“Biocide Regulations – A Comparison of EU/UK/K-BPR”

Robert Kiefer
REACH24H USA Inc.

SCHC Annual Meeting 2021
November 5, 2021

Intellectual Property Statement

The material contained in this presentation is the work of expert(s) selected by the Program Committee of SCHC and is intended solely for the purpose of professional development and continuing education. Material in an SCHC-sponsored presentation does not constitute a recommendation or endorsement of any kind. This material is believed to accurately represent current regulatory requirements and industry standards for hazard communication. However, SCHC cannot guarantee the accuracy or completeness of this information. Users are responsible for determining the suitability and appropriateness of these materials for any particular application.

REACH24H
WWW.REACH24H.COM 合规创造价值

Biocide Regulations – A Comparison of EU/UK/K-BPR

Robert J. Kiefer

General Manager, REACH24H USA Inc.

REACH24H Consulting Group

Value In Compliance

Overview

REACH24H
WWW.REACH24H.COM 合规创造价值

1. EU BPR Introduction
2. UK BPR Introduction
3. Korea BPR Introduction
4. A Comparison of EU/UK/K-BPR

1. EU BPR Introduction

- EU BPR

REACH24H
WWW.REACH24H.COM 合规创造价值

Before:

DIRECTIVE 98/8/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 16 February 1998

concerning the placing of biocidal products on the market

(OJ L 123, 24.4.1998, p. 1)

After:

REGULATION (EU) No 528/2012 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 22 May 2012

concerning the making available on the market and use of biocidal products

(Text with EEA relevance)

(OJ L 167, 27.6.2012, p. 1)

1. EU BPR Introduction

Product Type (PT)

Disinfectants

- PT 1 Human hygiene
- PT 2 Disinfectants and algaecides not intended for direct application to humans or animals
- PT 3 Veterinary hygiene
- PT 4 Food and feed area
- PT 5 Drinking water

Preservatives

- PT 6 Preservatives for products during storage
- PT 7 Film preservatives
- PT 8 Wood preservatives
- PT 9 Fiber, leather, rubber and polymerized materials preservatives
- PT 10 Construction material preservatives
- PT 11 Preservatives for liquid-cooling and processing systems
- PT 12 Slimicides
- PT 13 Working or cutting fluid preservatives

Pest Control

- PT 14 Rodenticides
- PT 15 Avicides
- PT 16 Molluscicides, vermicides and products to control other invertebrates
- PT 17 Piscicides
- PT 18 Insecticides, acaricides and products to control other arthropods
- PT 19 Repellents and attractants
- PT 20 Control of other vertebrates

Other Biocidal Products

- PT 21 Antifouling products
- PT 22 Embalming and taxidermist fluids

1. EU BPR Introduction

- Product Type (PT)

For example,

Disinfectants

- PT 1 Human hygiene
- PT 2 Disinfectants and algaecides not intended for direct application to humans or animals
- PT 3 Veterinary hygiene
- PT 4 Food and feed area
- PT 5 Drinking water

Rinse-Free Disinfectant Gel

Hygienic Handwash

Hard Surface Disinfectant

1. EU BPR Introduction

- Regulatory Contents

EU BPR

(Regulation EU No 528/2012)

- **Active Substance (AS)**
- **Biocidal Product (BP)**
- **Treated Article (TA)**

1. EU BPR Introduction

- Regulatory Contents

According to Art 3-1:

'Active Substance' (AS) means a substance or a micro-organism that has an action on or against harmful organisms

Under Review

'Biocidal Product' (BP) means any substance or mixture, in the form in which it is supplied to the user, consisting of, containing or generating one or more active substances, with the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism by any means other than mere physical or mechanical action

According to Art 3-1:

‘Treated Article’ (TA) means any substance, mixture or article which has been treated with, or intentionally incorporates, one or more biocidal products;

Existing and New Active Substances/Product Type: Review Program

- More than 650 AS/PT combinations are included in the programme.
- The combinations are listed in Annex II of the Review Programme Regulation ((EU) No 1062/2014)

II

(Non-legislative acts)

REGULATIONS

COMMISSION DELEGATED REGULATION (EU) No 1062/2014

of 4 August 2014

on the work programme for the systematic examination of all existing active substances contained in biocidal products referred to in Regulation (EU) No 528/2012 of the European Parliament and of the Council

ANNEX II

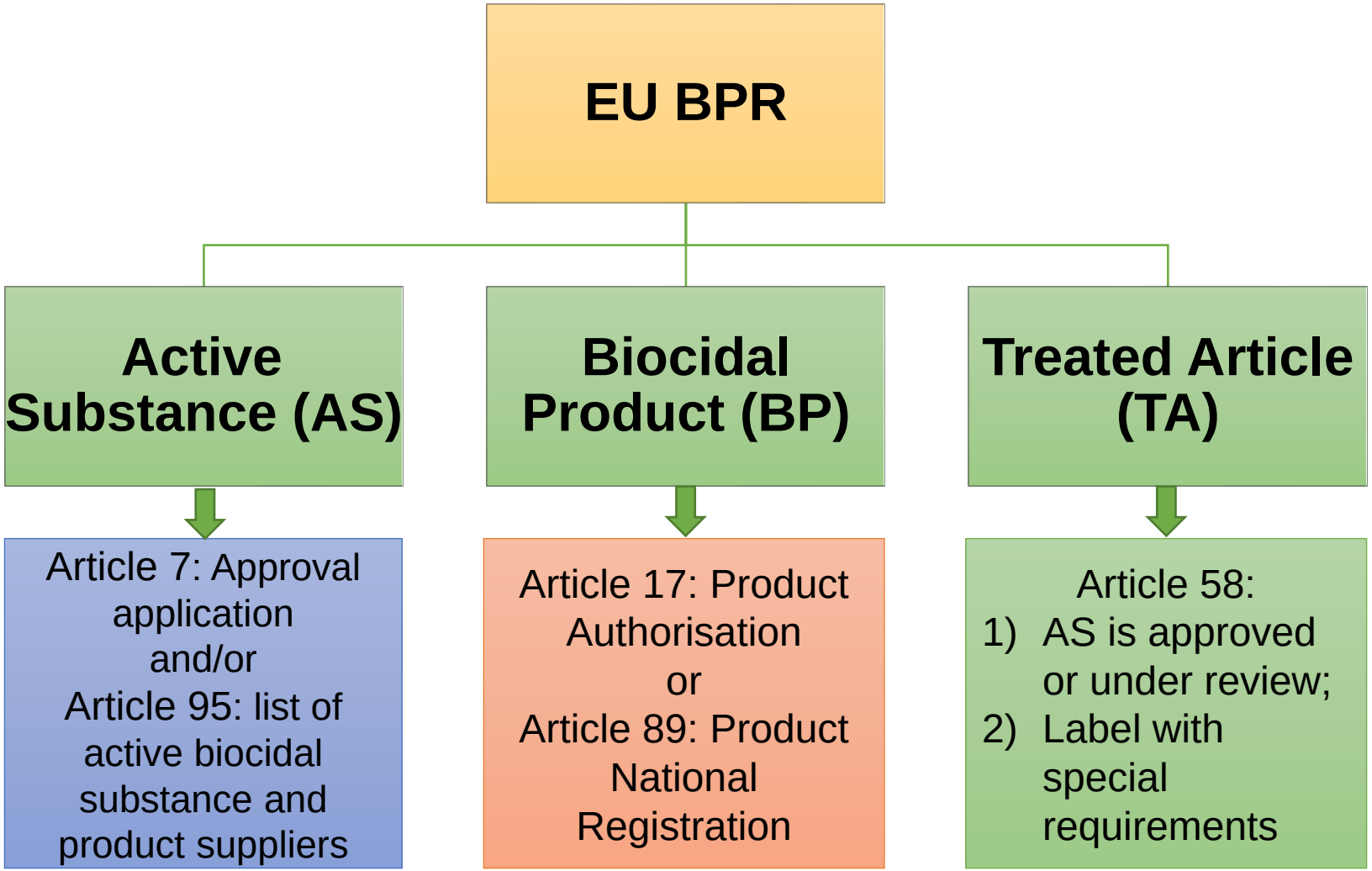
SUBSTANCE/PRODUCT-TYPE COMBINATIONS INCLUDED IN THE REVIEW PROGRAMME ON 4 AUGUST 2014

