REACH24H



Protecting Trade Secrets Around the World, Part 3: How To Deal with Confidential Business Information in the Asia-Pacific Region

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SCHC Spring 2017 Meeting March 28, 2017



Contents





Japan GHS



According to JIS 7253, substance name and its concentration or concentration range shall be indicated on SDSs if it is present above concentration limit and contributes to the classification of the product.

If substance name belongs to trade secrets, a generic substance name can be used. However, the following substances must be disclosed and cannot be claimed as confidential:

- Respiratory sensitizing or skin sensitizing substance >0.1% w/w;
- Carcinogenic Category 2 substance >0.1% w/w;
- Reproductive toxicant Category 1 or 2 >0.1% w/w;
- STOT Category 2 substance >1% w/w;

China GHS



Both GB 15258-2009 and GB/T 17519-2013 have given clear guidance on information disclosure on labels and SDSs. Hazardous ingredients contributing to the classification of a substance or mixture and their concentration or concentration ranges shall be disclosed. Generic names are acceptable.

For trade secret ingredients, real substance names and CAS numbers can be hidden. However, hazards shall be fully disclosed.

Korea GHS



For Korea, substance name, CAS or exact content can be claimed as confidential business information and hidden from Safety Data Sheets. Prior approval is not required. However, all hazards must be fully disclosed.

When using concentration ranges, the range must be within 5% range.

If the contents are less than 5%, the lower limit shall be indicated as ">=1%" (0.1% for carcinogens and germ cell mutagens, 0.2% for respiratory sensitizers, and 0.3% for reproductive toxicants).



For Taiwan, hazardous ingredients contributing to the classification of a substance or mixture and their concentration shall be disclosed.

Companies who do not wish to disclose the name or concentration of hazardous chemicals or suppliers' names in SDSs for the necessity of national security or trade secret protection shall provide a written document to Taiwan OSHA and obtain an approval.

However, chemical substances with the following hazard classifications are not allowed to be withheld on Safety Data Sheets (SDSs) and on labels:

- Acute toxicity Category 1, 2 & 3;
- Skin corrosion and irritation Category 1;
- Serious eye damage/irritation Category 1;
- Respiratory or skin sensitization;
- Carcinogenic, Mutagenic or Reproductive Toxicant;
- STOT single exposure or repeated exposure Category 1.



SDS Confidentiality of Business Information

Article 18

The manufacturer, importer or supplier who wants to retain the name/concentration of hazardous substance, or the name of the manufacturer, importer or supplier to safeguard the national security or commodity trade secrets, shall submit the following documents to the central competent authority for approval:

- 1) Certification as a national security or commodity business secret;
- 2) Measures taken to protect the national security or commodity trade secrets;
- 3) Economic benefit evaluation of applicants and their competitors;
- 4) Classification of hazardous chemicals in the product and supporting material.



SDS Confidentiality of Business Information

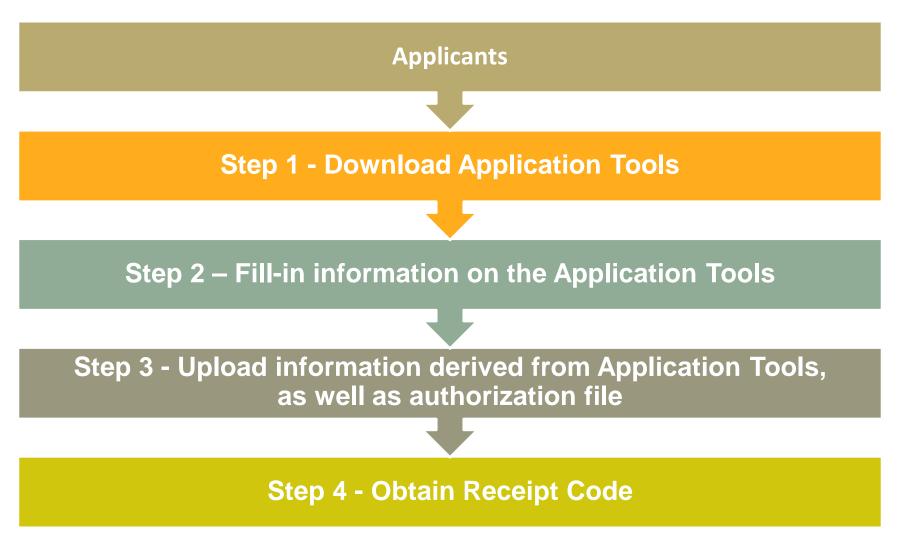
Article 18 (continue)

