

# *Overview of Regulatory Compliance Requirements for Hazardous Chemicals and Dangerous Goods in China*

26.09.2018, Arlington | XIANG GUOZHAO



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*01*

## *GHS implementation in China*

## *Brief Introduction of the GHS Implementation in Mainland China*



China GHS

### *Hazard classification*

#### **Classification**

#### **28 Hazard Classes**

GB 30000.2~30000.29-2013

(UN GHS rev 4)

From Nov. 1, 2014

**Inventory of Hazardous Chemicals (2015)**

- new version, 2828 substances

**Guidance of the Inventory (C&L)**

Issued Aug 19, 2015

### *Hazard communication*

#### **Label/Packaging**

Label:

GB 15258-2009

Packaging:

GB 190-2009

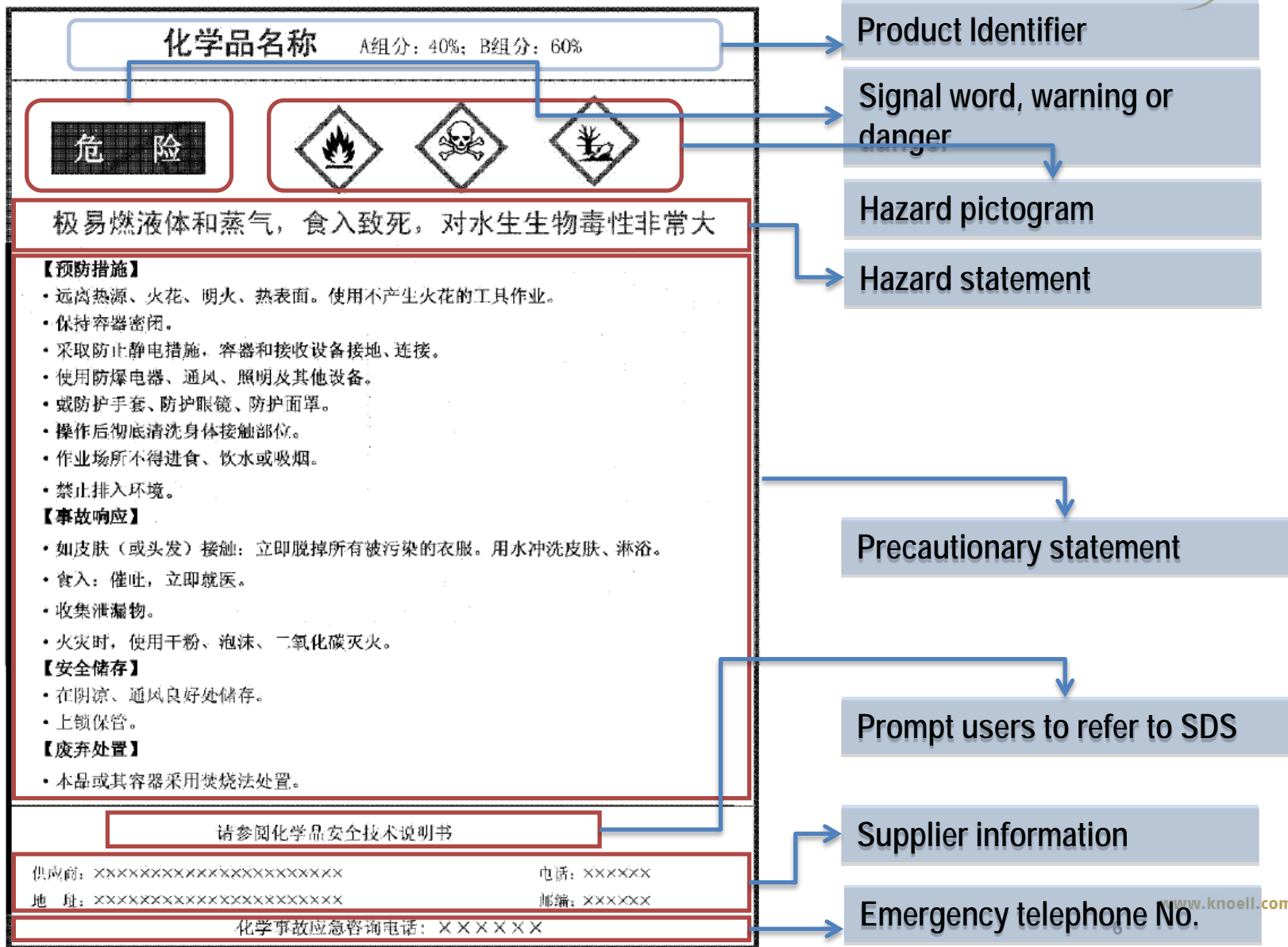
#### **SDS**

SDS Guidance

GB/T 17519-2013

From Jan. 1, 2014

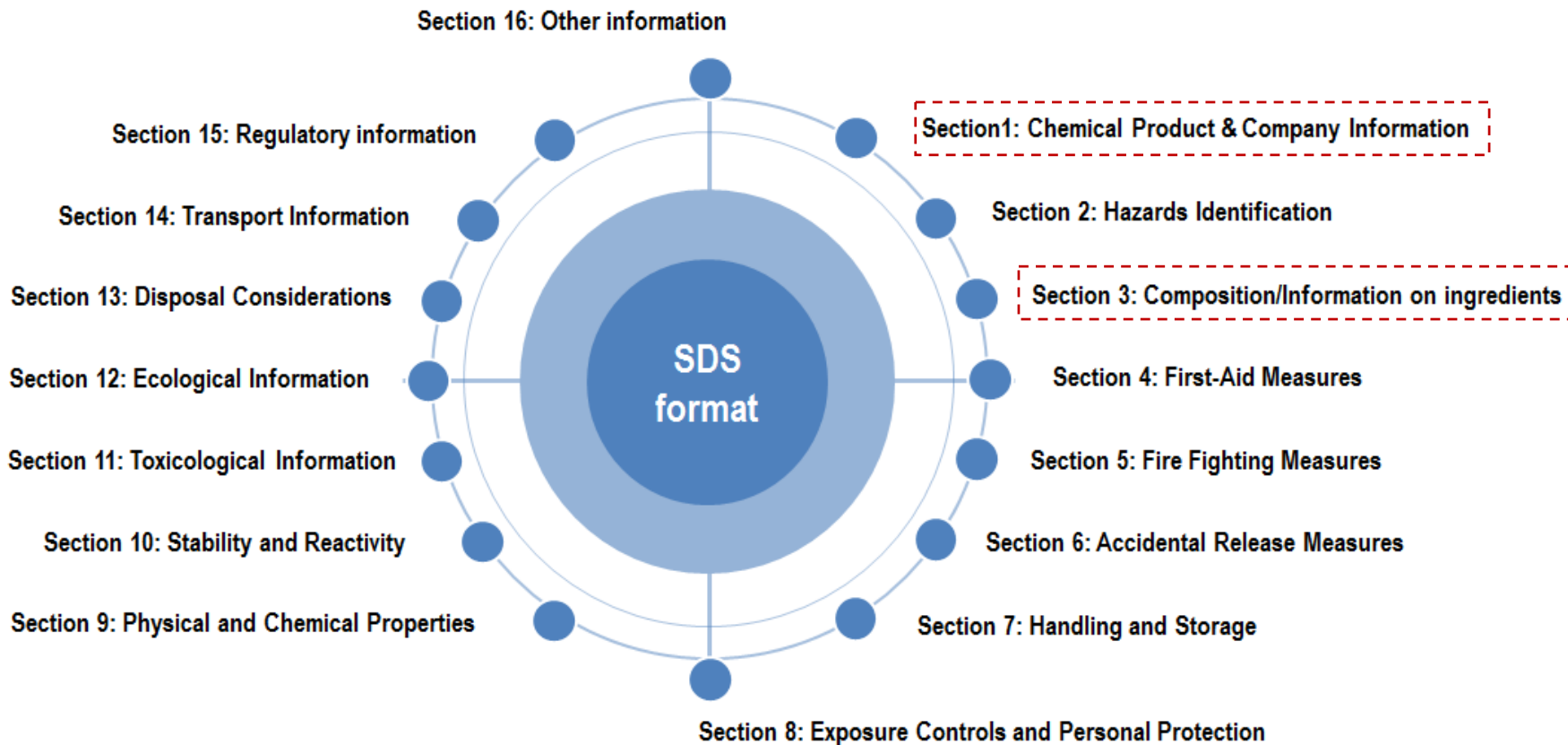
GHS-Related Regulations/Measures in China	
<b>Hazard Identification &amp; Classification</b>	<a href="#">Implementation Guidance of the Inventory</a> Physical Hazard Identification and Classification ( <a href="#">SAWS Order 60</a> )
<b>Registration</b>	HazChem Registration ( <a href="#">SAWS Order 53</a> ); New Chemical Substance Registration (MEP Order 7)
<b>Administrative Licensing</b>	<ul style="list-style-type: none"><li>• Safe Manufacturing Permit (<a href="#">SAWS Order 41</a>);</li><li>• Safe Operation Permit (<a href="#">SAWS Order 55</a>);</li><li>• Safe Use Permit (<a href="#">SAWS Order 57</a>)</li></ul>
<b>Entry-Exit Inspection &amp; Quarantine</b>	Statutory Check: Declaration of conformity, inhibitor/ stabilizer info, GHS labels and SDSs in Chinese, etc. ( <a href="#">AQSIQ Announcement 30 of 2012</a> )