PART 1

Active substance/product-type combinations supported on 4 August 2014, excluding any other nanomaterial than those explicitly mentioned in entries 1017 and 1019

Entry number	Substance name	Rapporteur Member State	EC number	CAS number	1	2	3	4	5	6	7	8	9	10	11	12	13	17	18	19	21	22
1	Formaldehyde	DE	200-001-8	50-00-0		x	x															x
6	2-(2-butoxyethoxy)ethyl 6-propylpiper-	EL	200-076-7	51-03-6															x			

1. EU BPR Introduction

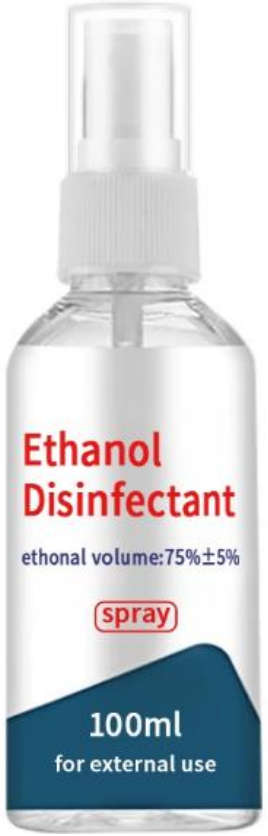


1. EU BPR Introduction

For Example:

REACH24H
WWW.REACH24H.COM 合规创造价值

Article 7: Approval application
and/or
Article 95: Listing



Step 1

The AS is Ethanol (CAS No. 64-17-5) and the PT is PT 1 Human hygiene.

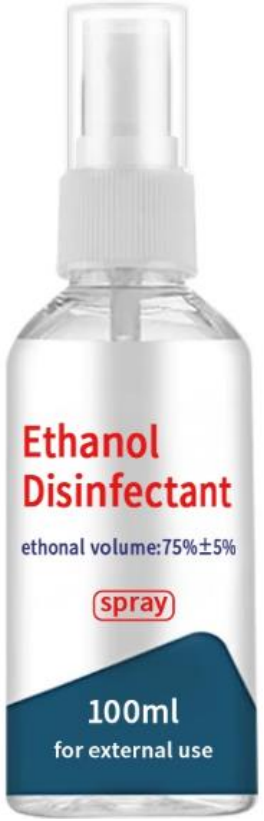
Regulatory Requirements		Investigation	Strategy
Article 7: Approval application	The AS/PT is under review or approved	Ethanol and PT 1 is under review.	√
https://echa.europa.eu/information-on-chemicals/biocidal-active-substances			
Article 95: List of active biocidal substance and product suppliers	The AS manufacturer or the BP formulator should be listed in the Art 95 list.	No, no one in the supply chain is listed in the Art 95 listing	Apply for Art 95 listing
https://echa.europa.eu/information-on-chemicals/active-substance-suppliers			

1. EU BPR Introduction

For Example:

REACH24H
WWW.REACH24H.COM 合规创造价值

Article 17: Product Authorisation
or
Article 89: Product National Registration



Step 2

The BP is 75% (v/v) Ethanol and PT 1 Human hygiene.

Regulatory Requirements		Investigation	Strategy
Article 17: Product Authorisation	If the AS/PT is approved	Ethanol and PT 1 is existing active substance/PT in the review program and under review	At present, the applicant should do the National Registration. Once the Ethanol/PT 1 is approved, the applicant could apply for the product authorization in the Member State(s) or EU.
Article 89: Product National Registration	If the AS/PT is existing active substance/PT in the review program and under review		

1. EU BPR Introduction

REACH24H
WWW.REACH24H.COM 合规创造价值

Article 89

Transitional measures

1. The Commission shall carry on with the work programme for the systematic examination of all existing active substances commenced in accordance with Article 16(2) of Directive 98/8/EC with the aim of achieving it by 31 December 2024. To that end, the Commission shall be empowered to adopt delegated acts in accordance with Article 83 concerning the carrying out of the work programme and specification of the related rights and obligations of the competent authorities and the participants in the programme.

Depending upon the progress of the work programme, the Commission shall be empowered to adopt delegated acts in accordance with Article 83 concerning the extension of the duration of the work programme for a determined period.

In order to facilitate a smooth transition from Directive 98/8/EC to this Regulation, during the work programme the Commission shall adopt either implementing regulations providing that an active substance is approved, and under which conditions, or, in cases where the conditions laid down in Article 4(1) or, where applicable, the conditions set out in Article 5(2), are not satisfied or where the requisite information and data have not been submitted within the prescribed period, implementing decisions stating that an active substance is not approved. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 82(3). Regulations approving an active substance shall specify the date of approval. Article 9(2) shall apply.

- **National Registration**

For Example...