According to the national standards CNS15030, hazardous substances that belong to the following hazard categories, shall not apply for confidentiality of safety data sheet content:

- 1) Category 1, 2, 3 of Acute Toxicity
- 2) Category 1 of Skin Corrosion/Irritation
- 3) Category 1 of Serious eye damage/eye irritation
- 4) Respiratory or skin sensitization
- 5) Germ cell mutagenicity
- 6) Carcinogenicity
- 7) Reproductive Toxicity
- 8) Category 1 of Specific target organ toxicity-single exposure
- 9) Category 1 of Specific target organ toxicity-repeated exposure

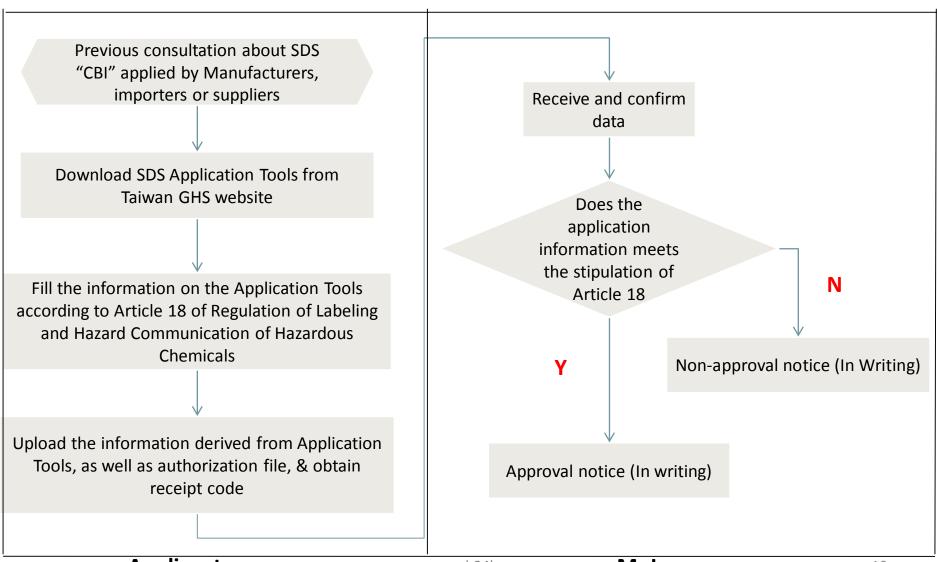


SDS Confidentiality of Business Information - Procedure





SDS Confidentiality of Business Information - Procedure





SDS Confidentiality of Business Information - Application Form

1) Basic information

2) Supporting material of business secret

3) Description and supporting material of hazard classification of hazardous chemicals

Apply only to retain the name of the manufacturer, importer or supplier, need not fill the hazardous substances of Basic information, and Classification of hazardous chemicals in the product and supporting material.

Explanation



SDS Confidentiality of Business Information - Application Form

表 1 基本資料 申請者資訊 申請者身分別 □製造者 □輸入者 □供應者 申請者名稱 申請者地址 工商登記證號碼 統一編號 電話(代表號) 傳真(代表號) 聯絡人資訊 聯絡人姓名 聯絡人地址 聯絡人電子郵件信箱 聯絡人電話(公) 聯絡人行動電話 聯絡人傳真 代理人資訊 代理人名稱 代理人地址 工商登記證號碼 統一編號 電話(代表號) 傳真(代表號) 申請保留揭示資訊 安全資料表化學品名 □危害性化學品成分名稱 □危害性化學品成分含量 申請保留揭示項目 (可複變) □製造者、輸入者或供應者名稱 危害性化學品成分資訊 化學文摘社登記號碼 (CAS NO.) 中文化學名 英文化學名 濃度百分比範圍 其他中文同義名稱 其他英文同義名稱 揭示之中文類名* 圖示之英文類名*

Foreign manufacturers/institutions
applications should entrust
domestic manufacturers/institution
to apply for approval, and provide
commission (authorization)
document

The class name used for confidentiality should refer to the Appendix of Technical guidelines for the registration of new chemical substances MoL: Principle of chemical substance class name



