

# Welcome

Webinar: Know your obligations  
when exporting hazardous  
chemicals outside the EU

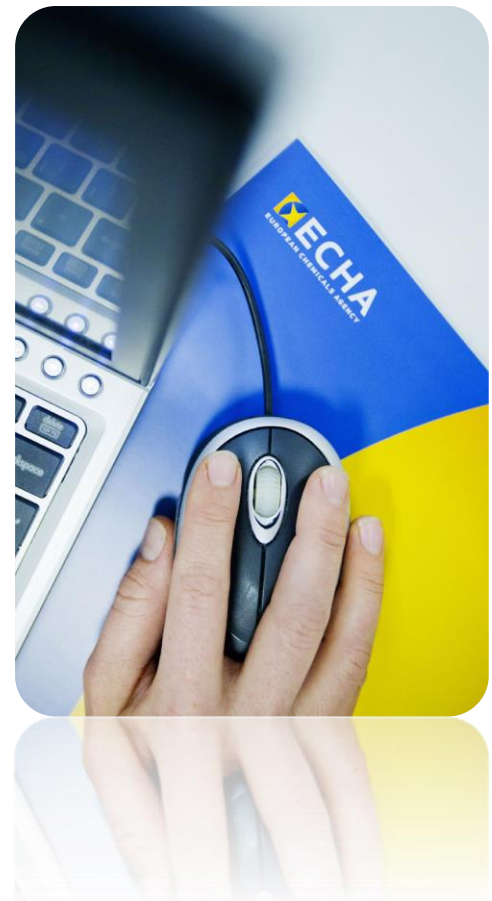
24 September 2020

Salla Gynther  
Valeria Yilmaz  
Ramona Cioata



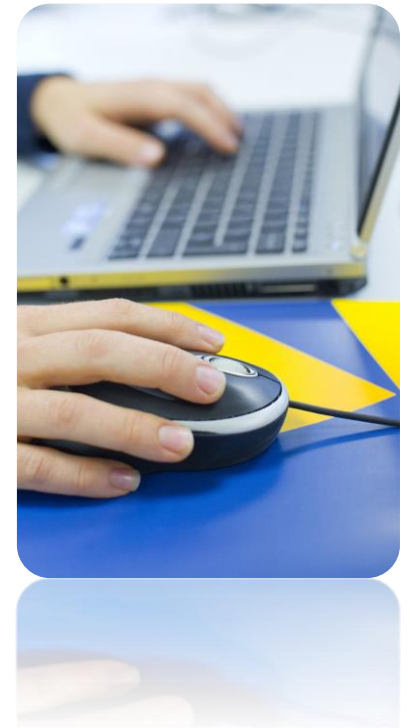
# What you can expect from today

- **Learn about** the PIC Regulation, the Rotterdam convention, the export notification procedure and the explicit consent requirement
- **Learn how** to prepare and submit an export notification, follow-up on your notifications and report on your annual imports and exports
- **Key messages** and **tips**
- Get **answers** to questions



# Questions

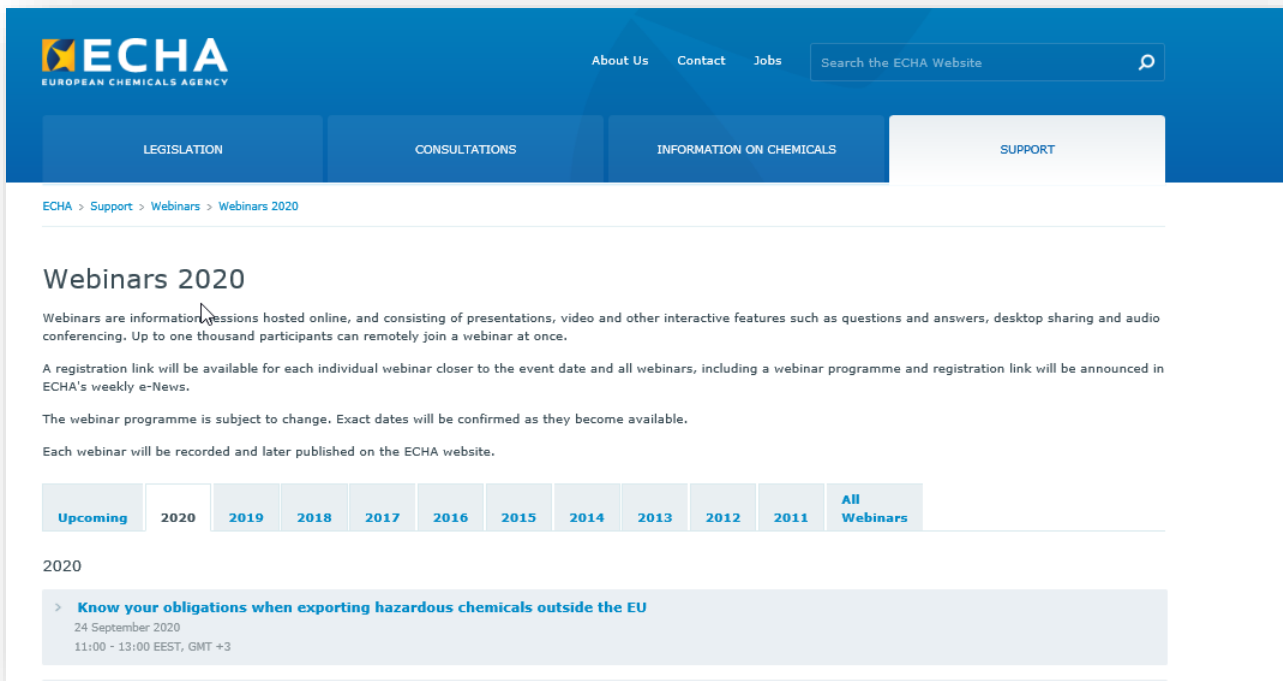
- Join Q&A at: [slido.com](https://www.slido.com)  
Event code:
- Send questions from **11:00 to 15:00**  
**Helsinki Time**
- Only questions within webinar scope
- Question not answered?  
Contact us: [echa.europa.eu/contact](https://echa.europa.eu/contact)



# Material published

Video recording, presentations and Q&A

[echa.europa.eu/support/training-material/webinars](https://echa.europa.eu/support/training-material/webinars)



The screenshot shows the ECHA website's 'Webinars 2020' page. The header includes the ECHA logo, navigation links for 'About Us', 'Contact', and 'Jobs', and a search bar. The main navigation menu has 'LEGISLATION', 'CONSULTATIONS', 'INFORMATION ON CHEMICALS', and 'SUPPORT'. The breadcrumb trail is 'ECHA > Support > Webinars > Webinars 2020'. The page title is 'Webinars 2020'. The text explains that webinars are information sessions hosted online with various interactive features, and that registration links will be provided closer to the event date. It also notes that the webinar programme is subject to change and that each webinar will be recorded and published on the ECHA website. A navigation bar below the text allows filtering by year from 2020 to 2011, with 'All Webinars' as an option. The '2020' filter is selected, and a list of webinars is shown, including one titled '> Know your obligations when exporting hazardous chemicals outside the EU' on 24 September 2020 from 11:00 to 13:00 EEST, GMT +3.