☐ Poland

- If the active substance of the product you would like to register in Poland is still in the review program and is not approved yet, the biocidal product should be registered under the national procedure.

Regular Authorisation under Polish Transitional Law

➢ **What materials should be prepared?**

No.	Application Materials
1	Application form which should be filled in electronically
2	Evidence of payment concerning submission of the application
3	Document certifying the legal status of the applicant
4	Data report - efficacy of the biocidal product.
5	Information given on the label.
6	Safety Data Sheet (SDS)
7	Power of Attorney (PoA)

Note: All documents in foreign languages require sworn translation into Polish

For Example...

Netherlands

- If one or more of the active substances are included in the review programme for the relevant biocidal product type, then the procedure under transitional law is applicable: Dutch transitional law, and
- If you wish to put a product on the market which is not identical to an already authorised product or you have no Letter of Access (LoA) then you are required to obtain a **Regular Registration**.

Regular Authorisation under Dutch Transitional Law

➢ **What materials should be prepared?**

No.	Available Application Forms	Annotation
1	Form B	Application form
2	Appendix A - Active substance	Dossier on the active substance(s), or a Letter of Access to the substance dossiers
3	Appendix B - Product	Dossier on the product
4	Appendix C - Comparative assessment	If comparative assessment is possible
5	Appendix PGB - PUB	A systematic description of the use of the biocidal product
6	Appendix Composition	The composition of the biocidal product.
7	Appendix Reference list	Fully referenced list of documents, including which part of the application the document is proof/justification for
8	Appendix WG/GA	Legal Conditions for Use and the Directions for Use of the biocidal product.
9	Appendix Article 95	Self-declaration form or letter of confirmation of supply

1. EU BPR Introduction

- Product Authorisation

REACH24H
WWW.REACH24H.COM 合规创造价值

CHAPTER IV

GENERAL PRINCIPLES CONCERNING THE AUTHORISATION OF BIOCIDAL PRODUCTS

Article 17

Making available on the market and use of biocidal products

1. Biocidal products shall not be made available on the market or used unless authorised in accordance with this Regulation.

2. Applications for authorisation shall be made by, or on behalf of, the prospective authorisation holder.

Applications for national authorisation in a Member State shall be submitted to the competent authority of that Member State ('the receiving competent authority').

Applications for Union authorisation shall be submitted to the Agency.

3. An authorisation may be granted for a single biocidal product or a

CHAPTER XI

TECHNICAL EQUIVALENCE

Article 54

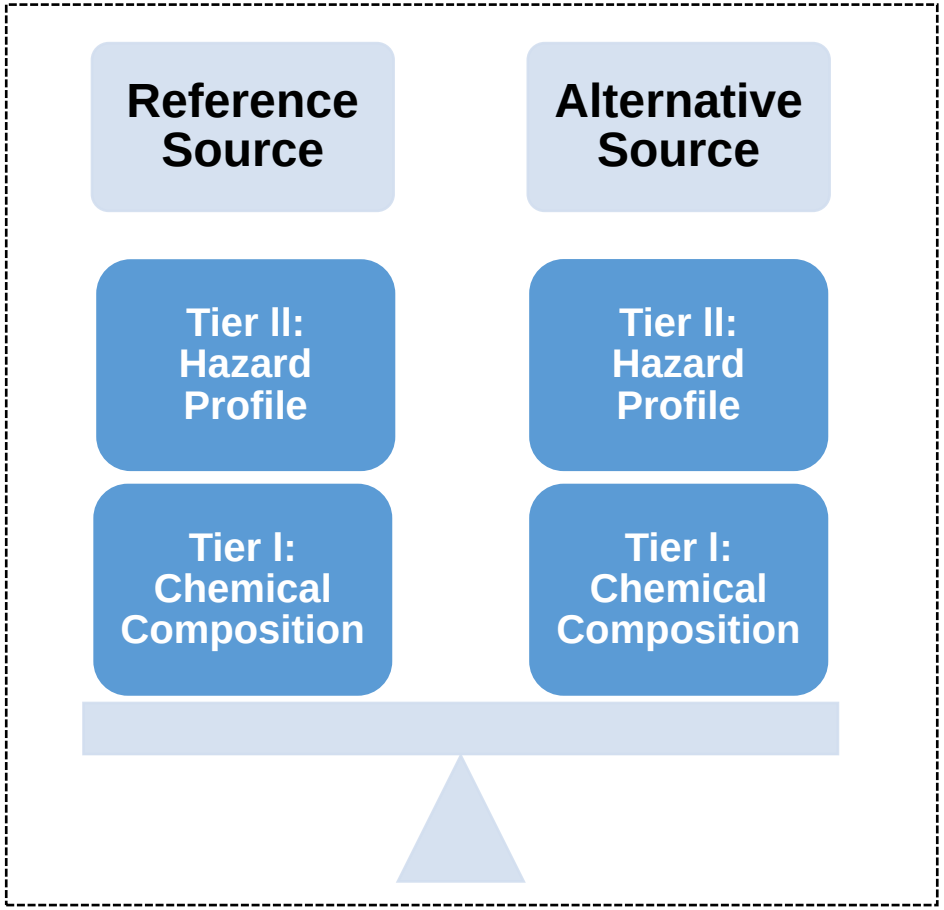
Assessment of technical equivalence

1. Where it is necessary to establish the technical equivalence of active substances, the person seeking to establish that equivalence ('the applicant') shall submit an application to the Agency.

2. The applicant shall submit all data that the Agency requires to assess technical equivalence.

Phase 1: Technical Equivalence (TE)

A. Definition



According to *Article 3(w)* of BPR

'**Reference source**' is the previous applicant who completed the AS approval.

'**Alternative source**' is either from a source different to the reference source, or from the reference source but following a change to the manufacturing process and/or manufacturing location.

