

# Progress in China's Import/Export Control and Registration Enforcement of Hazardous Chemicals

Robert Kiefer REACH24H USA Inc.

SCHC 2025 Annual Meeting

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# Content

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Overview of Chinese
Hazardous Chemical
Management

China GHS:
Compliance Points for
SDS & GHS Label

**China Hazardous Chemical Registration** 

**Summary and Compliance Advice** 



# Part 1

# China Hazardous Chemical

Management Background

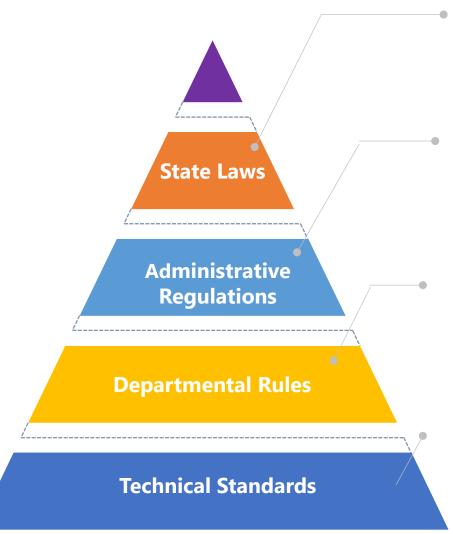
# **China Hazchem Management Background**



**Customs Authority Emergency Management Department Ministry of Ecological Ministry of Ecological Environment Public Safety Environment Ministry of Commerce** Import & Operation/ **Disposal** Warehousing **Transport** Purchase/Sale **Export Public Safety Market Supervision and Management Department Transportation Department Ministry of Emergency Management Railway Administration Public Safety Civil Aviation Authority** 

# China Hazchem Management Background





#### **Level 1 – State Laws**

Safety Production Law of the People's Republic of China Law of the People's Republic of China on Safety of Hazardous Chemicals (Draft)

#### **Level 2 – Administrative Regulations**

Regulations on the Control over Safety of Hazardous Chemicals (Decree No. 591 of the State Council)

Regulations on the Administration of Precursor Chemicals (Decree No. 445 of the State Council)

#### **Level 3 – Department Rules**

Measures for the Administration of Hazardous Chemicals Registration (SAWS Order No. 53) Measures on the Administration of Physical Hazard Identification and Classification for Chemicals (SAWS Order No. 60)

#### **Level 4 – Technical Standards**

Rules for Classification and Labelling of Chemicals (GB 30000.2~29-2013); General Rules for Preparation of Precautionary Label for Chemicals (GB 15258-2009); Safety Data Sheet for Chemical Products - Content and Order of Sections (GB/T 16483-2008); Guidance on the Compilation of Safety Data Sheet for Chemical Products (GB/T 17519-2013)

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# **□ Inventory of Hazardous Chemicals**

#### **Inventory of Hazardous Chemicals (2015)**

https://www.mem.gov.cn/gk/gwgg/xgxywj/wxhxp\_228/201503/t2015030 9\_232632.shtml

- Refers to highly toxic chemicals and other chemicals that are toxic, corrosive, explosive, flammable, and combustion-supporting, and are harmful to the human body, facilities, and the environment
- It was jointly formulated and announced by 10 Ministries and Commissions including the former State Administration of Work Safety (SAWS);
- A total of **2,828 entries** (including **148 highly toxic chemicals**); In addition to the listed entries, inorganic salts include both anhydrous and compounds containing crystal water; entries without content descriptions except mixtures refer to the entries Industrial products or chemicals with a purity higher than industrial products;
- Hazardous chemicals determination principles: 81 GHS
   classifications;

# Catalogue of Hazardous Chemicals (2002)

- 3823 items
- TDG Dangerous Goods Classification

2828 items
GHS Classification

# List of Highly Toxic Chemicals (2002)

- 3353 items
- Acute Toxicity Category 1/2

148 items
Acute Toxicity
Category 1

Number	Product Name	Alias	CAS Number	Remark
1	opium	opium	8008-60-4	
	5-amino-3-phenyl-1,2,4-triazol-1-yl-			
4	N,N,N',N'-	triaminhas	1021 47 C	highly
	tetramethylphosphonicdiamide[content	triamiphos	1031-47-6	toxic
	> 20%]			
	Synthetic resins, paints, auxiliary materials,	coatings and	other products	containing
2828	-sustainable co	<u>mbustion</u>		
	shall not be managed as flammable liquids	5)		



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# **□ Inventory of Hazardous Chemicals**

Index	Chinese Name	Alias	English Name	CAS No.	Hazard Class	Remark
	含易燃溶剂的合成树脂,油漆,辅助材料,涂料等制品【闭杯闪点≤60℃】		Synthetic resins, auxiliary materials, paints and other products containing flammable solvent (flash point not more than 60°C)		(1) Flash point < 23°C, initial boiling point ≤35°C: Flam. Liq. Cat. 1 (2) Flash point < 23°C, initial boiling point > 35°C: Flam. Liq. Cat. 2 (3) 23°C ≤ Flash point ≤60°C: Flam. Liq. Cat. 3 Health hazard and environmental hazard needs to be judged based on the ingredient.	