# Agenda

- 11:00 **PIC: scope and general overview**  
Salla GYNTHNER, ECHA
- 11:20 **Export notification and related procedures**  
Valeria YILMAZ, ECHA
- 11:35 **How to fill in an export notification**  
Ramona CIOATA, ECHA
- 11:50 **Annual reporting**  
Ramona CIOATA, ECHA
- 11:55 **Concluding remarks**  
Ramona CIOATA, ECHA
- 11:00 – 13:00 **Webinar open for questions**

# PIC: scope and general overview

Webinar: Know your obligations when exporting hazardous chemicals outside the EU

24 September 2020

Salla Gynther  
European Chemicals Agency





## What is PIC about?

- Concerns export and import of hazardous chemicals
- Places obligations on EU companies who wish to export or import PIC chemicals to/from non-EU countries
- Provides support to developing countries through information exchange on hazardous chemicals

# Background

- Rotterdam Convention on Prior Informed Consent (PIC): global UN treaty that supports countries in managing risks of imported chemicals
- Principle: Prior informed consent required from importing party before export of banned or severely restricted chemicals
- Rotterdam Convention implemented in the EU by Regulation (EU) 649/2012 (PIC Regulation)





# Objectives

## Promote shared responsibility

- Export notifications / Acknowledgements of receipt

## Promote cooperation in international trade of listed hazardous chemicals

- PIC procedure

## Protect human health and the environment

- Information on characteristics of exported products and how to store, transport, use and safely dispose of hazardous chemicals

## PIC: goes beyond Rotterdam Convention

- Requirement for export notification and explicit consent extends to **all countries**, not only parties to the Convention
- EU Regulation comprises a **larger list of chemicals**
  - Annex III of the RC: 52 chemicals 
  - Annex I of EU PIC: 228 chemicals 
- EU makes export notifications irrespective of intended use
  - No guarantee that declared intended use corresponds to final use in importing country



## Scope

- Chemicals **banned or severely restricted** within the EU
  - Active substances in pesticides (PPP) or biocidal products including disinfectants, insecticides and parasiticides,
  - Industrial chemicals (REACH)
- PIC also lists chemicals (mainly persistent organic pollutants (POPs) and mercury compounds) **banned for export** from the EU
- **All chemicals exported** from the EU must comply with the the Classification, Labelling and Packaging ( CLP) Regulation (EC) No 1272/2008

# Annex I

## Part 1

Chemicals **banned or severely restricted within the EU** in at least one of the four use subcategories:

- Industrial chemicals (for professional and/or public use)
- Pesticides (plant protection products and/or biocides)

## Part 2

Chemicals **banned or severely restricted within the EU** in one of the two use categories defined by the Rotterdam Convention:

- Industrial chemicals
- Pesticides

## Part 3

Chemicals listed in Annex III of the Rotterdam Convention and subject to PIC procedure

# Annex V

## Part 1

Persistent Organic Pollutants  
(POPs)  
Stockholm Convention

## Part 2

Reflects Regulation on Mercury  
(Regulation No. 2017/852)

## Amendments to Annexes

- PIC Regulation Annexes updated once a year on the basis of developments in EU legislation and internationally under the Rotterdam and Stockholm Conventions
  - Last amendment applicable as of 1 September 2020: 22 new substances added
- Updates to Annexes initiated by European Commission





## What does PIC apply to?

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### **Substances**

Listed in Annex I (either individual substances or entries within a group of substances)

---

### **Mixtures**

Containing one (or several) substance(s) listed in Annex I, in a concentration that triggers labelling obligations for the mixture under CLP (Regulation (EC) No 1272/2008)

---

### **Articles**

If they contain a chemical listed in Part 2 or 3 of Annex I and the use of the chemical has been banned or severely restricted by Union legislation in that particular product

---

# When does PIC not apply?



## Chemicals used in:

- Drugs
- Radioactive materials
- Wastes
- Chemical weapons
- Food and food additives
- Feeding stuffs
- Medicinal products



## Special procedure applies:

Chemicals exported for research or development in quantities  $\leq 10$  kg/year and per importing country

# Specific implementation approaches

- The following are out of scope based on approaches adopted in Meetings of Designated National Authorities (DNAs)
  - UVCBs\* unless UVCB itself listed in Annex I of PIC
  - PIC substances as impurities of non-PIC substances
- Discussions continue and approaches may change in the future

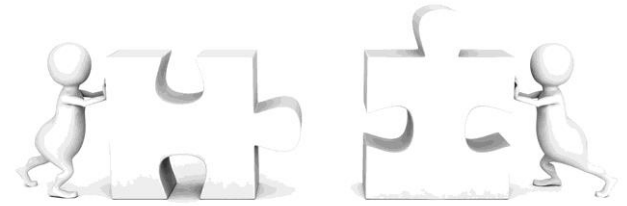
\* *UVCB = unknown or variable composition, complex reaction products or of biological materials*





# Conditions for exporting PIC chemicals





## Two main procedures...

- Export notification
  - Provisions outlined in Article 8
  - Data requirements outlined in Annex II
- Explicit consent
  - Provisions outlined in Article 14

## ... depending on which part of Annex I chemicals belong to

- **Part 1: export notification**
- **Part 2: export notification and positive explicit consent** response from importing country
- **Part 3: conditions vary** depending on use category of export and response provided by importing country in latest PIC circular



→ Latest PIC circular is published on the [ECHA website](#)

# Annex I Part 3

## Procedure required

| Import response | Positive  | Negative                                      | None  |
|-----------------|---|---|---|
| Use category    |   |   |   |
| Same            | <p><b>Simplified notification</b><br/>(special reference identification number request)</p> | <p><b>Export not allowed</b></p>              | <p>Export notification + Explicit consent</p> |
| Different       | <p>Export notification + Explicit consent</p>   | <p>Export notification + Explicit consent</p> |   |

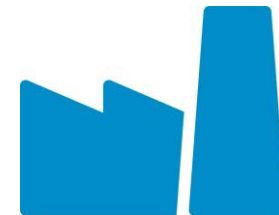
# Obligations



## Key EU actors

- EU-based exporters and importers
- European Commission (DG Environment)
  - Common designated national authority of the Union
- Designated national authorities (DNA)
- ECHA
- Customs






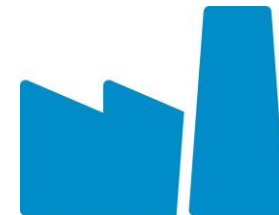
# Obligations for EU exporters (1)

## Before export

- Determine if chemical intended to be exported is covered by PIC and can be exported or not
  - Chemical listed in Annex I or Annex V?
  - What are the required procedures?
  - Any doubt? Contact your designated national authority or ECHA Helpdesk [echa.europa.eu/contact](https://echa.europa.eu/contact)
- Prepare necessary documents to be submitted in ePIC

Consolidated lists of PIC chemicals are published on [ECHA website](https://echa.europa.eu)

  
Group substances not fully comprehensive



# Obligations for EU exporters (2)

## When exporting

- Ensure compliance with provisions of Article 17
  - **All** exported chemicals (not only PIC chemicals) are **packaged and labelled** as if they were to be placed on the EU market (unless specific provisions exist in importing country)
  - Provide a **safety data sheet** to each importer in one of the official/principal languages of the importing country

## After export(s)

- **Report** actual quantities of PIC chemicals exported during previous calendar year by 31 March in accordance with Article 10





# Obligations for EU importers

- Report to designated national authority:
  - Actual quantities of PIC chemicals imported during previous calendar year by 31 March (Art.10)
- Other than the above, imports of chemicals are mainly covered by other EU legislation (e.g. REACH)

# Export notification and related procedures

Webinar: Know your obligations when exporting hazardous chemicals outside the EU

24 September 2020

Valeria Yilmaz  
European Chemicals Agency



# Export notification



## Main principles

- First export in each subsequent year and for each importing country should be notified
- 35 days before first export is due
- A “Reference Identification Number” (RIN) is assigned for each notification