SDS Confidentiality of Business Information - Application Form

表 2 商品營業秘密證明資料

40.4 阿印昌9	R 他省
認定為國家安全或和	新品營業秘密之證明
是否已在勞動部公告之化學物質清單取	□有,資料保護物質編碼
得資料保護物質編碼?(已取得資料保	□否
護物質編碼者,以下商品營業秘密證明	
資料免填)	
申請保留揭示項目,是否目前已在其他	
國家 SDS 揭露受到資料保護?請說明並	
輔以相關檔影本、日期與資訊。	
若未在其他國家取得資料保護,僅在本	
國申請的合理理由為何?(已取得其他	
國家資料保護者免填)	
該危害性化學品成分是否已於國內申請	
專利?如果專利已核可,是否曾將專利	
轉移給其他公司? 在申請專利的過程中	
是否已將相關資訊公開?	
為保護國家安全或商品	營業秘密所採取之對策
是否可透過分析或其他管道知道該保留	
揭示資訊?是否已在安全資料表或產品	
相關技術手冊可能登載相關資訊? 相關	
競爭者是否已可以獲取前述資訊?	
是否曾採取過任何措施與對策避免該保	
留揭示資訊外流?相關競爭者目前是否	
知道該申請保留資訊?	
請摘要說明該申請保留資訊在您公司/	
工廠內部如何確實進行資料保護。您的	
供應鏈或合作夥伴若可獲得該資訊,他	
們受到哪些合約的限制?	
對申請者及其競爭	者之經濟利益評估
公開該申請保留資訊,對申請者在市場	
上的競爭地位有何影響? 公開該申請保	
留資訊造成您的利益損失或實質損害為	
何?或是造成競爭者經濟利益獲益為	
何?	

If necessary, the central competent authority shall notify the contact person by e-mail (ghs@osha.gov.tw) to ask for more information.

In order to testify that the application data are consistent with the conditions for the CBI.



SDS Confidentiality of Business Information - Application Form

表 3 危害性化學品成分之危害性分類說明及證明資料

危害性化學品成分是否已列在我國 GHS	□是	□否				
三階段適用物質名單中?						
申請保留揭示安全資料表之化學品是否	□是	□否				
是首次在台灣製造、輸入或供應?						
危害性化學品成分之何	色害性分	類說明及語	登明			
不屬於急毒性物質第一級、第二級或第						
三級之說明及證明						
不屬於腐蝕/刺激皮膚物質第一級之說						test report scientific
明及證明					Provid	le test report, scientific
不屬於嚴重損傷/刺激眼睛物質第一級					literat	ure or estimate data of
之說明及證明				ATTI	structi	ure-activity relationship
不屬於呼吸道或皮膚過敏物質之說明及					acc	ording to CNS 15030
證明					classifi	cation standards or GHS
不屬於生殖細胞致突變性物質之說明及					nurnle	book to prove that the
證明					hazard	lous chemical ingredient
不屬於致癌物質之說明及證明					dano	t have the above specific
不屬於生殖毒性物質之說明及證明					00 110	alth hazard categories.
不屬於特定標的器官系統毒性物質-單					nea	aith hazard categories
一暴露第一級之說明及證明						
不屬於特定標的器官系統毒性物質-重						
複暴露第一級之說明及證明						



SDS Confidentiality of Business Information - Related Provisions

New chemical substances approved by MoL, before it is incorporated into the **List of Chemicals**, its hazardous chemical name can be replaced by a new chemical substance code on SDS.

Upon approval, the class name shall be provided on SDS, as well as the Approval Document Number.

The information filled on the Application Tools shall be upload to the websites designated by authority.

Data or documents submitted by the applicant will be returned by authority if they are not sufficient to meet the requirements of Article 18 of Regulation of Labeling and Hazard Communication of Hazardous Chemicals.

Australia GHS



Australia requires that the chemical identity of a hazardous ingredient contributing to the classification of a chemical or a substance with occupational exposure limits be disclosed on Safety Data Sheets (SDSs).

If substance name belongs to trade secret, the use of generic name for a hazardous substance is only accepted in certain cases (moderate hazard category and no occupational exposure limit established).

If the exact concentration of an ingredient is confidential, the concentration of the ingredient can be disclosed using the following range or narrower range: <10%, 10-30%, 30%-60%, >60%.

Malaysia GHS



For Malaysia, supplier may omit information on the name of a hazardous chemical or the composition and ingredients of a hazardous chemical on SDSs if the information belongs to confidential business information. If the substance name is omitted, such information shall be replaced with the generic names of the hazardous chemicals.

