

CIRS's Practice as REACH Only Representative – HSA Report

Prepared by CIRS Ltd, Submitted on 15 July 2010

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History and Foundation

CIRS was set up in April 2008 by China REACH solution centre under the supervision of the China Inspection and Quarantine Bureau and was privatized later as an independent consulting firm. CIRS has a diverse team of over 100 experienced staff. CIRS's experience stems from our strong presence in both the EU and China, after providing cost effective regulatory support and testing services to cover over 3000 companies. CIRS follows the developments and advice of authorities and associations monitoring REACH by attending events held by the national authorities (eg. HSA meetings and ECHA stakeholder's day).

CIRS acts as an only representative to companies manufacturing chemicals outside the EU. We have an in depth understanding of our client's needs in terms of decreasing technical barriers to trade and thus, opening up new markets in the EU for our clients.

Non EU manufacturers wishing to export chemicals into the EU are obliged to comply with the EU regulation REACH (Registration, Evaluation and Authorisation of Chemicals EC1907/2006) which was introduced in 2007. Under this regulation, an importer or EU manufacturer of a substance in quantities above 1 tonne per annum must register that substance. Non-EU manufacturers may submit registration via the appointment of REACH Only Representative, in which case their importers will be regarded as downstream users and do not need to do registrations.

At CIRS, we are experienced only representatives. In the past, we have acted as only-representative for over 2,400 non-EU manufacturers worldwide. CIRS's Irish office is recognized as a 'legal person established in the community'¹ in accordance with the REACH regulation and our staff/team have 'sufficient background in the practical handling of substances and the information related to them.'² Furthermore, we shall 'keep available and up-to-date information on the quantities imported and customers sold to as well as information on the supply of the latest update to the safety data sheet.'³

CIRS has many years experience as a regulatory service provider. Our specific expertise and specialist knowledge pertaining to the REACH regulation has been recognized by so many global chemical manufacturers that we are currently the largest REACH compliance service provider in the world. With over 100 employees worldwide, there is no doubt that we can offer a high level of service and support to the companies we act as OR for. Our diverse team has all the skills necessary to fulfill your registration requirements (especially in terms of technical aspects of dossier preparation).

As the largest REACH compliance provider in the worldwide we have an unparalleled level of expertise and can deliver a service of the highest standard. Our strengths – our experience, cost, diverse staff, large staff

¹ REACH regulation

² REACH regulation

³ REACH regulation

numbers: speed - fast turnaround. We provide a friendly and transparent service.

CIRS has a standardized system for tracking our client's regulatory compliance and for meeting our obligations as an OR. These include the following standardized documents issued by CIRS:

- Power of Attorney (POA)
- Only representative confirmation and pre-registration certificate
- Reach tonnage coverage certificate – direct export
- Reach tonnage coverage certificate – distributors
- Reach compliance user management system

In addition CIRS has recently developed a RCUM (REACH compliance user management) system which is a secure and transparent system for storing all our clients' documents and information in an easily accessible and filed location. This system was tailor made and designed by our in house IT experts. In addition it is maintained by 4 staffs and monitored/backed up frequently. In order to ensure consistency clients and staff of CIRS follow the standard operation procedure (SOP) during use of the RCUM and we have provided our customers with a user guide to aid the user friendliness of the system. The RCUM system adds to the level of service we can provide our clients with and means that their tonnage records and documentation is easily accessible. Each client receives an account within the system which is secured by the login and password. The overall aim of this system is to add to the transparency of the data CIRS holds and of the service we provide.

Reach specifications of OR

- Non-EU companies shall provide their only representative with up-to-date information on the list of EU importers which should be covered by the registration of the only representative and the quantities imported into the EU.

CIRS has Power of Attorney Documents for all customers but require the information listed above. As such it intends to attain this information via a Volume and Tonnage certificate.

- Non-EU companies shall inform all the EU importers in the same supply chain that he has appointed an only representative to conduct the registration thus eventually relieving the importers from their registration obligations.

CIRS has met this obligation through the distribution of Power of Attorney and OR confirmation certificate.

- The list of importers that are covered by the registration is to be reported in IUCLID in section '1.7 Suppliers'.
- EU importers must be clear which imports the OR has responsibility for. (Requires exact documentation on which imported quantities are covered by the OR and which are not.)