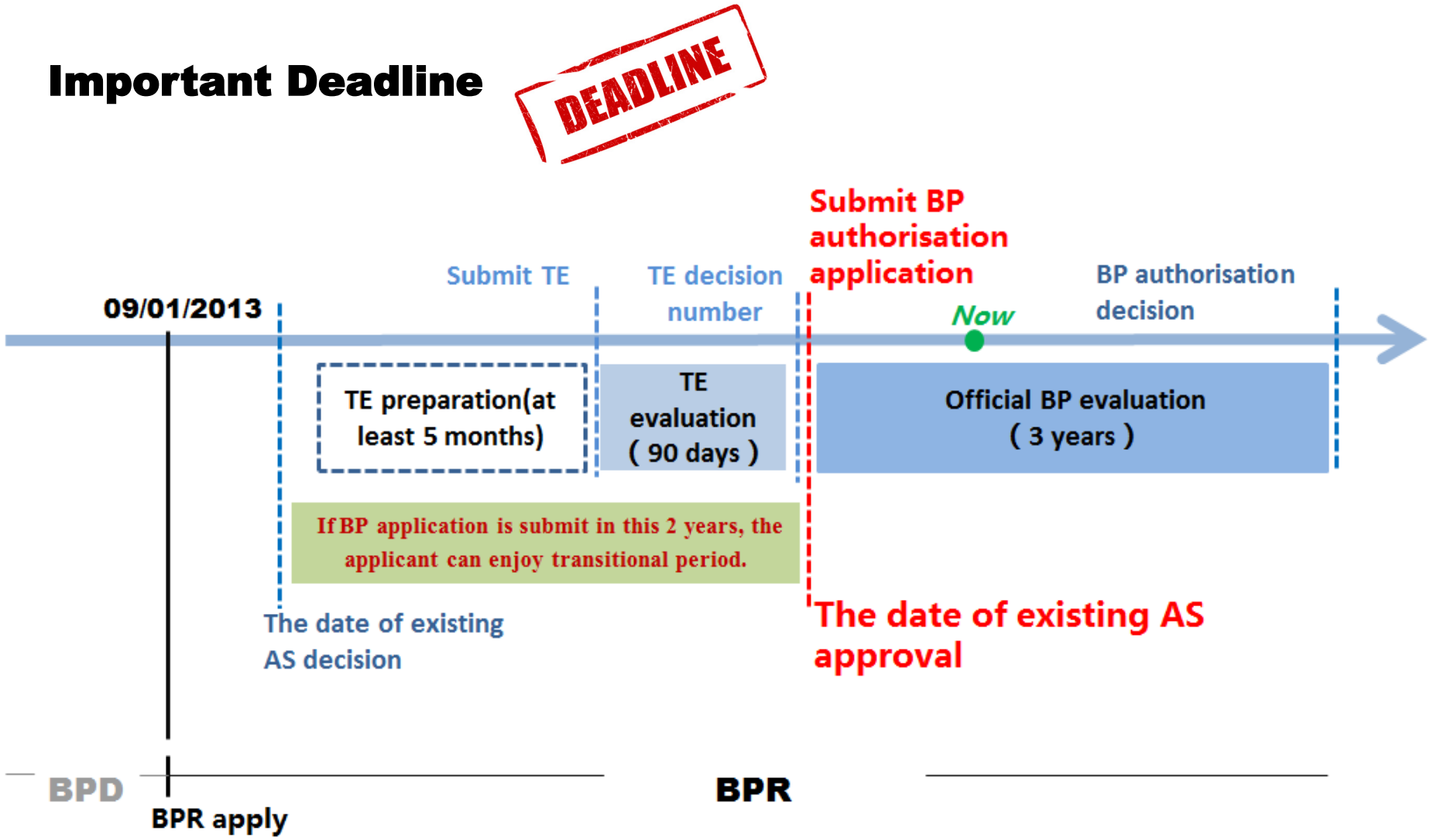
TE Decision Number
for Product Authorisation

Phase 2: BP Authorisation

No.	Forms	Requirements	Main Materials	Timeline
1	National Authorisation (NA) and Mutual Recognition	Plan to sell a product in one EU Member State (NA).	a. AS dossier or LoA b. BP dossier or LoA c. SPC, a summary of the biocidal product characteristics	2 years (case by case)
2	Union Authorisation (UA)	i. At Union level ii. Used under similar conditions across all Member States iii. Exceptions: PT 14, 15, 17, 20 and 21		At least 2.5 years
3	Simplified Authorisation	i. Contain only AS laid down in Annex I of BPR ii. Cannot contain any substance of concern or nanomaterials iii. Sufficiently effective iv. Handling of the product must not require protective equipment.	a. SPC b. Efficacy data c. Any other relevant information	90 days
…	… (eg. BPF / SBP)	…	…	…