## Elements of Label and Noteworthy Points

Label Elements		China Mainland
Chemical identification	Name	1. Consistent with SDS; 2. The chemical name or common name should be available in both English and Chinese languages
	Compositions	Consistent with SDS
	Position	In top of label and should be striking
Pictogram	Color	White base, black word, red box; Black box is acceptable in some cases
	Size	Not specified
Signal word		should be striking
Hazard statement		1. Below signal word; 2. Arrange in certain orders: PC, Health, environment
Precautionary statement		No limitation of number
Supplier identification		Post code is required
Emergency number		1. 7*24h available; 2. Within territory of China; 3. Should not be a mobile phone; 4. Handled by professional personnel with related expertise
Reference tips		Please refer to SDS for more detailed information 详细信息请参阅化学品安全技术说明书

# Elements of SDS and Noteworthy Points



**A** Section 1:  
Chemical Product & Company  
Information

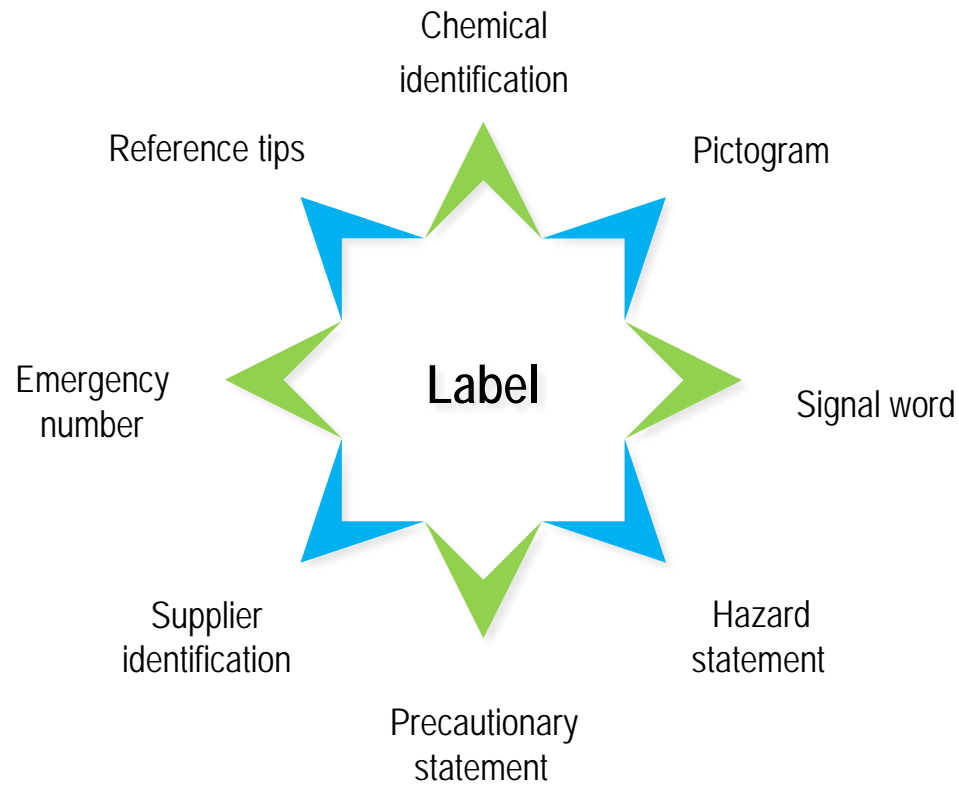
**Emergency Phone**

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

**Claim confidentiality for GHS-classified ingredients**

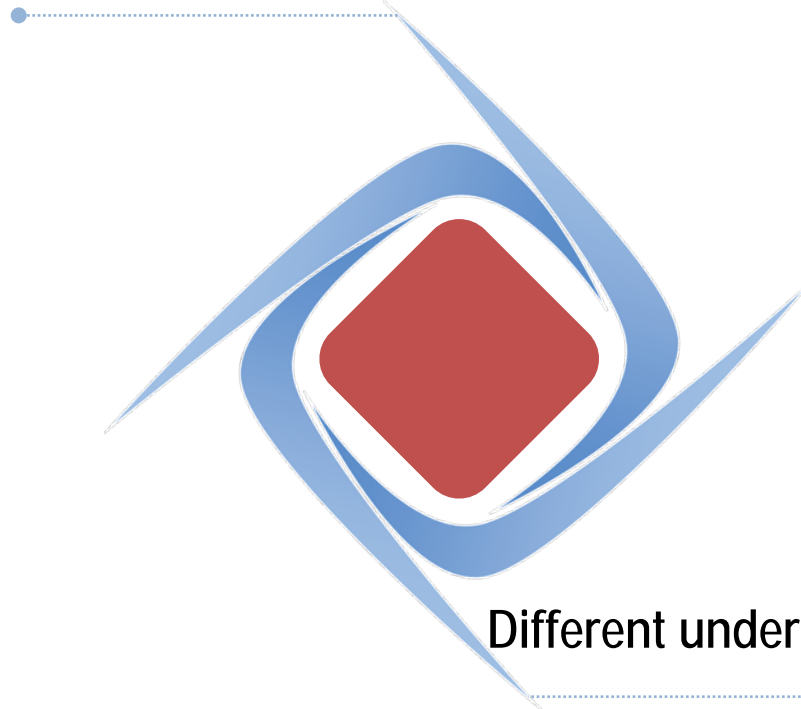


## *Elements of Label and Noteworthy Points*



## *Some Chinese-characteristics open questions*

Classification



Different understanding of local port

02

## *Registration of Hazardous Chemicals under SAWS Order 53*

## *Brief Introduction of Basic Concepts, Registration Scheme and Procedure*

### Measures on HazChem Registration (SAWS Order 53)

#### ✓ Competent Authorities

--- **NRCC** - The National Registration Center for Chemicals of SAWS

--- Local **Registration Offices**

#### ✓ Who's Affected?

--- Domestic Manufacturers & **Importers**

#### ✓ When to Register?

--- Prior to the final acceptance of a newly-built chemical plant (Manufacturers) or **Prior to any importing activities (Importers)**.

