

BACKGROUND

The chemical law in Taiwan is **Toxic Chemicals and Concerned Substances Control Act (TCCSCA)**. It was amended on **16 January 2019**. Under this Act, there is a regulation on Chemical Substances Registration. From 1 January 2020, manufacturers or importers who manufacture or import any **Existing Chemical Substance** in an annual amount of 100 kilograms or more, should apply for the **Phase One Registration** within 6 months from the date of manufacturing/importing. Taiwan's EPA also issues a list of Priority Existing Chemicals (PECs) subject for Standard Registration. The first batch contains 106 PECs. Taiwanese manufacturers, importers and Third-Party Representatives (TPR) based in Taiwan can register substances under the TCCSCA.

Non-Taiwanese companies are not allowed to submit substance registrations directly and they cannot appoint a TPR to register substances on their behalf. The regulations only authorize Taiwanese importers or manufacturers to appoint a TPR to assume their chemical registration responsibilities.

Non-Taiwanese manufacturers not willing to disclose product compositions to their Taiwanese clients can ask the importers to nominate a TPR to do the annual reporting on behalf of the importers without disclosing product composition to the importers.

CHEMICAL INVENTORY IN TAIWAN

Taiwan's Chemical substance Inventory (TCSI) was compiled jointly by two competent authorities, the Environmental Protection Administration and Ministry of Labor. The inventory contains more than 100,000 substances that have been circulated or placed in Taiwan between 1992 and 2014. The Inventory Chemical Substance Nomination and Notification (CSNN) is available online for search, via CAS no., English name, or Chinese name. Chemicals in the inventory are considered Existing Chemical Substances in Taiwan. Chemicals outside the inventory are considered New Chemical Substances.

EXEMPTIONS

- Substances which occur in nature.
- Chemical substances in machines or equipment for test run purposes.
- Inseparable intermediates from chemical reactions in the reaction vessel or production process.
- Chemical substances for national security or national defense purposes.
- Chemical substances under customs supervision.
- Chemical wastes produced or released from industrial process.
- By-products or impurities that are of no commercial application.
- Mixtures; but individual constituents of mixtures shall not be applied to the Article.
- Articles
- Polymers that the 2% Rule is Applicable and listed on the inventory of existing chemical substances.
- Controlled chemicals defined by Occupational Safety and Health Act, Regulations Governing Designation and Handling Permission of controlled Chemicals (under evaluation)
- Concerned Chemical Substances defined by TCCSCA (under evaluation)

SUBSTANCE REGISTRATION

Existing Chemical Substance

- Manufacturers / Importers, who manufacture/import existing chemical substances in an annual amount of 100 kilograms or more, should apply for the Phase One Registration within 6 months from the date of manufacture/import.
- Standard Registration is required for substances that are listed on the 106 PECs List with the tonnage band of more than 1 TPA.
- Joint registration of the same substance is recommended.

New Chemical Substance

- Small quantity registration of those below 100 kg per year
- Simplified Registration between 100 kg and 1 ton per year
- Standard Registration for those above 1 ton per year

ANNUAL REPORTING

Annual Reporting takes place from April 1 to September 30. Information to be included in Annual Reporting:

- Substance name
- CAS Number
- Registration number for each substance
- Volume in the previous year
- Information on importer or manufacturer

HOW CAN GPC HELP YOU?

- Supply Chain communication for Third Party Representative (TPR) Appointment
- Consortia communication (Joint Registration)
- Communication with competent regulatory authorities in Taiwan (TSCB and EPA)
- Existing Chemical Substance – Phase One Registration and Standard Registration support
- New Chemical Substance – Small quantity, Simplified Registration and Standard Registration
- Annual Reporting
- Review the compliance check communication and provide responses/justification
- Substance Sameness & Identification related follow up queries
- Member dossier update
- Certificate of compliance and tonnage coverage to the Buyers
- Manage Tonnage band compliance
- Update information on Registration as and when required
- Regulatory & compliance Submission to the IT system.



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