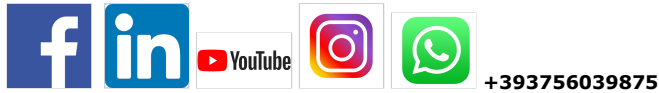




Newsletter RNI srl 07.02.2022

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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](#)

UNITED NATIONS: PROPOSAL FOR INCLUSION OF METHOXYCHLOR AS POPs (PERSISTENT ORGANIC POLLUTANT)



The meeting of the POP committee held in Geneva from 24 to 28 January 2022 recommended the inclusion of methoxychlor, a pesticide, in Annex A of the Stockholm Convention, without exemptions. It will then be evaluated in the Conference of the Parties (COP) of the Stockholm Convention in 2023 for its global elimination.

The risk profiles of the UV-328 plastic additive and the flame retardant Decolorane Plus have also been adopted.

Three new proposals for the list of additional substances for elimination or restriction were also considered:

- Chlorpyrifos, presented by the European Union;
- chlorinated paraffins with carbon chains of length C14-17 and $\geq 45\%$ chlorine by weight (MCCP), presented by the United Kingdom; And
- Long-chain perfluorocarboxylic acids (LC-PFCA), their salts and related compounds, presented from Canada.

For more information press [here](#)

SOUTH KOREA: CONSULTATION ON COSMETICS PRECAUTION REGULATION



On 25 December 2021, the Ministry of Food Safety and Medicines (MFDS) presented the draft regulation "on the labeling of precautions for use and fragrance allergens in cosmetics" to solicit public opinion. Major amendments to the draft include:

- extension of the cosmetic area
- new precautions for use
- reorganization of the precautions for use

Interested parties may submit suggestions to MFDS before February 11, 2022.

For more information press [here](#)

EUROPEAN COMMISSION: REACH EVALUATION OPTIONS



The European Commission has collected a number of possible measures to review the REACH assessment processes, including the withdrawal of registration numbers in the event of non-compliance, dossier expiration dates and additional fees for actions causing a burden of additional work for Echa.

In a document to the competent authorities for REACH and CLP (Caracal), the Commission listed several changes in areas such as checking and assessing completeness of dossiers, substance evaluation and decision-making procedures.

The EU chemical strategy has "zero tolerance for non-compliance" and "one substance, one evaluation" among its objectives and therefore a REACH amendment is needed to ensure compliance checks on all registrations and to allow for the withdrawal of numbers of registration. Another measure that Caracal is contemplating is the introduction of an "expiration date" for the dossier. This will involve legal changes to reinforce the expectation that dossiers are always compliant and "not just at the time of compliance check as perceived by some actors," he says. Other proposals include matching tariffs to actions that cause Echa's workload, such as dossier updates, comments on draft evaluation decisions and new adaptations.

Other potential measures include:

- authorize Echa to consider a dossier as "manifestly inappropriate and non-compliant". A definition of this term needs to be developed;
- Extend the capacity to carry out substance evaluation to Echa (currently only EU Member States do this);
- Extend substance evaluation from risk-based to hazard-based concerns to ensure that the tool is used effectively for generating hazard data;
- limit the process of verifying compliance with dossier evaluation and remove or modify procedural steps in the decision-making process to improve resource efficiency and timing; And
- a new tool that allows authorities to perform tests in specific circumstances.

The Commission underlined that the measures, if chosen, would be subject to legal scrutiny and evaluation of the efficiency and effectiveness of the regulation.

Industry is also in favor of the proposals, albeit with some reservations.

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](#).

KKDIK (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 KKDIK 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



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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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