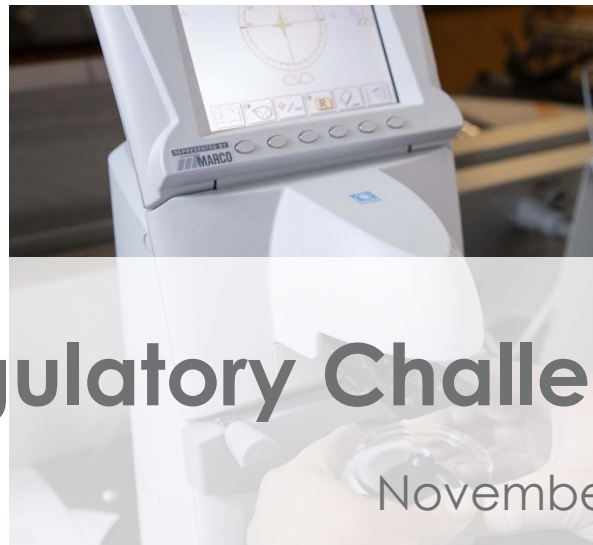


ESSILOR

SEEING THE WORLD BETTER






Chemical Regulatory Challenges in Asia Pacific Markets

November 13, 2019

A man with curly hair, glasses, and a beard is looking down at a document he is holding. He is wearing a patterned button-down shirt. The background is a large window with a grid pattern, showing a bright, slightly blurred outdoor scene. The overall tone is professional and focused.

Essilor Tools

New chemicals: Stages & Gates Requirements

GATE	OBJECTIVES	HOW	WHO	
<p>Gate 2</p>  <p>Concept Approval</p>	<p>Ensure new chemical products do not contain any priority chemical listed in Essilor PCL lists.</p> <p>Complete Process Hazard Analysis (PHA)</p>	<p>Screen new chemicals with CHEM Hazard and ensure they do not contain any PCL1 or PCL2 priority chemicals.</p>	<p>R&D / Global Engineering</p> <p>EHS Local / R&D/GE</p>	<p>Chem Hazard</p> <p>Process Hazard Analysis Form-V0</p>
<p>Gate 3</p>  <p>Proof of Technical feasibility</p>	<p>Ensure compliance with Global Chemical Regulations, get from suppliers all information and documents required to proceed with import registration or notifications.</p> <p>Carry out product safety evaluation and prepare product safety summary when required.</p> <p>Create a safety data sheet for all chemicals intended to be manufactured/mixed at Essilor entities.</p>	<p>Carry out verifications according to GEHS 02.013 - Global EHS requirements for Chemicals Ordering.</p> <p>According to GEHS 02.014 procedure for Lens Safety Evaluation.</p> <p>All necessary Safety Data Sheets for chemicals manufactured by Essilor must be requested to Global EHS .</p>	<p>Purchasing GS&P/ Local</p> <p>Global EHS</p> <p>Global EHS</p>	<p>GEHS 02.013 - Global EHS Requirements for Chemicals Ordering</p> <p>GEHS 02.014 - Lens Safety Evaluation</p> <p>SDS Request form</p>
<p>Gate 4</p>  <p>Market authorization</p>	<p>Prepare registration or import notification dossiers. Verify additional local regulatory requirements that may apply and ensure all obligations are fulfilled.</p>	<p>Compliance check and registration/notification dossiers will be completed and submitted to authorities by local EHS and local purchasing.</p>	<p>Local Purchasing/ EHS</p>	

SDS Process – The request for new chemical

*Request Date: Year Month Day Requestor Name/Organization:

* Product name	
* Intended use/application	
SDS Number:	
Packaging size(s) or Weight:	
Product Identifier (Product Code, etc.):	LA

*Manufacturer	
Company Name	ESSILOR International
Address	347, rue de Paris 94227 - Creteil la Porte - Creteil , (FRANCE)
Telephone Number	+33 (0) 1 49 77 42 24
Contact Person (displayed on the MSDS)	Global EHS Department
Emergency Telephone Number	N°: 099114 - Tel.: +33 (0) 1 45 42 99 99
Email (displayed on the MSDS)	response@sdsc@essilor.com

Supplier	
Company Name	
Address	
Telephone Number	
Contact Person (displayed on the SDS)	
Emergency Telephone Number	
Email (displayed on the SDS)	

***SDS requested for:**

United Nations GHS				
UN Purple Book SDS and classification	<input type="checkbox"/> English			Other:
The Americas				
USA	<input type="checkbox"/> English			Other:
Canada	<input type="checkbox"/> English	<input type="checkbox"/> French		Other:
Brazil	<input type="checkbox"/> Portuguese	<input type="checkbox"/> English		Other:
Mexico	<input type="checkbox"/> Spanish	<input type="checkbox"/> English		Other:
Middle East and Africa				
India	<input type="checkbox"/> Hindi	<input type="checkbox"/> English		Other:
Israel	<input type="checkbox"/> Hebrew	<input type="checkbox"/> English		Other:
Saudi Arabia	<input type="checkbox"/> Arabic	<input type="checkbox"/> English		Other:
South Africa	<input type="checkbox"/> English			Other:

Asia Pacific				
Australia	<input type="checkbox"/> English			Other:
China	<input type="checkbox"/> Chinese	<input type="checkbox"/> English		Other:
Japan	<input type="checkbox"/> Japanese	<input type="checkbox"/> English		Other:
Korea	<input type="checkbox"/> Korean	<input type="checkbox"/> English		Other:
Malaysia	<input type="checkbox"/> Malay	<input type="checkbox"/> English		Other:
New Zealand	<input type="checkbox"/> English			Other:
Singapore	<input type="checkbox"/> English			Other:
Taiwan	<input type="checkbox"/> Chinese	<input type="checkbox"/> English		Other:
Thailand	<input type="checkbox"/> Thai	<input type="checkbox"/> English		Other:
Europe				
EU	<input type="checkbox"/> English			Other:
Austria	<input type="checkbox"/> German	<input type="checkbox"/> English		Other:
Belgium	<input type="checkbox"/> French	<input type="checkbox"/> Dutch	<input type="checkbox"/> English	Other:
Bulgaria	<input type="checkbox"/> Bulgarian	<input type="checkbox"/> English		Other:
Croatia	<input type="checkbox"/> Croatian	<input type="checkbox"/> English		Other:
Cyprus	<input type="checkbox"/> English			Other:
Czech Republic	<input type="checkbox"/> Czech	<input type="checkbox"/> English		Other:
Denmark	<input type="checkbox"/> Danish	<input type="checkbox"/> English		Other:
Estonia	<input type="checkbox"/> Estonian	<input type="checkbox"/> English		Other:
Finland	<input type="checkbox"/> Finnish	<input type="checkbox"/> Swedish	<input type="checkbox"/> English	Other:
France	<input type="checkbox"/> French			Other:
Germany	<input type="checkbox"/> German	<input type="checkbox"/> English		Other:
Greece	<input type="checkbox"/> Greek	<input type="checkbox"/> English		Other:
Hungary	<input type="checkbox"/> Hungarian	<input type="checkbox"/> English		Other:
Ireland	<input type="checkbox"/> English			Other:
Italy	<input type="checkbox"/> Italian	<input type="checkbox"/> English		Other:
Latvia	<input type="checkbox"/> Latvian	<input type="checkbox"/> English		Other:
Lithuania	<input type="checkbox"/> Lithuanian	<input type="checkbox"/> English		Other:
Luxembourg	<input type="checkbox"/> French	<input type="checkbox"/> English		Other:
Netherlands	<input type="checkbox"/> Dutch	<input type="checkbox"/> English		Other:
Norway	<input type="checkbox"/> Norwegian	<input type="checkbox"/> English		Other:
Poland	<input type="checkbox"/> Polish	<input type="checkbox"/> English		Other:
Portugal	<input type="checkbox"/> Portuguese	<input type="checkbox"/> English		Other:
Romania	<input type="checkbox"/> Romanian	<input type="checkbox"/> English		Other:
Russia	<input type="checkbox"/> Russian	<input type="checkbox"/> English		Other:
Slovakia	<input type="checkbox"/> Slovak	<input type="checkbox"/> English		Other:
Slovenia	<input type="checkbox"/> Slovenian	<input type="checkbox"/> English		Other:
Spain	<input type="checkbox"/> Spanish	<input type="checkbox"/> English		Other:
Sweden	<input type="checkbox"/> Swedish	<input type="checkbox"/> English		Other:
Switzerland	<input type="checkbox"/> German	<input type="checkbox"/> French	<input type="checkbox"/> Italian	Other:
Ukraine	<input type="checkbox"/> Ukrainian	<input type="checkbox"/> English		Other:
United Kingdom	<input type="checkbox"/> English			Other:

*** COMPOSITION INFORMATION**

Chemical Name ¹	CAS Number	% (w/w) ²	Confidential (Y/N) ³	Purpose in Material ⁴

TOXICOLOGICAL TEST DATA

* Toxicological data available for the product as a whole? Yes No

	Describe test results, test species and methods	
Oral LD50	Species:	Method:
Dermal LD50	Species:	Method:
Inhalation LC50	Species:	Method:
Sensitization ⁵	Species:	Method:
Other Test Results ⁶		

ECO-TOXICOLOGICAL TEST DATA

* Eco-toxicological data available for the product as a whole? Yes No

	Describe test results, test species and methods	
LC50 (Fish)	mg/L, Duration:	Species: , Method:
EC50 (Daphnia)	mg/L, Duration:	Species: , Method:
IC50 (Algae)	mg/L, Duration:	Species: , Method:
Log P _{ow}		
BOD and/or COD		
Other Test Results ⁷		

¹ For polymers, provide the average MW and content of all residual monomers/monomers.
² Indicate %g, %v, or ppb. The total composition must be 100%. Ranges are accepted and in these cases, 3C will perform the hazard and risk evaluation from a ~~representative~~ standpoint.
³ If ~~Y/N~~ indicate whether the name and/or concentration are proprietary. Provide the generic name or HMPC number (Canada) and/or concentration range in ~~ppm~~. Please note that for EU member states the use of generic names is subject to severe restrictions.
⁴ E.g. residual monomers, impurity, stabilizer, ingredients.
⁵ Data from sensitization and other ~~in vitro~~ ~~in vivo~~ test results in the MSDS but will be used for the hazard evaluation of the product, which will be assessed via criteria.

