

Chemical Policy: Challenges & Opportunities

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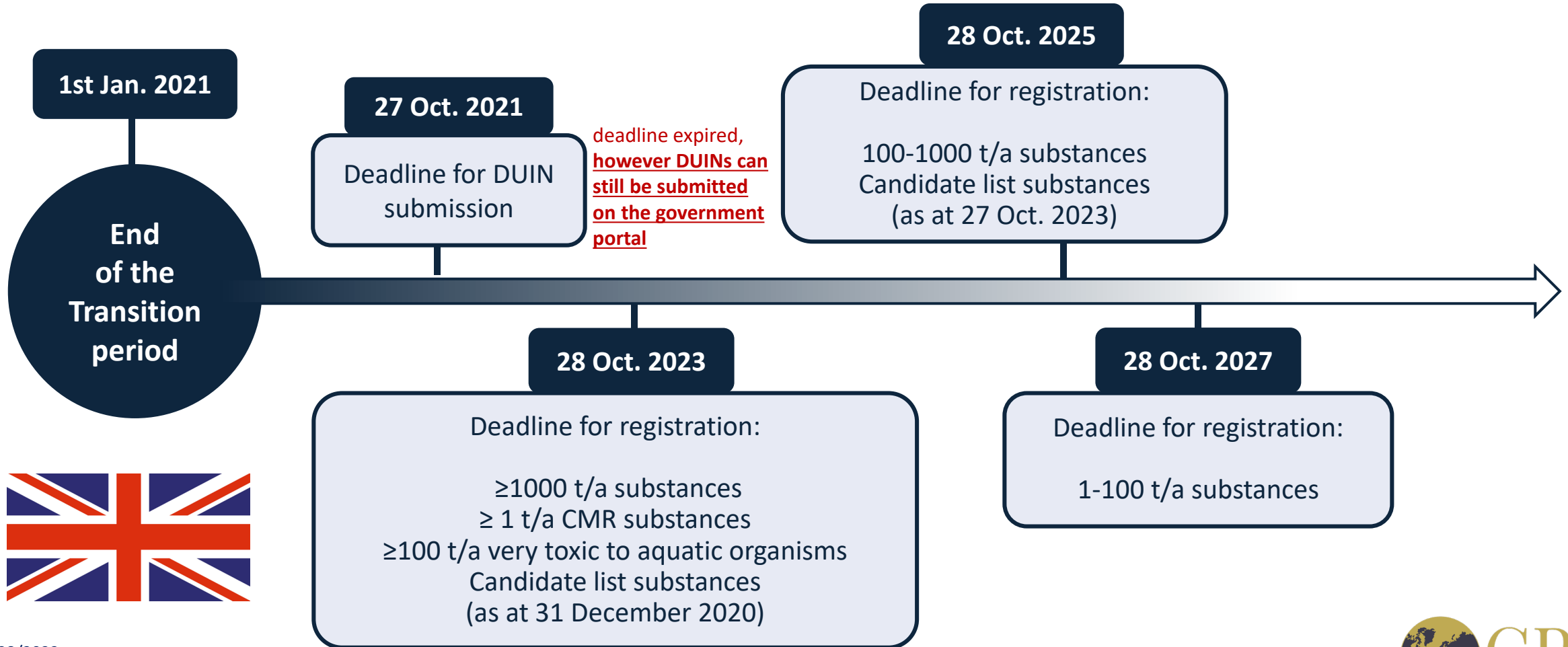


UK REACH

Start from 1st January 2021

Companies seeking to export an EU-registered substance to the GB market: Downstream User Import Notification (DUIN)

