One enterprise, One product, One QR code_ **Hazardous Chemical Registration in China**

or hazardous chemicals in China, their manufacturers and importers in China shall register them to the National Registration Centre of Chemicals (NRCC) prior to manufacturing or importation. It's under the Measures for Administration of Hazardous Chemicals Registration (hereinafter referred to as the "SAWS Order 53"), which has been implemented since 2012. The latest new regulatory update is a QR code system that has been introduced in 2021 and shall be fully implemented later this year. It's also known as the "One enterprise, One product, One QR code" and becoming one of the most popular topics in the chemical supply chain in the world.

Hazardous Chemical Registration

In general, 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.

Chinese domestic manufactures and 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.

The registration requires certain information including Chinese MSDS and label, classifications, physical and chemical properties, uses, company information, relative permission certificates, safety management information, etc. Depending on the different activities, e.g., import, manufacture, etc, the required documents are also different.

The validity of registration certificate is 3 years and has to be renewed 3 months prior to the certificates expiry date.

One enterprise, One product, One QR code

In general, for any hazardous chemical product in China, after the hazardous chemical registration is done, a QR code could be generated from the system directly. By scanning the QR code, the information including hazardous chemical registration, Chinese SDS and labelling, etc. will be accessed. The authority would like to use this QR system to encourage enterprises to comply with this hazardous chemical registration and keep all hazard information up to date. The QR code is the identification of hazardous chemicals. All kinds of enterprises shall not sell, purchase, use or transport dangerous chemicals without the code. This is called "One enterprise, One product, One QR code".

The QR code should be in the right corner of or somewhere suitable on the chemical safety label. The QR code location should keep consistent in the same product and same enterprise.

The QR code shall also be provided to the carriers or purchasers. It is required to print, paste or hang the QR code in a conspicuous position during transportation. There are also certain requirements regarding printing the QR code and its size and quality. Particularly, the size of the QR code shall be determined according to the size of the chemical safety label. Generally, it shall not be less than the size of the pictogram in the chemical safety label, and the length of the short side shall not be less than 1cm. The printed QR code shall not be deformed or damaged easily, so as to make sure the code works in the whole supply chain process.

Latest implementation status in China

The first pilot project was started in 2021 in Guangdong province, which was very successful. Currently it is a very local requirement in different regions. Based on the local customs and authorities, the implementation requirements are quite different. Provinces including Shanghai, Guangdong, Jiangsu, Fujian, Shandong, Zhejiang, Beijing, Hebei, Sichuan, etc. are

> more involved in this new QR requirement.

CIRS

CIRS Services



EU REACH;



UK REACH;



China Chemical Management;



Korea REACH;



Taiwan TCCSCA;



Global GHS; and



Training and testing.

Why choose CIRS?



4,000+ global SDSs and labels authored every year;



3,000+ K-REACH pre-registrations completed;



2,000+ EU REACH registrations completed;



200+ China REACH typical notifications completed;



Designated Third Party Representative (TPR) services;



Comprehensive one-stop compliance services; and



Customized on-site and online training services.

Bryan Zhou, Senior Regulatory Affairs Consultant CIRS, Europe bryan.zhou@cirs-group.com https://www.cirs-group.com/en