PHYSICAL-CHEMICAL DATA

* Physical Data (Size: "Not relevant" or "Not available" if applicable)

Physical State	
Appearance (Form)	
Color	
Odor	
pH	
Flash Point	°C / °F Test method:
Boiling Point	°C / °F at ()
Specific Gravity (Relative Density)	at °C / °F
Relative Vapor Density (air=1)	at °C / °F
Viscosity	() at °C / °F

Other Data:

Vapor Pressure	() at °C / °F
Melting Point	°C / °F
Bulk Density	()
VOC Content	Test Method:
	() at °C / °F
Solubility in Water (Specify measured values or select one)	- Completely Soluble (100%) = - Soluble (10-99%) = - Moderately Soluble (1-10%) = - Slightly Soluble (0.1-1%) = - Insoluble (<0.1%) =
Stability (Solvent:)	() at °C / °F
Partition coefficient: n-octanol/water (Log P _{ow})	
Evaporation Rate (n-Butylacetate ⁸)	
Viscosity (25 °C/77 °F)	() (Unit:)
Viscosity (40 °C/104 °F)	() (Unit:)
Lower Flammability Limit (LFL)	%
Upper Flammability Limit (UFL)	%
Auto-ignition Temperature	°C / °F
Decomposition Temperature	°C / °F
Other: (E.g. Particle Size, Volatiles, Freezing Point, Flammability (Solid))	

⁶ Please note: Physical/chemical data should reflect the results of tests performed on the product itself.

No local translation is permitted as SDSs must be kept up-to-date with regulations as well as product composition changes. New formats or translations required by Essilor entities should be requested to Global EHS Department who will coordinate the work with 3E Company. In case there is a modification in the composition of an existing product (for example new raw material validation): this information has to be provided to Global EHS Department who will make sure that all safety data sheets available for this product are updated accordingly.

Essilor Priority Chemical Lists

Essilor has set Priority Chemicals Lists (PCL) to ensure better control over hazardous substances in its products and processes and the replacement of those with unacceptable risk.

Any new or existing chemical must be [screened against Priority Chemicals Lists](#) by using Chem Hazard tool.

Refer to [GEHS 02.013](#) procedure for more information about Global EHS requirements for chemicals ordering. The procedure describes the general steps that must be followed by Corporate Sourcing and Procurement, Global Engineering, R&D departments and Manufacturing Sites, to identify major requirements prior ordering chemicals.

Chem Tool Rules

PCL 1

Substitute it Now!

The use of chemicals listed in PCL 1 list is prohibited in any Essilor workplaces.

PCL 2

Plan for replacement

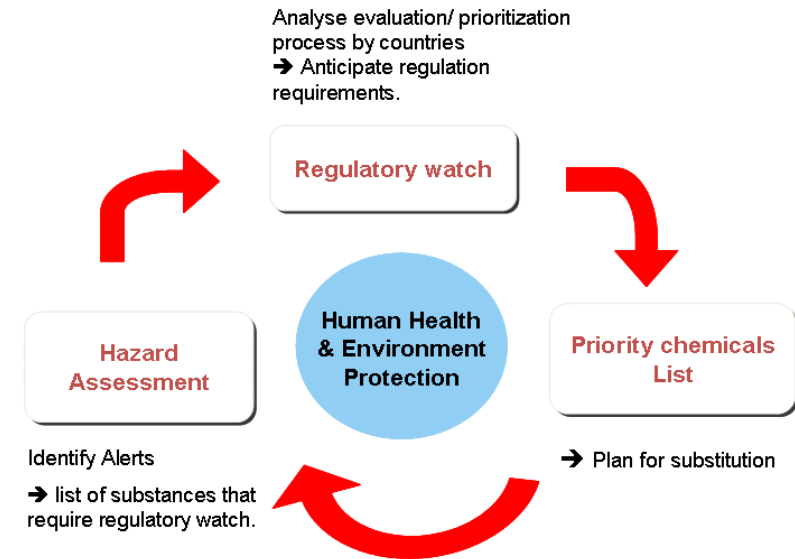
PCL 2 chemicals are banned for new product or process development purpose, and must be replaced where a safer alternative exists. For existing uses where there is no known alternative solution, strong efforts must be made to identify & validate replacement solutions.

PCL 3

Consider safer chemical (if technically possible)

PCL3 chemicals should be replaced by safer alternative when it is technically/economically possible. This list should be used as a guide for R&D selection of new chemicals.

Priority Chemicals Lists (PCL)



- Priority chemicals listed in PCL 1 and PCL 2 cannot be used in R&D for new product development purpose if it is intended after study to be deployed in other Essilor workplaces.
- The requirements set up in Essilor Priority Chemicals lists (PCL) are a worldwide internal Essilor Policy even if local regulatory requirement may be less restrictive. The lists are continuously updated as new information/regulation on hazardous chemicals become available.



Essilor CHEM Hazard

Worksheet in Gentex Optics - Tools for Chemical Compliance.pptx [Compatibility Mode] - Excel

File Home Insert Page Layout Formulas Data Review View ACROBAT Tell me what you want to do... Sign in Share

Clipboard Font Alignment Number Styles Cells Editing Data Protection

G26 Evidence of Carcinogenicity established by International Agency for Research on Cancer (IARC)

ESSILOR Priority Chemicals Lists (PCL)

PCL 1
Substitute it Now!
The use of chemicals listed in PCL 1 list is prohibited in any Essilor workplaces.

PCL 2
Plan for replacement
PCL 2 chemicals are banned for new product or process development purpose, and must be replaced where a safer alternative exists. For existing uses where there is no known alternative solution, strong efforts must be made to identify & validate replacement solutions.

PCL 3
Consider safer chemical (if technically possible)
PCL3 chemicals should be replaced by safer alternative when it is technically/economically possible. This list should be used as a guide for R&D selection of new chemicals.

CHEM HAZARD

CHEM Hazard - February 2019

Thailand List of Hazardous Substances:
A classification ruling needs to be secured from DIW. Requirements depend on classification:

- Class Non-DG: if annual imported weight over 1 tonne, import notification as per list 5.6 (report on hazards identification).
- Class 1: ref. number and import notification
- Class 2: registration and import notification
- Class 3: registration and storage site audit, import license and notification
- Class 4: import prohibited (unless specific permission for lab tests)

[For further details on regulatory requirements, click on each regulation title:](#)

New Search Export Data Clear all

CAS	Chemical name	Priority Chemical List	Priority level	Global EHS Requirement	Level of concern	Substitutes available	EUROPE		NORTH AMERICA			ASIA			INTERNATIONAL		
							Candidate SVHC	EU Export	California Prop65	TSCA	US TURA	Canada CEPA	Japan CSCL	Thailand (Hazardous Substances Class)	PHL CCO	PHL PCL	PHL Controlled precursors
4151-50-2	Sulfuramid	NO : Comply with SDS						All PIC Procedures					3				YES
68957-62-0				This CAS number is not listed in Essilor PCL, and in regulations covered by Chem Hazard. It falls under general preventive measures as specified in SDS, or specific local regulations that may apply.													
136-51-6				This CAS number is not listed in Essilor PCL, and in regulations covered by Chem Hazard. It falls under general preventive measures as specified in SDS, or This CAS number is not listed in Essilor PCL, and in regulations covered by Chem Hazard. It falls under general preventive measures as specified in SDS, or													
27253-33-4				This CAS number is not listed in Essilor PCL, and in regulations covered by Chem Hazard. It falls under general preventive measures as specified in SDS, or This CAS number is not listed in Essilor PCL, and in regulations covered by Chem Hazard. It falls under general preventive measures as specified in SDS, or													
4075-81-4				This CAS number is not listed in Essilor PCL, and in regulations covered by Chem Hazard. It falls under general preventive measures as specified in SDS, or This CAS number is not listed in Essilor PCL, and in regulations covered by Chem Hazard. It falls under general preventive measures as specified in SDS, or													
22464-99-9				This CAS number is not listed in Essilor PCL, and in regulations covered by Chem Hazard. It falls under general preventive measures as specified in SDS, or													
8052-41-3	stoddard solvent; Low boiling point naphtha - unspecified; [A colourless, refined petroleum distillate that is free from rancid or objectionable odours and that boils in a range of approximately 148,8 °C to 204,4 °C.(300 °F to 400 °F)]	YES	PCL 2	VERY HIGH Concern chemical: No new development product/process is allowed. This chemical MUST be substituted where a safer alternative exists. For other uses requiring quality validation before substitution, all risk management measures must be implemented until a safer alternative is validated.	Carcinogenic: may cause cancer	This chemical is not a PCL2 if it can be shown that the substance contains less than 0,1% of toluene benzene (EINECS No 200-753-7)											
				This CAS number is not listed in Essilor PCL, and in regulations covered by Chem Hazard. It falls under general preventive measures as specified in SDS, or													