**Synthetic perfumes** 

**Ethanol Solutions** 

**Adhesives** 

# O1 China Hazchem Management Inventory of Hazardous Chemicals - Determination Principle

REA	12/	
KCA	<b>1</b> 4	

	1.Explosive	Unst. Expl.	Div. 1.1	Div. 1.2	Div. 1.3	Div. 1.4	Div. 1.5	Div. 1.6	
	2.Flammable gas	Cat. 1	Cat. 2	Unst. Gas A	Unst. Gas B			1	
	3.Aerosols	Cat. 1	Cat. 2	Cat. 3					14 GHS Classifications not adopted by
	4.Oxidizing gas	Cat. 1							Inventory (excluded from the
	5.Pressurized gas	compressed gas	liquefied gas	refrigerated liquefied gas	dissolved gas				Inventory):
	6.Flammable liquids	Cat. 1	Cat. 2	Cat. 3	Cat. 4				• Explosive Cat. 1.5
	7.Flammable solid	Cat. 1	Cat. 2						Explosive Cat. 1.5
Physical	8.Self-reactive substances/mixtures	Туре А	Туре В	Туре С	Type D	Type E	Type F	<del>Type G</del>	• Explosive Cat. 1.6
Hazard	9.Spontaneous combustion liquid	Cat. 1							Explosive cat. 1.0
	10.Spontaneous combustion solid	Cat. 1							<ul> <li>Aerosols Cat. 2</li> </ul>
	11.Self-heating substance	Cat. 1	Cat. 2						7.0.050.0 20.0 2
	12.Substances/mixtures which, in contact with water, emit flammable gases	Cat. 1	Cat. 2	Cat. 3					• Aerosols Cat. 3
	13.Oxidizing liquid	Cat. 1	Cat. 2	Cat. 3					Flammable liquid Cat. 4
	14.Oxidizing solid	Cat. 1	Cat. 2	Cat. 3					Flaminable liquid Cat. 4
	15.Organic peroxide	Туре А	Type B	Type C	Type D	Type E	Type F	Type G	Self-reactive Type F
	16.Metal corrosion	Cat. 1							Self-reactive Type I
	1.Acute Toxicity - Oral/Inhalation/Dermal	Cat. 1	Cat. 2	Cat. 3	Cat. 4	Cat. 5			Self-reactive Type G
	2. Skin corrosion/irritation	Cat. 1	Cat. 1A	Cat. 1B	Cat. 1C	Cat. 2	Cat. 3		Sell reactive Type G
	3.Serious eye damage/eye irritation	Cat. 1	Cat. 2	Cat. 2A	Cat. 2B				<ul> <li>Organic peroxides Type G</li> </ul>
	4.Respiratory or skin allergies	Cat. 1	Cat. 1A	Cat. 1B					organic peroxides Type e
Health	5.Germ Cell Mutagenicity	Cat. 1A	Cat. 1B	Cat. 2					Acute Toxic Cat. 4
Hazard	6.Carcinogenicity	Cat. 1A	Cat. 1B	Cat. 2					
	7. Reproductive toxicity	Cat. 1A	Cat. 1B	Cat. 2	Lactation				<ul> <li>Acute Toxic Cat. 5</li> </ul>
	8. Specific target organ toxicity - single exposure	Cat. 1	Cat. 2	Cat. 3					
	9. Specific target organ toxicity - repeated exposure	Cat. 1	Cat. 2						• Skin Corr./Irrit. Cat. 3
	10. Aspiration hazard	Cat. 1	Cat. 2						<ul> <li>Aspiration hazard Cat. 2</li> </ul>
	1.1Hazard to the aquatic environment - acute	Cat. 1	Cat. 2	Cat. 3					<ul> <li>Aquatic hazard - Acute Cat. 3</li> </ul>
Envi. Hazard	1.2 Hazard to the aquatic environment - chronic	Cat. 1	Cat. 2	Cat. 3	Cat. 4				
	2. Harm to the ozone layer	Cat. 1							<ul> <li>Aquatic hazard - Chronic Cat. 4</li> </ul>



# □ Inventory of Hazardous Chemicals - Implementation Guideline

#### 国家安全监管总局办公厅关于印发

危险化学品目录(2015版)实施指南(试行)的通知

安监总厅管三 [2015] 80号

各省、自治区、直辖市及新疆生产建设兵团安全生产监督管理局:

为有效实施《危险化学品目录(2015 版)》(国家安全监管总局等10部门公告2015年第5号),国家安全监管总局组织编制了《危险化学品目录(2015版)实施指南(试行)》(请自行从国家安全监管总局网站下载),现印发给你们,请遵照执行。在实施过程中,如遇到问题,请及时反馈国家安全监管总局监管三司(联系人及电话:陆旭,010-64463239<带传真>)。

安全监管总局办公厅

2015年8月19日





In Revision: 2019/2020 Consultation

Number	Product Name	Alias	English Name	CAS Number	Hazard Category	Note
137	丙酮	二甲基酮	acetone; propanone; dimethyl ketone	67-64-1	Flammable liquid, category 2 Serious eye damage/eye irritation, category 2 Specific target organ toxicity - single exposure, category 3 (narcotic effects)	





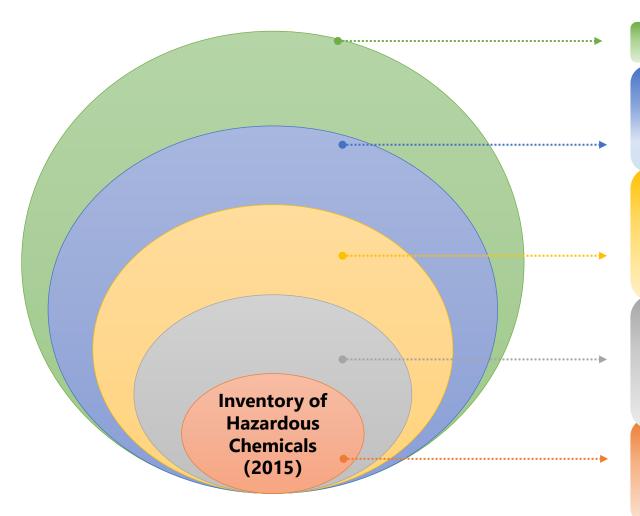
# □ Inventory of Hazardous Chemicals - 70% Principle

#### **Article 5 in the Guidance:**

A chemical is regarded as a hazardous chemical and subject to hazardous chemical management if the major compositions are listed in the Inventory, and the sum of their mass fractions or volume fractions is no less than 70% (unless it is determined not eligible for the hazardous chemical determination principles after hazard identification). Work safety administrations should indicate the trade name and the major compositions for mixtures when issuing relevant safety administrative permits.