Where the exact concentration of an ingredient is CBI, the concentration of the ingredient shall be disclosed using the following allowable concentration range or a narrower range.

<1%
1 to <3%
3 to <5%
5 to <10%
10 to <30%
30 to 60%
>60%

Where the classification of the hazardous chemical is based on the ingredients, rather than the product as a whole, the classification must be based on the highest concentration provided in the SDS.

Thailand GHS



When a new product is introduced to Thailand, full composition should be disclosed to DIW without any trade secret. However, when preparing SDS and label, are trade secrets for some ingredients allowed? Is any additional notification or documentation required?

If SDS and label are **NOT** used for importation, it is allowed to keep some ingredients as trade secret. But, as specified in B.E. 2555, for substances, impurities and stabilizing additives which are themselves classified and which contribute to the classification of the substance must be listed; and for mixtures, concentration or concentration range of all hazardous ingredients, which are present above their cut-off levels.

If SDS and label are used for importation, you have to disclose 100% composition information to DIW. In case of CBI, you may ask importer to try following steps:

- 1) Let importer conduct DIW consultation via on-line system. Fill composition shown in MSDS (composition in range is OK)
- 2) Since importer does not fill 100%, on-line system does not show the result and ask importer print out the document from on-line system.

Thailand GHS



- 3) Submit hard copy obtained from on-line system along with MSDS (company name in section 1 has to be the same as invoice or shipping document) to DIW one-stop-service located at DIW officer
- 4) Inform DIW officer + write it on document that it is CBI case and manufacturer will send 100% composition directly to DIW via e-mail "director.cbi@diw.mail.go.th"
- 5) DIW officer will give importer submission number and submission date.
- 6) Importer will forward submission number and date to supplier for reference.
- 7) Supplier submits 100% composition to DIW via director.cbi@diw.mail.go.th with submission number and date for officer to track
- 8) Inform back to importer what date to submit data to DIW
- 9) Importer follows up DIW for consultation letter result accordingly. HOWEVER, if customs asks 100% composition for HS code, this option is not valid. Because there is nothing showing 100% in DIW letter.

Singapore GHS



SS 586: Part 3: 2014

There should be full disclosure of ingredients determined to be hazardous. However, under certain conditions, non-disclosure of genuine commercially confidential information may be permitted. The manufacturer or importer may use a generic name on the label and SDS, in place of the chemical name of an ingredient. The generic name used should describe the functionality of the ingredient, substance or polymer which contributes to the hazard. Where generic name is allowed, CAS number may be omitted.

A claim of confidential business information cannot be made for some ingredients. Generic names are not permitted for:

- a) Substances classified as:
 - Carcinogenic Category 1
 - Germ cell mutagenicity Category 1
 - Reproductive toxicity Category 1
 - Specific target organ toxicity, single or repeated exposures Category 1
 - Skin corrosion or serious eye damage Category 1
 - Respiratory sensitisation Category 1
 - Acute toxicity Category 1, 2 and 3;
- b) have a Singapore PEL.

New Zealand GHS



Component chemicals must be listed by chemical name, common name or synonyms and CAS number, together with their concentration or concentration range. In most cases there should be full public disclosure of ingredients. However, ingredients are required by regulation to be identified in the following circumstances:

- a) Where the ingredient is present in such a concentration that it would, independently of any other ingredient, cause the substance to be classified as a Skin corrosion Cat. 1A/1B/1C or an Eye Damage Cat. 1; and
- b) Where the ingredient is present in such a concentration that it would, independently of any other ingredient, cause the substance to be classified as a toxic substance of Acute Tox Cat. 1/2/3, Respiratory/Skin Sensitizer Cat. 1, CMR, STOT Cat. 1/2.

In these cases, the identification of the ingredient must include any CAS number that has been allocated to it. Where a generic name has been used to identify a group of ingredients of classification a Skin Corrosive Cat. 1A/1B/1C or an Eye Damage Cat. 1, a CAS number need not be given.

In addition, the concentration of the ingredient in the substance must also be given. Under certain conditions, non-disclosure of commercially confidential information about ingredient identity may be permitted where this has been agreed to by ERMA within the approval for that particular substance.

Indonesia GHS



For the protection of CBI to the extent not violating aspects of health, security, safety, and the environment, items that don't have to follow the disclosures rules:

- a) Chemical name, CAS and/or the generic chemical name;
- b) Chemical Mixtures and preparations are classified nonhazardous but contains additives and/or impurities which are classified as hazardous presenting at the concentration not exceeding the quantity limit (cut-off value) and/or the concentration limit; and
- c) Concentration or level of chemicals.