Introduction Instruction Data record



Philippines

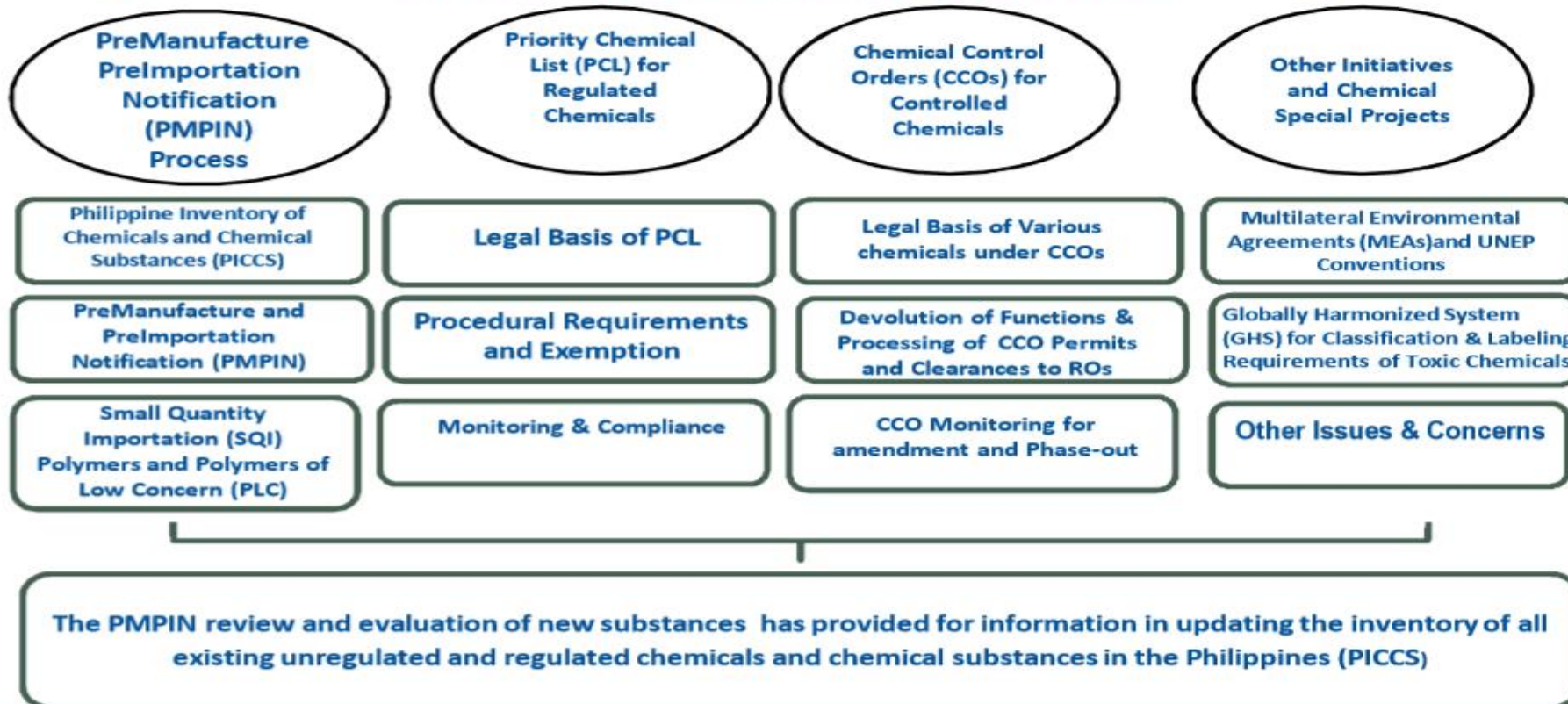
Government Agencies That Control Chemicals in the Philippines

AGENCY REGULATING	CHEMICALS BASED ON USAGE	LAW	Chemical Examples
DENR - EMB	Industrial Chemicals	Republic Act (RA) 6969	Mercury, Formaldehyde, Lead, Benzene etc.
DDB-PDEA	Dangerous Drugs	RA 9165	Ketamine Amineptine
DA - FPA	Fertilizers and Pesticides (Agricultural Use)	PD 1144	Endosulfan Chlorothalonil
DOST – PNRI	Radioactive Chemicals	RA 5207	Cesium Cobalt Iridium
DOH - FDA	Chemicals for human consumption	RA 10620 / PD 881	Cosmetic Products Vitamins
DILG-PNP	Explosives	RA 9516	Aluminum Nitrate Ammonium Acetate Iron Nitrate

Introduction to Philippine Chemical Management



Overview of Key Components in Chemical Management



Philippine Priority Chemicals List (PCL) and PCL Compliance Certificate

- Philippine Priority Chemicals List (PCL) is a short list of hazardous chemicals that have been determined to potentially pose unreasonable risks to public health, workplace and environment in the Philippines (i.e., bio-accumulative, highly toxic, persistent).
- There are currently 92 chemicals on Philippine Priority Chemicals List (PCL).
- **PLC compliance certificate** was once required before you can manufacture or import them. This is no longer a requirement.

Philippine Chemical Control Order (CCOs)

- Chemicals that are subject to **Chemical Control Order (CCO)** are restricted or banned (*limit or regulate the use, manufacture, import, transport, processing, storage, possession and wholesale*) due to their serious risks to human health or the environment.
- You need to obtain permission from DENR-EMB (Department of Environment and Natural Resources, Environmental Management Bureau) first before importing them into the Philippines. They are also subject to mandatory GHS SDSs and labelling.
- Chemicals subject to CCOs include:
 - Ozone-depleting substances,
 - Lead and Lead Compounds, (Example: 6 year phase out of lead in paint 2013 -2019)
 - Polychlorinated Biphenyls (PCBs),
 - Mercury, (Phase out date 2022 for manufacture and importation, exemptions allowed.)
 - Asbestos and
 - Cyanide and Cyanide Compounds.
- General Exemptions under the CCO Rules
 - Chemical substances and mixtures regulated by laws other than RA 6969
 - Special circumstances as determined by DENR-EMB

How to Comply with Chemical Control Orders (CCO)

For chemical substances subject to Chemical Control Orders, you need to register them with DENR-EMB & obtain import clearance.

In addition to that, you need to meet the following requirements:

- **Limitation in Industrial Use:**
 - Gradual phase out of import and manufacturing or
 - Gradual substitution of the chemical uses and premises
- **Annual Report to DENR-EMB.**
 - All manufacturers, importers, and industrial users of chemicals must submit an annual report to DENR-EMB that includes information on production, exposure data, waste, storage, and treatment.
- **Labeling Requirements**
- **Storage Requirements**
- **Treatment and Disposal Requirements**
- **Self-Inspection**
- **Reporting and Recordkeeping Requirements**

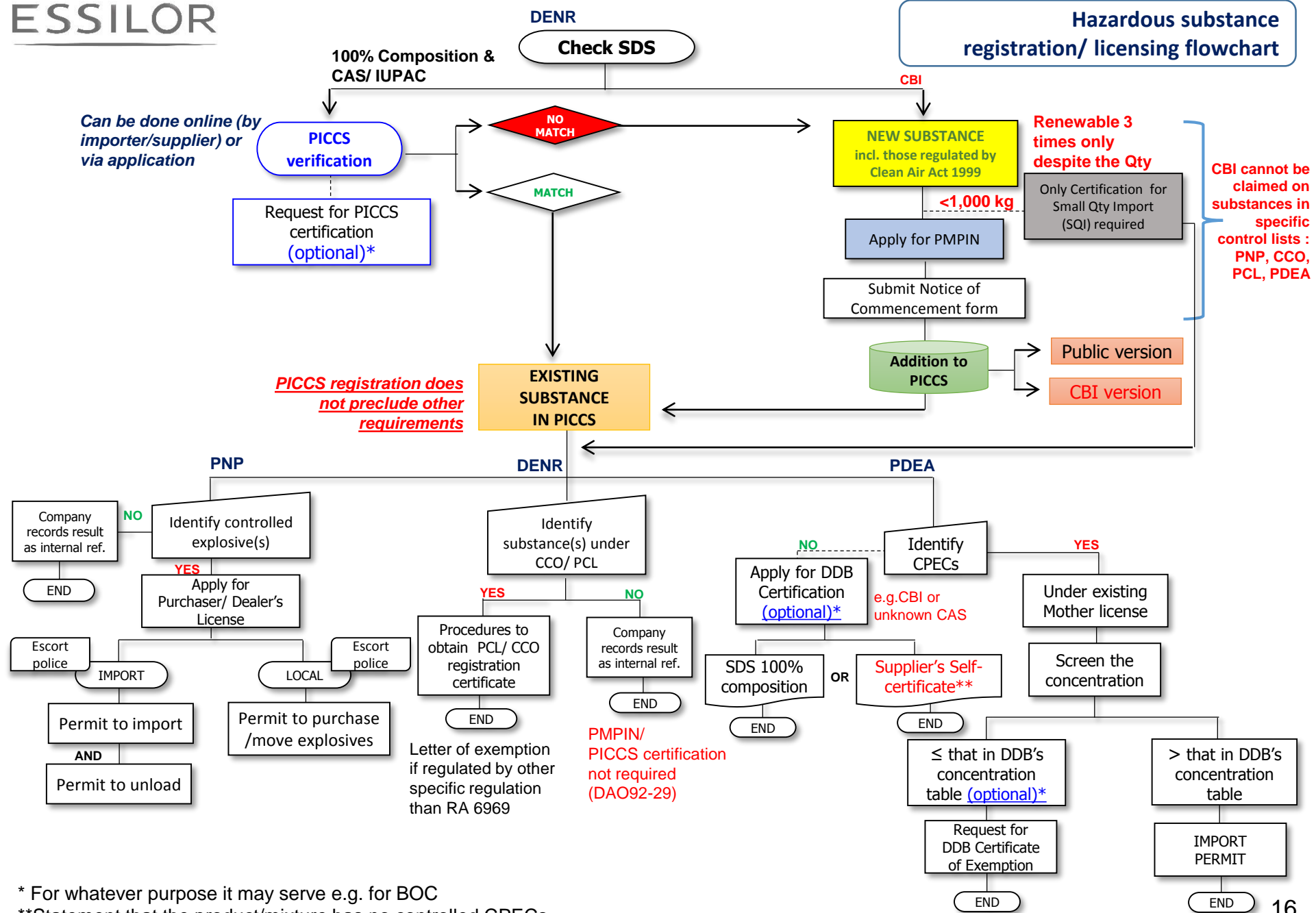
Chemical Control Order

- All CCO importation clearance should be secured and approved prior to the actual arrival at the Port of Entry.
- No Importation Clearance shall be issued when the chemical is already at the port of entry as endorsed by the Bureau of Custom (BOC)
- Any special instructions or procedures that are being introduced or done by respective Offices (other than those stated in harmonization policy under DAO 2015) must inform EMB-CO to ensure uniform implementation of the CCO Procedures.

PICCS Online Search System

- The Philippine Inventory of Chemicals and Chemical Substances (**PICCS**) is a list of all existing chemical substances used, sold, distributed, imported, manufactured, stored, exported, treated or transported in the Philippines. It was first published in 1995 with 15,000 listed chemicals. By 2015 there were over 47,000
- Manufacturers and importers don't have to conduct new chemical notification (PMPIN) if their chemicals are already listed in the PICCS, *unless the chemicals are listed in the Priority Chemicals List (PCL) or subject to Chemical Control Orders (CCO)*.
- Although new chemicals are added in PICCS annually, the online database of the authority is not usually up-to-date. Tip: Enterprises should do the new chemicals search on their own first, and then contact the authorities if necessary (for example, the CBI issues).

