



Chemical Regulatory Compliance Provider

**CRCP** Overview



## Our services include, but are not limited to:

- Korea REACH registration(new & existing Chemicals)
- Expertise advice to polymers & intermediates
- EU REACH & BPR compliance
- Global chemical notification and registration
- (US, China, Japan, Taiwan, Australia, etc.)
- CAS assignment
- (M)SDS & label authoring according to GHS/CLP
- Korea BPR compliance (biocides and consumer chemical products)
- Product label authoring
- Regular consultation for chemical regulatory compliance
  - (K-REACH, CCA, K-BPR, Korea Hygiene Control Act, etc.)
- Third-Party Representative(TPR) Service; for confidentiality or hazard communication in supply chain, etc.



# Chemical Registration, Notification and Exemption in Korea



Existing chemical substances as well as new chemical substances are required to be registered under K–REACH. When chemical substances(products) are manufactured and/or imported in Korea, verification of chemicals, permission to conduct hazardous chemical business, and/or other actions are required under Chemical Control Act(CCA). In addition, manufacturers and/or importers of new chemical substances in Korea have obligations to submit investigation reports on the harmfulness or danger of new chemical substances under Occupational Safety and Health Act(OSHA). As such, various types of registrations are required by different laws and regulations in Korea. CRCP provides the one–stop solution and efficient registration strategy, based on long years of expertise and experience.

- Chemical inventory build-up
- New chemical substances registration and/or notification
- Existing chemical substances pre-registration and/or registration
- Chemical substance Information Communicative Organization(CICO)(Korean SIEF) management services
- Support for communication along supply chain
- Data gap analysis, test arrangement and/or monitoring services
- Data-set purchase services
- Only Representative(OR) services for overseas customers
- Preparation and/or submission of Investigation report on the harmfulness or danger under OSHA
- Dossier submission of registration and/or notification
- Dossier submission of confirmation of registration exemption
- Examination on intermediate exemption and/or Polymer of Low Concern(PLC) Exemption
- Dossier submission of verification of chemicals under CCA
- Notification for Priority Management Chemicals(PMC) in products

# Expertise Consultation for Polymer & Intermediate

While polymers and/or intermediates also need to be compliant with registration, major countries allow polymers and/or intermediates to be exempted from registration or to be registered with the reduced data–set. Experts in CRCP, who have professional knowledge and much experience, shall provide the optimized solution with the lowest cost for the registration of polymer and/or intermediate in various countries including Korea.

- Examination on qualification for the regulatory definition of polymer and/or intermediate
- Compliance strategy build-up for polymers and/or intermediates
- Examination on qualification for polymer exemption and/or special cases
- under domestic/global chemical regulations
- Examination on qualification for intermediate exemption and/or special cases under domestic/global chemical regulations
- Dossier submission of the registration exemption for polymers and/or intermediates
- Dossier submission of the registration for polymers and/or intermediates
- Preparation of generic name for polymer compounds and/or Confidential Business Information(CBI) protection
- Analysis on residual monomer content



# Simplified Registration under Exceptional Provision

Under K–REACH, there are special case clauses to be excluded from registration obligations or to be allowed to submit simplified registration by applying the exceptional provisions with regard to the substances of natural origin, substances beyond the scope of application of K–REACH, and/or less harmful substances.

The exceptional provisions under K–REACH are similar to those of EU REACH but have different application categories. CRCP enables domestic and/or international clients to save registration costs and time based on the variety of experience regarding the special cases under K–REACH and EU REACH.

- Determination whether substances are excluded from registration obligation under K–REACH
- Compliance strategy build-up for simplified registration
- Simplified registration applied for special case



### Consumer Chemical Products and Biocides Safety Act(K-BPR) Compliance



Consumer Chemical Products and Biocides Safety Act(K–BPR) came into effect on January 1, 2019. "Consumer Chemical Products subject to Safety Check", listed on public notice enacted by Ministry of Environment(MOE)(including cleaning agent, coating agents, adhesives, fragrances and/or other consumer chemical products), are subject to compliance check of safety standards under K–BPR. In addition, active substances and/or biocidal products shall be manufactured and/or imported after obtaining approval from the MOE under K–BPR.

CRCP provides reasonable compliance strategy for K–BPR based on our previous experience in compliance with EU Biocidal Products Regulation(BPR).