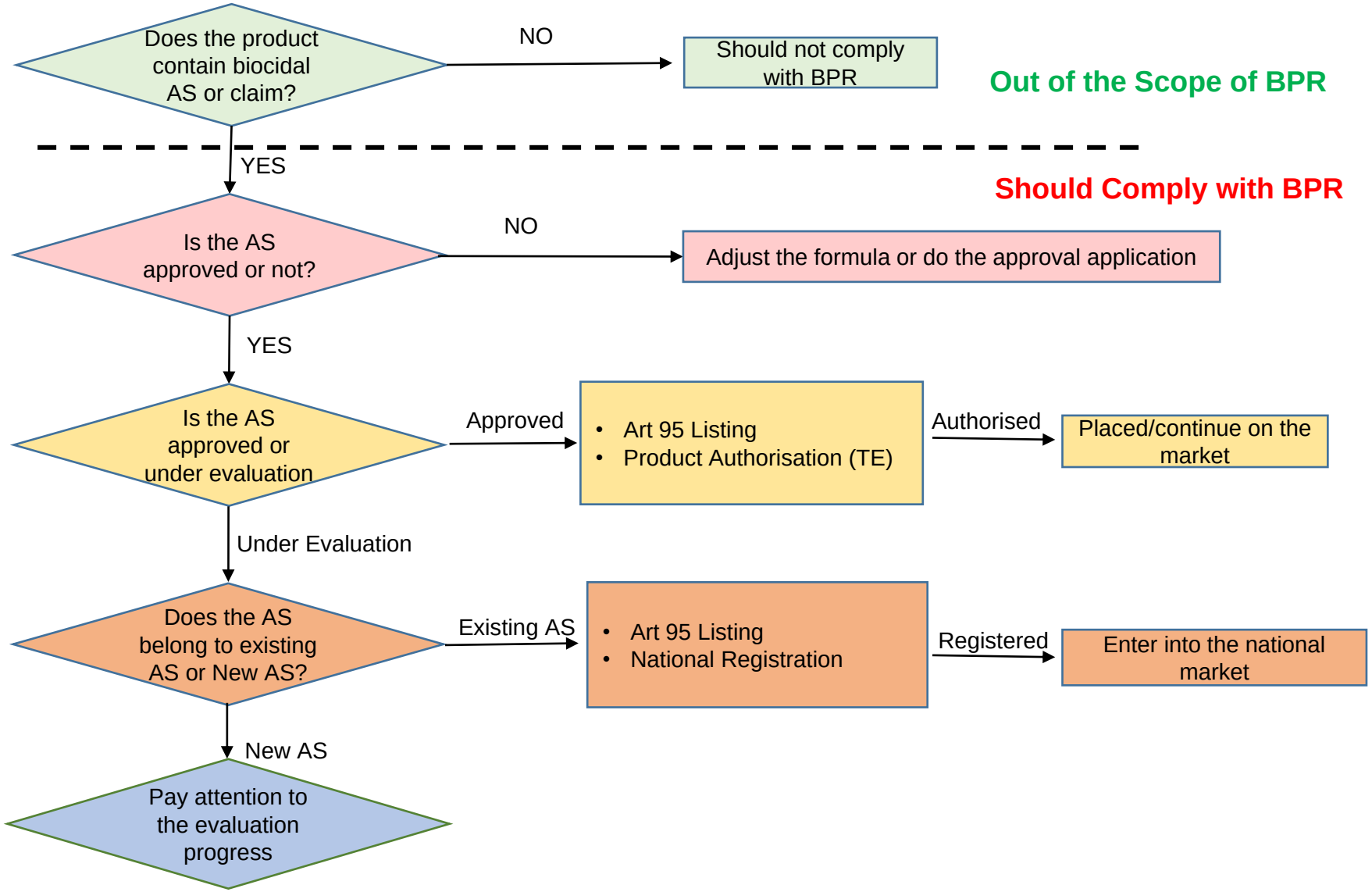
1. EU BPR Introduction

◆ **Important Deadline**



1. EU BPR Introduction

- Conclusion



1. EU BPR Introduction

- Conclusion

AS: Ethanol
PT 1
Under Evaluation

AS: Hypochlorous Acid
PT 1
Under Evaluation

Product Analysis

Does the product contain biocidal AS?

NO → Should not comply with BPR

Out of the Scope of BPR

YES

Should Comply with BPR

Is the AS approved or not?

NO → Adjust the formula or do the approval application

YES

Is the AS approved or under evaluation

Approved →
- Art 95 listing
- Product Authorisation (TE)

Authorised → Placed/continue on the market

Under Evaluation

Does the AS belong to existing AS or New AS?

Existing AS →
- Art 95 listing
- National Registration

Registered → Enter into the national market

New AS

Pay attention to the evaluation progress

1. EU BPR Introduction

- Conclusion

AS: Isopropanol
PT 1
Approved

AS: Sodium Hypochlorite
PT 2
Approved

Product Analysis

Does the product contain biocidal AS?

NO → Should not comply with BPR

Out of the Scope of BPR

YES

Should Comply with BPR

Is the AS not approved?

YES → Adjust the formula or do the approval application

NO

Is the AS approved or under evaluation

Approved → • Art 95 listing • Product Authorisation (TE) → Authorised → Placed/continue on the market

Under Evaluation

Does the AS belong to existing AS or New AS?

Existing AS → • Art 95 listing • National Registration → Registered → Enter into the national market

New AS

Pay attention to the evaluation progress

2. UK BPR Introduction

Before 31 December 2020:

- Biocidal Products Regulation (BPR, Regulation (EU) 528/2012) (EU BPR)

After 31 December 2020 (BREXIT Transition Period):

- Great Britain (England, Scotland and Wales) under the GB Biocidal Products Regulation (GB BPR)
- Northern Ireland (NI) under the EU Biocidal Products Regulation (EU BPR)
- GB Biocidal Products Regulation (GB BPR) effective at 11pm on 31 December 2020

2. GB BPR Introduction

Product Types

Disinfectants	Preservatives	Pest control	Other biocidal products
• PT 1 Human hygiene • PT 2 Disinfectants and algaecides not intended for direct application to humans or animals • PT 3 Veterinary hygiene • PT 4 Food and feed area • PT 5 Drinking water	• PT 6 Preservatives for products during storage • PT 7 Film preservatives • PT 8 Wood preservatives • PT 9 Fibre, leather, rubber and polymerised materials preservatives • PT 10 Construction material preservatives • PT 11 Preservatives for liquid-cooling and processing systems • PT 12 Slimicides • PT 13 Working or cutting fluid preservatives	• PT 14 Rodenticides • PT 15 Avicides • PT 16 Molluscicides, vermicides and products to control other invertebrates • PT 17 Piscicides • PT 18 Insecticides, acaricides and products to control other arthropods • PT 19 Repellents and attractants • PT 20 Control of other vertebrates	• PT 21 Antifouling products • PT 22 Embalming and taxidermist fluids

2. GB BPR Introduction

GB Biocidal Products Regulation (GB BPR)

Competent Authority

Health and Safety Executive (HSE)

Similar as EU BPR

Biocides Management

Active Substance (AS) → Approvals

Biocidal Product (BP) → Product Authorisation

Treated Article (TA) → Safety and Labeling Standards

Active Substance Approvals

- 'New Active Substances' to be used in biocidal products and biocidal product families under the GB Biocidal Products Regulation (GB BPR)
- Existing Active Substances for product types that have not been supported under the review programme – ‘Non-Review Programme existing active substances‘
- Changes to 'Review Programme active substances', such as when a new company wants to take over support of the active substance in the review programme from the existing participant

GB Review Programme

- Active Substances that were already in the EU Review Programme on 31 December 2020 are intended to be included in the GB Review Programme.

- Where an AS/PT combination had previously been considered to be outside the scope of the EU BPR, but new guidance or an Article 3(3) decision is published which confirms it is within scope, you will continue to be able to submit a declaration of interest in notifying the active substance / product type combination for review.

Adding Active Substances in GB Review Programme

1) You have placed a product on the GB market either:
   a. prior to 01 January 2021, based on published guidance or written advice from the EU Commission, and EU Competent Authority or HSE; or
   b. after 31 December 2020, based on published guidance or written advice from HSE

AND

2) That guidance or advice stated that either:
   a. the product was excluded from the scope of EU/GB BPR; or
   b. the relevant active substance / product type combination was one which was already notified

AND

3) That guidance or advice has subsequently been reviewed by either:
   a. new guidance published by the EU Commission prior to 01 January 2021, or HSE after 31 December 2020; or
   b. a decision published in accordance with Article 3 (3) of EU BPR prior to 01 January 2021, or Article 3 (3) of GB BPR after 31 December 2020

2. GB BPR Introduction

Applications for Inclusion on the GB Article 95 List can be made to HSE by:

- UK based companies who make active substances available on the market in Great Britain (GB)
- UK based companies who make biocidal products available on the GB market
- UK representatives of companies based outside the UK who make active substances or biocidal products available on the GB market