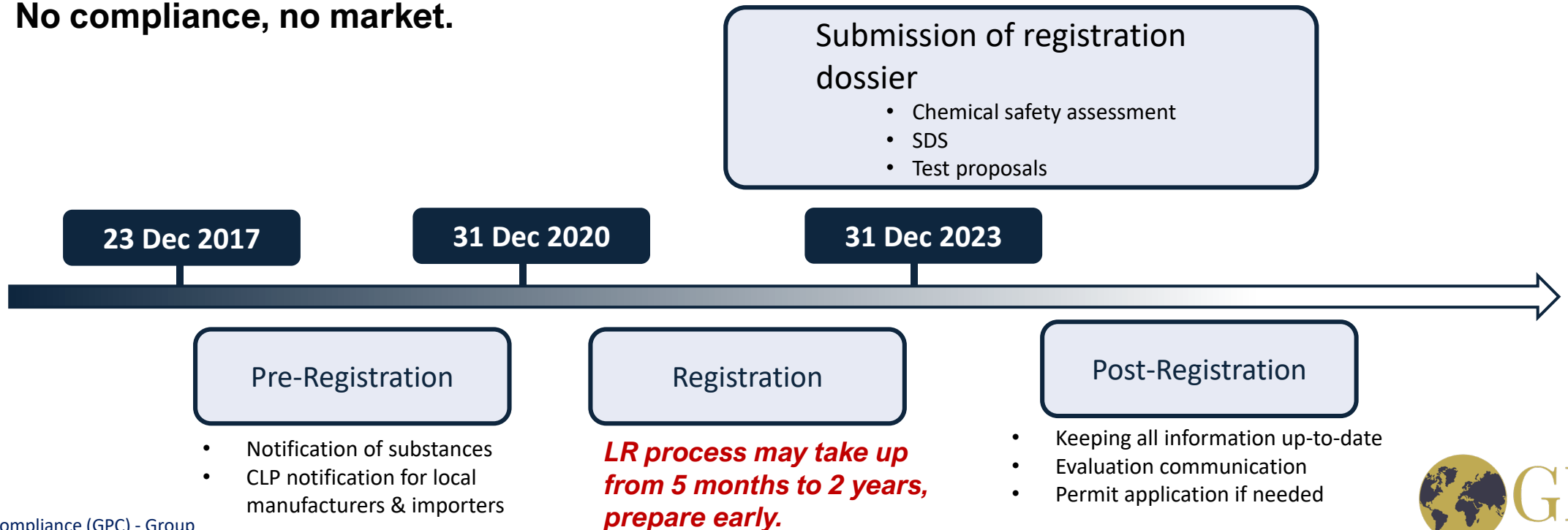
Exporters who do not qualify for DUIN or NRES (New Registration of Existing Substances) must register their substances under UK-REACH before they may place that substance on the GB-market.



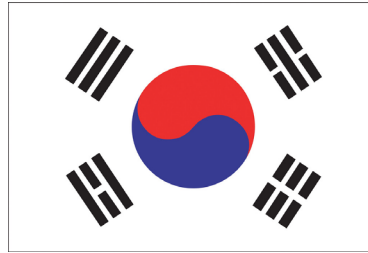
Turkey REACH (KKDIK)



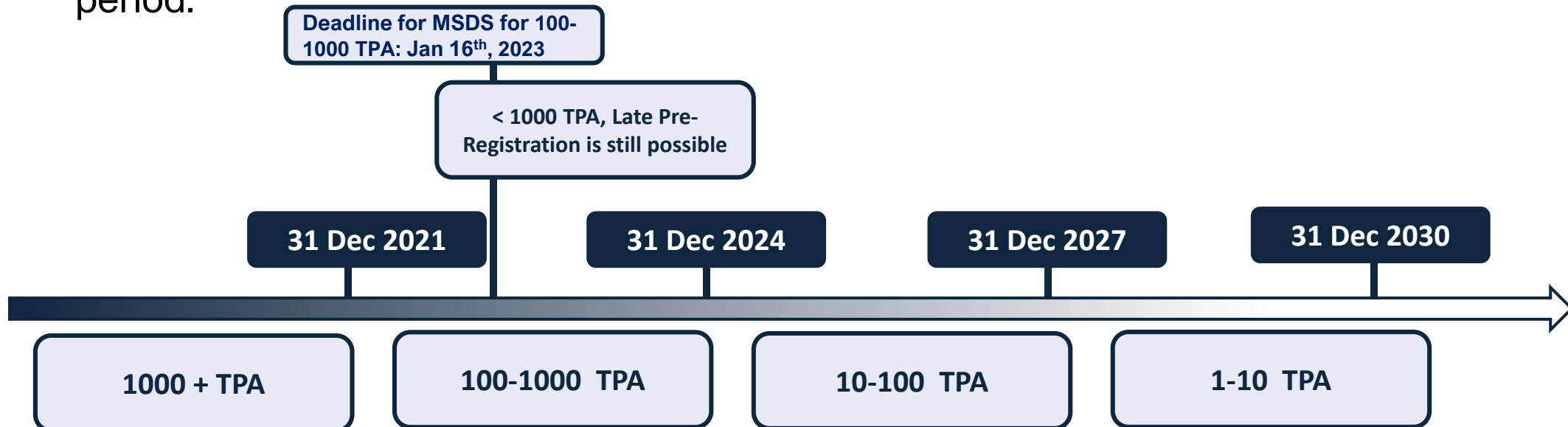
- Enforced on December 23, 2017
- Updated KKDIK Authority Fee (updated January 2022)
- Continued Lead Registrant (LR) appointment (started from March 2021)
- Registration deadline for ***all substances*** under KKDIK, regardless of tonnage band is **December 31, 2023**
- **No compliance, no market.**