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# □ Inventory of Hazardous Chemicals – Judgment Type



#### 5. Chemicals without GHS Classification

#### 4. Low Risk Chemicals

The product is not included in the list and has GHS classification, but it does not meet the determination principle;

#### 3. General Hazardous Chemicals

The product is not included in the list, its hazards conform to the determination principle (81 GHS classifications), and the listed ingredients are <70%;

#### 2. Equivalent to listed Hazardous Chemicals

The product is not included in the list, its hazards conform to the determination principle (81 GHS classifications), and the ingredients listed in the catalogue are ≥70%;

#### 1. Hazardous Chemicals included in the Catalogue

Entry 1-2827; Entry 2828 (products containing flammable solvents, flash point  $\leq$  60°C);

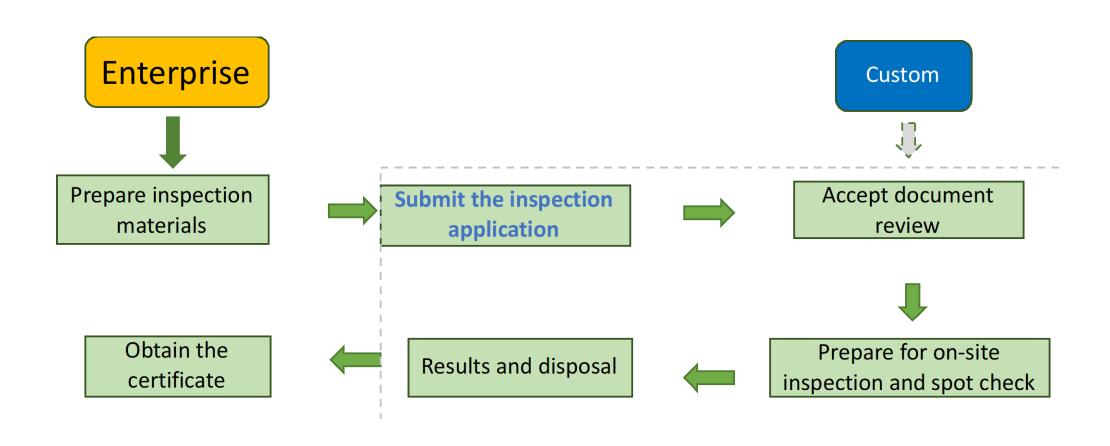




		In-Inventory	y Management	Out-Inventory Ma		
	of the requirements		4) GHS classification that conforms to the principle of catalog determination, but does not meet the requirements of ≥70%	5) GHS classification that does not meet the principles of catalog determination	Legal Basis	
SDS & Label	Need	Need	Need	Need	Need	Decree No. 591 of the State Council of the People's Republic of China
Registration of Hazardous Chemicals	Need	Need	Need	Need	Unnecessary	SAWS Order No. 53
Production/ Operating License	Need	Need	Need	Unnecessary	Unnecessary	SAWS Orders No. 41 and 55
Import & Export Supervision	Statutory Inspection	Statutory Inspection	Statutory Inspection	Declare by non- hazardous chemicals	Sampling	GAAC Announcement [2020] No. 129
Hazardous Chemicals Warehouse	Need	Need	Need	According to local requirements	Unnecessary	Decree No. 591 of the State Council of the People's Republic of China

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Apply for Inspection

#### **Time/place/documents/other documents**

When the consignees or their agents of imported hazardous chemicals declare, the items to be filled in shall include:

- 1) Name of inspection and quarantine
- 2) HS code
- 3) Property of goods
- 4) Packing type
- 5) Dangerous goods information





-GACC Announcement No. 129 of 2020

Third Revision: List the declaration items



Apply for Inspection

**Time/place/documents/other documents** 

#### The following documents should also be provided:

- (1) Declaration of Conformity of enterprises importing hazardous chemicals;
- (2) Statement of Situation: Name and quantity of inhibitor or stabilizer;
- (3) China compliant GHS SDS and label;
- (4) Hazard Identification Report;

GACC Announcement No. 129 of 2020

# **Import & Export Documents' Sample**



# Declaration of Conformity

#### 进口危险化学品经营企业符合性声明

(格式范本)

<u>(企业名称)</u> 报	检的 <u>(商品名称 )</u> ( HS 编码:
化学品正式名称:	,联合国 UN 编号 : ) ,
共(桶/袋/箱等	) (吨/千克),使用包装 UN
标记	,从国家(或地区)进口至中国。

以上报检货物使用的包装、危险公示标签和安全数据 单符合中华人民共和国法律、行政法规、规章的规定以及国 家标准、行业标准的要求。

上述内容真实无误,本企业对以上声明愿意承担相应的法律责任。

特此声明。

法定代表人或其授权人(签字):

企业 (盖章):

年 月 日

- Company Name
- Product Name
- HS Code
- Product Weight and Package
- Transportation Origin and Destination
- Compliance with China's Regulation
- Company Signature

# **Import & Export Documents' Sample**

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# For Transportation



## **■ For Custom Clearance**



- Whether it's listed in the Inventory
- Whether it's a hazardous chemical
- Which GHS classification they have identified

# **Import & Export Documents' Sample**



#### SDS & GHS Label

- > Import meet China GHS
- > SDS GB/T 16483-2008, GB/T 17519-2013;
- ➤ Label GB 15258-2009

### 化学品安全技术说明书。

依据 GB/T·16483、GB/T·17519 编制↔ 产品名称: ALEXIT 催干剂↔ 最初编制日期: 2018年7月30日。 修订日期: 2018年7月30日。 版本: 10。



- Export meet export country GHS/CLP)
- Provide Chinese translation

2,2'-[(3,3'-dichloro[1,1'-biphenyl]-4,4'-diyl)·bis(azo)·]bis[N-(2-methylphenyl)·-3-oxobutyramide]。

Safety·Data·Sheet。

According to Regulation (EU) 2015/830 (REACH Annex II).

Date-of-issue:-5/08/2018 → Revision-date:-5/08/2018 → Version:-1.0.