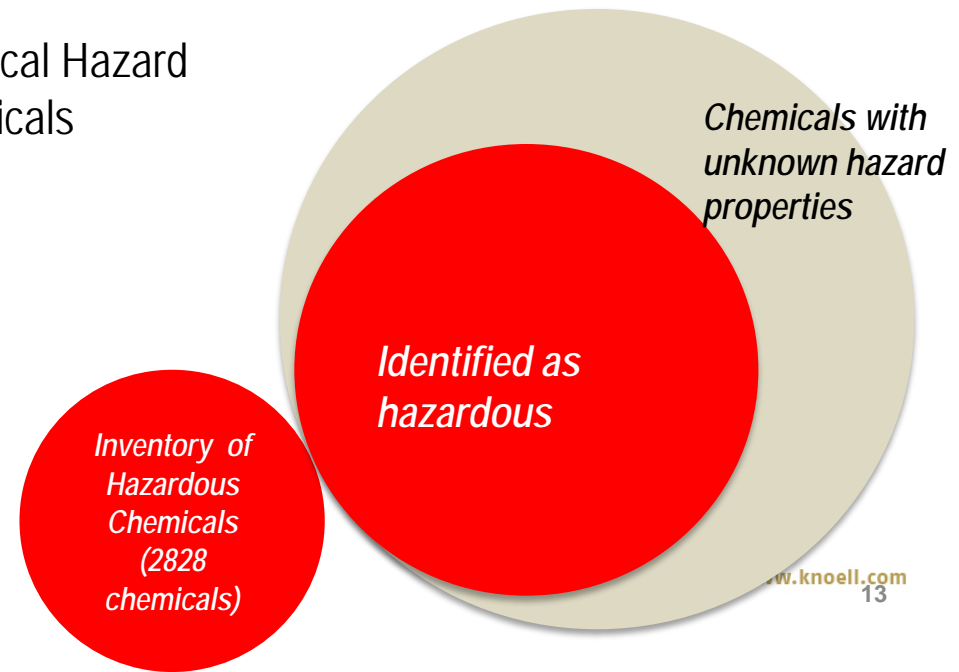
## ✓ What Chemicals

### 1. Chemicals listed in the Inventory of Hazardous Chemicals (2015)

The 2015 version of the Inventory was published on May 1, 2015; replaces 2002 version.

### 2. Chemicals with unknown hazard properties but identified to be hazardous after hazard identification

Measures for the Administration of Physical Hazard  
Identification and Classification of Chemicals  
(SAWS Order 60)



## *Guidance for the Implementation of China 2015 Inventory of Hazardous Chemicals*

### Background

- 2015 Inventory of Hazardous Chemicals entered into force on May 1 (by 10 authorities)
- Implementation Guidance (Trial) issued by SAWS on Aug 19
- Consisting of 2 parts:
  - Specification of the Implementation Rules (within SAWS's jurisdiction)
  - Annex: Classification Information Sheet of Hazardous Chemicals  
(the official classification results of the listed chemicals)

## Critical checkpoints of SAWS Order 53 --- Official Classification guideline

SN	Chinese Chemical Name	Chinese Alias	English Name	CAS No.	Hazard Category	Remark
1	阿片	鸦片	opium	8008-60-4	Specific target organ toxicity-Repeated exposure, Cat.2	
2	氨	液氨; 氨气	Ammonia; liquid ammonia	7664-41-7	Flammable gases, Cat.2 Gases under pressure Acute toxicity-Inhalation, Cat.3* Skin corrosion/irritation, Cat.1B Serious eye damage/eye irritation, Cat.1 Hazardous to the aquatic environment-Acute hazard, Cat.1	

*Incomplete Classification: The guidance will not list the complete hazard categories of the chemicals; companies should supplement other hazard categories by consulting the data of their own, without changing the hazard category listed in the guidance.*