Although the importer (considered a DU once an OR has been appointed) will receive confirmation from his non-EU suppliers (Power of Attorney) on the appointment of an OR, he should preferably also obtain confirmation in writing from the only representative that his imported tonnage and use is indeed covered by the registration submitted by the only representative.

This would not only provide the importer with the contact point to whom he, acting as a DU, can make his own use known, but would also give the importer a clear documentation that the imports are indeed covered by the registration of the OR, as otherwise he remains responsible for the imports.

- OR is responsible for fulfilling all obligations of importers: registration, pre-registration, communication in the supply chain, notification of substances of SVHC, classification and labeling and any obligations resulting from authorizations or restrictions etc.
- Obligation of OR is to keep up to date information on quantities imported and customers sold to – to be provided to enforcement authorities on request.

Power of Attorney (POA)

This Power of Attorney is entered into by and between "we"

_____ ("CLIENT")

with its principal offices at

_____ ("CLIENT Address")

And service provider

CHEMICAL INSPECTION & REGULATION SERVICE LIMITED ("CIRS")

with its principal offices at

Singleton House, Laurence Street, Drogheda, Co. Louth, Ireland ("CIRS Address")

We, the client, as a non-EU manufacturer, hereby appoint and retain CIRS as our Only Representative to fulfill all the obligations of importers under "Registration, Evaluation, Authorization and Restriction of Chemicals, Regulation (EC) No 1907/2006" (hereinafter referred to as "REACH") for the following chemical substances:

Index	Name	CAS No.	EC No.	Tonnage (ton/year)	Registration deadline
1					

This Power of Attorney shall become effective upon and from the date when the appointment is signed.

Termination of this power of attorney is possible at any time according to the mutual agreement in written form between CIRS and us.

Signed on behalf of
CLIENT

Signature:

Signed on behalf of
CIRS

Signature:



REACH Certificate of Compliance – OR Confirmation and Tonnage Coverage

In compliance with the article 8 of the Regulation (EC) 1907/2006 of 18th December 2006 concerning the registration, evaluation, authorization and restriction of Chemicals (REACH), we hereby confirm that the non-EU manufacturer:

Puji Chemicals Co., Ltd

having its principal place of business at
391 Wener Road, Hangzhou City, P.R of China

has appointed
Chemical Inspection and Regulation Service Limited

having its principal place of business at
Singleton House, Laurence Street, Drogheda, Co. Louth, Republic of Ireland

as its Only Representative for REACH compliance of the following substances:

Substance Name	EC No.	CAS No.	Pre-registration / Registration No.	Tonnage (ton/y)	Registration Deadline
Alginic Acid	232-680-1	9005-32-7	05-21136881800-34-0000	1~10	2018
Humic Acid	215-809-6	1415-93-6	05-2115507697-37-0000	10~100	2013
Arginine	205-866-5	74-79-3	05-2115507687-23-0000	1~10	2018
Glycine	200-272-2	56-40-6	05-2115507684-25-0000	1~10	2018
L-serine	200-274-3	56-45-1	05-2115507680-51-0000	1~10	2018
Glutamic Acid	210-522-2	56-86-0	05-2115507683-57-0000	100~1000	2013
Ammonium Sulphate	231-984-1	7783-20-2	05-2115507688-67-0000	1~10	2018

In capacity of the appointed Only Representative, **Puji Chemicals Co., Ltd** is identified under the Universal Unique Identifier code (UUID):

ECHA-def9-0031-47e8-543157899764

This REACH certificate is not valid unless accompanied by an annex bearing same certificate number.

This REACH certificate alone should not be used to carry out any kind of import formalities.

Yunbo Shi, Managing Director, Chemical Inspection and Regulation Service Limited



Annex to REACH Certificate No. : CIRS POA 2008--00917

According to "Guidance on REACH Registration (Version1.4)" published by ECHA, it is necessary that the "non-Community manufacturer" provides his only representative with up-to-date information on the list of EU importers which should be covered by the registration of the only representative and the quantities imported into the EU.

We hereby issue this volume tracking and tonnage coverage certificate to show the enforcement authorities of member states that the imported product delivered by the non-EU entity below is covered by the (pre)registration(s) of Chemical Inspection and Regulation Service Limited (OR) and is thus REACH compliant.