- Notification for compliance check of safety standards with regard to consumer chemical products subject to safety check
- Expertise consultation for product safety and labeling standard
- Dossier submission of active substances approval
- Dossier submission of biocidal products approval
- Expertise consultation for safety and labeling standard of biocidal products
- Support for communication along supply chain
- Data gap analysis, test arrangement and/or monitoring services for active substances approval
- Data-set purchase services
- Only Representative(OR) services for overseas customer
- SIEF(Substance Information Exchange Forum) management services

# Work-place Safety and Health Compliance (CCA Compliance)

As many chemical accidents had occurred, the need for strengthening the chemical management system was raised. Accordingly, Toxic Chemical Control Act (TCCA) has been completely revised and newly enacted as Chemicals Control Act(CCA).

CRCP provides professional services to enable clients to comply with the chemical regulations smoothly through collaboration with own staff and partners.



- Dossier submission of verification of chemicals
- Expertise consultation for hazardous substance business permission
- Statistical survey and/or chemical discharge volume investigation
- Preparation of off-site consequence analysis
- Preparation of risk management plan
- Preparation of hazardous substance display/store plan
- Preparation of hazardous substance delivery(transport) plan
- Expertise consultation for hazardous substance facility inspection
- (M)SDS authoring, translation, revision and review

# Regular Consultation for Chemical Regulatory Compliance



Companies treating chemicals shall comply with several chemical–related regulations such as Act on Registration, Evaluation, Etc. of Chemicals(K–REACH), Chemicals Control Act(CCA), Occupational Safety and Health Act(OSHA), Act on Safety Control of Hazardous Substances, High–Pressure Gas Safety Control Act, Hygiene Control Act, Consumer Chemical Products and Biocides Safety Act(K–BPR) and/or other regulations. Such obligations require companies to hire several experts to cope with regulatory compliance and continuous update for revised and newly enacted regulations, which may be a burden for companies.

In order to ease such burden of our clients, CRCP provides 'Regular Consultation' to give expertise consultation for all regulatory concerns our clients may have. Regular consultation services enable our clients to reduce the risk of violating regulations, and to focus their internal human resources on their own business.

- Chemical Inventory build-up
- Update for the latest regulatory trends and news
- Expertise consultation for K-REACH, CCA, OSHA, K-BPR and/or other regulations
- Support for communication along supply chain overseas
- Expertise consultation for substance registration and/or exemption under various regulations
- Expertise consultation for legal obligation for import and/or management of chemicals
- Training on K-REACH and/or CCA
- Expertise consultation for product labeling
- Expertise consultation for chemical management system within companies
- Expertise consultation for current chemical regulatory compliance status of clients

# TPR(Third-party Representative for Confidentiality) Service

# Why is TPR Service necessary?

1. It comes to be essential to recognize information on substances contained in products rather than information on products or half-finished products itself due to the strengthened chemical regulations for the Hazardous substances.

2. Through regulatory restriction of the use of Hazardous substances, manufacturers and/or importers are required to be aware of the information on the presence and the concentration of the regulated hazardous substances in the products.

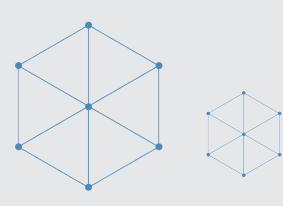
3. It, however, is becoming too difficult and inefficient to figure out the composition of hazardous substances through analysis and/or test, arise from the increase in the number of hazardous substances which need the regulatory control.

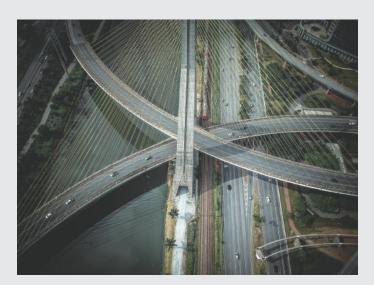
4. There may be business risk in case that the manufacturers and/or importers fails to comply with the chemical regulations when there is no information about the composition of substances within the products.

5. As a result, business interruption may occur in the situation of no mutual communication on the substance composition in the supply chain.

6. CRCP provides TPR services, acting as an intermediary to share essential information for implementation of the chemical regulatory compliance maintaining confidentiality between substance providers and downstream users.