Industrial companies shall disclose confidential information to the authorities, at the request of the Director General of Industrial Development and/or in an emergency to ensure the protection of the confidentiality of company information.



Contents

- GHS CBI Disclosure in A-P Region
- Chemical Registration CBI Disclosure in the A-P Region

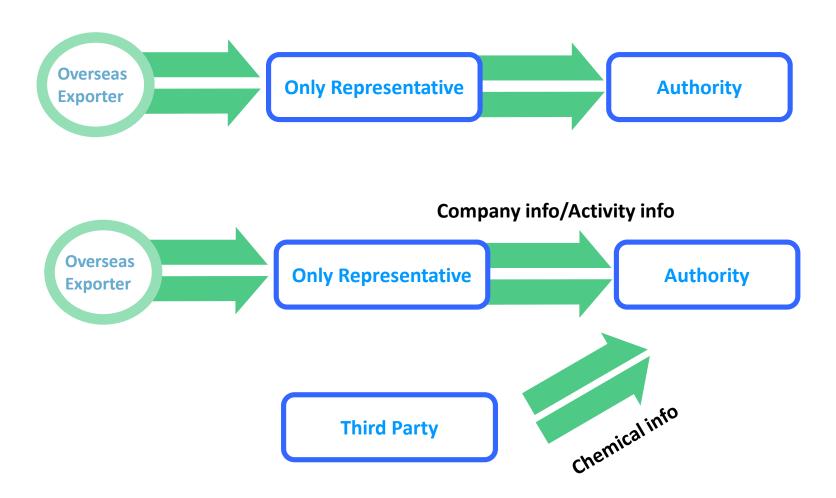


Who Can Be the Notifier/Registrant?

		No	otifier	
Country/Region	Regulation	Local Importer or Manufacturer	Overseas Supplier	CBI policy
China Mainland	MEP No.7	٧	V	OR+ third party submission
Japan	CSCL	V	Depends on the notification type, only the normal notification can be submitted by overseas company	N/A
Japan	ISHA	٧	X	N/A
Taiwan	TCSCA	V	X	TPR
South Korea	K-REACH	٧	Appoint an OR	OR

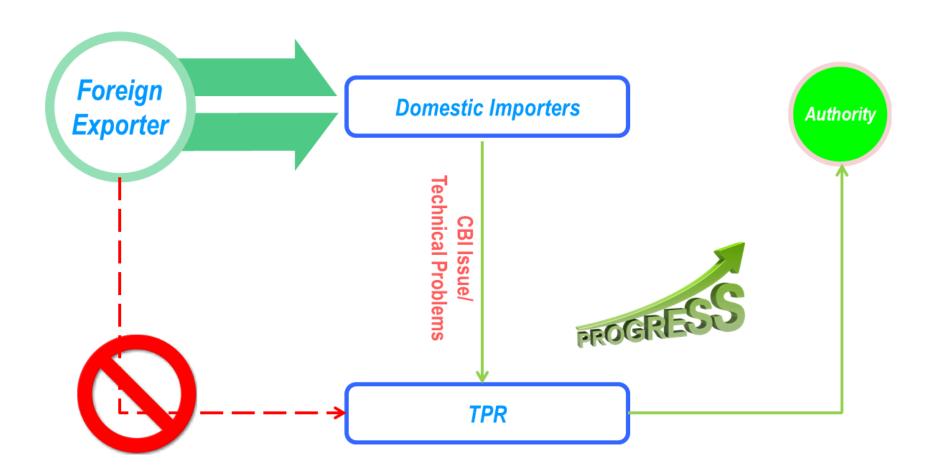


OR/Third Party Role in China Mainland





TPR Role in Taiwan





Public Right-to-Know - China Mainland

The notifier can claim particular information to be confidential in the notification dossier, e.g., chemical name, chemical identification, downstream users, product type, usage, all physico-chemical/toxicology/eco-toxicology data.

And all the claims will not be charged.