Incomplete Classification

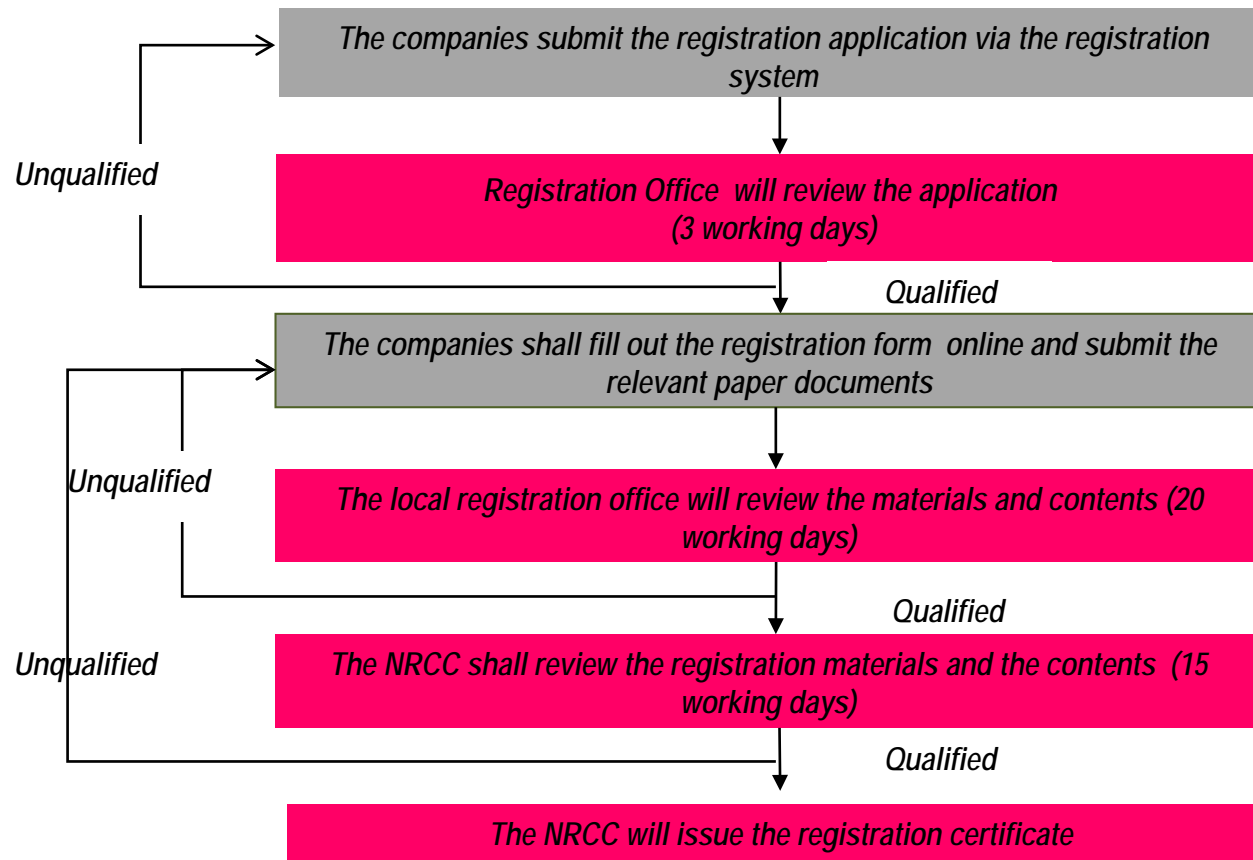
Two important principles

Lowest Classification

*Only the lowest applicable hazard classification will be specified for one hazard category of chemicals in the Catalogue; Companies should specify a single hazard class no less than the lowest applicable classification indicated.*

# Brief Introduction of Basic Concepts, Registration Scheme and Procedure

## Registration Scheme and Procedure

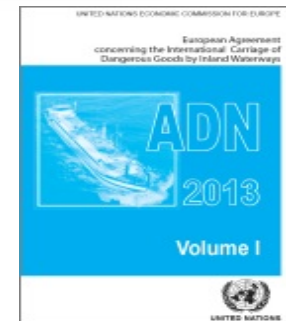
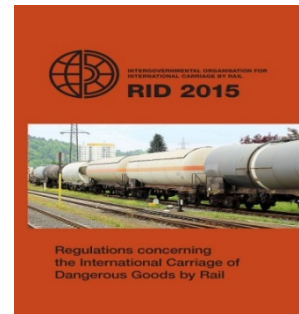
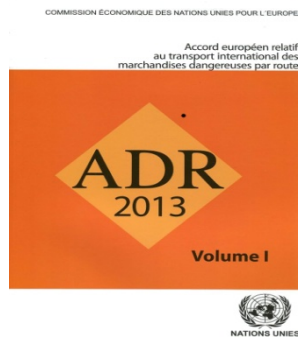
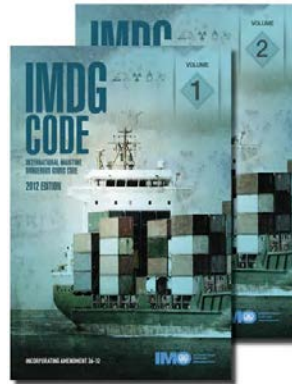




03

## *Regulatory System of TDG in China*

# International Conventions/Rules



# Legal Framework of TDG in China

# National Laws/Administrative Regulations

## Departmental Rules

## Technical Standards *Latest update---JT/T 617*

- Classification and Code of Dangerous Goods (GB 6944-2012)
- List of Dangerous Goods (GB 12268-2012)
- Packing Symbol of Dangerous Goods (GB 190-2009)
- Excepted Quantities and Packing Requirements of Dangerous Goods GB 28644.1-2012
- Limited Quantities and Packing Requirements of Dangerous Goods GB 28644.2-2012
- Classification and List of Organic Peroxides GB 28644.3-2012
- .....