<http://119.92.161.2/internal/CasREgistry.aspx>

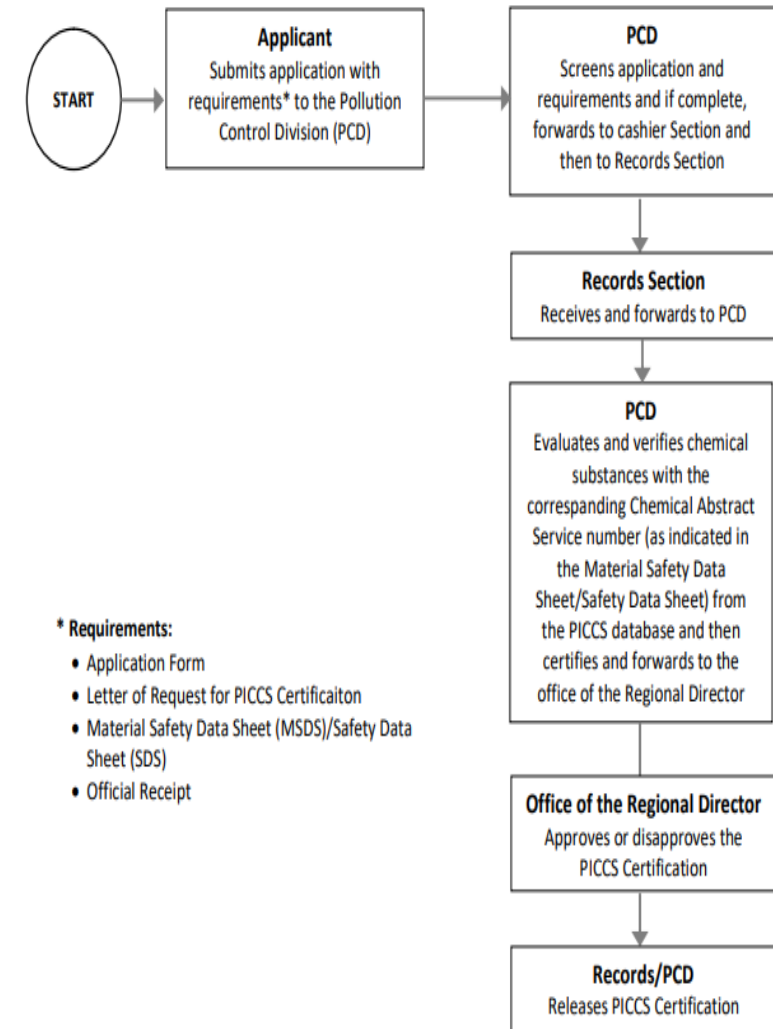


* For whatever purpose it may serve e.g. for BOC
 **Statement that the product/mixture has no controlled CPECs

PICCS Certification

- The purpose of [PICCS certification](#) is to show the Bureau of Customs or other authorities that a substance is indeed listed on [PICCS](#) and thus is exempt from [PMPIN](#).
 - Even though PICCS certificate is not a mandatory requirement, the Bureau of Customs or other authorities may request importers to present PICCS certificate before releasing the goods.
- Companies may apply for PICCS certification for their substances by submitting the following info
 - Completed PICCS application form and notarized copy
 - (M)SDS in ISO11014 or GHS format
 - Letter of request for PICCS certification
 - Official receipt of processing fee (~10 USD per substance)

PICCS Certificate Process Flow Chart



PICCS Questions

What if my substance is not on PICCS?

- A substance that cannot be found on PICCS will be regarded as a new substance in the Philippines.
- Manufacturers or importers need to submit a [Pre-Manufacture and Pre-Importation Notification \(PMPIN\)](#) of new substance to the (DENR-EMB) and secure clearance.

What if my substance is on PICCS?

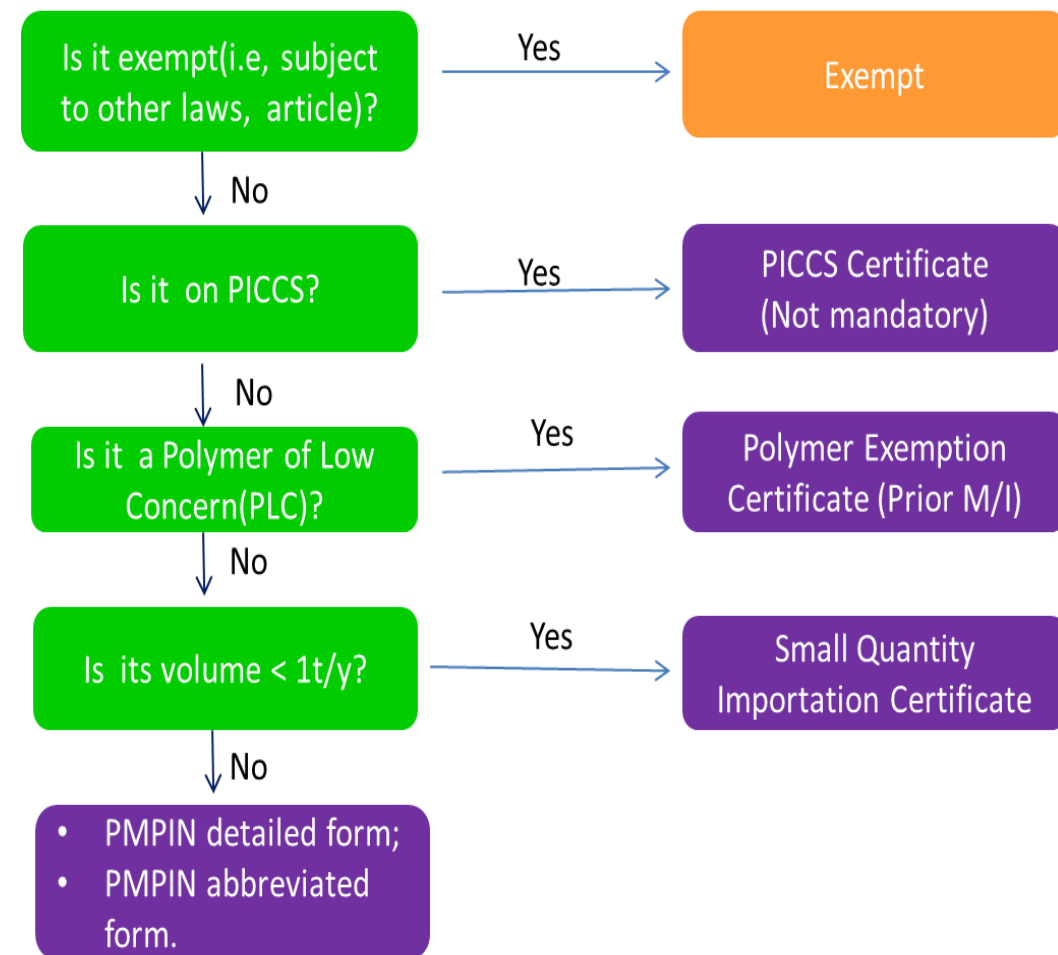
- You do not need to prepare an notification for your substance to secure clearance from DENR-EMB prior to production or importation provided that these chemicals are not on [Priority Chemical Lists \(PCL\)](#) and not are subject to [Chemical Control Orders \(CCO\)](#).
- Tip: Know that the Bureau of Customs sometimes request companies to prove that their substances are listed on PICCS. In that case, the recommendation to companies has been to apply for [PICCS certification](#) in advance. This will save time.

PMPIN Exemptions

The following substances are exempt from PMPIN.

- Chemicals and chemical substances included in PICCS;
- Small scale premises;
- Small quantity chemicals;
- Certain polymers and other substances exempt from PICCS requirements;
- Non-isolated intermediates;
- Articles;
- New chemicals manufactured exclusively for export;

Note: For small quantity of new substances (<1t/y) which are exempt from PMPIN, you must apply for Small Quantity Importation Certification (SQI). Even for substances listed on PICCS, you may apply for PICCS certification (not a compulsory requirement).



PMPIN Abbreviated & Detailed Form

Section A: Premise Information (Importer/Manufacturer)

Premise Name:
Premise Address (Facility/Warehouse):
Mailing/Office Address:
Responsible Person:
Contact Number:

Section B: Chemical Identification Information

Chemical (CAS) Name:
CAS RN:
IUPAC:
Common Name:
Molecular Formula/Structure:
Synonyms for the New Chemical:
Trade Name of the New Chemical:

Section C: Production Import and Intended Use

Intended use:
Total Quantity Produced/imported in 12 months (Kg):
Estimate the new quantity in the following categories (Kg):

Site Limited	Industrial
Commercial	Consumer

Section D: Occupational Exposure

Type of Activity:
Number of Workers:
Exposure of Activity:

Section G: Statement on Physicochemical Characteristics

Form: Color:
Odor:
Boiling Point:
Melting/Freezing Point:
Flash Point:
Density:
Solubility:
Vapor Pressure:
Partition Coefficient:
Others:

Section H: Statement on Toxicological Effects

Acute Toxicity (Oral/Dermal/Inhalation):
Skin Irritation/Corrosion:
Eye Irritation/Corrosion:
Sensitization:
Carcinogenicity:
Genotoxicity:
Mutagenicity:
Chronic Toxicity:
Specific Target Organ Toxicity (STOT):
Others:

Section E: Estimate Environmental Release and Disposal

Release Quantity:
Release Media:
Control Measure:

Section F: Regulatory Status in other Country

Country Name:
Regulatory Status in the Country:
is MSDS available in the Country:

Section I: Statement on Environmental Effects

Acute Aquatic Toxicity (Fish/Daphnia/Algae):
Degradability/Persistency:
Bioaccumulation:
Chronic Aquatic Toxicity:

Section J: List of Other Companies (Joint Submission)

Company Name:
Company Address:
Contact Person:
Contact Number:

PMPIN APPLICATION

- Detailed PMPIN Form
 - Chemicals not yet listed in any countries
 - 120 – 180 working days (Processing Time)
- Abbreviated PMPIN Form
 - Chemicals already listed USA, Japan, Canada, Australia, EU and Korea
 - 90 Working days (Processing Time)

Pre-Manufacture and Pre-Importation Notification (PMPIN) of New Substance in Philippines

PMPIN Documentary Requirements

SUBJECT: New Requirements for Applicants of Pre-Manufacture Pre-Importation Notification (PMPIN).

As per provisions of DENR A.O. 29 the Implementing Rules and Regulations (IRR) of Republic Act 6969 entitled "Title II: The Management of Chemicals and Toxic Substances" the following are the new requirements in compliance with the PMPIN Rules.