3.1 Chemical Nam	ne				
	□No IECSC Comprehensi	ve Check; IECSC Co	mprehensive Check ((Check No.:)	
Chemical Name	Chinese Name:	· ·		nemical name can be kept as resent on the Notification f you tick off the	
(□Confidential)	English Name (□IUPAC Name	me; □CAS Name):	10 01 1101 1 11 1		
ı					
3.2 Structure Inf	or m ation				
Molecular Formu	la(□Confidential):	Molecular Weight	: CAS N	o (□Confidential):	
Chemical Structu	re (□Confidential):	The information of formula, CAS numerous structure can be kee	nber and chemical		



Public Right-to-Know - China Mainland

Public Announcement of Normal Notification

Seria numb		Accepta numbe	I I name in	Notifier	Notification type	Management type
	序号	受理号	中文名称	申报人	申报种类	管理类别
	1	I	多卤代乙酰苯胺	安徽东健化工科技有限公司	常规申报	重点环境管理危险 类
	2	受16019	脂肪族二元胺与脂肪族羧酸和羟基脂肪族羧酸的反应产物	Elementis Specialties, Inc	常规申报	危险类
	3	受16042	二(三烷基烷基酸)烷基- (((三烷基己酰基)氧基)烷 基)烷二酯	路博润添加剂(珠海)有限公司	常规申报	一般类
	4	受16053	氟化吡啶	大连九信精细化工有限公司	常规申报	重点环境管理危险 类

Taiwan Information Dissemination and CBI Application

REACH24H

CBI Application

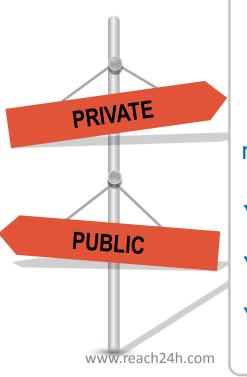
- 1. Meet the conditions for CBI application;
- 2. Up to 15 years;
- 3. An extension application is needed three months before the date expires.

Conditions for CBI Application

- It is not known to persons generally involved in the information of this type;
- 2. It has economic value, actual or potential, due to its secretive nature; and Its owner has taken reasonable measures to maintain its secrecy.

Restrictions of CBI Application

- 1. It is necessary for protecting people's lives, bodies, health.
- 2. It is consented by the manufacturer or importer.



For those information determined to be business secret, the following chemical information registered shall be protected:

- ✓ Identification of chemical substance
- ✓ Information on manufacture or import
- ✓ Use of chemical substance



Registration information that needs to be disclosed is as follows:

- ✓ Chemical substance name
- ✓ Manufacture or import conditions
- ✓ Hazard classification and labeling
- ✓ Safe use information
- ✓ Physical and chemical properties
- ✓ Toxicological and Ecotoxicological information
- ✓ Hazard assessment
- ✓ Exposure assessment.

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Taiwan Information Dissemination and CBI Application – Necessary Materials





	 該化學物質目前是否在其他國家受到資料保護?(*1) Has the chemical substance received data protection in other countries? 		是 Y	否 N
確認表(請於□內打∨)	 公開該化學物質的化學名稱及CAS No.,是否會對登錄人的商業利益造成影響? Does it cause any effect on the registrant's commercial interests if the name and CAS No. of the chemical substance are disclosed? 		是 Y	否 N
	3. 是否可透過分析該化學物質市場化之產品之製程得知化學物質資料? Is it possible to access the chemical substance information through the analysis of the production process of chemical substance product on the market?		是 Y	否 N
Checklist (Please tickin∨boxes □)	 登錄人是否已採取行動並將持續維持資料的保密性? Has the nominator taken action and will he/she continue to maintain the confidentiality of data? 		是 Y	否 N
	5. 登錄人是否曾採取行動防止該化學物質資料因其廢棄物而揭露? Has the nominator taken any action to avert the disclosure of chemical substance data due to the release of itswastes?		是 Y	否 N
	6. 是否曾被國內外主管機關認定該化學物質具環境危害性或可能對人類健康、生物造成危害? Has the chemical substance been identified as hazardous to the environment or harmful to human health andcreatures by the local or overseas government authorities?		是 Y	否 N
聯絡人確認與簽章 (The contact person confirms and signs)	以上確認無誤(I confirm that the information provided above is true, complete and accurate 簽章(Signature) 日期(Date):	e.)		