## What is a RIN?

- Unique identifier of an export notification required for customs declaration
- A string of 10 numbers and letters starting with "1" for a standard notification (special RIN starts with "0")
- RIN status changes overtime and indicates if export is allowed



## 5 possible statuses

### ✓ Active (*Export Allowed: 03/08/2020– 31/12/2020*)

- Export is allowed and can take place within given time period

### 🕒 Inactive (*Export Allowed: 01/09/2020– 31/12/2020*)

- Export is not allowed, cannot take place yet and will be allowed within given time period

### 🕒 Inactive

- Export has not been allowed yet

### 🚫 Disabled

- Export is not allowed

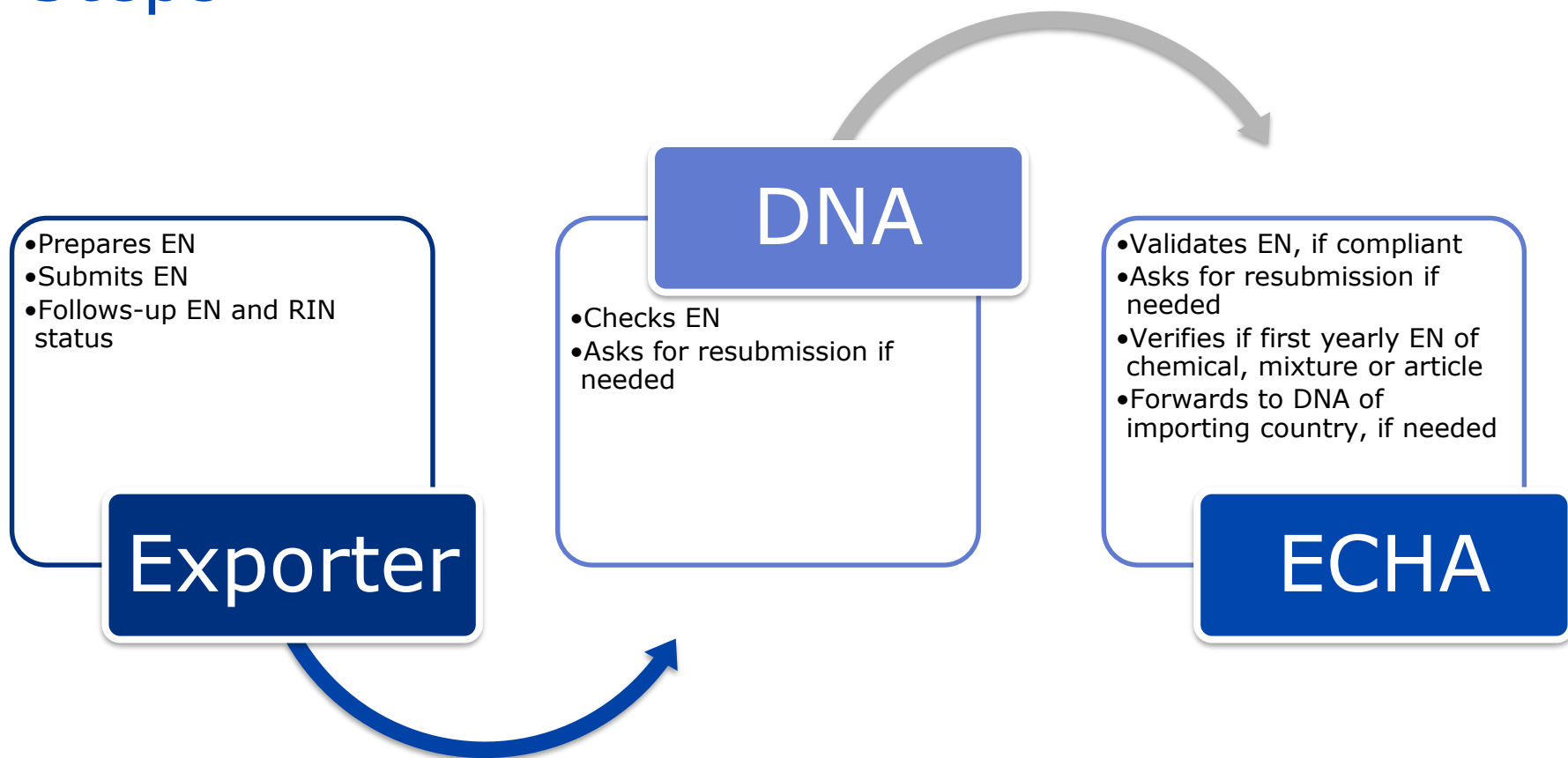
### ✗ Expired

- This RIN was for a past year and cannot be used as basis for exports anymore

The screenshot displays the ECHA Export Notification interface for a chemical. At the top, it reads "Export notification for a chemical: [redacted] (version1)". Below this, there is a prominent orange box with a clock icon and the word "Inactive". To the right of this box are buttons for "Download PDF", "View", and "Actions". The main content area is titled "Section 1 - IDENTITY OF THE CHEMICAL SUBJECT TO THE EXPORT NOTIFICATION" and lists the following details:

- 1.1 Common name: Benzene (Part 1 of Annex I)
- 1.2 Chemical name according to an internationally recognized nomenclature (e.g. IUPAC):
- 1.3.1 CAS number: 71-43-2
- 1.3.2 EC number: 200-753-7
- 1.3.3 Harmonized system customs code:
- 1.3.4 CN code: 2902 20 00
- 1.3.5 CUS code:
- 1.3.6 Other numbers (if applicable, specify the numbering system):

## Export notification Steps



## Specific procedures

- Emergency situations
- Special RIN requests

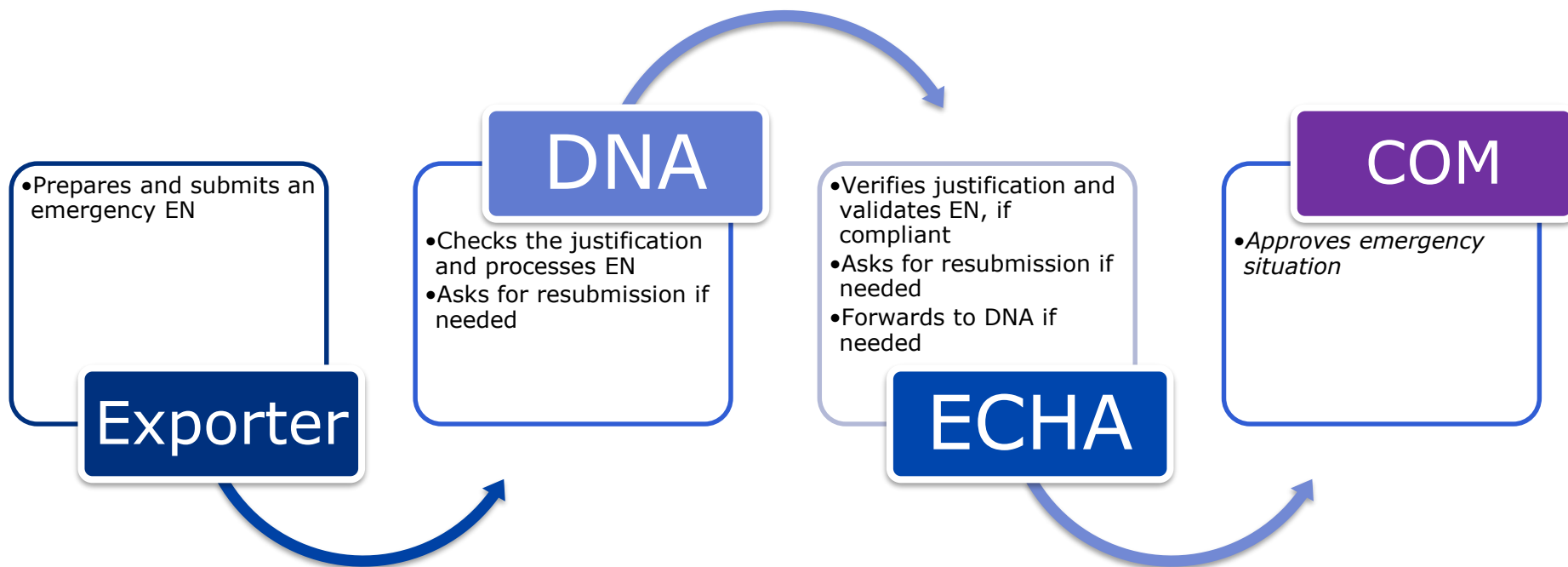




## Emergency export notification

- Public health or environmental emergency where delay can worsen the situation in destination country
- No requirement to submit 35 days prior to export
- Not subject to explicit consent procedure
- Requires approval by European Commission