- [MOT Order 1 of 2015](#) - Provisions on the Supervision and Administration of Safe Railway Transportation of Dangerous Goods (take effect from 1<sup>st</sup> May, 2015 )
- [MOT Order 2 of 2013](#) - Provisions on the Road Transport of Dangerous Goods
- [MOT Order 10 of 1996](#) - Rules on the Waterway Transport of Dangerous Goods
- [CCAR-276-R1](#) - Provisions of the Administration of Civil Air Transport of Dangerous Goods in China
- .....

### Decree 591

- *Chapter 1 General Principles*  
*Article 2 The safe management for .....transportation ..... governed by these Regulations.*
- *Chapter 5 Transportation Safety*
- *Article 43 Those engaged in highway transportation and water transport of hazardous chemicals should .....*
- .....

*04*

*Inspection for Hazardous Chemical Importation/exportation*

## Possible moves for supervising

### Basic knowledge---Competent authority

National level



AQSIQ



国家市场监督管理总局  
State Administration for Market Regulation

Local level



CIQ

上海市浦东新区  
市场监督管理局  
中国(上海)自由贸易试验区

AQSIQ: General Administration of Quality Supervision, Inspection and Quarantine of PRC  
Local Entry-Exit Inspection and Quarantine Bureau (CIQ)

## *Possible moves for supervising*

### Scope



#### **Inventory of Hazardous Chemicals (2828 items)**

According to Decree 591  
AQSIQ Announcement Order 30, Inspection of entry-exit hazardous  
chemical products and their packaging



#### **Statutory Inspection Catalogue (236 chemical related items, HS CODE based)**

According to commodity inspection law and it's implementation regulation  
Most of them are coatings, pesticides, petroleum products and other  
chemical products.  
Different port may have additional items, like Shanghai have 57 additional  
HS code

## Possible moves for supervising---Inspection Procedure



Package Performance Test

Package Use Appraisal

## *Possible moves for supervising---Required materials/information*

### CIQ Declaration

- Declaration of Conformity for Hazardous Chemicals
- SDS, GHS Label
- Hazard Identification (for export activity)
- Package Performance (for export activity)
- Name, quantity, information of inhibitors and stabilizers contained in the products, if available (for export activity)

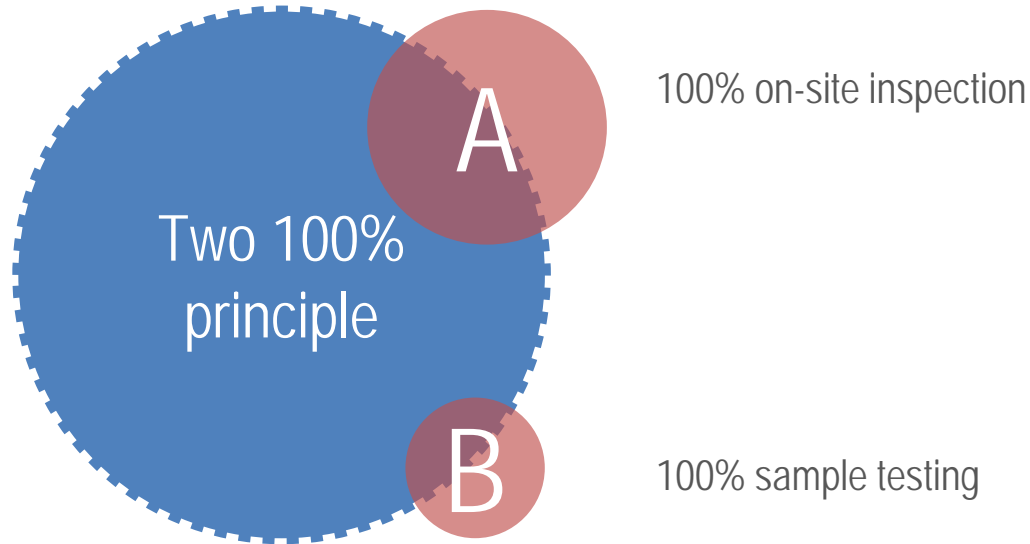
Focus  
items

### Port Inspection

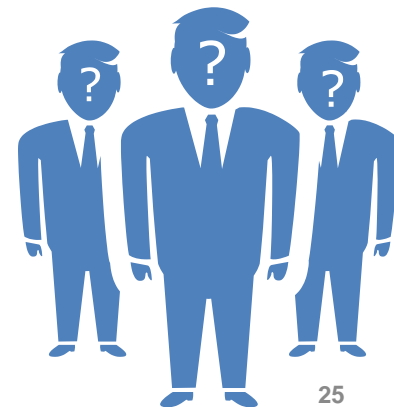
- Compliance of label
- Check whether or not the information on main compositions, physical- chemical properties and hazard category is compliant with declaration
- Compliance of SDS
- Sample testing



