

China "One Enterprise, One Product, One Code" Policy and South Korea MSDS Submission

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On January 5, 2022, the Work Safety Committee of the State Council issued the National Plan for Centralized Management of Safety Risks of Hazardous Chemicals, aiming to promote the use of the new registration system for hazardous chemicals as well as the application of the "One Enterprise, One Product, One Code" Rules.

What's Considered "Hazardous Chemical" in China?

- Chemicals listed on the Catalog of Hazardous Chemicals (2015) and Chemicals that meet the determinative principle proposed by guidance of the Catalog of Hazardous Chemicals (2015) shall be registered under SAWS Order No.53. Both substances and mixtures are subject to registration.

Who is Responsible for Registration?

- Domestic manufactures and domestic importers which are handling hazardous chemicals shall register them accordingly.
- Please note that companies outside of China cannot register those hazardous chemicals as registration holder directly but can complete the registration through their importers.

What are the Registration Requirements?

- Classification and labelling;
- Physical and chemical properties;
- Uses;
- Hazard characteristics;
- Safety requirements for storage, use and transportation;
- Emergency response measures in case of dangerous situations.

One Enterprise, One Product, One Code



"Enterprise"

In registration of hazardous chemicals registration system, each enterprise shall be registered and approved as a unit



"Product"

Each hazardous chemical should apply for code separately



"Code"

The enterprise separately generates a unique safety information code for each hazardous chemical, this information code will be automatically generated after the hazardous chemical registration is completed

Scope of Application

- All hazardous chemicals produced, operated, used, stored and transported within the territory of China shall have for safety information codes.
- Safety information code is the identification of hazardous chemicals. All kinds of enterprises shall not sell, purchase, use or transport dangerous chemicals without safety information code.

The Contents of QR Code

Fixed information: (cannot be changed and is automatically generated based on the registration information system)

- Chemical name and CAS Number Enterprise name
- Chemical registration number (serial number)
- Chemical label elements: warning words, pictograms and hazard descriptions
- Precautions for safety disposal: first aid measures, leakage emergency disposal measures, fire fighting measures
- Status (whether the registration is normal) Safety data sheet and safety label.

Which enterprises could obtain QR code?

- ✓ Product and import enterprises. (When producing or importing hazardous chemicals)
- ✓ Operating enterprises selling repackaged hazardous chemicals.
- ✗ Downstream enterprises, such as general operating enterprises, user, chemical and pharmaceutical enterprises, do not need to obtain QR codes.



Requirements of the QR Code

- The QR code should be located in the right corner of or somewhere suitable in chemical safety label. The QR code location should keep consistent in the same product and same enterprises.
- The inner packaging can be exempted from affixing or printing the Safety information code, while the outer packaging should have the QR code printed or affixed.- The enterprise needs to provide the QR code to the carrier or purchaser.
- It is required to print, paste or hang the QR code in a conspicuous position during transportation.



South Korea MSDS Submission

Ministry of Employment and Labor has modified the Occupational Safety and Health Act in 2019. Under the Amended OSHA, the requirements regarding (Material) Safety Data Sheet/ (M)SDS is implemented from 16 Jan. 2021. The revised regulation applies to manufacturers and importers of hazardous chemicals based in Korea. Related enterprises should submit the (M)SDS to MoEL before manufacturing or importing.

What is the Material Controlled Under K-OSHA?

- A chemical substance or mixture that falls under the classification standards pursuant to Article 104 of the Occupational Safety and Health Act (with GHS Classification).

Who Can Submit the MSDS

- Domestic manufacturer/importer
- Foreign manufacturer appoint a Korean OR

How to submit an MSDS?

- Website: <http://msds.kosha.or.kr>

When to Submit the MSDS?

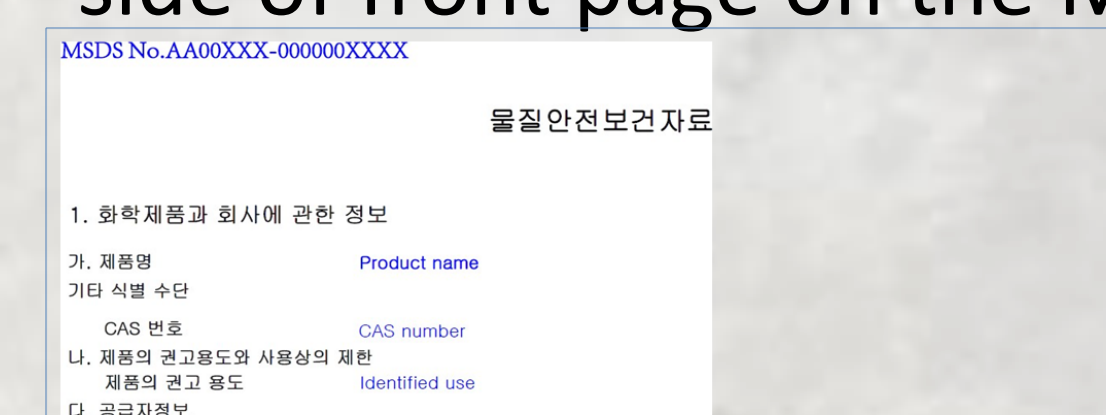
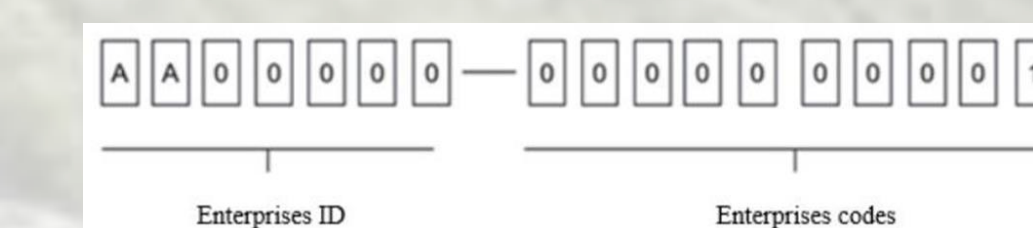
- New Product: No transitional period. MSDS shall be submitted to the MoEL prior to manufacture/import. New product refers to products that have not been sold in the Korean market before January 16, 2021.
- Existing Product:
 - ≥ 1000tpa, before 16 Jan. 2022;
 - 100-1000tpa, before 16 Jan. 2023;
 - 10-100tpa, before 16 Jan. 2024;
 - 1-10tpa, before 16 Jan. 2025;
 - Less than 1tpa, before 16 Jan. 2026