- Support for communication along supply chain
- Receiving confidential information via Non-Disclosure Agreement(NDA) and/or performing related business
- Identification and/or certificate issuance on Hazardous substances
- Identification and/or certificate issuance on substances subject to registration
- Expertise consultation for regulatory compliance after identification of the substances





# **Global Chemical Regulatory Compliance**



## **Global Chemical Registraton & Notification**

Due to increased consciousness of chemical hazard, requirements for strengthening safety of human health and/or environment are getting higher. And, on the other hand, as a part of paper wall(non-tariff trade barrier) for the sake of economy protection, global major countries strengthen or establish the regulations regarding chemical registration. CRCP has multiple accomplished experts, who experienced a great number of registrations and/or risk assessment under EU REACH, K–REACH, and/or other global chemical regulations for many years. We provide comprehensive consulting services for chemical registration, while continuously monitoring regulatory trends for each country.

- Chemical registration and/or other relevant compliances under EU REACH
- Expertise consultation for registration including PMN, SNUR, and others, and/or provision of agency services under US Toxic Substances Control Act(TSCA)
- Assignment of new CAS registry number
- New chemical substance notification under China REACH
- Chemical registration under Japan Chemical Substances Control Law(CSCL) and/or Industrial Safety and Health Law(ISHL)
- Notification of substances under Taiwan Toxic Chemical Substance Control Act(TCSCA)
- Notification of new substances for Canada Domestic substances list(DSL)
- Chemical registration under Australia National Industrial Chemicals Notification and Assessment Scheme(NICNAS) and/or New Zealand Inventory of Chemicals(NZIoC)
- Notification of new substances under Philippines Pre-Manufacture and Pre-Importation Notification(PMPIN)
- Notification of hazardous substances under Thailand Annex 5.6

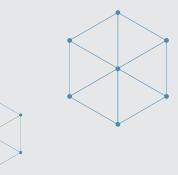
# EU REACH Compliance



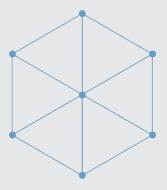
CRCP provides OR Services for EU REACH compliance to non-EU company by operating CRCP GmbH in Frankfurt, Germany. We, through CRCP GmbH, directly provide contentable 'one-stop service' to our clients for EU REACH registration.

CRCP also provides services other than REACH according to Korean companies' needs regarding EU regulations.

Our professional consultants have successfully completed a number of EU REACH registrations including several lead-submissions.



- Provision of latest trends and news on EU REACH
- Dossier submission of inquiry, registration, notification and/or authorisation under REACH
- Substance Identity Profile(SIP) verification
- Data gap analysis
- Communication on data sharing and/or SIEF activity
- Support for communication along supply chain and/or certificate issuance to downstream user
- Authoring and/or reviewing the registration dossier(TD/CSR)
- Review on test items and/or monitoring the tests in EU
- Authoring Safety Data Sheet(SDS) according to EU CLP
- Performing REACH registration as a Lead Registrant(LR)
- Third-Party Representative(TPR) services
- Provision of legal advice



# Key competitiveness of CRCP

#### 1:1 Clients customized services

CRCP selects the most optimal consultants pursuant to the characteristics of our client's business, so as to maximize the convenience and efficiency of client's business.

#### Successful cases of registration, notification and/or authorization

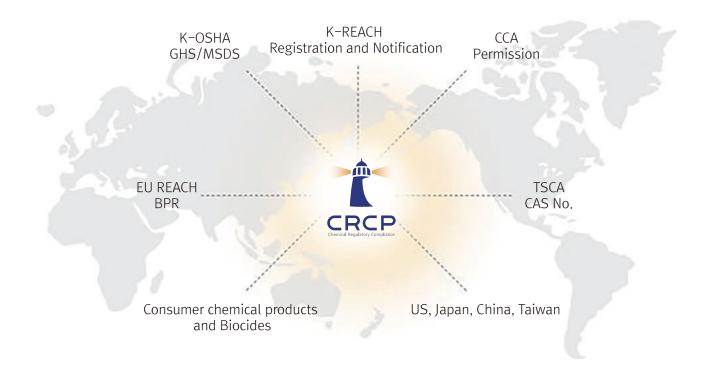
CRCP has accumulated various experiences on businesses with domestic and overseas SMEs, large enterprises, laboratories, universities and others. Such experiences will enable CRCP to provide a fully customized solution for any requirements of our clients.

#### Provision of cost-and-time-saving solution

CRCP provides cost-and-time-saving solution by applying appropriate exceptional provisions including exemption, simplified registration, or others under regulations.

#### One-stop service system

In CRCP, various regulatory compliance projects are handled one-stop by expertise consultants, which enable the provision of specialized service to clients.



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