Taiwan Information Dissemination and CBI Application – Necessary Materials





- 該化學物質目前是否已於其他國家進行資料保護?是否已於其他國家申報為新化學物質或既有化學物質?請提供相關文件影本與詳細日期與資訊並說明。 Has the chemical substance received data protection in other countries? Has the chemical substance been received as new chemical substance or existing chemical substance in these countries? Please provide copy(s) of information with details and explain in this section.
 - 如果清單僅公開該化學物質的名稱,對登錄人在市場上的競爭地位有何影響?清單中的物質名稱與登錄人名稱並無直接連結,市場競爭對象如何利用清單物質名稱資訊造成您的利益損失或實質損害?請說明。 Describe the substantial adverse effects that should result in your competitive position if the chemical substance name appears in the inventory? In your answer, explain the relevance between the disclosure of substance name and any loss or damage to your commercial benefits, even there is no direction connection between chemical substance name and nominator in the inventory, Please explain
- 勞錄人是否曾採取過任何措施避免製造或輸入該物質的資訊外流?相關競爭者目前是否不知道國內已製造或輸入該化學物質?請説明。 Describe any measures has been taken or undergoing to avoid manufacture or import information outflow. Are your competitors aware of that the chemical substance is commercially available
 - in Taiwan? Please explain.
 - 該化學物質資訊是否已可能被雜誌期刊或政府公開資訊揭露?在(物質)安全資料表(MSDS/SDS)或產品相關技術手冊是否已可能登載相關資訊?相關競爭者是否已可以獲取前述資訊?請說明。 Has the information claimed for data protection appeared or been referred to in any of the following:
 - a. Professional or trade publications or any governmental agency publication;
 - b. (Material) safety data sheets (MSDS/SDS) or other similar documents (such as technical data sheets) for the substance; or
 - 登錄人於國內製造或輸入該化學物質的目的是什麼?請說明。 Describe your purpose(s) of manufacturing or importing this chemical substance in Taiwan? Please explain.

c. Any other media or publications available to the public or to your competitors. Please explain.

- 該化學物質是否已於國內申請專利?如果專利已核可,是否曾將專利轉移給其他公司?在申請專利的過程中是否已將相關化學物質名稱公開?如果已公開那申請資料保護的理由是什麼?請說明。 Has the chemical substance been patented in Taiwan? If so, has the patent been transferred to other company? Has the chemical name been disclosed in the process of applying for patent? Please explain.
- 請摘要說明該化學物質在您公司內部使用上如何確實進行資料保護。您的供應鏈或合作夥伴若可獲得化學物質的資訊,他們受到哪些合約的限制,請說明內容。 Describe what measure has been taken in your company /unit for data protection. If anyone outside your company/unit (supply chain) has access to any of the claimed confidential business information. Is this information restricted by any confidentiality agreement(\$\struct \text{WMW.VGA*Gusiness*CaPther(s)}\) or in the supply chain(s). If so, please explain.

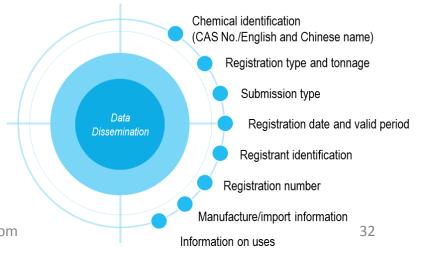
More Information About Taiwan Information Dissemination



Following four items could be protected as CBI:

資料保密申請費					
□是■否申請登錄保密	□是■否申請登錄保密				
項目	金額(新臺幣)				
一、登錄人資料	<u></u> 12,500				
二、化學物質辨識資料	□12,500				
三、化學物質製造或輸入資訊	<u></u> 12,500				
四、化學物質用途資訊	□12,500				
總計					

Detail of types of data for publication with no CBI application:



More Information About Taiwan Information Dissemination







http://tcscachemreg.epa.gov.tw/Epareg/OpenDat a/content/NewChemistPage.aspx

- Latest update on December 16, 2015;
- 2. Information dissemination is a phase-in and dynamic updates process;
- 3. First batch of new chemical applied for SQR with no CBI application has been published;
- 4. Up to now totally 168 chemicals;
- 5. Functions for registration number authenticity confirmation will soon be integrated into the platform.

Public Right-to-Know – Japan CSCL REACH24H

A —	Disclosed Information				
Notification Type	Chemical Name	MITI No.	CAS No. & structure (if available)		
Normal (No volume limitation)	٧	٧	٧		
Low Volume (<10t/a all over Japan)	X	X	X		
Polymer of low concern (No volume limitation)	X	X	X		
Small Volume (<1t/a all over Japan)	Х	X	X		
Intermediate, etc. (No volume limitation)	X	X	X		

Public Right-to-Know – Japan ISHA REACH24H

Notification Type	С	Disclosed In	formation
Notification Type	Chemical Name	ISHA No.	CAS No. & structure (if available)
Normal (No volume limitation)	٧	٧	٧
Small Volume (<100 kg/a per notifier)	X	X	X

Annex 5.6 Notification in Thailand



Purpose

- Establish Annex 5.6, expand the scope of HSCA and gather hazard information
- Establish the inventory of existing chemicals

Who should notify?