Epoxy·resin·solution Xylene: 25% CAS-No. 1330-20-7 Name: Anhui Hengyuan New Material Co. Ltd... Address: No.16 Zijin Road, Circular Economy-Park, Huizhou-District, Huangshan City, Anhui-Warning. H226: Flammable liquid and vapor. Tel:+86-0559-3516666 P210: Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking. P233: Keep container tightly closed. P370+P378: In case of fire: Use media other than water to extinguish P302+P352:-IF-ON-SKIN:-Wash-with-plenty-of-water P403+P235: Store in a well-ventilated place. Keep cool. P501: Dispose of contents/container to hazardous or special waste collection point, in accordance with local, regional, national and/or international regulation.

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# **Hazard Identification**

**List in Inventory** 

**Check Ingredients and GHS Classification** 

# **Information Transfer**

SDS

Label

# Registration/Filing /Permit

Hazardous Chemical Registration

**Manufacturer/Trade Permit** 

Take care of Import/Export
Process



# Part 2 **China's Compliance Points for** SDS & GHS Label

# Guidance on the Compilation of SDS

U.S.

Hazard Communication Standard (HCS)

China

- GB/T 16483-2008 "Safety Data Sheet for Chemical Products - Content and Order of Sections"
- GB/T 17519-2013 "Guidance on the Compilation of Safety Data Sheet for Chemical Products"

#### SDS Content

**♦**Internationally agreed 16-section format

♦ Version: UN GHS Rev. 4 & UN GHS Rev. 10

**◆**Language: Simplified Chinese

**Section1: Chemical Product & Company Information** 

**Section 2: Hazards Identification** 

**Section 3: Composition/Information on ingredients** 

**Section 4:** First-Aid Measures

**Section 5:** Fire Fighting Measures

**Section 6:** Accidental Release Measures

**Section 7:** Handling and Storage

**Section 8:** Exposure Controls and Personal Protection

**Section 9:** Physical and Chemical Properties

**Section 10:** Stability and Reactivity

**Section 11:** Toxicological Information

**Section 12**: Ecological Information

**Section 13**: Disposal Considerations

**Section 14: Transport Information** 

**Section 15:** Regulatory information

**Section 16:** Other information

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# **■** Requirements for SDS in China

#### 化学品安全技术说明书

产品名称: Napropamide 450 SC 修订目期: 2020年05月16日 最初编制日期: 2020年05月16日 (担GB/T 16483、GB/T 17519编制

SDS编号: 12345 版本: 1.0

#### 第 1 部分 化学品及企业标识

化学名称(申文名) 化学名称(英文名) : 裁草肢 450 克甸升 悬浮剂

P名称(英文名) : Napropanije (50 SC

企业名称 地址

部政编码

: XXXXXX : XXXXXX : D-20097

传真 : +(9(0)40 / 2275-1045 电话号码 : +(9(0)40 / 2275-0 电子邮件地址 : SDB4HELWAG.COM 胶套管电电话 : +85-522-8289999

产品推荐及限利用途

建议用途 : 除草剂 使用限制 : 无相关信息

第 2 部分 危险性概述

#### 医急情况概述

#### 造成严重限刺激。对水生生物有毒并具有长期持续影响。

GHF 分类

健康危害 : 严重眼损伤/眼刺激 炎别 2环境危害 : 危害水生环境 - 长期危险 类别 2

上述未涉及的其他危险性、分类不适用或无法分类

标签要素

象形图 (GHS CN)

<u>(!)</u>

警示词 (GEN)-CN) : 警告

危险性说明 (GHS-CN) : H219 - 造成严重取刺激

HI11 - 对水生生物有毒升具有长期持续影响。

防靶説明 (GHS CN)

预防措施 : P264 - 作业后彻底清洗双手。前臂和面影。

P273 - 避免释放到环境中。

Section	Standards GB/T 16483 and GB/T 17519
Section 1	Product Chinese/English name, supplier information, recommended usage, emergency telephone number
Section 2	Emergency overview, pictogram, signal word, H/P statements
Section 3	Provide components which have GHS classification, choose proper CBI components
Sections 4/5/6/7	Consistent with product hazard characteristics/ classification
Section 8	Provides China OELS (occupational exposure limits), biological limits, and other applicable international control parameters
Sections 9/10/11/12/14	Consistent with product hazard characteristics/ classification
Section 15	Provide Chinese chemical regulatory information
Others	Language: Simplified Chinese; update at least every 5 years

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# **■ Emergency Telephone Number**

#### Legally required in SDS, Label and Registration

- 1) Companies set the Emergency Tel on their own
- ▶ 24/7 availability;
- Fixed-line within the territory of China;
- Professional work staff responds to the call
- 2) Appoint an accredited agent to provide the Emergency Tel service
- Registration Authorities can provide the Emergency Tel service (Article 22 of SAWS Order 53)

### **◆** Use of Emergency Telephone Number provided by NRCC:

- ▶ TEL: (+86) 0532 8388 9090
- http://er.nrcc.com.cn/



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# **■** Requirements for SDS in China

#### 化学品安全技术说明书

产品名称: Napropamide 450 SC 修订目期: 2020年05月16日 優初倫制日期: 2020年05月16日 握GB/T 16483、GB/T 17519编制

SDS@9: 12345

#### 第 1 部分 化学品及企业标识

化学名称(中文名) 化学名称(英文名) : 裁草肢 450 克甸升 悬浮剂

: Napropanide 450 SC

 企业名称
 : XXXXX

 地址
 : XXXXX

能政编码 : D-20097 传真 : +49(0)40 / 2275-1845

电话号码 : +(9(0)40 / 2275-0 电子部件地址 : SDB4HELNAG.COM 旅禽脊肉电话 : +85-522-3359990

产品推荐及限利用途

建议用途 : 除草剂 使用限制 : 无相关信息

第 2 部分 危险性概述

#### 医急情况概述

造成严重限刺激。对水生生物有毒并具有长期持续影响。

GHS 分類

健康危害 : 严重眼损伤/眼刺激 炎别 2环境危害 : 危害水生环境 - 长期危险 类别 2

上述未涉及的其他危险性、分类不适用或无法分类

标签更素

象形图 (GHS CN)

警示词 (GHS-CN) : 警告.

