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NEWSLETTER

Newsletter RNI srl 02.11.2021

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**RNI has activated the transmission service with digital certification of regulatory practices for Spanish authorities.****RNI can be found on pages 202 and 203 of Chemical Watch's Global Service Providers Guide 2021, at the following [link](#)****In order to verify the VAT number associated with the UFI code in most European countries, press [here](#)**

BPR: REQUEST FOR RE-APPROVAL OF PROPICONAZOLE AS A PRESERVANT FOR WOOD



European woodworking, coatings and chemicals industries have launched a protest over the potential loss of a wood preservative, which they believe would leave them without approved chemicals to protect products such as wooden windows and doors from deterioration.

Propiconazole, a broad-spectrum fungicide, is no longer eligible for approval under the EU biocidal products Regulation (BPR) since it was classified as reprotoxic 1B under the CLP Regulation. The substance is also facing a possible classification as an endocrine disruptor, which would be a further exclusion criterion under the BPR.

The chemical's current BPR approval for use in wood preservatives (product type eight) expires on December 31, 2022, having already been postponed twice. Its reapproval depends on the availability of suitable alternatives. Failure to do so could result in a waiver and re-approval limited to a maximum of five years. Of just under 40 biocidal active ingredients currently approved for use in wood preservatives, only four are fungicides that could be used for the same purpose as propiconazole, respondents said in the consultation, which closed on September 6. But none of them can completely replace the chemical, according to comments from propiconazole manufacturer Lanxess and other manufacturers.

For more information press [here](#)

EFSA: NEW GUIDELINES ON FOOD ENZYMES APPLICATIONS



EFSA has updated its scientific guide for applications for food enzyme authorization and for extending the validity of existing authorizations, according to Regulation (EC) No. 1331/2008 and its implementation rules. The scientific guide lists the data and information to be included in the application for authorization of the food additive. The data requested concern the origin, production, characteristics of food enzymes, toxicology, allergenicity and the estimation of exposure to them. The origin, production and characteristics of the food enzyme should be provided only for enzymes of microbial, plant and animal origin, while toxicological data, allergenicity and exposure estimation should be provided for all enzymes, regardless of their source of derivation.

EFSA will assess the safety of food enzymes and conclude whether or not they pose a risk to human health under the proposed conditions of use based on the data presented.

This guide will be applicable to applications submitted from April 21, 2022.

For more information press [here](#)

UK: LATE DUIN IS POSSIBLE



On 27th October the possibility to notify DUIN (Downstream Import Notification) in the UK expired. Companies that submitted their notifications for their substances in time to the HSE, will benefit from extended UK REACH registration deadlines as follows: 27 October 2023, 2025, and 2027 depending on the annual tonnage and the hazards of the substance. However, companies that have not notified their substances by the deadline and wish to continue importing EU REACH registered substances into the UK market at 1 tonne or more per year can still submit DUIN late notifications.

UK-based importers and UK-based only representatives appointed by non-UK suppliers (such as non-UK manufacturers / formulators) may submit DUIN notifications late. When the designated OR sends the late DUIN, the GB downstream users will be covered by this DUIN and will not have to send their own.

The HSE recommends doing this as soon as possible.



Our UK - BREXIT services cover the fulfillments of national regulations in the UK which will come into force after the release.

RNI srl provides the services listed for EU companies and for UK based companies:

- For national authorization applications still under evaluation in the UK, submitted by companies based in the EU, it is necessary that the latter appoint their own OR (based in the UK) by 31.12.2021 to continue the authorization process.
- LATE DUIN notification for GB importers of substances and mixtures **is possible after 27.10.2021**
- New UK REACH registrations according to new deadlines
- Compliance with new UK regulations (REACH, CLP; BPR, etc.)
- Exclusive Representation Services in UK for Italian / EU companies (OR service)

In collaboration with our partner LANDILEX, we also offer [legal consultancy](#).

For more information press [here](#).

KKIDIK (TURKISH REACH): LATE PREREGISTRATION ACCEPTED BY TURKISH AUTHORITY ONLY EARLY 2021

ACT NOW IF YOU LOST THE LAST DEADLINE



In 2017, Turkey published and consolidated the text of the KKIDIK regulation regarding chemicals that can be placed on local national market. The scheme adopted follows the European REACH regulation in many prescriptions, so much so that it is often referred to as Turkey-REACH.

One of the significant differences is that there is only one registration deadline for all tonnage bands, set for 31/12/2023.

At this stage, the possibility is open to pre-register by 31/12/2020 but the Turkish government seems to accept late preregistration until 31.12.2023.

Moreover, in the last quarter of 2021 The MoEU will add a sub-tool into the KKS in order to generate Chemical Safety Report.

As for REACH EU, applicants must be Turkish legal entities. Non-Turkish companies that want to keep the market will have to appoint a local OR (only Representative). RNI srl can offer this service.

SEA UPDATES:

The SEA CLP like Regulation has been updated, adding 110 new substances to the Harmonized List of classification and labeling "and new hazard classifications. Furthermore, only polymers must be notified and not their ingredients.

For more information press the here

For more information, contact us at info@reachup.it



AssICC has signed an agreement with the associated company RNI (ReachUp Regulatory Network Italy) srl, which offers advice on product regulations for the European and extra-European markets.

Thanks to the stipulated agreement, for all the companies associated with AssICC will be reserved a 10% discount on the RNI srl services.

For more info visit the [webpage](#)



From this month, REACHUP offers import and export worldwide consultant services on TRADE ITALIAN AGENCY. You can access on the ICE online vetrina previous registration.

The link of the page is reported [here](#)



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