALIAN INTRODUCERS

It is important for Non-Australian introducers to register their business and meet compliance & reporting requirements for uninterrupted exports to Australia. Australian Registered Business Number (ARBN) is mandatory for the same. Non-Australian introducers can also appoint an Australian agent for compliance requirements if they are unable to obtain Australian Registered Business Number (ARBN). We are glad to inform you that GPC has a legal entity in Australia and can help non-Australian companies to meet their compliance requirements as an Australian agent.

ACTION POINTS:

- Identify the industrial chemical to be placed in the Australian market.
- Check if the industrial chemical is in the inventory.
- If not available inventory, collect technical data with respect to the risks associated for humans and the environment.
- Work out on categorization based on the risk associated.
- Submit annual declaration at the end of registration year (1 September – 31 August each year).
- Keep the records even after the introduction.


BACKGROUND


Thailand established the Hazardous Substance Act in 1992. The Act has been amended several times with a focus on hazard management. The Ministry of Industry (MOI) in Thailand, the main authority responsible for the Act has approved the 5th revision of the Act in early 2021. Manufactures and importers handling listed Hazardous Substance must notify or register and apply for license at the **Hazardous Substances Control Bureau, Department of Industrial Works**. For controlling purposes and administrative reasons, the Hazardous Substance divides chemicals into 4 types according to the severity of toxicity (see table below). Manufacturers and importers of hazardous substances exceeding 1 ton per year are required to notify their hazardous substances to the Department of Industrial Works (DIW) via DIW's online system. The notification shall be submitted within 60 days from the date of manufacture or importation. This notification is also called *Thailand Chemical Inventory Notification*.

Type	Compliance requirement
1	- Notification of product information and import of >1t/y hazardous chemicals
2	- Check status of substance via online system and discuss with DIW authorities - Submission of application and related documents: 100% composition, MSDS, etc. - Checking of application and its information by DIW officers - Evaluation process - Registration required - It may take 17 days for certificate.
3	- Check status of substance via online system and discuss with DIW authorities - Submission of application and related documents: 100% composition, MSDS, etc. - Checking of application and its information by DIW officers - Evaluation process - Registration & license required ; (Type 3) (e.g., Acetone) to approve & appeal to Ministry in 30 days
4	- Totally banned (import, export and possession) (e.g., Phenyl hydrazine) - Exemption: R& D purpose chemicals


THAILAND EXISTING CHEMICALS INVENTORY (TECI)

Thailand's inventory includes 11,481 entries. Users can search chemicals via Chemical name, molecular formulas, hazardous substance type, chemical type, CAS number or chemical code. The search results, as well as the entire inventory, could be exported and downloaded as a PDF or Excel document. The substance information in the inventory also includes the import quantity, production volume, and the physical/health/environmental hazards of the substance.

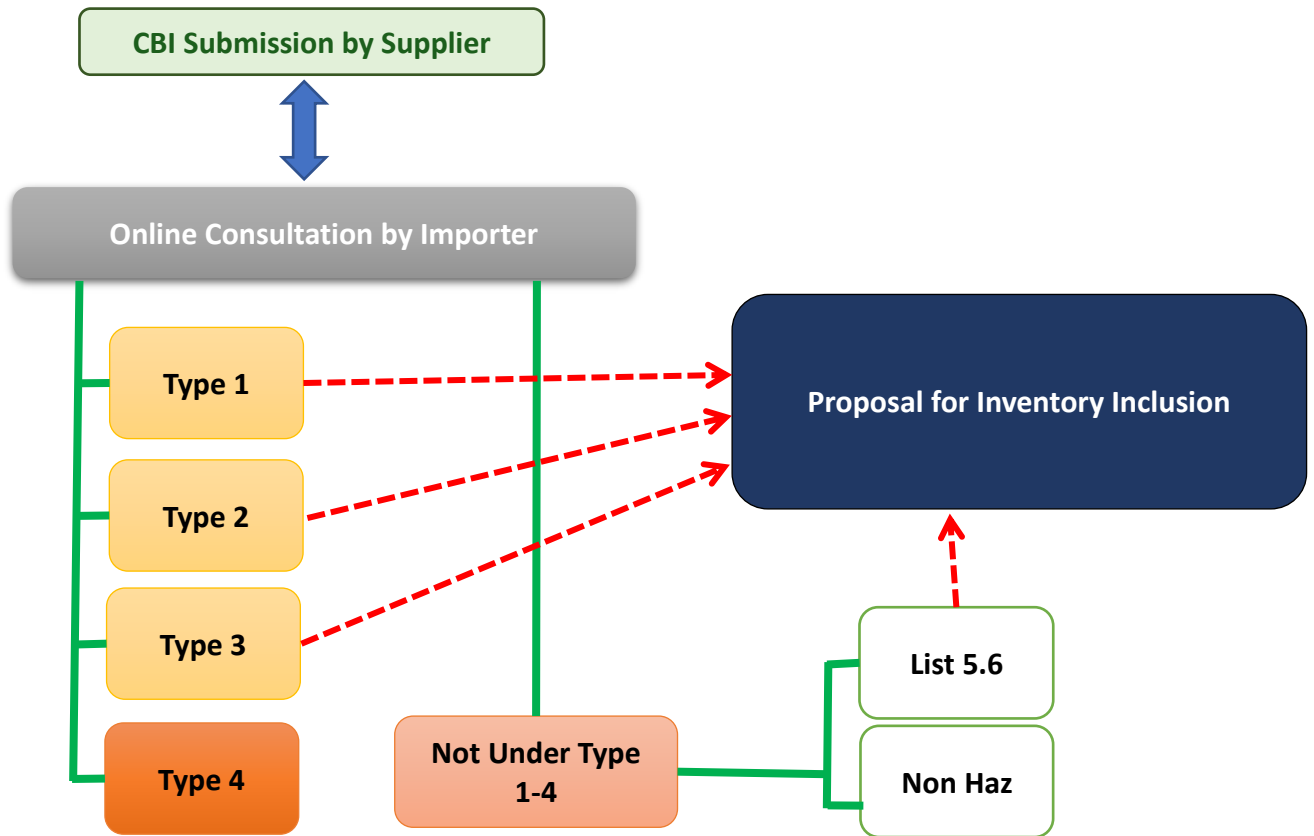
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DETERMINING HAZARD TYPES UNDER DIW



NOTIFICATION TO LIST 5.6

If the substance/mixture is not classified as Type 1, 2, 3, or 4, and if it has any of the GHS hazard properties, then the company shall apply for the declaration of the hazardous substance **List 5.6**. **Notification should be done within 60 days** from the date of manufacture or import.

Information required:

- Legal entity
- Type of activity: production or import.
- Type of hazardous substances: substance or mixture
- Trade name and HS code
- Transport information: UN number, class
- Composition
- Type of packaging
- Manufacturer name and country of origin
- GHS classification
- Physico-chemical properties, toxicological, ecotox and disposal information (from SDS)
- Copy of GHS SDS prepared in Thai

COMPLIANCE ADVICE

- Identify the substances that already export or expected to be exported to Thailand
- Check the status of substance in the inventory (TECI)
- Identify the competent person within the organization/consultant to perform Substance Assessment (Identifying hazard nature of substances)
- Plan your activities in advance and stay update on compliance requirements from the authority.