A. PROCEDURAL Requirements

1. Notifier: Name of Philippine Company and/or Firm – Only importers or industries that are registered to manufacture in or licensed to import into the Philippines will be allowed to apply or notify.
2. Substance must be defined as new chemical or fuel additive. New chemical is defined as chemical not listed in the Philippine Inventory of Chemicals & Chemical Substances (PICCS).
3. Notarized and completed PMPIN-3 Abbreviated or PMPIN-4 Detailed Form
PMPIN-3: for chemicals manufactured or includes in the Inventory of USA, EU, Australia, Canada, Japan or Korea
PMPIN-4: for chemicals manufactured or imported from other countries not listed in PMPIN-3
PMPIN Forms are available at: www.emb.gov.ph/portal/chemical/downloadables.aspx
4. Material Safety Data Sheet (MSDS) / Safety Data Sheet (SDS) in ISO-11014 format
5. Specific Use of the Chemical
6. Annual volume of import
7. Notification must be filed at least 100 days before date of manufacture or importation.
8. Two hard copies of PMPIN duly notarized 1 receiving copy & 1 CD format.
9. Payment of processing fee: for PMPIN3- P 2,150
for PMPIN4- P 3,750
10. Request for Confidential Business Information (CBI) – for PMPIN application containing confidential business information.

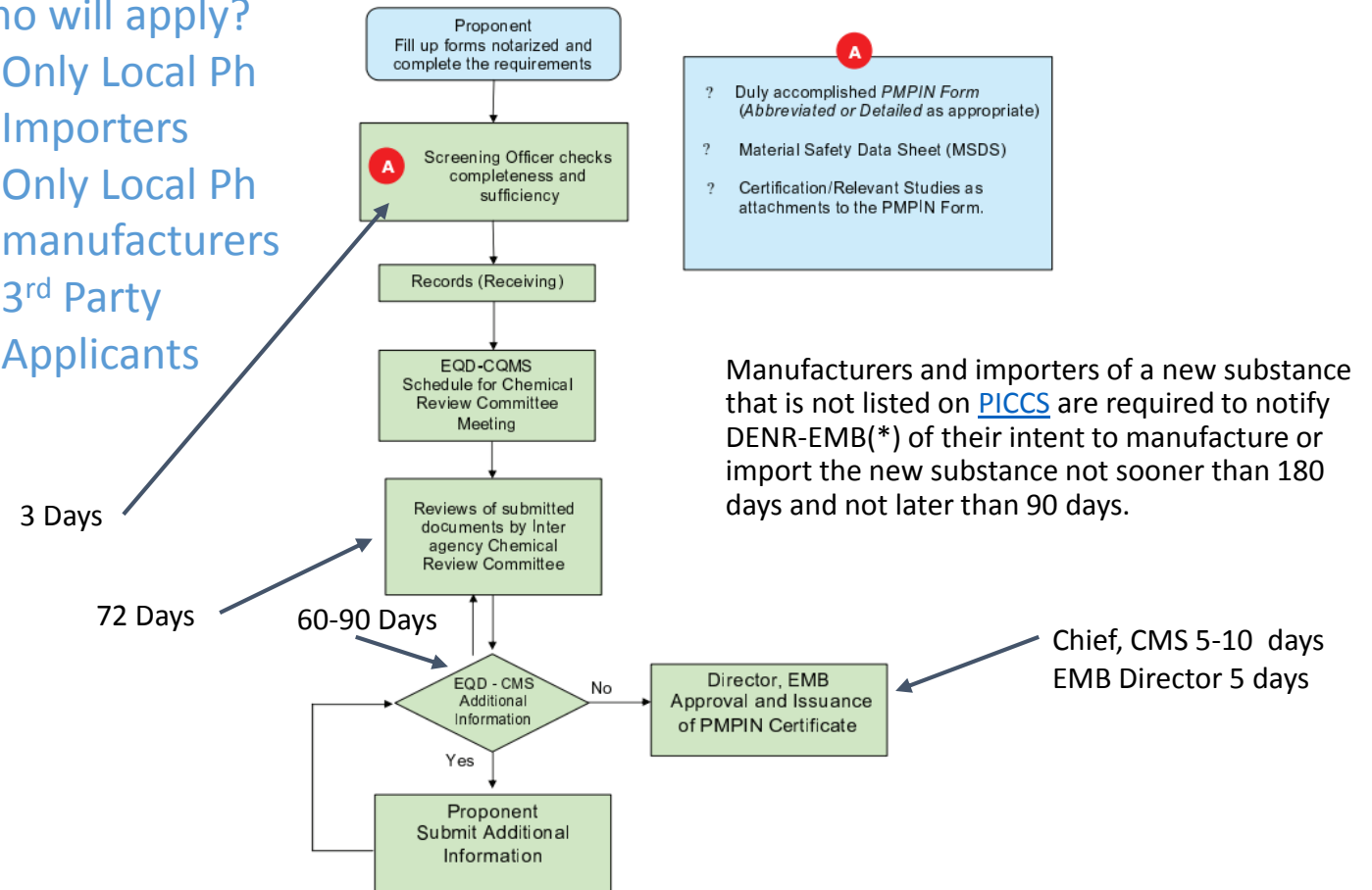
B. SUBSTANTIVE Requirements

1. Complete information of MSDS/SDS following 16 sections
2. For sufficiency of submitted MSDS/SDS giving more focus on:
 - a. Toxicological Information
 - b. Ecological Information
3. For PMPIN-4, laboratory reports for the following information are required:
 - a. Physical and Chemical Properties
 - b. Toxicological Information
 - c. Ecological Information

- Who will apply?
- ▶ Only Local Ph Importers
 - ▶ Only Local Ph manufacturers
 - ▶ 3rd Party Applicants

PROCEDURAL FLOW:

Pre-Manufacturing and Pre-Importation Notification (PMPIN) Certification



Manufacturers and importers of a new substance that is not listed on [PICCS](#) are required to notify DENR-EMB(*) of their intent to manufacture or import the new substance not sooner than 180 days and not later than 90 days.

- ▶ *DENR-EMB: The Department of Environment and Natural Resources Environmental Management Bureau (DENR-EMB).

What is Confidential Business Information (CBI)?

- The local counterpart will apply reflecting the information in the PMPIN Form by following the SDS of the products and not the individual chemical.
- Supplier will directly disclose the new chemicals with CBI to the EMB – Central Office through chemicals.emb.gov.ph or www.emb.gov.ph
- Or the supplier may send the information through the EMB-NCR, EMB- Region 4A and EMB-Region 3.

Current Issues

- Disclosure of confidential information is hard to acquire
 - The supplier is different from the manufacturer of the chemical/substance. The supplier doesn't have the chemical information.
 - The supplier and manufacturer of the chemical/substance do not want to disclose information even to Regulatory Office.
- Confidential information sent by email sometimes does not indicate anything about the importer.

Ref: EMB Memorandum Circular No. 2014-01

Supplier's concerns on Confidential Business Information (CBI)

Hazardous substance registration/ licensing flowchart

CBI Exposure level

Supplier

Control Authorities

Importer

○ No match with Regulated imported list
 ☒ Match with PICCS

Check 100% composition against Customs regulated-imported list AND PICCS database

<http://emb.gov.ph/internal/CasREgistry.aspx>
 PICCS database

NO MATCH WITH BOTH REGULATED IMPORTED LIST + PICCS = Regulated import



Microsoft Office Excel Worksheet
 Customs regulated-imported list



Adobe Acrobat Document
 PICCS database 2012



PDF File
 PCL Draft 032618
 PICCS database

Secure a PMPIM* from EMB

Undergo CBI procedure using CBI form

Please refer to the Memorandum Circular no.010 Series of 2014



Adobe Acrobat Document

NO Controlled substance(s) under PNP, CCO, PCL, PDEA

Controlled substance under PNP, CCO, PCL, PDEA

No CBI disclosure

Obtain a Self-certificate as confirmation from supplier

END

No CBI disclosure

Registration of new substance
 (Only product/ substance name will appear in SQI/ PMPIN certificate)

CBI shall be indicated on a specific certificate applied by importer for a purpose it may serve

*Pre-manufacture and Pre-importation Notification

PMPIN Compliance Certificate

Form Number: PMPIN-001-001
BUREAU OF CUSTOMS

PMPIN COMPLIANCE CERTIFICATE

By virtue of Republic Act 6969, (Toxic Substances and Hazardous Wastes Control Act) as implemented by the DENR Administrative Order No. 24, Series of 1992, a Certificate is hereby issued to

NAME OF COMPANY
FACILITY ADDRESS

for having complied with the Pre-Manufacture and Pre-Importation Notification (PMPIN) requirements for the following product:

NAME OF CHEMICAL
Chemical Abstract Number No. 0000000

Provided that the above-mentioned grantee complies with the Terms and Conditions, as hereunder:

Terms and Conditions:

1. **NAME OF CHEMICAL** shall be allowed to be imported and used for the additive.
2. Notice of Commencement on the Importation of **NAME OF CHEMICAL**, with a copy of the Bill of Lading and the Import Entry and Tax Revenue Declaration shall be submitted not later than three weeks after arrival of the first shipment.
3. **NAME OF COMPANY** shall provide its clients a copy of the Material Safety Data Sheet (MSDS) of this product for proper handling, transport, storage, disposal and personal protective equipment to be recommended.
4. **NAME OF COMPANY** shall submit any new toxicological and ecological information on the chemical concerned to this office including updates in its MSDS.
5. **NAME OF COMPANY** shall comply with other pertinent requirements under RA 6969, Clean Air Act, Clean Water Act and other pertinent environmental laws.
6. **NAME OF COMPANY** shall be held liable in cases of injury or damage to public health and the environment and shall properly compensate the affected parties and/or restore damaged areas resulting from the distribution, use and disposal of the said chemicals.
7. Any violation of the condition shall be subject to the penalty provisions set forth under RA 6969. The DENR-BOC has the authority to request the same upon written notice and providing further that the concerned matter pertains not within the authority and jurisdiction of other agencies of government that govern other agencies relative to the regulations, permits, licenses, transactions and other activities herein.

Based on this certificate shall be included in the Strategic Inventory of Chemicals and Chemical Substances (SICCS) only upon receipt of the Notice of Commencement and Bill of Lading of the first shipment and shall remain in the list unless otherwise notified or deleted therein.