K-REACH



- Enforced on January 1, 2019.
- **New substances** (> 1 TPA) not in KECL (inventory), Existing substances over 1000 TPA and PEC substances requires Registration prior to placing in Korean Market.
- Existing substances (<1000 TPA) do not require immediate registration - transition period:



EU-REACH & Chemical



European Green Deal & Chemicals Strategy for Sustainability

Action:

REACH Revision / CLP Revision / PFAS Restriction / Revision of sectoral legislation

SVHC Assessment

The SCIP database ensures that the information on objects/articles containing Substances of Very High Concern (SVHC) is available throughout the whole lifecycle of products and materials, including at the waste stage.

PCN (Poison Center Notification)

- Under Annex VIII to the CLP Regulation, importers and downstream users placing hazardous mixtures on the EU market are to provide specific information on their mixtures to appointed bodies.
- **1 January 2021** for consumer or professional use;
- **1 January 2024** for industrial use.

SCIP

- The Database for Substances of Concern In articles as such or in complex Products (SCIP) was established under the Waste Framework Directive (WFD)
- It aims to reduce hazardous chemicals in waste and promote safer alternatives.
- From **5 January 2021**, article information should be communicated.

Legislation Tracker

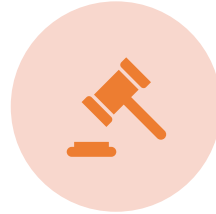


Initiative	Status	Timeline
REACH	Consultation closed (15 April)	Draft expected in Q4 2022
CLP	Consultation closed (15 November 2021)	Draft expected Q4 2022
Toy Safety Directive	Consultation closed (25 May 2022)	Draft expected Q4 2022
Cosmetics Products Regulation	Consultation closed (21 June 2022)	Draft expected Q4 2022
Food Contact Materials legislation	Public consultation in Q2 of 2022	Draft expected in Q2 2023
Ecodesign Regulation	Commission draft presented (30.03)	Parliament and Council negotiations
PFAs restriction (REACH)	Preparation of restriction dossier (SE, NO, DK, DE, NL)	Submission expected for 13.01.2023 (As per restrictions roadmap)
Safe and Sustainable by Design criteria	Discussions ongoing. Mapping study and workshop on methodology completed.	Q3 Workshop on case-study criteria Q4 Publication of framework and criteria for case-studies
Essential use criteria	Discussions ongoing (not public)	Unknown

Element of Compliance Due-Diligence



REGULATORY
CONTEXT



REGULATORY
OBLIGATIONS



OBLIGATIONS OF
STAKEHOLDER IN
SUPPLY CHAIN



COMPLIANCE
REQUIREMENTS



INDEPENDENT
VERIFICATION AND
VALIDATION



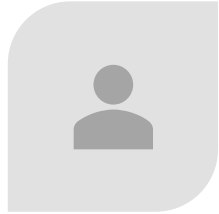
COMPLIANCE
CONFIRMATION /
CERTIFICATION

Compliance issues of a Company in Supply-Chain

- What are compliance obligations
- What obligations are with other actors in supply-chain
- How to evaluate such compliances – of such actors
- Independent evaluation and due diligence
- Compliance issues to not disrupt the production / schedules
- Manage and retrieve compliance documentation for inspections
- To assure that all supplies are compliant with applicable regulation
- To also assure the downstream user that the supplies they receive are compliant (independently verified)