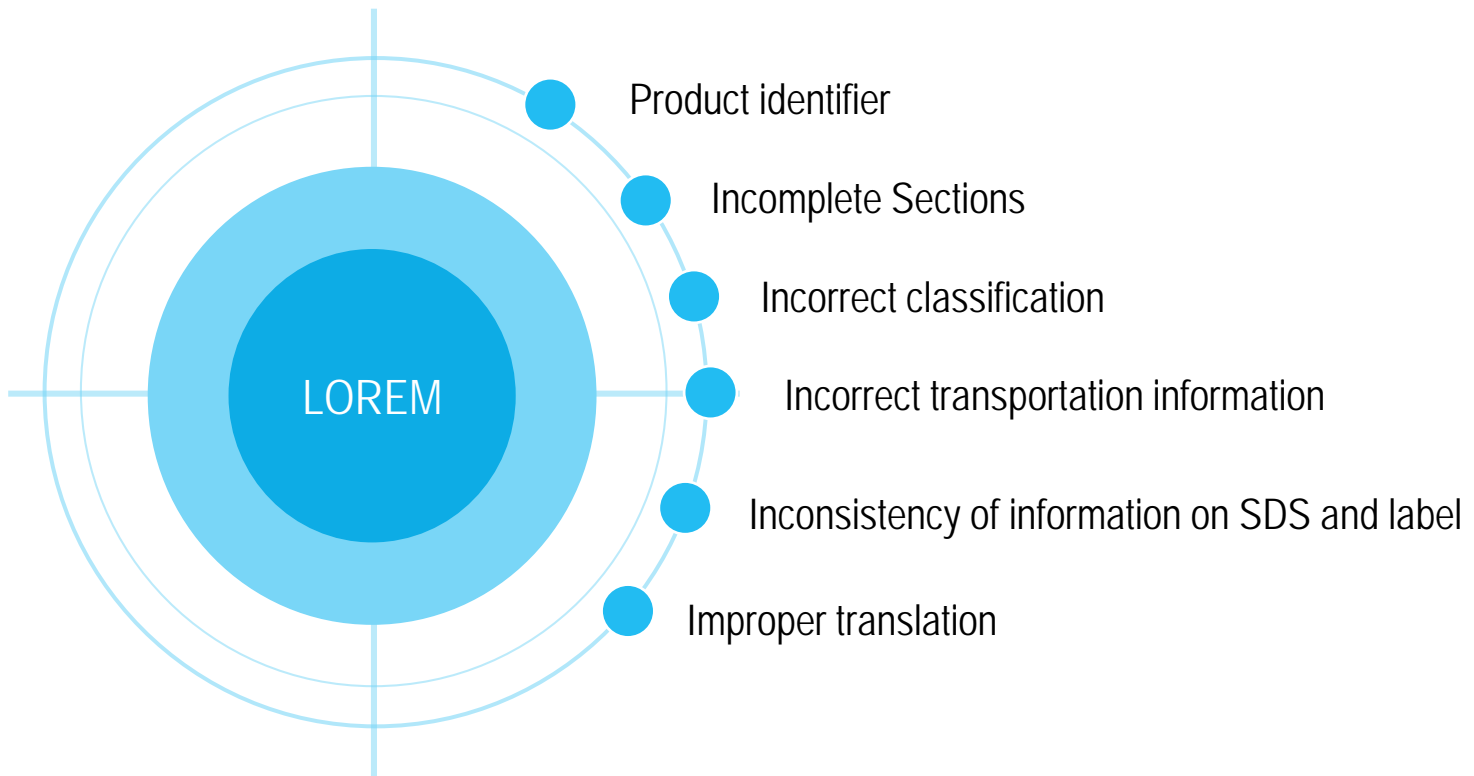
## Possible moves for supervising---" Two 100%" principle



*Noteworthy points:  
Sampling problems  
Grace period...*



## *Common problems released by authority*



**ANY QUESTIONS?**

**THANK YOU FOR ATTENTION !**