## Emergency export notification Steps



## Special RIN requests

- “Light procedure” for exports of PIC chemicals exempted from obligations of PIC Regulation but require a code for customs clearance
- Special RIN requests checked by exporter’s DNA
- ECHA not involved

## Special RIN requests

### 3 scenarios

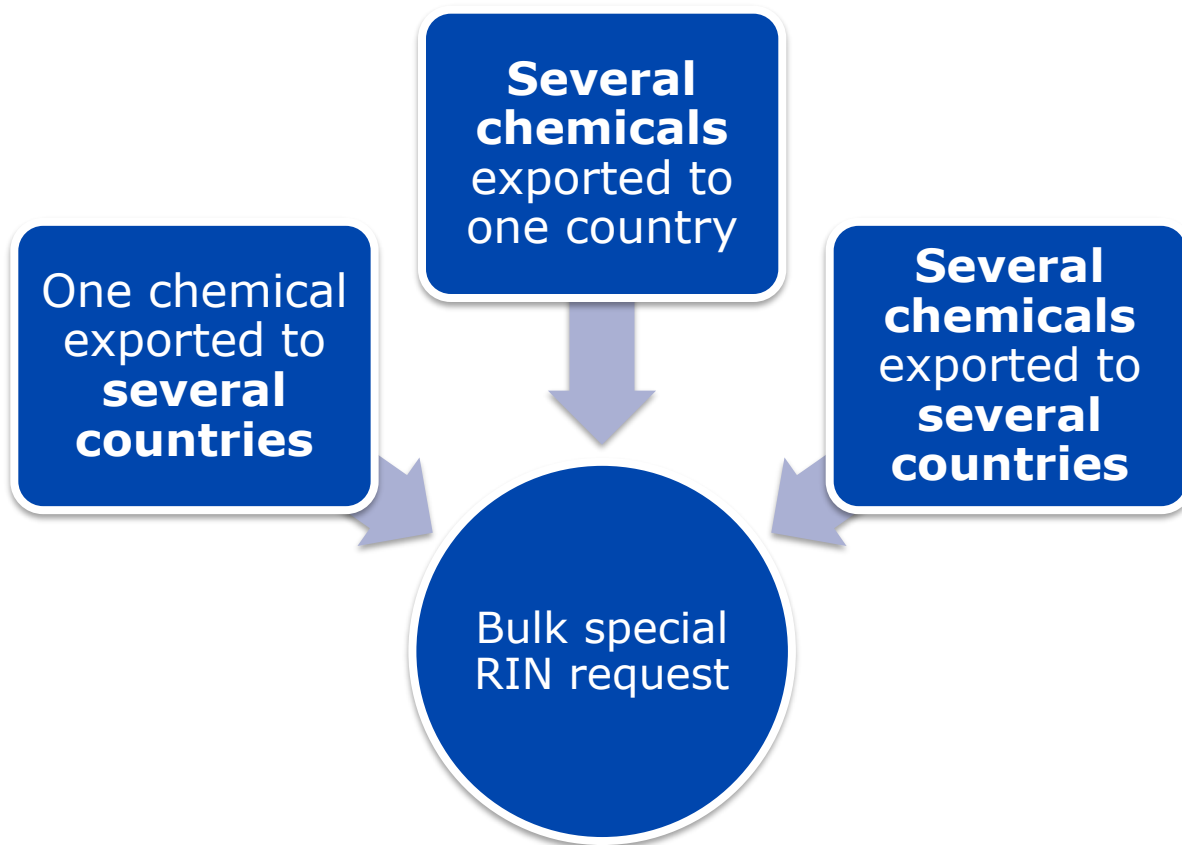
Annex I and V chemicals in **quantities <10kg**  
/year/importing country for **research or analysis**

*→ should be obtained for customs clearance*

Importing country waived its right to receive an export notification

Positive import response is available on Rotterdam Convention website (for Convention parties)