Exporter Information / Non-EU Entity Information

Non EU Entity / Exporter	Name	Puji Chemicals Co., Ltd		
	Address	391 Wener Road, Hangzhou City, China		
	Contact person	Michael Zhang	Tel	0086 571 4567 8
	Email	mz@pujichem.com	Fax	0086 571 4678 9

EU Importer Information

EU Importer/Downstream User	Name	WonderChem GmbH		
	Address	1243 Francis Street, Hamburg, Germany		
	Contact person	Tom Stevenson	Tel	00 40 456 78924
	Email	tom@wonderchem.com	Fax	00 40 456 78923

Imported Product Information

Substance Name / Component Name	EC No.	CAS No.	Estimated Volume Covered	Uses of Substances
Alginate Acid	232-680-1	9005-32-7	50kg	Additive
Humic Acid	215-809-6	1415-93-6	25kg	Additive
Arginine	205-866-5	74-79-3	1ton	Additive
Glycine	200-272-2	56-40-6	28kg	Additive
L-serine	200-274-3	56-45-1	47kg	Additive
Glutamic Acid	210-522-2	56-86-0	51kg	Additive
Ammonium Sulphate	231-984-1	7783-20-2	51kg	Additive

The use of this certificate is restricted to the importer and imported product indicated above.

Disclaimer: As only representative, we are obligated to keep above information confidential. We strictly abide by the EC competition law rules and will not disclose above information to any third party except enforcement authorities or use above information to get involved in the actual trade.

Signature (The Only Representative)

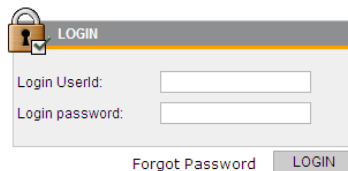


REACH Compliance User Management System

Each client will be assigned a username and password that enables them to login to our RCUM system to:

- View the list of substances pre-registered (EC number, tonnage band, pre-registration number and registration deadline, etc.)
- View and search the list of substances registered or to be registered. (EC number, tonnage band, registration number, status of registration and uses covered included in registration, etc.)
- Edit the inventory of importers.
- Download documents and certificates (POA, REACH certificate, SDS, application forms, etc).
- Change your password.

REACH COMPLIANCE USER MANAGEMENT SYSTEM



LOGIN

Login Userid:

Login password:

[Forgot Password](#)



RCUM Demonstration Ltd

Address :Dublin
 Tel :+353 765 3478 Fax :+353 765 3499 Uuid:

Pre-registration Information

Search :

EC Name	EC No.	CAS No.	Tonnage	Pre-registration No.	Reg Deadline	CEFIC Code	SDS
Ethanol	245-579-201	644-4578-99	10-100	05-66789877333-2345	05-31-2018		SDS

Total:1 ItemsPages:

Registration Information

EC Name	EC No.	CAS No.	Tonnage	Status	Registration No.	SDS	Uses
Methanol	234-456-789	6332-571-690	1000	in progress	tba		Uses

Total:1 items

Inventory of Importers

[Add New Importer](#)

Company Name	Country	Operation
BASF ASD	Germany	Edit

REACH NEWS

- [CIIRS New Website Launched](#)
- [Submit Your C&L Notification Today](#)
- [REACH Registration 2010, Are You Ready?](#)
- [Are You Prepared For China New Chemical Notification?](#)

 [Download Certificate](#)

FAQ

- [What can I do with REACH Compliance User Management System?](#)
- [What if I lost my password?](#)
- [What shall I do if I would like to change tonnage and postpone registration deadline?](#)
- [What if I found something wrong in the system?](#)
- [Why do I need to disclose the inventory of importers in this system?](#)
- [How can I work with you to be REACH compliant?](#)

Major Concerns

- Non-EU companies are not willing to disclose the name of importers and the quantities of products sold to their OR;
- Non-EU companies do not supply REACH compliant SDS to their customers;
- Some companies are not willing to register their substances before 2010 even though the tonnage of their substances exceed 1000 ton per year;
- Many EU importers, especially SMEs are not fully aware of the requirements of REACH;
- The enforcement of member states is weak.

About Us

CIRS is a leading provider of regulatory consulting and testing services with a strong focus on chemical compliance. With a strong presence in EU and China, CIRS has provided cost-effective regulatory support and testing services to over 3,000 companies while doing businesses in both the EU and China.

CIRS is the largest REACH Only Representative in the world and has successfully registered 12 substances up to date. We can also help you find REACH registered chemicals and suppliers..

CIRS is a recommended service provider by China Inspection and Quarantine Bureau, the US Mission to the EU and IDA. CIRS is also a member of Helsinki REACH Centre.



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