Manufacturer or importer in Thailand.

No OR, No TPR!

• How?

On-line notification at http://haz3.diw.go.th/hazvk



Thailand CBI Procedure

- 1. Thailand importer logs in DIW's website at http://haz3.diw.go.th/hazvk (create an account if they don't have one)
- 2. Importer goes to "Consultation Toolbar" shown in picture and fill in the information.





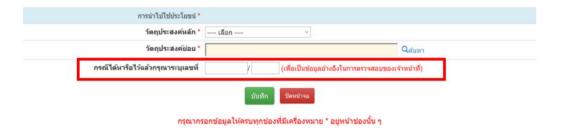
Thailand CBI Procedure (Cont'd)

- 3. Print "Consultation Letter" and remark "ผู้ผลิตจะส่งองค์ประกอบสินค้าที่เป็นความลับ ทางการค้า ให้โดยตรงทาง e-mail"
- 4. Hand in the consultation letter and SDS to DIW's one stop office.
- 5. Receive a submission number and date.
- 6. Give submission number and date back to manufacturer.



Thailand CBI Procedure (Cont'd)

- 7. Manufacturer provide CBI through director.cbi@diw.mail.go.th (submission number and date in email's subject)
- 8. Manufacturer informs importer.
- 9. Importer waits for DIW's respond and receives a CBI consultation number. Normally takes 1-2 months.
- 10. Continue Annex 5.6 notification with CBI consultation number.



K-REACH Legal Base



Article 45 of the Act on Registration and Evaluation of Chemical Substances (K-REACH)

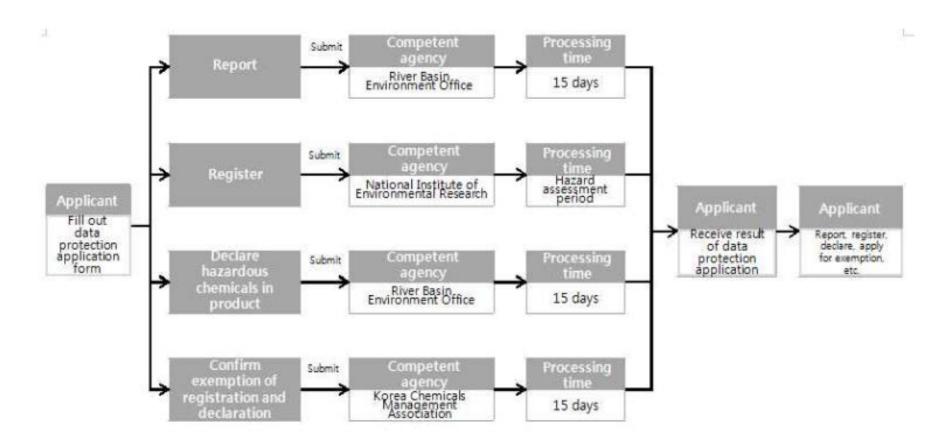
Article 2 of Unfair Competition Prevention and Trade Secret Protection Act

For the data submitted to comply with reporting and registering obligation under K-REACH, application for data protection may be made under Article 45 of said Act.

Confidentiality cannot be applied when identity information of substance already listed in existing chemical inventories of countries including Korea (chemical name, CAS no.)

In cases where data protection over chemical name is applied at a time when submitting registration dossier (or Confirmation Application of Registration Exemption), please make an appropriate generic name in accordance with MoE Public Notice No. 2014-241, and then replace the chemical name with the generic name.

K-REACH Data Protection Procedure REACH24H



Note: OR Appointment Form (POA) issued by overseas manufacturer or producer (This applies only to the cases where an OR appointed by overseas manufacturer or producer makes a request under Article 38 of the Act.

K-REACH Extension of Data Protection REACH24H

The data shall be protected for a period of five years. The request for extension of protection period shall be made 30 days prior to the expiration date, and extension request can be made by up to twice at a five-year-interval.

In cases where data protected is the name of chemical substance, however, information items relevant to homogeneity such as CAS number, structural formula, name of monomer are included in the data protected. Hazardous information and use should be public.





Thanks for your attention!

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