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Newsletter RNI srl 15.11.2021

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Download here our services brochure



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

USA: THE STATE OF WASHINGTON PROPOSES A SERIES OF RESTRICTIONS ON SEVERAL PRODUCTS



A draft report was released on November 17 in which the Washington State Department of Ecology outlined plans to impose restrictions on a wide range of goods under its nascent Safer Products for Washington program. The project plans to identify safer alternatives and to impose restrictions on chemicals. The draft regulatory recommendations formulated by Ecology are as follows:

- flame retardants in electronics and recreational polyurethane foams;
- polychlorinated biphenyls (PCBs) in paints and printing inks;
- poly- and perfluoroalkyl substances (PFAS) in carpets, furnishings and aftermarket treatments;
 phenolic compounds (bisphenols and ethoxylated alkylphenols (APE)) in food packaging, thermal paper and laundry detergents;
- phthalates in vinyl floors and personal care products.

Comments on the draft report to the legislator will be accepted until 14 January.

UK REACH: CONCERNS DESPITE THE HIGH NUMBER OF DUIN NOTIFICATIONS (DOWNSTREAM USER IMPORT NOTIFICATION)



Despite many DUIN notifications by 27 October 2021, it is not guaranteed that all chemicals registered under the EU REACH regulation will continue to be marketed in the UK.

DUIN notifications can still be made to allow companies that may have missed the deadline to be brought back into compliance and if necessary, provide additional information on the identity of substances within mixtures provided by a supplier after the deadline.

For more information press here

EUROPEAN COMMISSION: REACH PROPOSALS FOR POLYMERS AND ENDOCRINE DISRUPTORS



The European Commission has decided to postpone the registration of polymers and the identification of endocrine disruptors under REACH. The mandate of the polymer group has been postponed until the end of 2022, while that relating to endocrine disruptors until 2023.

In documents submitted to the competent authorities for REACH and CLP (Caracal) for a meeting on November 17-18, the Commission invited members to approve the extended mandates of the two Caracal subgroups - CASG-polymers and CASG-ED - stating that additional time it was necessary to finalize their work. The subgroups, set up to coordinate stakeholder input to proposals, are composed of representatives of the EU Member States and the EEA and led by the Commission. The Commission plans to update the information requirements of the REACH Regulation to allow identification of EDs by the end of 2022.

In addition to REACH revision, the sub-group is also working on the inclusion of endocrine disruption hazard classes in the CLP regulation, as established by the EU chemicals strategy.

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
- $\bullet\,$ 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 AUTORITHY 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



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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