MSDS Submission Options:

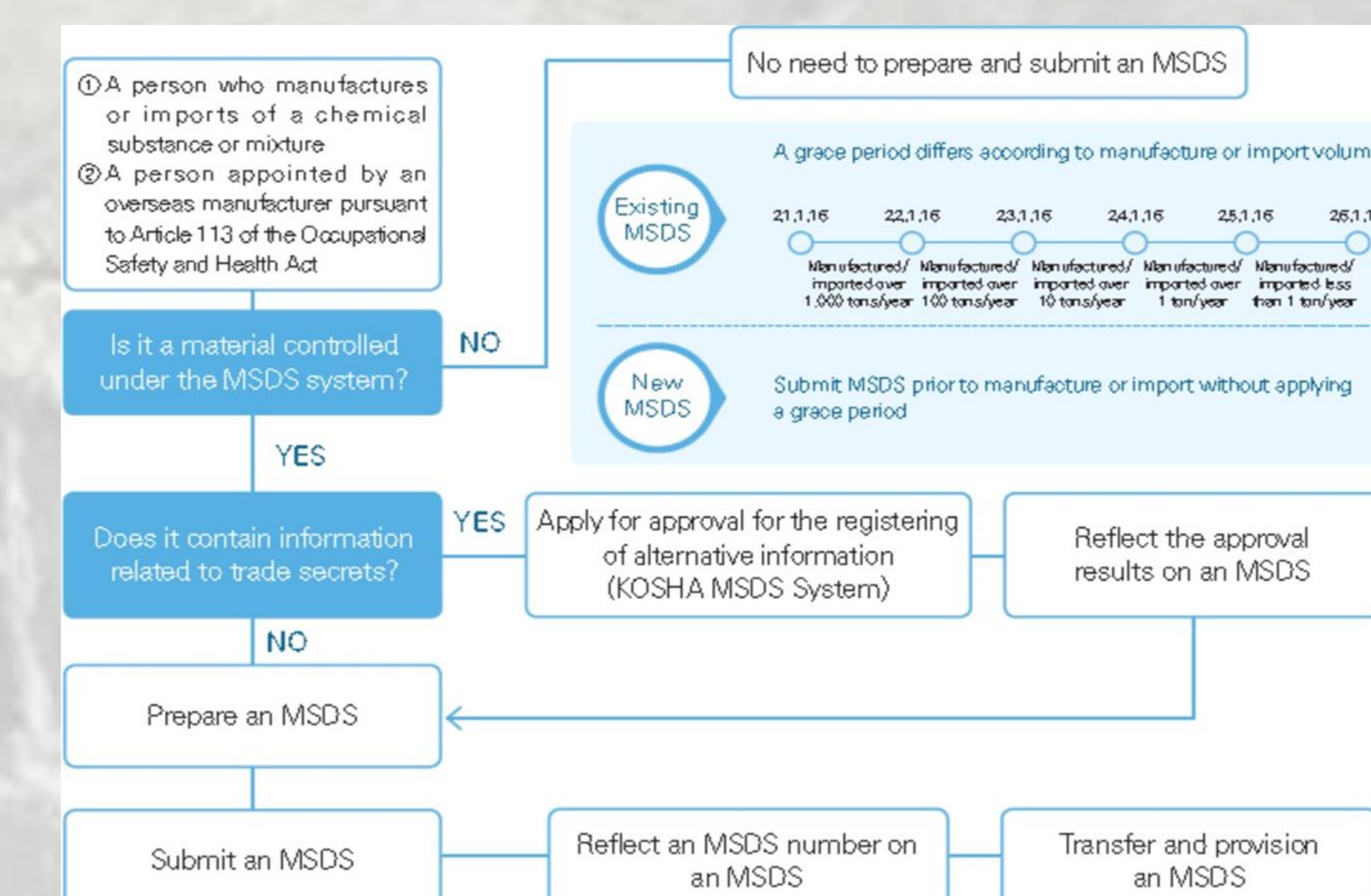
- ✓ Submit MSDS specifying 100% composition information (no matter the chemical ingredients are hazardous or non-hazardous);
- ✓ Only submit MSDS specifying hazardous ingredients and a separate document providing information of other ingredients will also be submitted to MoEL together with the MSDS; and
- ✓ Only submit MSDS specifying hazardous ingredients and a statement signed by foreign companies saying that all the non-disclosed ingredients are non-hazardous substances will also be submitted to MoEL along with the MSDS.

MSDS Submission Requirements:

- ✓ MSDS Language should be written in Korean; Must contain the contact info of Korean legal entity
- ✓ Corresponding codes will be obtained after the MSDS submission.



MSDS Submission Procedure:



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