Frequently Asked Questions about HazChem Registrations in China

Updated in May 2013

According to the revised version of the measures for the administration of registration of hazardous chemicals (China SAWS’s order 53) that came into force on 1 August 2012, manufacturers and importers in China shall register hazardous chemicals with the National Registration Center of Chemicals (NRCC) of SAWS prior to manufacturing or importation. In May 2013, the National Registration Centre for Chemicals of the State Administration of Work Safety (SAWS) in China has launched a new online HazChem registration system. Producers and importers can create their own user account in NRCC’s New Online HazChem Registration System and start relevant registration work.

In this document, we have summarized frequently asked questions about HazChem registrations in China.

#1 Who shall register hazardous chemicals under SAWS’s order 53?
A: Domestic companies who manufacture hazardous chemicals in China or import hazardous chemicals to China shall register. The measures have triggered important new obligations for companies, especially importers in China because importers are not required to register under old measures. Foreign companies who export hazardous chemical products to China cannot register.

#2 Which chemical products are subject to HazChem registrations?
A: Chemical products classified as hazardous according to China GHS are subject to HazChem registrations except those chemicals classified to certain hazard categories (i.e., acute toxicity category 5). The Chinese authority is now working on a guidance document to clarify which hazard categories are exempt from HazChem registrations.

#3 What information is required for HazChem registrations?
- legal entity information
- composition information (name, CAS & content)
- classification and labeling
- physiochemical data/toxicology data/eco-toxicology data
- main uses
- Chinese GHS SDGs & labels
- conditions for safe storage, use and transport
- emergency responses
- a domestic 24h emergency telephone number

Login address: http://register.nrcc.com.cn/EnterpriseManage/Login.aspx

#4 What is the relationship between the Catalog of Hazardous Chemicals and HazChem registrations?

<table>
<thead>
<tr>
<th>Registration</th>
<th>Chemicals in the Catalog of Hazardous Chemicals</th>
<th>Other hazardous chemicals excluding certain hazard categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Production license or operation license</td>
<td>Yes</td>
<td>No</td>
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If a company is not sure whether its chemical product is subject to registration or if the hazard property of a product is unknown, the company shall ask designated institutions to issue hazard classification report or prepare its own hazard classification report and ask NRCC to verify it. NRCC will then determine whether a chemical product requires registration or not.
#5 My product contains one ingredient in the Catalog and my product is not classified as hazardous according to GHS criteria because its concentration is below GHS cut-off value, do I need to register this product?

A: No. Registration is not required for non-hazardous product.

#6 My product is classified as hazardous according to GHS and my customer in China has asked me to provide business sensitive ingredient information to them so that they can register the hazardous chemical product with NRCC. What should I do to keep our composition information confidential while helping our customer comply with SAWS’s order 53?

A: There are two options:

- Asking CIRS as an independent third party to submit HazChem registrations on behalf of your customer in China;
- Asking SAWS’s designated institutions to treat your product as a new product without any hazard information and provide all required physio-chemical data/toxicology/eco-toxicology data;

Option 2 is far more expensive.

#7 My company exports many hazardous chemical products to China and all those products contain the same hazardous substance. Shall I register the substance only or every hazardous product?

A: Registration needs to be submitted separately for each hazardous product.

#8 If our products are classified under GHS but do not contain any hazardous chemicals identified in the Catalog, do we need to register our product?

A: Yes except for certain exempt hazard categories as given in SAWS’s guidance document.

#9 If our company has registered a hazardous chemical product under the old measures for HazChem registrations, what shall we do now?

A: The validity of a registration certificate is 3 years. If a registration certificate is still valid, your company does not need to do anything at the moment. When the certificate is going to expire, your company shall renew the certificate according to the requirements of new measures;

#10 How could you help us with HazChem registrations in China?

A: CIRS can either provide full-package registration service or half-package registration service as third party consultant.

**Full Package Service**: Application of user account, gathering information, preparation of hazard classification report, filling registration forms online, preparation of GHS SDGs & labels, 24h emergency telephone number and third-party representation;

**Half Package Service**: preparation of hazard classification report, preparation of Chinese GHS SDGs & labels, 24h emergency telephone number and third-party representation.

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