ATTY. JONAS R. LEONES
BOC-Director

Form Number: PMPIN-001-001
BUREAU OF CUSTOMS

PMPIN COMPLIANCE CERTIFICATE

By virtue of Republic Act 6969, (Toxic Substances and Hazardous Wastes Control Act) as implemented by the DENR Administrative Order No. 24, Series of 1992, a Certificate is hereby issued to

NAME OF COMPANY
FACILITY ADDRESS

for having complied with the Pre-Manufacture and Pre-Importation Notification (PMPIN) requirements for the following product:

NAME OF CHEMICAL
Chemical Abstract Number No. 0000000

Provided that the above-mentioned grantee complies with the Terms and Conditions, as hereunder:

Terms and Conditions:

1. **NAME OF CHEMICAL** shall be allowed to be imported and used for the additive.
2. Notice of Commencement on the Importation of **NAME OF CHEMICAL**, with a copy of the Bill of Lading and the Import Entry and Tax Revenue Declaration shall be submitted not later than three weeks after arrival of the first shipment.
3. **NAME OF COMPANY** shall provide its clients a copy of the Material Safety Data Sheet (MSDS) of this product for proper handling, transport, storage, disposal and personal protective equipment to be recommended.
4. **NAME OF COMPANY** shall submit any new toxicological and ecological information on the chemical concerned to this office including updates in its MSDS.
5. **NAME OF COMPANY** shall comply with other pertinent requirements under RA 6969, Clean Air Act, Clean Water Act and other pertinent environmental laws.
6. **NAME OF COMPANY** shall be held liable in cases of injury or damage to public health and the environment and shall properly compensate the affected parties and/or restore damaged areas resulting from the distribution, use and disposal of the said chemicals.
7. Any violation of the condition shall be subject to the penalty provisions set forth under RA 6969. The DENR-BOC has the authority to request the same upon written notice and providing further that the concerned matter pertains not within the authority and jurisdiction of other agencies of government that govern other agencies relative to the regulations, permits, licenses, transactions and other activities herein.

Based on this certificate shall be included in the Strategic Inventory of Chemicals and Chemical Substances (SICCS) only upon receipt of the Notice of Commencement and Bill of Lading of the first shipment and shall remain in the list unless otherwise notified or deleted therein.

ATTY. JONAS R. LEONES
BOC-Director

A copy of the Certificate shall be retrieved and print directly by the company at their own computer.

Copy of the Bureau of Custom (BOC) at the Port of Entry.

Small Quantity Importation Certification

- This is an exemption to the PMPIN Process
- Small Quantity Importation Certification(SQI) is required prior to the importation of less than 1,000 kg./yr of pure chemical substances or component chemical in percentage by weight of product, mixtures not listed in PICCS into the Philippines.
- The following info is required for application of SQI.
- Letter of request for SQI clearance
- SDS in ISO11014 or GHS format
- Completed application form and notarized copies
- Official receipt of processing fee (~11 USD per substance)

Letter head of Company

13.11.2019

Regional Director
 Environmental Management Bureau
 DENR Region 1V-A, Roxas Boulevard, Manila
 Attention: Miss Marissa DC Malabana
 Chief, Chemicals & Hazardous Waste management section

Supplier's address

Subject: Request for Disclosure of business information according to the MC no.010 Series of 2014

Dear Ms. Malabana

This letter is in relation to **Name of local business entity** application for the Small Quantity Importation Clearance of the following products

Name of Product

Confirming herewith, the components of the products above are:

Components of Product x	CAS no#	Concentration
Fill in chemical names and CAS #		25 - 30
With % in product. Ranges are		5 - 10
Acceptable.		1 - 5
		< 1
		< 0.5
Ingredients withheld on SDS for CBI	CAS no#	Concentration
Chemical family name on PICCS		20 - 40%
CAS# and % in product		10 - 30%
TOTAL		100%

Because this products are composed of substances we bought from different suppliers which themselves also have confidentiality concerns, limiting our ability to provide full chemical disclosure, we have provided chemical family names which highly represent the materials.

We do hope that you will find the information on this letter to be suitable and sufficient in granting approval for the Small Quantity Importation Clearance application.

Please feel free to contact (name of local expert), by phone at 333-333-3333 or by email at (include email address) should there be further clarifications needed.

Sincerely yours,

Corporate Seal

Name and signature of managing official

Example: EHS Director

dd.mm.2016

Regional Director
 Environmental Management Bureau
 DENR Region 1V-A, Roxas Boulevard, Manila
 Attention: Miss Marissa DC Malabana
 Chief, Chemicals & Hazardous Waste management section

Subject: Request for Disclosure of business information according to the MC no.010 Series of 2014

Dear Ms. Malabana

This letter is in relation to [REDACTED], Inc application for the Pre-manufacture Pre-import notification of the following products:

1. Product name
2. Product name

Confirming herewith, the components of the products above are

Available product components

Because these 2 products are composed of substances we bought from different suppliers which themselves also have confidentiality concerns to provide us detailed composition, we have invited them to send the composition of the following substances to you to complete this letter:

1. Chemical Product Name 1
2. Chemical Product Name 2
3. Chemical Product Name 3
4. Chemical Product Name 4

We do hope that you will find the information on this letter as well as the ones that will be sent by our suppliers suitable and sufficient in granting approval for the Pre-manufacture Pre-import notification application.

Please feel free to contact me via phone or email [REDACTED] should there be further clarifications needed.

Sincerely yours,

Signature of legal representative & Company's seal
 [Position]

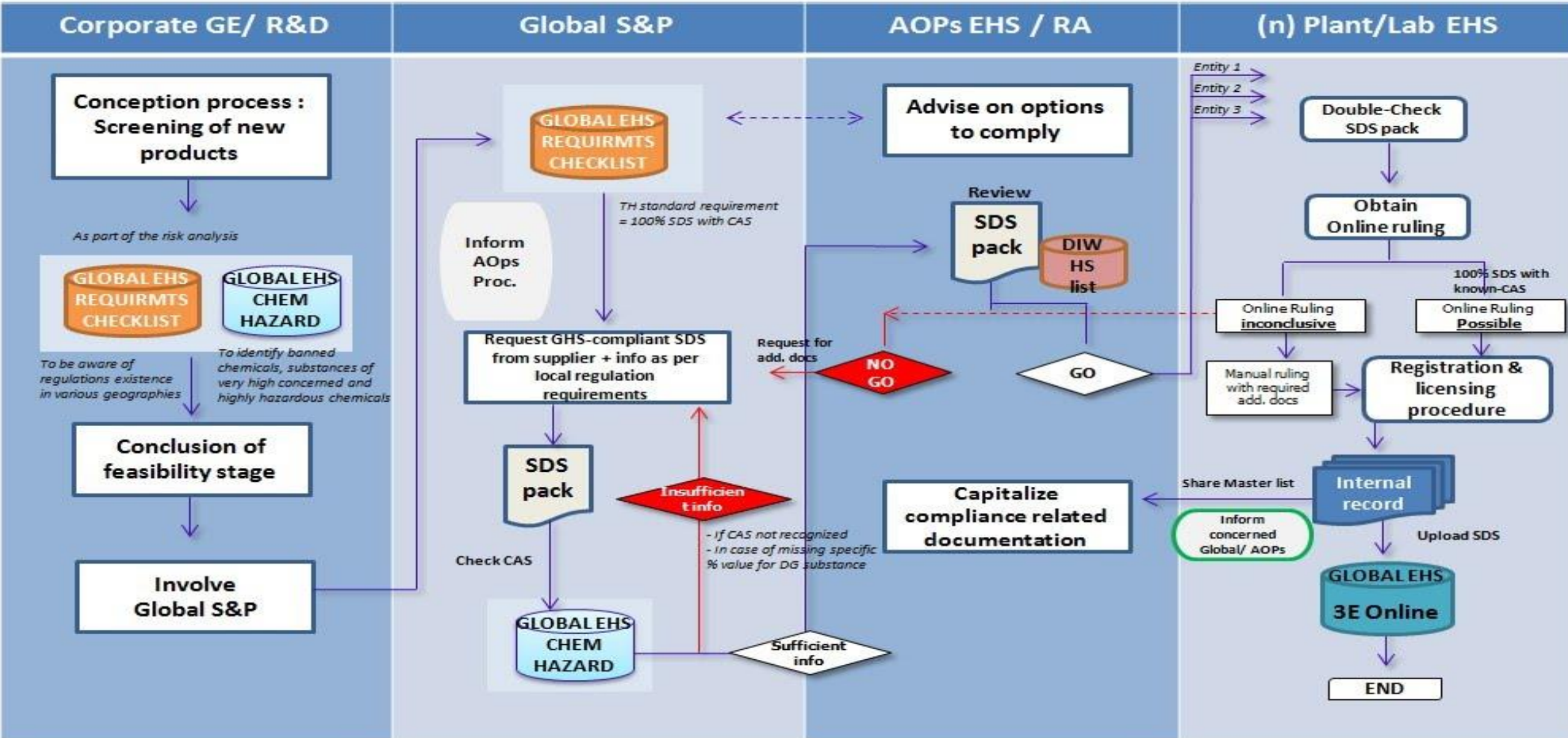


Thailand

New Global product

Buyer : Global S&P Category buyer
User : Thai Plants / Labs (multi-sites)