危险性说明 (GHS-CN) : H219 - 造成严重取刺激

Bit1 - 对水生生物有毒并具有长期特线影响。

防範視明 (GES CN)

预防措施 : F251 - 作业后彻底清洗双手。前臂和面部。

P273 - 避免释放到环境中。

Section	Standards GB/T 16483 and GB/T 17519
Section 1	Product Chinese name, emergency telephone number
Section 2	<b>Emergency overview</b> , pictogram, signal word, H/P statements
Section 3	Provide components which have GHS classification, choose proper CBI components
Section 4/5/6/7	Consistent with product hazard characteristics/ classification
Section 8	Provides China OELS (occupational exposure limits), biological limits, and other applicable international control parameters
Section 9/10/11/12/14	Consistent with product hazard characteristics/ classification
Section 15	Provide Chinese chemical regulatory information
Others	Language: Simplified Chinese; update at least every 5 years

# Emergency Overview

Emergency overview provides a description of the severe harm that chemicals might trigger immediately, and hazards which might lead to serious consequences, therefore, needs to be identified urgently. This subsection could serve as reference for rescue personnel.

#### **Section 2 Hazards Identification**

#### 2.1 Emergency overview

Colorless liquid with aromatic odor. Flammable liquid and vapor. The vapor could form explosive mixture with air. Severe benzene poisoning may result in disturbance of consciousness, respiratory failure and sudden death. Ventricular fibrillation may occur. Does harm to hematopoietic system. May lead to leukemia.

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# **■** Requirements for SDS in China

#### 化学品安全技术说明书

产品名称: Napropamide 450 SC 修订目期: 2020年05月16日 優初倫制日期: 2020年05月16日

SDS偏慢: 12345 版数: 1.0

#### 第 1 部分 化学品及企业标识

化学名称(中文名) 化学名称(英文名)

部政编码

: 教草胺 450 克甸升 悬浮剂

: Napropamide 450 SC

<u>企业名称</u> : XXXX 地址 : XXXX

: XXXXX : D-20097

传真 : +(9(0)40 / 2275-1045 电话号码 : +(9(0)40 / 2275-0 电子部件地址 : \$DB4HELWAG.COM 应急管句电话 : +05-522-02059090

产品推荐及限利用途

建议用途 : 除草剂 使用限制 : 无相关信息

第 2 部分 危险性概述

#### 医急情况概述

造成严重限则差。对水生生物有毒并具有长期特殊影响。

GHI MA

健康危害 : 严重眼损伤/眼刺激 炎别 2环境危害 : 危害水生环境 - 长期危险 类别 2

上述未涉及的其他危险性。分类不适用或无法分类

标签更素

象形图 (GH) (N)

警示词 (24%-0%) : 警告。

危险性说明 (GHS-CN) : H219 - 造成严重限刺激

H(11 - 对水生生物有毒升具有长期持续影响。

防範視明 (GES CN)

预防措施 : F251 - 作业后彻底清洗双手。前臂和面部。

P273 - 避免释放到环境中。

Section	Standards GB/T 16483 and GB/T 17519
Section 1	Product Chinese name, emergency telephone number
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Section 9/10/11/12/14	Consistent with product hazard characteristics/ classification
Section 15	Provide Chinese chemical regulatory information
Others	Language: Simplified Chinese; update at least every 5 years



# Guidance on the Compilation of GHS Label

In U.S.

Hazard Communication Standard (HCS)

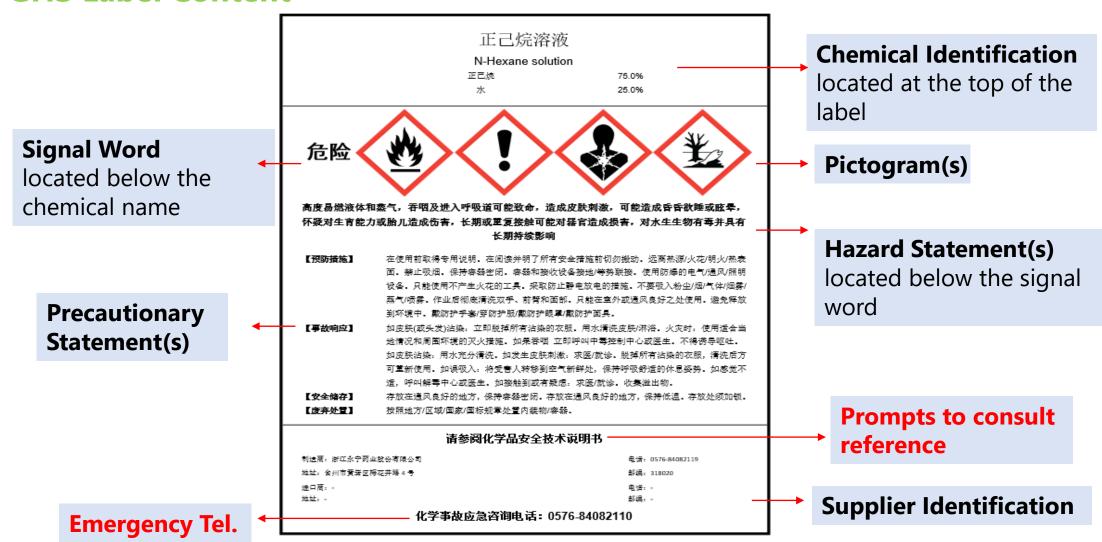
**In China** 

• GB 15258-2009 General Rules for Preparation of Precautionary Labeling for Chemicals.