## Special RIN Bulk submission



# Explicit consent

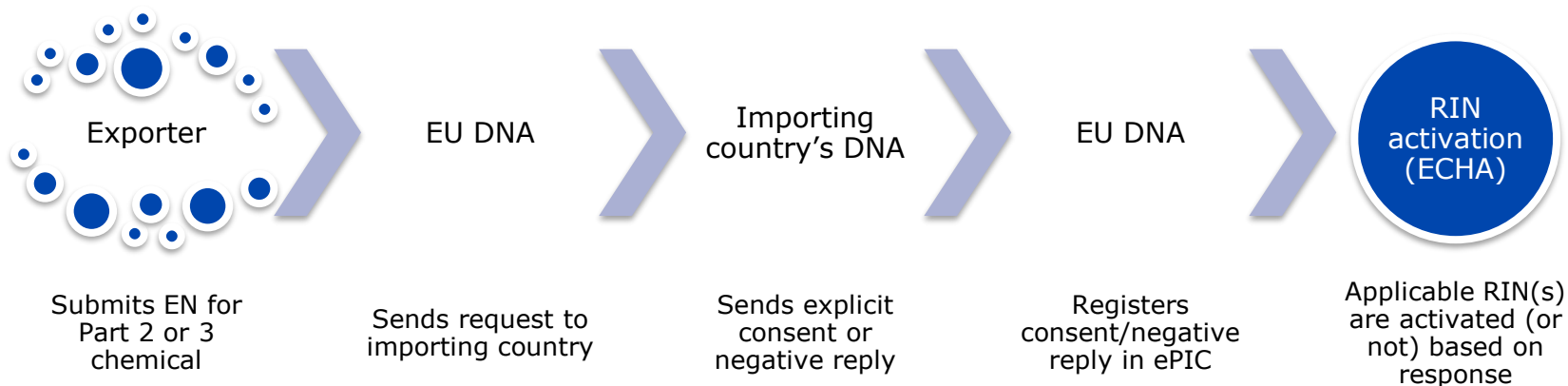


## Main principles



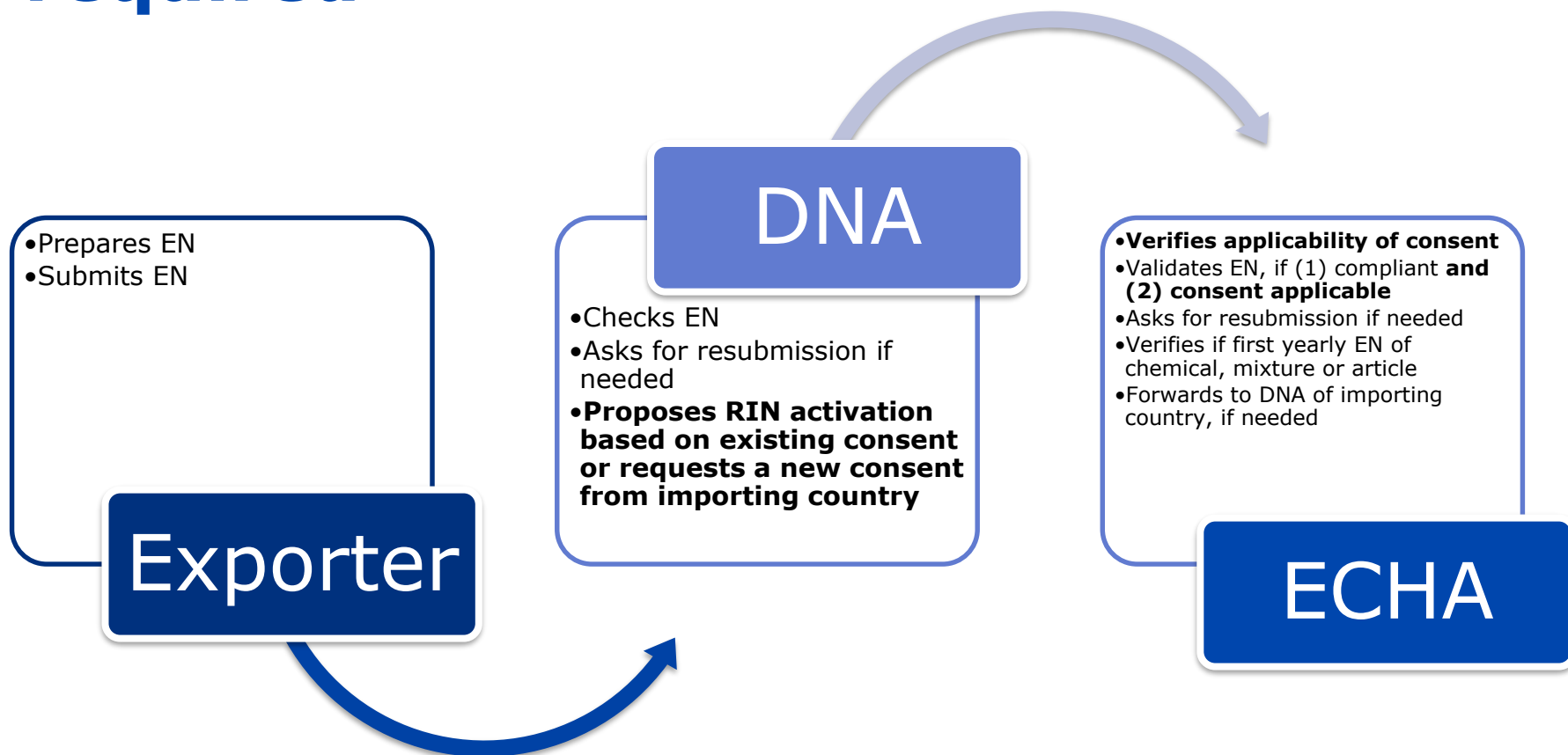
- Required for Annex I part 2 and 3 chemicals
- Sought and received by exporter's DNA from importer's DNA
- Explicit consent can have different restrictions
  - Limited validity
  - Importer-specific
  - Use specific, etc.

## Explicit consent procedure





## Export notification when consent required



## Waivers

- Requirement for valid positive explicit consent response from importing country can be waived on a case by case basis if:
  - For part 2 chemicals only: importing country is member of OECD

OR

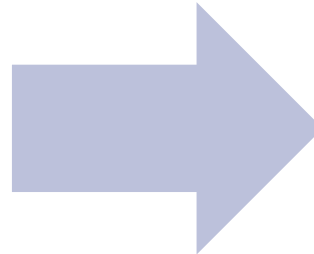
- For part 2&3 chemicals: if no response received from importing country 60 days after request for explicit consent was made by EU designated national authority



# When can a waiver be proposed?

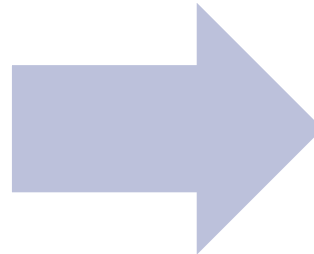


**Right after** submission of export notification for Part 2 chemicals



**OECD waiver** can be proposed

No response from importing country **within 60 days**



**Standard waiver** proposal can be submitted

# Main aspects of the procedure



- Documentary evidence that substance is licensed, registered or authorised in importing country
- Submitted in ePIC
- Approval done by EU DNA, in consultation with European Commission, case-by-case
- ECHA not involved
- Waivers can be granted a validity for a maximum period of 12 months

➤ See [waiver information sheet](#)

# How to fill in an export notification

**Webinar: Know your obligations when exporting hazardous chemicals outside the EU**

24 September 2020

Ramona Cioata  
European Chemicals Agency



# How to fill in an export notification



Use export notification templates



Submit export notification



Examples of resubmissions and rejections cases



# Relevant for export notification

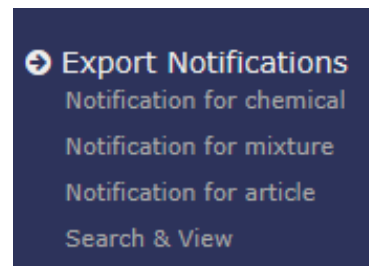
- Only one export notification for the same chemical, year and importing country

- Templates available in ePIC




Select relevant one for intended export

- Mixtures/articles to be created beforehand



# Section 1 of export notification

- **Importing country**
- Check if destination country has specific requests

| Chemical/Category                                       |  |
|---|--|
| Full importer details required for export notifications | EN  |

- **Chemical identity**
- If a single substance (e.g. benzene), select from drop-down list
- If chemical belongs to group entry (e.g. Tributyltin compounds), enter identifier (e.g. CAS#) manually and system will pre-fill 'common name' field
- Once information selected/entered, other identifiers available for ECHA are automatically filled in

## Export notification for a chemical: New

Please start the notification process by filling all the required information

\* denotes required fields

\* Importing country: South Africa 

[Click here to view the information provided for the importing country](#)

### IDENTITY OF THE CHEMICAL SUBJECT TO THE EXPORT NOTIFICATION

Please provide information requested below. You should either select a chemical from the list or enter a valid CAS number or EC number.

Select a Chemical 

1.2 Chemical name according to an internationally recognized nomenclature (e.g. IUPAC):

#### 1.3 Code numbers

1.3.1 CAS number:

1.3.2 EC number:

1.3.3 Harmonized system customs code:

1.3.4 CN code : \*

Disclaimer: ECHA cannot guarantee that this is the most up-to-date code.

1.3.5 CUS code:

Please note that completion of the CUS code is mandatory for all substances and mixtures for which a CUS code has been assigned.



# Section 2 of export notification

- Section 1 replaced by section 2, for mixtures/articles
- Mixtures/articles created beforehand
- Selection of correct mixture/article done from drop-down list

## Export notification for a mixture: New

Please start the notification process by filling all the required information

\* denotes required fields

\* Importing country:

**Section 2**

Section 3

Section 4

Section 5

Section 6

Attachments

### IDENTITY OF THE MIXTURE TO BE EXPORTED

Please provide information requested below.

2.1 Trade name and name of the mixture : \*



Test mixture

2.3 CN code:

2.4 CUS code:

Please note that completion of the CUS code is mandatory for all substances and preparations for which a CUS code has been assigned.