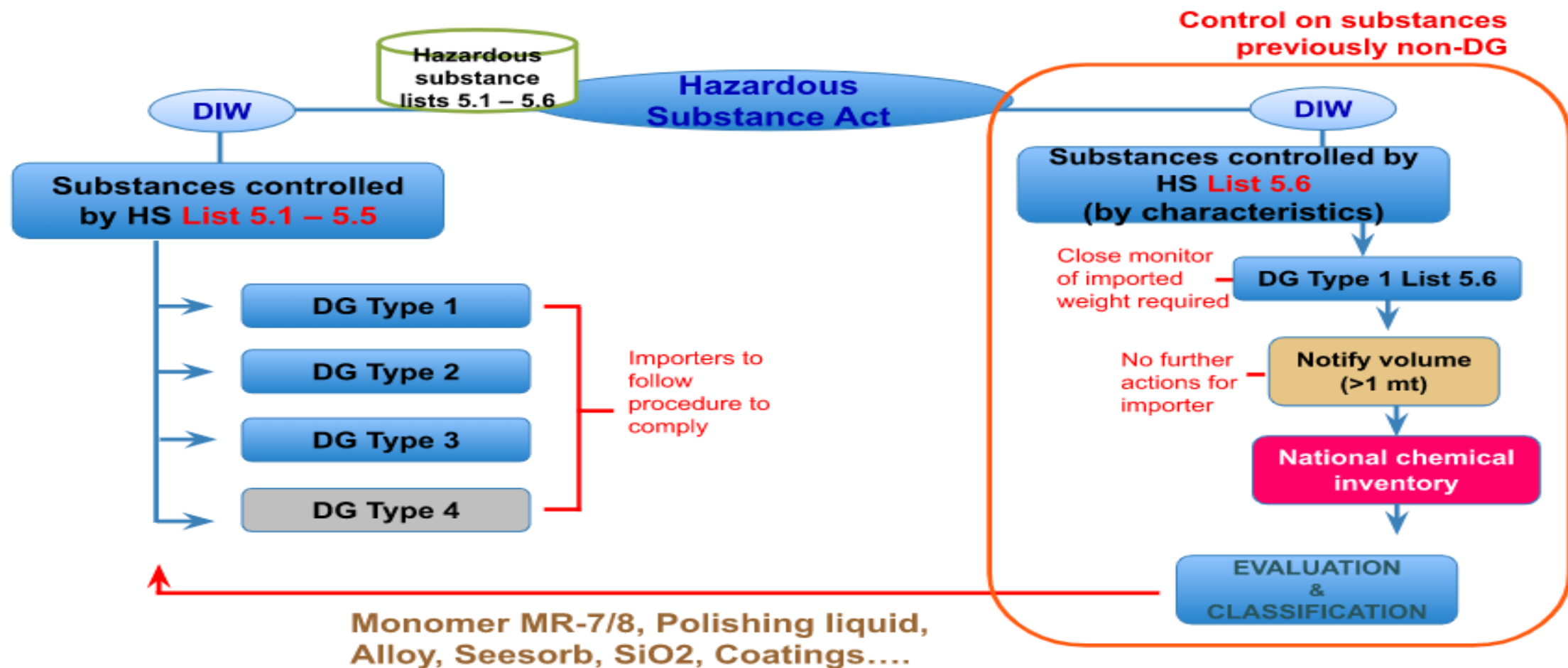
New DG validation flowchart



Hazardous Substance Act

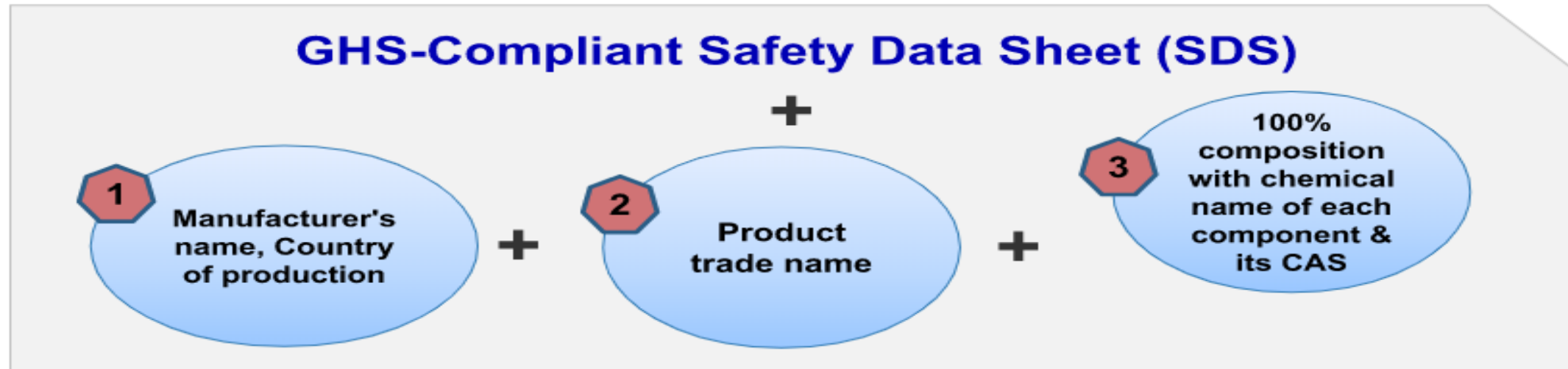
Most important chemicals control law in TH

- Non-DG chemicals from other countries can be DG in Thailand (vice versa)
- Same classification is applicable to both import/export chemicals



DG classification system

How to know if my DG needs to comply?



DG classification system

How to get to know the classification & procedure to comply?

- Example : Product A

100% composition with CAS

Chemical Name	CAS Number	Content (%)
1-METHOXY-2-PROPANOL	107-98-2	19.5
BUTANOL-norm	71-36-3	20.5
METHANOL	67-56-1	12
SILANE TREATED SILICA	63148-61-8	29
WATER	7732-18-5	19

Assessment

Self-assessment

Online ruling from
DIW website

Most accurate method of assessment
Standard document accepted by DIW

DG classification system

How to get to know?

A Self-assessment

Chemical Name	CAS Number	Content (%)
1-METHOXY-2-PROPANOL	107-98-2	19.5
BUTANOL-norm	71-36-3	20.5
METHANOL	67-56-1	12
SILANE TREATED SILICA	63148-61-8	29
WATER	7732-18-5	19

Look-up from DIW HS list – See demonstration

B DIW Online ruling

Responsible : Procurement or EHS

ชื่อทางเคมี Chemical name	CAS NUMBER	%ส่วนผสม Concentration	DG type ชนิดที่
1-METHOXY-2-PROPANOL	107-98-2	19.5	-
SILANE TREATED SILICA	63148-61-8	29	-
เมทานอล (methanol) หรือ เมทิลแอลกอฮอล์ (methyl alcohol)	67-56-1	12	1
BUTANOL-norm	71-36-3	20.5	-
Water	7732-18-5	19	-

= DG type 1

DG classification system

How to get to know?

C

CHEM Hazard

Assessment tool for the sourcing of new chemicals

- CHEM Hazard provide a possibility to identify Essilor banned chemicals and to track global regulatory change

This tool takes into account the DIW HS list 5.1 – 5.5 & List 5.6

CHEMtool
ESSILOR
CHEM Hazard
Essilor Management of Chemicals Hazards

CHEM Hazard, May 15

Chemical Information

Chemical name

Starts with... Contains... Matches exactly with...

CAS number

Search

EHS Requirement for Essilor use

Chemical Name Priority Level

Priority chemical for substitution?

Global EHS Requirement CAS number not found in the listed regulations. You must comply with SDS risk management measures, as well as with specific local regulations that may apply.

Level of concern

Safer Alternatives

STRATEGIC PRODUCTS
Validated substitutes :

Regulatory Informations

<p>EUROPE</p> <p><input type="checkbox"/> Candidate SVHC</p> <p><input type="checkbox"/> Eu Export :</p>	<p>NORTH AMERICA</p> <p><input type="checkbox"/> California Prop 65</p> <p><input type="checkbox"/> TSCA</p> <p><input type="checkbox"/> Canada CEPA</p>	<p>ASIA</p> <p><input type="checkbox"/> Japan CSCL</p> <p><input checked="" type="checkbox"/> Thailand (DG class) : Import notification as per 5.6 list</p>	<p>INTERNATIONAL</p> <p><input type="checkbox"/> OSPAR</p> <p><input type="checkbox"/> Rotterdam PIC</p> <p><input type="checkbox"/> KYOTO</p>
---	---	---	---

New chemicals importation (for project/ test)

Supplier Confidentiality concerns

1) Supplier not knowledgeable of Thai DG regulation

2) Suppliers do not want to disclose their full compositions

Examples

Sigma Aldrich – *“We sell to France (EI), not to Thailand. We are compliant with EU regulation. You need to find solutions with your HQ”*

BWT (distributor) – *“Sorry, we cannot do more, you are allowed to deal directly with our supplier”*

NIKON – *“As a distributor of Essilor, we will do our best, but it will take time since NDA must be signed between us and our suppliers”.*

Some other

“Why now??? I used to ship to Thailand in the past without having to provide 100% composition”

“Sorry, this is the maximum we can do.”

New chemicals importation (for project/ test)

Supplier Confidentiality concerns

What are alternatives to SDS with 100% composition?

1. **Side letter** to accompany standard SDS
2. SDS with **interval range** (possible when the product is not DG type 1-4)
3. **Manufacturer's self-certification (MSC)** based on DIW's HS list
4. Offer suppliers to sign **NDA**
5. Supplier to send directly their composition as **CBI to the Director of DIW**

New chemicals importation (for project/ test)

Supplier Confidentiality concerns


Alternative #1 Side letter

When?

Supplier is in difficulties to provide the chemical composition on the SDS

How?

Supplier details the product composition on a side letter, outside the standard SDS



Ecological Cleaning Solutions


**DECLARATION REGARDING OUR PRODUCT
CEROWEG EXTRA
ULTRASONIC CLEANING PRODUCT FOR POLISHING COMPOUNDS REMOVING**

We certify that our product CEROWEG EXTRA is composed of the following ingredients:

Compounds	%	CAS Number
Sodium hydroxide	3%	1310-73-2
Potassium hydroxide	12%	1310-58-3
Potassium tetra pyrophosphate	7%	7320-34-5
N-Tallow alkyl derivs, disodium salts	8%	61791-56-8
Sodium gluconate	15%	527-07-1
Water	55%	7732-18-5

Nyon, the 23.10.2014

NGL CLEANING TECHNOLOGY SA
Mrs BORRUTO Aurélie
 Technical Manager



New chemicals importation (for project/ test)

Supplier Confidentiality concerns

Alternative #2

SDS with interval range

This alternative works out when the Product is non-hazardous only

Product Name: DOWEX™ MR-3 LC NG Mixed Ion Exchange Resin

3.2 Mixture

This product is a mixture.