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#### ■ GHS Label Content



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## **■ GHS Label Size**



•		m						
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- Pictogram
- Signal word
- Hazard statement

### Precautionary statement

- Emergency phone number
- Address, postal code
- Prompt to consult reference material

Volume of Container or Packaging/L	Label Dimensions (mm x mm)
≤ 0.1	Use a Simplified Label
> 0.1 - ≤ 3	50 x 75
>3 - ≤ 50	75 x100
> 50 - ≤ 100	100 x 150
> 500 - ≤ 1000	150 x 200
> 1000	200 x 300

Label Dimensions (mm x mm)	Each Pictogram (mm x mm)
Small packaging or ≤ 0.125 L: use a Simplified Label	
If possible, ≥ 52 x 74	$\geq 10 \times 10$ If possible, $\geq 16 \times 16$
≥ 74 x 105	≥ 23 x 23
≥ 105 x 148	≥ 32 x 32
≥ 148 x 210	≥ 46 x 46

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# REACH24H

# Standard & Simplified GHS label

#### 正己烷溶液

N-Hexane solution

正己烷

75.0%

水

25.0%











高度易燃液体和蒸气,吞咽及进入呼吸道可能致命,造成皮肤刺激,可能造成昏昏欲睡或眩晕, 怀疑对生育能力或胎儿造成伤害,长期或重复接触可能对器官造成损害,对水生生物有毒并具有 长期恭续影响

【預防措施】 在使用前取得专用说明。在阅读并明了所有安全措施前切勿搬动。远离热源/火花/明火/热表

面。禁止吸烟。保持容器密闭。容器和接收设备接地/等势联接。使用防爆的电气/通风/照明设备。只能使用不产生火花的工具。采取防止静电放电的措施。不要吸入粉尘/烟/气体/烟雾/蒸气/喷雾。作业后彻底清洗双手、前臂和面部。只能在室外或通风良好之处使用。避免释放

到环境中。戴防护手套/努防护服/戴防护眼罩/戴防护面具。

【事故响应】 如皮肤(或头发)沾染。立即脱掉所有沾染的衣服。用水清洗皮肤/淋浴。火灾时。使用适合当

地情况和周围环境的灭火措施。如果吞咽 立即呼叫中毒控制中心或医生。不得诱导呕吐。 如皮肤沾染:用水充分清洗。如发生皮肤刺激:求医/就诊。脱掉所有沾染的衣服,清洗后方 可重新使用。如误吸入:将受害人转移到空气新鲜处,保持呼吸舒适的休息姿势。如感觉不

适,呼叫解毒中心或医生。如接触到或有疑虑:求医/就诊。收集溢出物。

【**安全储存**】 存放在通风良好的地方,保持容器密闭。存放在通风良好的地方,保持低温。存放处须加锁。

【废弃处置】 按照地方/区域/国家/国标规章处置内装物/容器。

#### 请参阅化学品安全技术说明书

化学事故应急咨询电话: 0576-84082110

制造商:浙江永宁药业股份有限公司 电话: 0576-84082119

姓址: - 舒揚

## ^

正己烷溶液

N-Hexane solution









高度易燃液体和蒸气,吞咽及进入呼吸道可能致命,造成皮肤刺激,可能造成骨骨欲建或眩晕。 怀疑对生育能力或胎儿造成伤害,长期或重复被触可能对器官造成损害。对水生生物有毒并具有 长期持续影响

请参阅化学品安全技术说明书

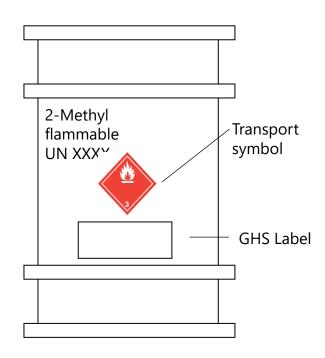
制造器。浙江水宁两业银份有限公司

危险

申請。0576-84082119

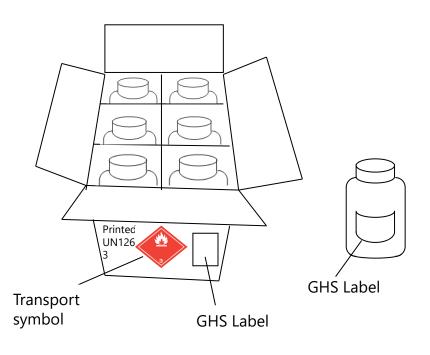
化学事故应急咨询电话: 0576-84082110





### For Single Packaging:

The transport symbol can be located on the same or another side to the GHS label



# For Combination Packaging:

The inner packaging is required to have a GHS label and the outer packaging is required to have a transport pictogram.

But in the actual supervision process, Customs also requires that GHS labels be affixed to the outer packaging.



# Part 3

**China Hazardous Chemical** 

Registration

# **China Hazardous Chemical Registration**

# REACH24H

# □ Registration Regulation Background







**Measures for the Administration of Registration of Hazardous Chemicals** (SAWS Order 53)

• Including purpose, principles, scope of registration, registration organization, content of registration, procedures of registration, corporate responsibility, penalties, etc.

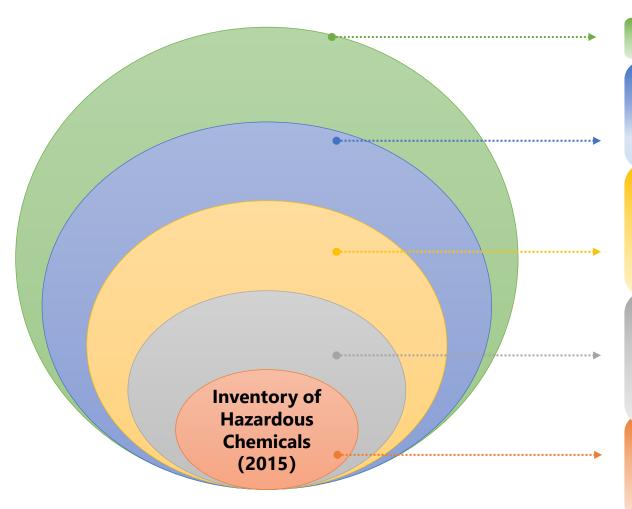


- Ministry of Emergency Management (MEM) National Registration Center for Chemicals (NRCC)
- Local Registration Offices



# REACH24H

# **□** Inventory of Hazardous Chemicals



#### 5. Chemicals without GHS Classification

#### 4. Low Risk Chemicals

The product is not included in the list and has GHS classification, but it does not meet the determination principle;

#### 3. General Hazardous Chemicals

The product is not included in the list, its hazards conform to the determination principle (81 GHS classifications), and the listed ingredients are <70%;

#### 2. Equivalent to listed Hazardous Chemicals

The product is not included in the list, its hazards conform to the determination principle (81 GHS classifications), and the ingredients listed in the catalogue are ≥70%;

#### 1. Hazardous Chemicals included in the Catalogue

Entry 1-2827; Entry 2828 (products containing flammable solvents, flash point  $\leq$  60°C);



Beginning in Feb 2022, a new system the Integrated Service System for Hazardous Chemical Registration

( <a href="https://whpdj.mem.gov.cn/#/login">https://whpdj.mem.gov.cn/#/login</a>) went online for national hazardous chemical registrations. The original information management system for hazardous chemical registration was discontinued at the same time.