Concentration ( % ) and information of substance(s)

| Annex I Chemical  | Group substance | Annex | Part |
|-------------------|-----------------|-------|------|
| No records found. |                 |       |      |

> Next section

# Section 3 of export notification

- **Information concerning export**

- **Export date** cannot be earlier than 35 days from submission of notification.

- Emergency Situation **only** where any delay may **endanger public health or environment.**

Emergency Situation (in accordance with Article 8(5))

In order to obtain the special RIN, please provide your justification below : \*

Section 1
**Section 3**
Section 4
Section 5
Section 6
Attachments

### INFORMATION CONCERNING THE EXPORT

Please provide information requested below.

3.1 Expected date of first export (dd.mm.yyyy) : \*

Emergency Situation (in accordance with Article 8(5))

3.2 Expected yearly amount of the substance/mixture (kg/l per year) : \*

Please use a dot (.) only as a decimal point and no other characters separating your figure eg. 10000 for ten thousand (NOT 10000.00)

please select unit ▼

3.3 Foreseen category in importing country : \*

Industrial chemical

- **Estimated yearly amount** of chemical to be exported

# Section 3 of export notification

- **Foreseen category in importing country**
- Select relevant tick box(es) and provide information on foreseen uses in free text field(s)
- Recommended to be as accurate as possible in describing intended use
- If explicit consent is required for export this information helps importing country designated national authority in decision-making

3.3 Foreseen category in importing country : \*

Industrial chemical

Pesticide

Industrial use foreseen in importing country : \*

# Section 3 of export notification

- **Add importers**
- Select importing company(ies) for this export notification
- If the list of companies is empty, a new company must be added

**Export notification for a chemical: New**

Save Save & Close Submit Cancel

Please start the notification process by filling all the required information  
\* denotes required fields

\* Importing country: South Africa ⓘ  
Click here to view the information provided for the importing country

Section 1 **Section 3** Section 4 Section 5 Section 6 Attachments

INFORMATION CONCERNING THE EXPORT

Please provide the information requested below

3.4 Importer name, address, telephone, fax and email : \*

+ Manage importers

- **Importer details**
- Add importers
- **Contact details**
- **PO box not accepted**

## List of companies : South Africa

The following companies have been defined for the selected country:

No company exist for the selected country - please create a new company

+ New company

| Name              |
|-------------------|
| No records found. |

Please add at least one company before continue editing.

Update notification (back) Cancel (back)

# Section 4-5 of export notification

- **Safety data sheet attached**

- If you do not attach a safety data sheet, fields become mandatory



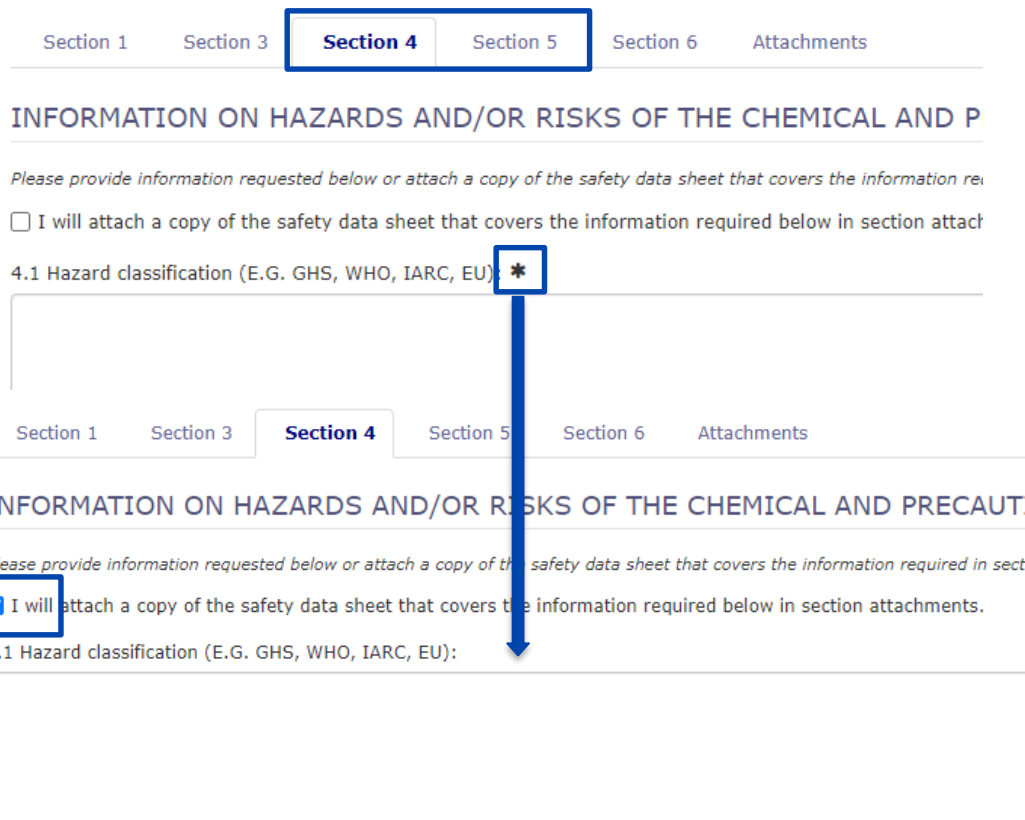
For mixtures, safety data sheet is added when creating it beforehand, as well as the text for field 4.1

- Provide a safety data sheet in official language of importing country or in one of its principal languages

- 5.2. pre-filled with "safety data sheet" as default value

5.2 Reference : \*

Safety data sheet



Section 1   Section 3   **Section 4**   Section 5   Section 6   Attachments

INFORMATION ON HAZARDS AND/OR RISKS OF THE CHEMICAL AND P

Please provide information requested below or attach a copy of the safety data sheet that covers the information re

I will attach a copy of the safety data sheet that covers the information required below in section attach

4.1 Hazard classification (E.G. GHS, WHO, IARC, EU) \*

Section 1   Section 3   **Section 4**   Section 5   Section 6   Attachments

INFORMATION ON HAZARDS AND/OR RISKS OF THE CHEMICAL AND PRECAUT.

Please provide information requested below or attach a copy of the safety data sheet that covers the information required in sect

I will attach a copy of the safety data sheet that covers the information required below in section attachments.

4.1 Hazard classification (E.G. GHS, WHO, IARC, EU):

# Section 6 of export notification

## Summary information on final regulatory action taken by exporting country

- All information in this section refers to EU level
- For importing non-EU countries to understand regulatory status of PIC chemicals in the EU

### Section 6.1 - Summary of and reasons for final regulatory action and date of entry into force

- ePIC pre-fills the summary of regulatory restrictions and reasons for them, with information available in its database, in accordance with **language** requirement in importing country
- This information is up-to-date and additional information should be added **only** if more recent and verifiable against EU regulations

Common name: **Permethrin (Part 1 of Annex I)**

Section 1 | Section 3 | Section 4 | Section 5 | **Section 6** | Attachments

**IDENTITY OF THE CHEMICAL SUBJECT TO THE EXPORT NOTIFICATION**

Please provide information requested below. You should either select a chemical from the list

Permethrin

1.2 Chemical name according to an internationally recognized nomenclature (e.g. IUPAC):

1.3 Code numbers

1.3.1 CAS number:

Section 1 | Section 3 | Section 4 | Section 5 | **Section 6** | Attachments

**SUMMARY INFORMATION ON FINAL REGULATORY ACTION TAKEN BY THE EXPORTING COUNTRY**

Please provide information requested below.

6.1 Summary of and reasons for the final regulatory action and date of entry into force : \*

It is prohibited to place on the market or use plant protection products containing permethrin because this active substance has been prohibited in accordance with Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC (OJ L 309, 24.11.2009, p. 1–50).