2. GB BPR Introduction

How to Get a Biocidal Product on the UK Market

Step 1
Check your product is regulated as a biocidal product

Step 2
- Check active substance status

Step 3
- Check your active substance supplier

Product Authorisation Deadlines

You must tell HSE that you are established in the UK by:

31 December 2021 if:
you are an existing UK authorisation holder – this includes Union authorisations and simplified authorisations and notifications

31 December 2022 if:
you were included on the GB Article 95 List on 1 January 2021

The date HSE grants your authorisation if:
you are resubmitting a pending application – this excludes changes and renewals

3. Korea BPR

- History

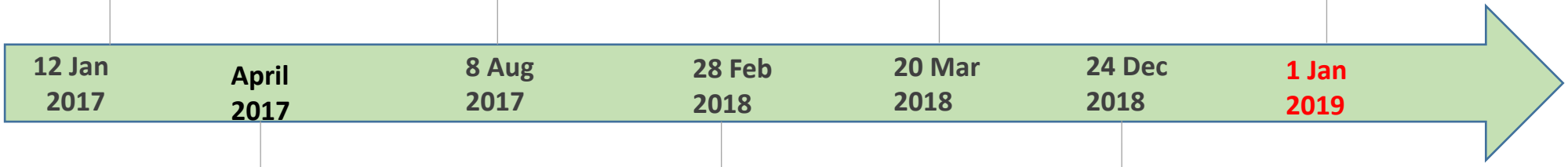
REACH24H
WWW.REACH24H.COM 合规创造价值

MOE notified the WTO Committee on TBT of draft proposal

Passed by South Korea's Cabinet

The K-BPR Law 15511 was promulgated

K-BPR Law 15511 takes effect



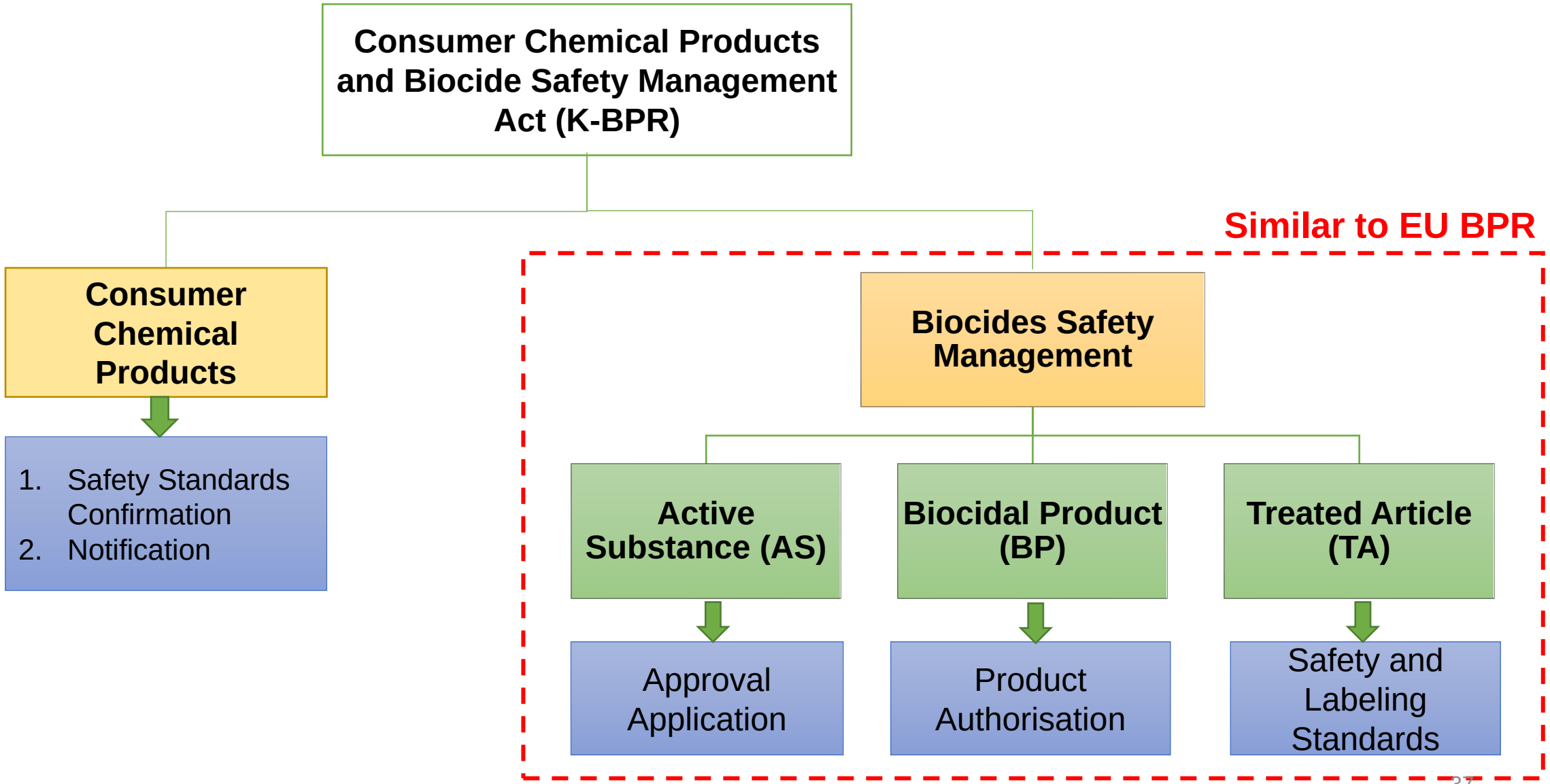
Humidifier disinfectant accident

Approved by National Assembly

Enforcement Decree and Rule Promulgation (planned)

3. Korea BPR

Introduction



3. Korea BPR

Product Types

Consumer Chemical Products

Categories	Items
1 Cleaning Products	1. Cleaning agent 2. Removing agent
2 Laundry Products	1. Laundry detergent 2. Bleaching agent 3. Fabric softener
3 Coating Products	1. Gloss coating agent 2. Special purpose coating agent 3. Rust inhibitor(Antirust) 4. Lubricants 5. Ironing aid
4 Adhesive/Bonding Products	1. Adhesive agent 2. Bonding agent
5 Fragrance/ Deodorization Products	1. Fragrance 2. Deodorizer
6 Dyeing/Painting Products	1. Material dyeing agent 2. Material coloring agent
7 Automotive Use Only Products	1. Washer fluid for automobile 2. Antifreeze for automobile
8 Printing & Document Related Products	1. Printing Ink / Toner
9 Beauty Products	1. Aesthetic adhesive agent 2. Tattoo dyes