#### **□** Who Should Apply?

- Hazardous chemical manufacturers
- Hazardous chemical importers
- Hazardous chemical trade enterprises
- Hazardous chemical use enterprises (use permit)
- Foreign exporters are exempted from registration





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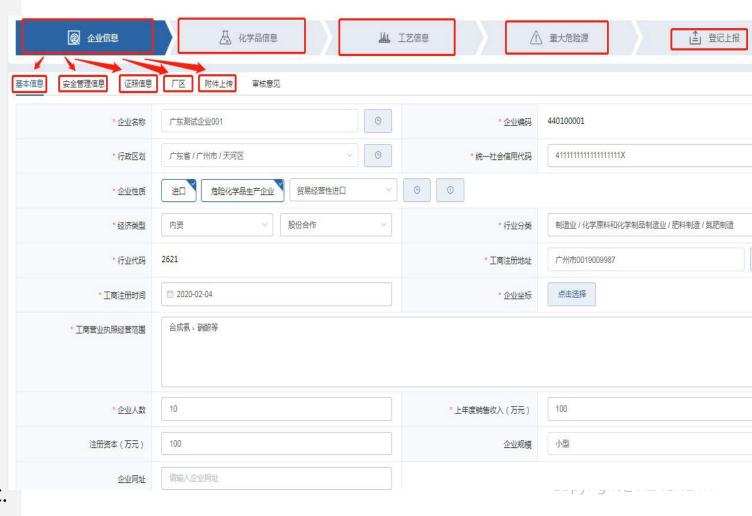
#### **□** Registration Process





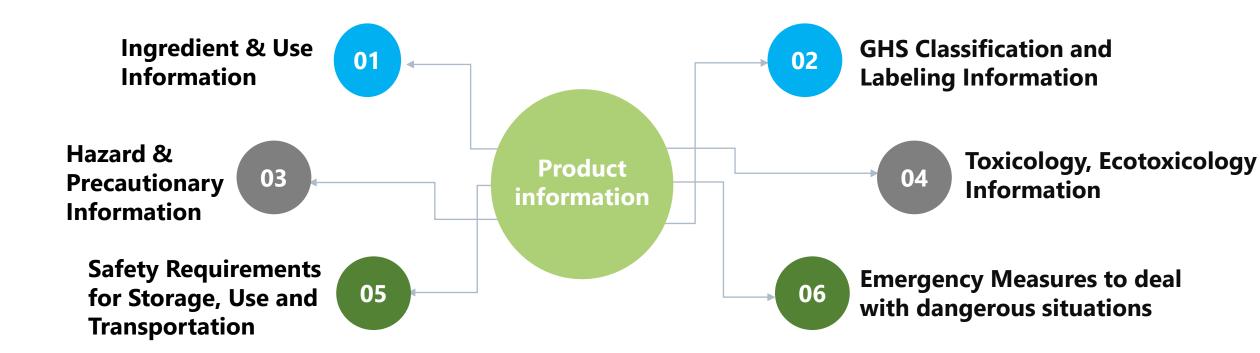
#### **□** Registration Content - Company Information

- Enterprise name, address, VAT number, establishment time
- Legal person, person in charge, person in charge of safety
- Economic type, trade classification and code
- Boundary map of longitude and latitude, industrial parks and factories
- Emergency call, duty call
- Scale, warehouse area, storage tank volume
- Major source of danger
- File upload: business license, HazChem production permit, trade business permit, etc.





#### **□** Registration Content - Product Information



> Special Items: HS Code, annual import volume, etc.



#### **□** Certificate



# China Hazardous Chemical Registration Hazardous Chemicals Registration Review

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#### □New Content in the System - Review Records in the Registration System

- **Self-Inspection:** Self-Inspection Time, Inspector, Inspector's Phone Number, Major Issues (Key Inspection Issues, Hazard Identification Issues, Documentation and Labeling Issues, Warning Sign Issues, Others), Number of Unregistered Chemicals, Number of Varieties with Unidentified Hazards
- Special Enforcement Inspection/Problem Rectification: Inspection Type, Person Responsible for Rectification, Existing Problems, Enforcement Suggestions, Type of Enforcement Enterprise, Whether Included in the Enforcement Inspection List, Enforcement Results
- Rectification of Problems from Preliminary Stages: Clue Enterprise, Source Enterprise of Clue, Province of Clue Enterprise, Type of





#### **□** New Content in the System - QR Code

The new system has added the interface of "Hazardous Chemical Ledger Management".