## Section 6.2 of export notification

- **Checkboxes**

- Information is **pre-filled** based on selected chemical. Indicate if regulatory restriction within the EU was introduced for industrial chemical or pesticide use category

- **Prohibited/allowed uses**

- Free text fields and **at least one of the two** must be filled in with relevant information
- Refer to uses in the EU for the **PIC chemical** to be exported
- More details: '**in brief**' guidelines for section 6.2 [https://echa.europa.eu/documents/10162/21721613/guidelines\\_section62\\_pic\\_notification\\_en.pdf/981ade4a-deb1-23e3-2bcb-b6e2cde1856d](https://echa.europa.eu/documents/10162/21721613/guidelines_section62_pic_notification_en.pdf/981ade4a-deb1-23e3-2bcb-b6e2cde1856d)

6.2 The final regulatory action has been taken for the category : \*

Industrial chemical  Pesticide

Please indicate below the following : \*

*At least one field must be provided*

Prohibited uses:

Allowed uses:

# Section 6.2 of export notification



## How it is used in the EU

### Section 6 - SUMMARY INFORMATION ON FINAL REGULATORY ACTION

6.1 Summary of and reasons for the final regulatory action and date of entry into force  
Didecyldimethylammonium chloride

It is prohibited to place on the market or use plant protection products containing didecyldimethylammonium chloride from 21 October 2009 concerning the placing of plant protection products on the market and

6.2 The final regulatory action has been taken for the category:

Industrial chemical  Pesticide

**Prohibited uses:**  
Plant Protection Products

**Allowed uses:**



## How will it be used in importing non-EU country

3.3 Foreseen category and foreseen use in importing country:

Industrial chemical  Pesticide

**Pesticide use foreseen in importing country:**  
Disinfection of surfaces and materials. For further information on product indication,



## Section 6.2 of export notification

- **Produced / Imported / Exported / Used:**
- These fields refer to **yearly quantities** of the PIC chemical produced, imported, exported and used at **EU level**. If information is not available, these fields can be left empty
- **Reference to regulatory document**
- **Gives additional info**
- Provide a reference to any **regulatory** document relevant for the export notification. Reference document must be **official and in force** and must refer to regulatory actions at **EU level**

*Estimation, where available, of the following yearly quantities for the Annex I chemical subject to this export notification*

Produced:

Imported:

Exported:

Used:

6.3 Reference to the regulatory document:

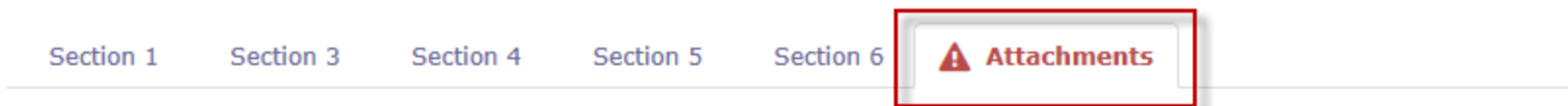
# Attachments

## 1. Please select the documents to attach to the export notification

- Safety Data Sheet in the official language(s) of the importing country

Safety Data Sheet  English  \\echa\data\users\u09:

- An error will appear in specific tab if safety data sheet not included



- For mixtures the safety data sheet is provided in the mixtures' master data

# Submitting the export notification

- RIN is allocated but notification is still in **draft** status

Export notification for a chemical: 1111111111 ✓ (draft)

✓ SUCCESS - Notification last saved on 11/08/2020 16:57. Please note that your notification has not been submitted yet.

- Errors are **marked**

Section 1   Section 3   Section 4   Section 5   Section 6   **⚠ Attachments**

Attach new documents

**⚠ When checkbox in Section 4.1 is selected, at least one SDS file is mandatory and must be attached**

# Submitting the export notification

- After corrections are made

✓ Submit

✓ Submit notification to DNA

- **Confirmation page**

## Export notification for a chemical: 1F [redacted] (draft)

✎ Continue editing

✓ Submit notification to DNA

Confirm details and submit

⚠ Warning: Please note that completion of the CUS code is mandatory for all substances and mixtures for which a CUS code has been assigned

Please press the "Submit notification to DNA" button if you agree with all the information provided below and also select the declaration texts where applicable.

I declare the following:

This export is not intended for the purpose of reclaiming mercury.

SDS declarations:

We have not attached a SDS in EN/FR/ES because we have provided it in an official language of the importing country.

We have provided the SDS in English because we do not have a version in the official/principal language of the importing country.

Export and import of hazardous chemicals

## Export notification for a chemical: 1F [redacted] IV (version1)

Export notification submitted successfully

Your export notification has been submitted successfully to your DNA. Please find below your RIN.

RIN:

1F [redacted] (version 1) *Tip: You may use the RIN when contacting us about your application through the Helpdesk.*

Chemical name:

1,2-dibromoethane (EDB) (Part 3 of Annex I)

Importing country:

[redacted]

Expected date of first export:

[redacted]/2020

Print


Back to home page

# **Export notification follow-up**




# Email alerts on the status change

ePIC automated message: Export Notification - 1K [ - Notification validated ]


 [nir@echa.europa.eu](mailto:nir@echa.europa.eu) Repl

ePIC automated message: Export Notification - 1C [ - RIN activated based on consent ]

 [pic@echa.europa.eu](mailto:pic@echa.europa.eu) Reply Reply All Forward ...


To: [redacted] Tue 18/08/2020 10:44

ePIC automated message: Export Notification - [redacted] [ - Information requirements not met ]

 [pic@echa.europa.eu](mailto:pic@echa.europa.eu) Reply Reply All Forward ...

To: [redacted] Tue 18/08/2020 11:29

ePIC automated message: Export Notification - 1 [redacted] [ - Notification not applicable (rejected) ]

 [pic@echa.europa.eu](mailto:pic@echa.europa.eu) Reply Reply All Forward ...

To: [redacted] Mon 17/08/2020 08:46

This is a message automatically generated by the ePIC application to inform you on the progress of the case specified below. Please follow the link to the ePIC application for more details.

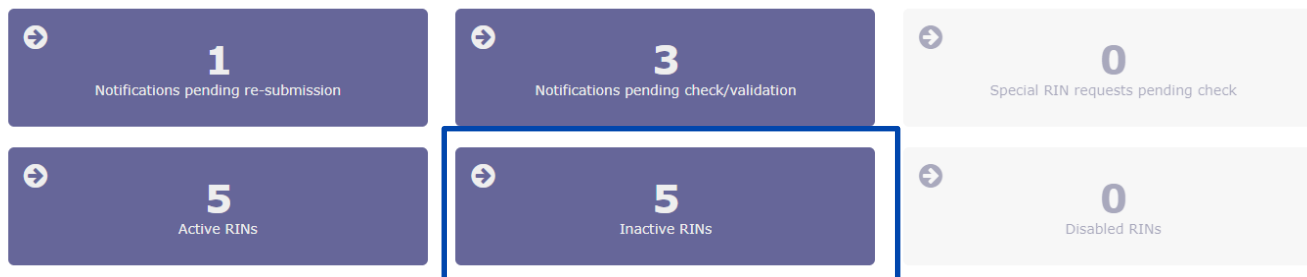
**Case:** Export Notification - [redacted]  
**Event:** Notification not applicable (rejected)  
**Generated On:** 17/08/2020 08:45  
**Exporter:** [redacted]  
**Chemical:** cadmium (non-pyrophoric) belongs to the group Cadmium and its compounds  
**Importing country:** India  
**Link (ePIC):** [https://epic.echa.europa.eu/pic-industry-web/rin/view/\[redacted\]](https://epic.echa.europa.eu/pic-industry-web/rin/view/[redacted])