CAS-No. / EC-No. / Index	REACH No.	Amount	Component	Classification: REGULATION (EC) No 1272/2008
--------------------------	-----------	--------	-----------	--

CAS-No. 69011-20-7	—	>= 20.0 - <= 30.0 %	Sulfonated polymer of styrene, ethylstyrene and divinylbenzene in the hydrogen form	Eye cor/irr, 1, H318
-----------------------	---	------------------------	---	----------------------

EC-No.
Polymer

CAS-No. 69011-18-3	—	>= 20.0 - <= 30.0 %	Trimethylamine functionalised copolymer of styrene and divinylbenzene in the hydroxide form	Eye cor/irr, 1, H318
-----------------------	---	------------------------	---	----------------------

EC-No.
Polymer

CAS-No. 7732-18-5	—	>= 40.0 - <= 60.0 %	Water##	Not classified
----------------------	---	------------------------	---------	----------------

EC-No.
231-791-2

Make sure all the composition adds up to 100%

Classification
DG1 List 5.6
(= NON-DG)

New chemicals importation (for project/ test)

Supplier Confidentiality concerns

Alternative #2
SDS with interval range

Crest Ultrasonics Corporation

MATERIAL SAFETY DATA SHEET

IDENTITY (As used on Label and List)

CHEM-CREST 515

Uses: Ultrasonic liquid detergent concentrate used for the removal of oils, greases, carbon residues, various oxides, particulate matter, and various other contaminants from steels, ceramics, glasses, and other compatible materials. Contact a Crest Ultrasonics chemical specialist for process specific recommendations

Section I – Product and Company Identification

Supplier:
CREST ULTRASONICS CORPORATION
SCOTCH ROAD, TRENTON MERCER AIRPORT
TRENTON, NJ 08628
UNITED STATES OF AMERICA

Emergency Telephone Number
(800) 424-9300 (USA Chemtrec) or (703) 527-3887 (Int'l Chemtrec)
Telephone Number for Information
(609) 883-4000

Last update: 24 June 2014

Section III – Composition / Information on Ingredients

COMPONENTS:	% ACTIVE	OSHA PEL	EC #	C.A.S. #
<u>PROPRIETARY NON-IONIC SURFACTANTS</u>	25-35%	N/E	-	68648-87-3 68081-81-2 127087-87-0 1300-72-7 9014-93-1 68584-24-7
2-METHYL-2,4-PENTANEDIOL	5-20%	125 mg/m3 (inhalation)	203-489-0	107-41-5
<u>PROPRIETARY INGREDIENTS, INERT</u>	45-70%			144-33-2 25322-68-3 7732-18-5 7757-82-6

New chemicals importation (for project/ test)

Supplier Confidentiality concerns

MSC – DG1 List 5.6

What for? Suppliers certify “no DG component(s) in their product”.

Having reviewed the chemical composition details of our product [redacted] batch [redacted], we find that none of the components of said product are specifically covered by :-

1. Thailand's Ministry of Industry Notification Re Lists of Hazardous Substances, B.E.2556 (dated 27 Sep 2013), and
2. Thailand's Ministry of Industry Notification Re Lists of Hazardous Substances (No.2), B.E.2557 (dated 5 Jan 2015)

Nonetheless, we find that said product has the following properties as covered by List 5.6 in Thailand's Ministry of Industry Notification Re Lists of Hazardous Substances (No.2), B.E.2557 :

Yes / No	1	Explosive
Yes / No	2	Flammable
Yes / No	3	Being an oxidizer
Yes / No	4	Toxic
Yes / No	5	Corrosive
Yes / No	6	Irritant
Yes / No	7	Imitant
Yes / No	8	Cardinogenic
Yes / No	9	Toxic to reproductive organs
Yes / No	10	Environmentally hazardous

No manual submission. Document to show to customs/audit when requested only.

This document is to be used in conjunction with the product's GHS-compliant Safety Data Sheet.

MSC – Manufacturer's Self-Certification

Alternative #3

MSC – DG specific

What for? Suppliers certify “there is DG component(s) in their product and confirm the % of the said component(s).”

Dear Director,

Having reviewed the chemical composition details and properties of our product [redacted] batch [redacted], we find that the component(s) of said product which is/are covered by Lists 5.1 – 5.5 as per :-

- 1) Thailand's Ministry of Industry Notification Re Lists of Hazardous Substances, B.E.2556 (dated 27th September 2013), and
- 2) Thailand's Ministry of Industry Notification Re Lists of Hazardous Substances (No.2), B.E.2558 (dated 19th February 2015)

include(s) the following:-

Name of substance	CAS no.	HS Type	Concentration
			[redacted] %
			[redacted] %

The remainder of the composition adding up to the full composition at 100%, which are not Type 1, Type 2, Type 3 or Type 4 hazardous substances, are as follows:

- Xxxx (product name is sufficient)
- Xxxx (product name is sufficient)
- Xxxx (product name is sufficient)

This document is to be used in conjunction with the product's GHS-compliant Safety Data Sheet.

New chemicals importation (for project/ test)

Supplier Confidentiality concerns

Alternative #3

MSC – Manufacturer's Self-Certification

Guideline for Manufacturer's Self-Certification (MSC)

Before requesting for MSC, an internal check should be performed.

- Check components against Thailand's Hazardous Substances Lists
 - Check **both** CAS # and molecular structure of the substance; consider also its synonyms
 - A substance is considered hazardous when its concentration is $\geq 1\%$.
 - A substance having **same/similar molecular structure** as any on the List is also considered DANGEROUS in Thailand, even though its CAS # or name does not explicitly covered in the List.

Thailand Hazardous Substance List Table Header

List 5.1 Controlled Substances

No.	Name of Hazardous Substance	CAS Number	Type of Hazardous Substance	Condition
325	Methyl vinyl ketone	78-94-4	3	
326	Methyl acrylate	96-33-3	2	
327	Methyl acetate	79-20-9	1	
328	Methyl ethyl ketone	78-93-3	3	Having concentration > 50% w/w

- For DG items, the Certification Letter must specify exact %; intervals are not acceptable
- The Certification Letter should be signed by the Manufacturer's authorized person.
- Required attachment to Certification Letter : business registration certificate (e.g. Article of Incorporation) or other document showing the legally-authorized person's name.
- DG Classes 1-3 may be imported into Thailand subject to certain procedures; DG Class 4 is prohibited from importation into Thailand

New chemicals importation (for project/ test)

Supplier Confidentiality concerns

Alternative #4

Offer supplier's to sign a Non-Disclosure Agreement (NDA)

Please contact Asia Regulatory Affairs or local responsible person to handle this

Before the signature of NDA, there can be back & forth exchanges of NDA for revision which can take weeks/months

Therefore, LEAD-TIME (obtaining of 100% composition + procedure with DIW) to consider.

New chemicals importation (for project/ test)

Supplier Confidentiality concerns

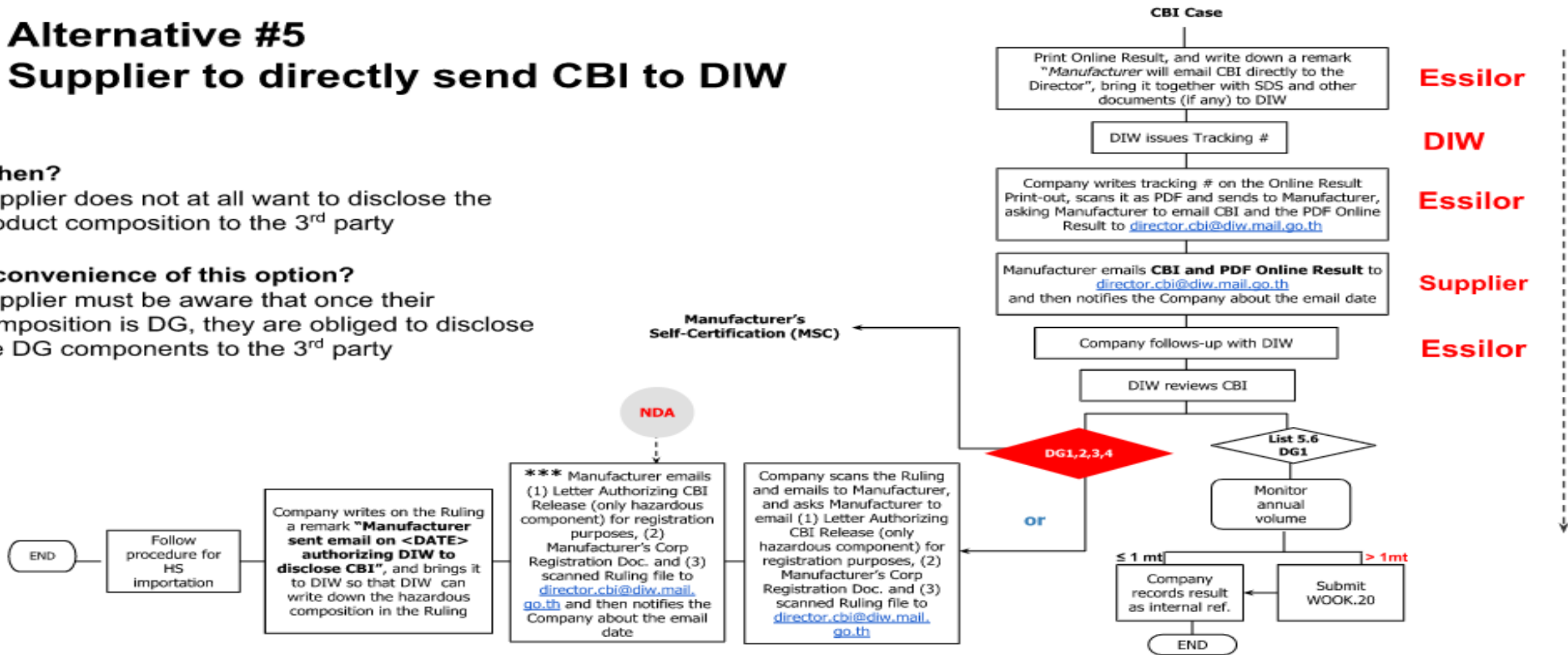
Alternative #5 Supplier to directly send CBI to DIW

When?

Supplier does not at all want to disclose the product composition to the 3rd party



Inconvenience of this option?

Supplier must be aware that once their composition is DG, they are obliged to disclose the DG components to the 3rd party



Introduction to PH & CN regulations

Comparative summary

	THAILAND 	PHILIPPINES 	CHINA 
Chemical database	DIW Hazardous substance list no.1 & no.2 Preliminary list of existing chemical both DG & Non-DG (Q1-2016)	1. PICCS 2. Others: Controlled chemicals under lists of DENR-EMB, PNP, PDEA	1. Inventory of Existing Chemical Substances Produced or Imported in China (IECSC) 2. Others : Catalog of hazardous chemicals 2015, Prohibited chemicals, Precursors and chemicals used in the production of Narcotic drug, etc.
Registration & Licensing	DG 3 as per the above lists	Controlled chemicals as per above lists	Controlled chemicals as per above lists
REACH-LIKE system	Notification of new chemical not listed National chemical inventory (Implementation date to be confirmed)	Priority Chemicals list (PCL) & Chemical Control Orders (CCO)	Notification of new chemical not listed in the IECSC since Oct 2010
GHS implementation	Substance March 2013 Mixture March 2017	Starting from Q2-2016 (for instance, <u>only applicable for substances & compounds under CCO/ PCL</u>)	Since Dec 2012 under Decree 591. Company must provide GHS-compliant SDS in order to obtain a registration certificate



Thank you!