危化品台账及一书—签管理/危化品台账管理 请输入CAS号 请输入名称 置重 ひ 请选择分类 化学品名称 CAS号 设计最大储量 储存详情 二维码 下载 一企一品一码佐证 不适用 讲口化学品 暂无数据 详情展示 二维码下载 维护 ☐ SDS 口 安全标签 待新增 详情展示 待新增 不适用 进口化学品 0.00 吨 二维码下载 ☐ SDS 口 安全标签 详情展示 口 安全标签 待新增 不适用 进口化学品 暂无数据 二维码下载 ☐ SDS 详情展示 待新增 不适用 暂无数据 口 安全标签 进口化学品 二维码下载 口 安全标签 待新增 0.00 吨 不适用 产品 详情展示 二维码下载 **Ⅲ** SDS 待新增 详情展示 口 安全标签 不适用 产品 0.00 吨 二维码下载 ☐ SDS 产品 0.00 吨 口 安全标签 待新增 不适用 详情展示 二维码下载 □ SDS 口 安全标签 待新增 详情展示 进口化学品 暂无数据 待新增 详情展示 不适用 进口化学品 暂无数据 二维码下载 ☐ SDS 口 安全标签 详情展示 二维码下载 维护 III SDS 口 安全标签 不适用 进口化学品 暂无数据



#### □ New Content in the System - QR Code

- > The new system has added the interface of "Hazardous Chemical Ledger Management".
- 危化品台账及一书—签管理/危化品台账管理

请选择分类	化学品名称	CAS号		储存详情	二维码	り重置
化学品名	氮[压缩的或液化的]	7727-37-9	危险化学品安全信息码	详情展示	二维码 维护	田 安全技术说明品—码佐证
	氨	7664-41-7		详情展示	二维码 维护	新增 田 安全技术说明 新增
	氯酸钾	3811-04-9	国 (2005) (1000)	详情展示	二维码 维护	口 安全技术说明新增
	碳酰氯	75-44-5		详情展示	二维码 维护	田 安全技术说明 新增
			ATTENDED NEW COLUMN			新增
						新增
						新增
			4401100012100001			<del>新</del> 增
			70.00			新增 I@REACH24H
_			确定			

#### REACH24H

#### □ Content in the QR Code

Hazardous chemical name, CAS number, registration number, enterprise name, some label elements (warning word, hazard pictogram, hazard description), first-aid measures, emergency response to leakage, fire extinguishing methods; support "SDS & Label" download.



Scan the QR code

#### 化学品安全信息码

化学品名称 氨

中文别名 液氨;氨气

CAS号 7664-41-7

登记号 4401100012100001

企业名称 广东测试企业001

警示词 危险



#### 危险性说明

易燃气体,含冷冻液化气体,可引起冻伤,吞咽会中毒,皮肤接触会中毒,吸入致死,对水生生物有毒,对水生生物有害并且有长期持续影响

#### 急救措施

立即脱去污染的衣着,应用2%硼酸液或大量

#### 化学品安全信息码

钟。就医。迅速脱离现场至空气新鲜处。保持呼吸道通畅。如呼吸困难,给输氧。如呼吸 吸停止,立即进行人工呼吸。就医。

#### 泄漏应急处置

远离火种、热源,工作场所严禁烟。使用防爆型的通风系统和设备。防止气体泄漏到工作场所空气中。避免与氧化剂、酸类、卤素接触。搬运时轻装轻卸,防止钢瓶及附件破损。配备相应品种和数量的消防器材及泄漏应急处理设备。 储存注意事项:储存于阴凉、通风的库房。应与氧化剂,酸类、卤素、食用化学品分开存放,切忌混储。采用防爆型照明、通风设施。禁止使用易产生火花的机械设备和工具。储区应备有泄漏应急处理设备。

#### 灭火方法

灭火剂:雾状水、抗溶性泡沫、 二氧化 碳、砂土。

化学品安全标签 (点击下载)

安全技术说明书(点击下载)

# **QR Code Update (not fully implemented)**

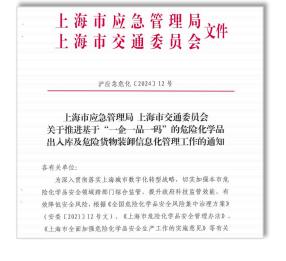


Since 2021, many regions in China have begun to carry out pilot projects of

"One Enterprise, One Product, One QR Code".









Guangdong
First round of pilots completed

Shanghai Beijing
Formal Implementation

for hazardous chemical safety risks

024.4 yright@REACH24H



# Part 4

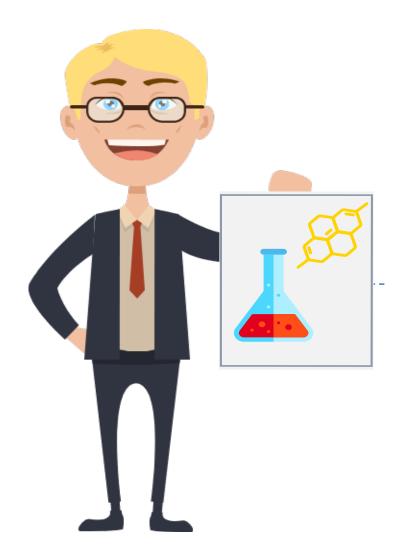
# **Summary and Compliance**

**Advice** 

### **Summary & Compliance Advice**

#### REACH24H

#### **□** Compliance Suggestions



#### 1. Analyze Product

- Substances: whether listed in the Inventory?
- Mixture: whether components are listed in the Inventory?
  - o Greater than 70%?
- Whether it has a GHS classification?
- Establish a data list of hazardous chemicals

# 2. Learn the Compliance Requirement for Hazardous Chemical in China

- Understand the scope and process of inspection and registration;
- Understand the key points for SDS & GHS label;
- Conduct regular self-inspection of trade chemicals;
- Deliver the updated information to importer in timely manner Copyright@REACH



#### **Summary & Compliance Advice**

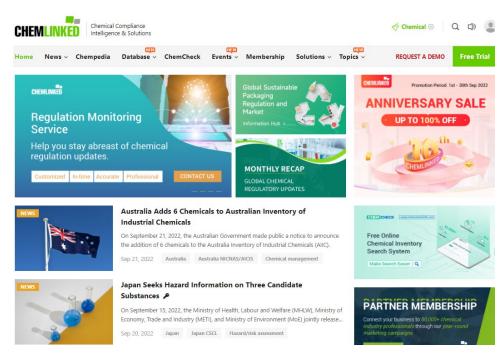


#### □ Compliance Tools/Resources - ChemCheck, ChemLinked





https://www.chemcheck24h.com/





https://chemical.chemlinked.com/



# Thanks!

#### **Contact Us:**

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T: +1 703-596-8055

E: robert.kiefer@reach24h.com