Our portal covers these issues



BUYER LISTS ITS SUPPLIERS
AND RELEVANT PRODUCTS
FROM ITS PANEL



THESE ARE VERIFIED AND
SUPPLIERS RECEIVES
CREDENTIALS FOR THE
PORTAL



PROACTIVELY IF SUPPLIER
APPROACH TO BE ADDED –
WILL NOT BE ADDED UNTIL
APPROVED BY THE BUYER



ONCE APPROVED SUPPLIER
HAS ITS OWN PANEL



INDEPENDENT SUPPLIER
LOGIN



SUPPLIER UPDATES ITS
SUPPLY

Supplier perspective concerns and perspective

Maintain and increase supplies

Difficult to maintain and manage multi-country compliance

Continue to be competitive and reliable / credible supplier

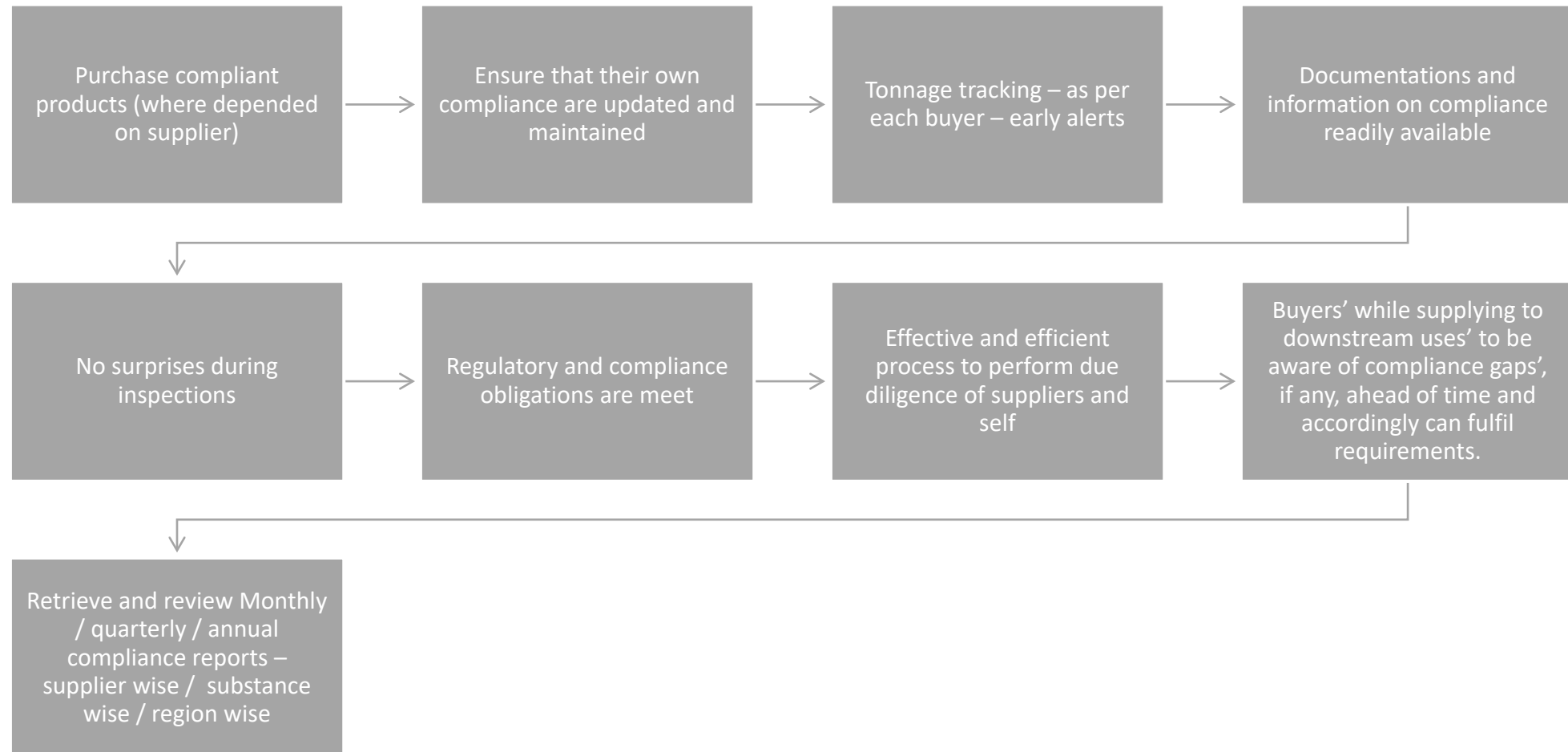
Avoid repeat sharing of compliance data

Be aware of gaps in compliance (and prepare for the same) ahead of supply

Confidentiality issues

- Sharing of certain data with the buyer
- Sharing of chemicals composition
- Secrecy of substance and proportions in product / brand

Buyers' perspective



Downstream users' perspective

Define and establish the compliance requirements – according to target country

Receive compliant supplies

Check for compliance documentations from the (Buyer) supplier

Independently reviewed / due diligence – certificate of compliance

Ensure timely supplies of the product



GPC

Your Regulatory Compliance Partner

Thanks!

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