Categories	Items
10 Sterilization Products	1. Disinfectant 2. Algicide 3. Antimicrobial and disinfecting agent for humidifier 4. Quarantine sterilization and disinfectant for the prevention of infectious diseases
11 Extirpator Products	1. Insect repellents 2. Health pesticide* 3. Health repellent* 4. Pesticide for preventing infectious disease prevention* 5. Rodenticide for infectious disease prevention*
12 Preservatives and Preservation Treatment Products	1. Preservatives for wood 2. Filter type preservation treatment product
13 Others	1. Candle 2. Moist remover 3. Artificial snow spray 4. Fog liquid for performances 5. Household chemical products for humidifiers

Product Types

K-BPR: Biocides Safety Management VS EU BPR

Category	Biocidal Product Type	
	K-BPR: Biocides Safety Management	EU BPR
Disinfectants	/	1 Human hygiene
	1 Disinfectant	2 Disinfectants and algaecides not intended for direct application to humans or animals
	2 Algaecide	
	/	3 Veterinary hygiene
	/	4 Food and feed area
	/	5 Drinking water
Pest control	3 Rodenticide	14 Rodenticides
	4 Control of other vertebrate	15 Avicides
		17 Piscicides
		20 Control of other vertebrates
	5 Insecticide	18 Insecticides, acaricides and products to control other arthropods
	6 Control other invertebrate	16 Molluscicides, vermicides and products to control other invertebrates
	7 Repellent	19 Repellents and attractants

Category	Biocidal Product Type	
	K-BPR: Biocides Safety Management	EU BPR
Preservatives	8 Product preservatives	6 Preservatives for products during storage
	9 Product surface preservative	7 Film preservatives
	10 Fiber, Leather preservative	9 Fibre, leather, rubber and polymerised materials preservatives
	11 Wood preservative	8 Wood preservatives
	12 Construction materials	10 Construction material preservatives
	13 Material / Equipment preservative	11 Preservatives for liquid-cooling and processing systems
		12 Slimicides
		13 Working or cutting fluid preservatives
	14 Embalming or taxidermist fluid	(Other biocidal products) 22 Embalming and taxidermist fluids
Other biocidal products	15 Antifouling agent	21 Antifouling products

☐ Active Substances Approval

Only Representative (OR):

K-BPR uses the OR concept beginning in Jan 1, 2021 and allows non-Korean companies to register through an OR on their behalf. It can prevent their confidential substance information from being disclosed to their importers or to the public in Korea.

☐ Active Substances Approval

Grace Period of Approval of Existing Biocide Active Ingredient

Classification	Group 1	Group 2	Group 3	Group 4
Grace Period of Biocide A.I. Approval	3 yrs. (31 Dec 2022)	5 yrs. (31 Dec 2024)	8 yrs. (31 Dec 2027)	10 yrs. (31 Dec 2029)
Product Type	- Disinfectants - Algaecides - Rodenticides - Insecticides - Repellants	- Wood preservatives - Control of other vertebrates - Control of other non-vertebrates	- Product preservatives - Product surface preservatives - Fabric, leather preservatives	- Construction material preservatives - Material/equipment preservatives - Embalming or taxidermist fluids - Antifouling agents - In situ AS - microorganism

If Active Substances are not designated as Existing Active Substances, the *new* substances shall not be manufactured or imported without obtaining Active Substances approval.

3. Korea BPR

- **Urgent for Group 1**

For Group 1 containing:

Disinfectants,

Algaecides,

Rodenticides,

Insecticides,

Repellants,

the approval deadline is **31 Dec 2022**!

Content	Deadline
OR Appointment for non-Korean companies	September 29, 2021
Pre-Registration for each Korean importer	/
Join the CICO Consortium	/
Approval application plan submission	September 30, 2021
Correction of the Approval application plan	October 31, 2021
Dossier and risk assessment report preparation	/
Approval application submission of LR	October 31, 2021
Correction of the Approval application	November 30, 2021
Approval application submission of the group members	December 31, 2021
Documents Supplement: 1) Three batches analysis report; 2) Sample; 3) Efficacy data; 4) Hazard data of the representative product if available; 5) Manufacturer's certificate	December 31, 2021
Completeness check	February 4, 2022, at the latest
Final approval	December 31, 2022

☐ Biocidal Product Authorisation

If all active substances contained in Biocidal Products are Existing Biocidal Substances, Authorisation Grace Periods for Biocidal Products will be granted for “Approval Grace Periods for active substances + 2 years”

If there are two or more substances whose Approval Grace Periods are different, Approval Grace Periods will be calculated based on the last end date of the grace period

☐ Biocide-Treated Article

If all active substances contained in Biocidal Products used for Biocide-treated Articles are subject to Approval Deferment: Biocide-treated Articles shall be granted “Authorisation Grace Periods of Biocidal Products + 1 year ”

If not, Biocide-treated Articles are allowed to be manufactured or imported without complying Safety & Labeling Standards until December 31, 2021

Ways to Comply with K-BPR

1. Appoint an Only Representative (OR) or set up branch office in South Korea, or
2. Entrust local importers to comply with K-BPR

Late Pre-registration if you have not done the Pre-Registration

1. Prepare the Application Proposals
2. Enjoy the Grace Period and prepare the approval materials

Biocidal Product Authorisation:

2 years later after the Substance Approval

Treated Article complies with Safety & Labeling standards:

1 year after the product authorisation or no later than December 31, 2021

Note: Non-Korean companies can prevent their confidential substance information from being disclosed to their importers or to the public in Korea by appointing an OR in 2021.

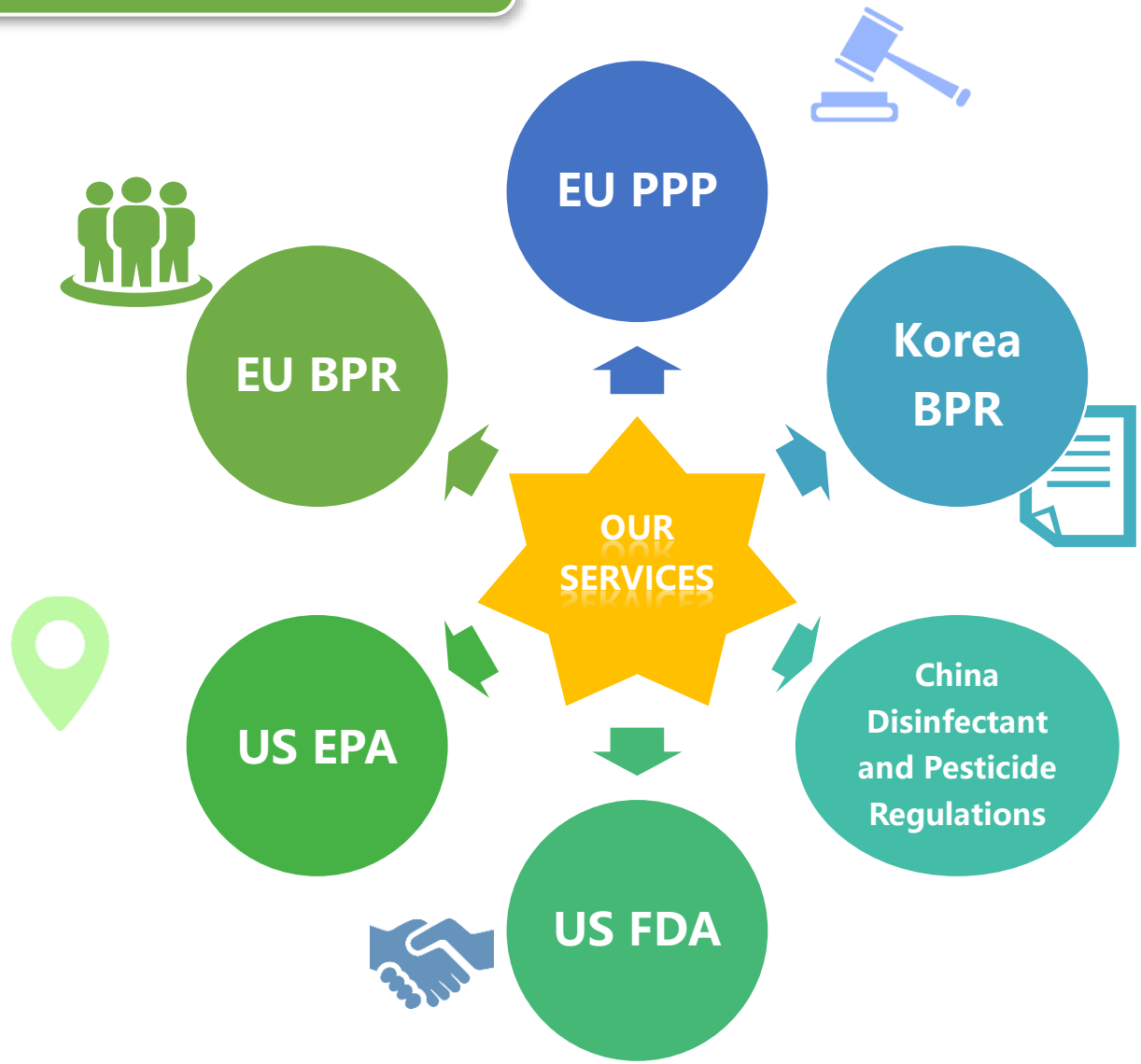
New active substance, biocidal product and treated article with new active substance cannot enjoy a grace period. Once they comply with K-BPR, they could be placed on the Korea Market.

4. A Comparison of EU/UK/K-BPR

Country	EU	UK GB	Korea
Competent Authority	ECHA and the MS National Competent Authority	Health and Safety Executive (HSE)	Ministry of the Environment (MOE) Korea Chemical Management Association (KCMA) Korea Environmental Industry Technology Research Institute (KEITI)
Main Regulations	EU BPR (Regulation EU No 528/2012)	GB BPR	Consumer Chemical Products and Biocide Safety Management Act (K-BPR)
Product Types	Four (4) Main Groups containing 22 Product Types: 1) Disinfectants 2) Preservatives 3) Pest Control 4) Other Biocidal Products	Same as EU BPR	Consumer Chemical Products: 13 Categories containing 37 Product Types. Biocides Safety Management: Four (4) Main Groups containing 15 product types： 1) Disinfectants 2) Pest Control 3) Preservatives 4) Other Biocidal Products
Compliance Requirements	1. Active Substance Approval and Art. 95 Listing 2. Product Authorization or Registration 3. Treated Article Compliance	Same as EU BPR	1. Safety Check and Notification; 2. Pre-Registration； 3. Active Substance Approval； 4. Biocidal Product Authorization; 5. Treated Article Compliance

Our Compliance Services

REACH24H
WWW.REACH24H.COM 合规创造价值



Contact Us

REACH24H
WWW.REACH24H.COM 合规创造价值

REACH24H

Follow Us on LinkedIn

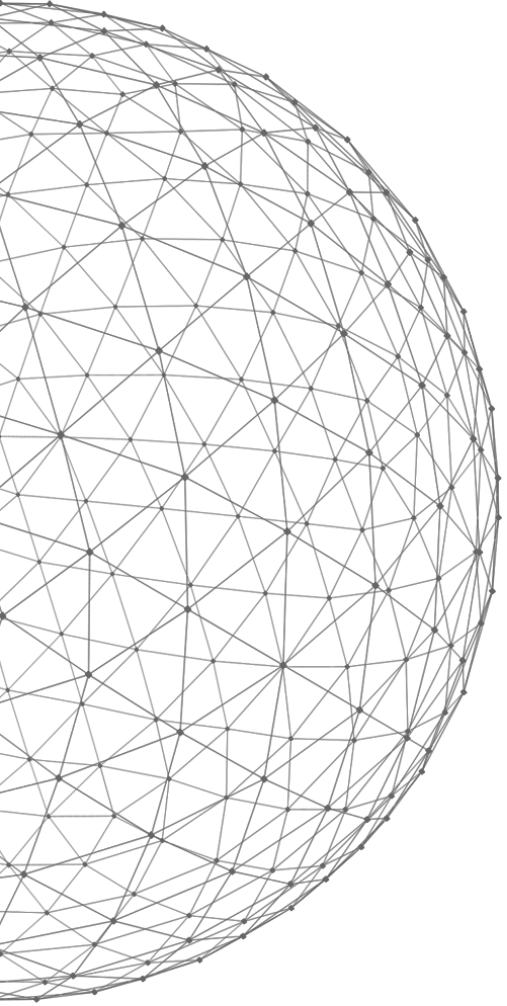
Tel: +1-703-596-8055

Email: robert.kiefer@reach24h.com

Address: 11921 Freedom Dr, Suite 550

Reston, VA 20190

CHEMLINKED
by REACH24H Consulting Group



REACH24H
WWW.REACH24H.COM 合规创造价值

Thank you for your attention!

Questions?