If there are any messages related to this submission, you can access them using the following link: [https://epic.echa.europa.eu/pic-industry-web/messages/EXN/\[redacted\]/list](https://epic.echa.europa.eu/pic-industry-web/messages/EXN/[redacted]/list)

Please do not reply to this message as replies are routed to an unmonitored mailbox. If you have a question or experience any problems, please contact the ECHA Helpdesk at the following link: <http://echa.europa.eu/contact>

# Check the status of your export notification






- From the main menu



Records found: 5

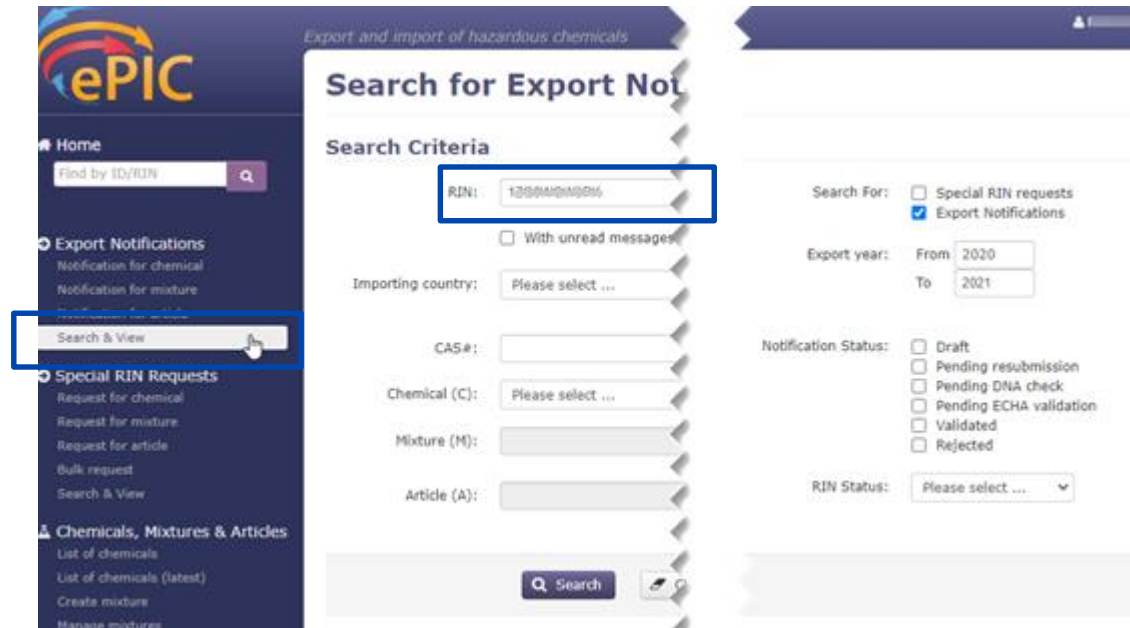
| RIN        | Name ↕                  | Importing country |
|------------|-------------------------|-------------------|
| XXXXXXXXXX | Alachlor                | Algeria           |
| XXXXXXXXXX | Amitraz                 | Algeria           |
| XXXXXXXXXX | 1,2-dibromoethane (EDB) | Albania           |
| XXXXXXXXXX | 1,1-Dichloroethene      | Algeria           |
| XXXXXXXXXX | Amitraz                 | Algeria           |

Page: 1/1

| Status ↕                | Actions   |
|-------------------------|---|
| Pending resubmission    |  |
| Pending resubmission    |  |
| Draft                   |  |
| Pending DNA check       |  |
| Pending ECHA validation |  |

# Check the status of your export notification

- Search and view



**Records found: 1**

| RIN   | Name    | Export Date | Status               |
|---|---------|-------------|----------------------|
| <a href="#">Edit notification for Amitraz</a> | Amitraz | 29/07/2020  | Pending resubmission |



# Check sequence of events for the export notification

- Check event history

## Export notification for a chemical: 1 [REDACTED]

Inactive

Importing country:  
Algeria

### Section 1 - IDENTITY OF THE CHEMICAL SUBJECT TO THE EXPORT

1.1 Common name:  
**Amitraz** (Part 2 of Annex 1)

1.2 Chemical name according to an internationally recognized nomenclature (e.g. IUPAC):

1.3.1 CAS number:  
33089-61-1

Download PDF View Actions

- Export notification
- List of RINs (search)
- Event history**
- Message history
- Submission history

## Export Notification: 1 [REDACTED] - Event history

Snapshot as of 12/08/2020 09:29

|                     |   |
|---------------------|---|
| 24/06/2020<br>10:52 | <b>Explicit Consent Request - Request registered</b><br>by Germany DNA [REDACTED] |
| 24/06/2020<br>10:30 | <b>Export Notification - Notification checked</b><br>by Germany DNA [REDACTED]    |
| 22/06/2020<br>16:51 | <b>Export Notification - Notification submitted</b><br>by R: [REDACTED]           |

# Check messages

- Check messages to identify actions needed

## Export notification for a chemical: 1Z[REDACTED]

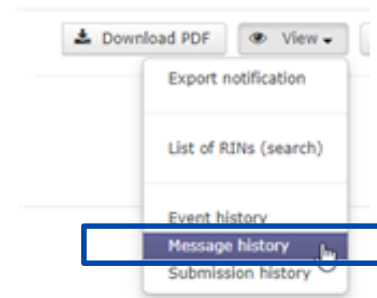
Inactive

Importing country:  
Algeria

### Section 1 - IDENTITY OF THE CHEMICAL SUBJECT TO THE EXPORT

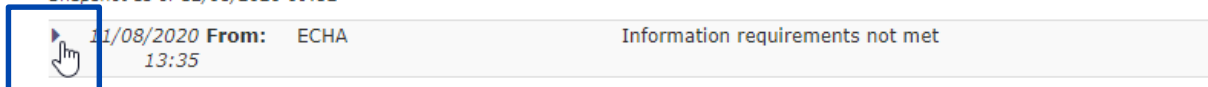
1.1 Common name:  
**Amitraz** (Part 2 of Annex I)

1.2 Chemical name according to an internationally recognized nomenclature (e.g. IUPAC):



## Export Notification: 1Z[REDACTED] - Message History

Snapshot as of 12/08/2020 09:32



**Message:** Dear Sir/Madam,  
  
Please revise section 6.2 and resubmit  
  
Kind regards,  
PIC Operations

# **Resubmission requests: main reasons**




# Importer contact details

- PIC Regulation Annex II point 4(f):  
*name, address and other relevant particulars of the natural or legal importing person*

## 3.4 Importer name, address, telephone, fax and email:

AL [REDACTED] Co.

**Address:** P.O. BOX [REDACTED]  
Alger  
Algeria



## 3.4 Importer name, address, telephone, fax and email:

A [REDACTED] Co.

**Address:** 113, cite [REDACTED] Raïs  
1 [REDACTED] Alger  
Algeria



# Intended use category in the importing country

\* denotes required fields

\* Importing country:

Tunisia 

[Click here to view the information provided for the importing country.](#)

Common name:

Didecyldimethylammonium chloride (Part 1 of Annex I)

## Annex I Chemical

Didecyldimethylammonium chloride

## Section 3 - INFORMATIC

### 3.1 Expected date of first export :

18/06/2020

### 3.2 Expected yearly amount of the substance 100 kg

### 3.3 Foreseen category and foreseen use

Industrial chemical  Pesticide

**Pesticide use foreseen in importing country:**  
Disinfection of surfaces and materials. For

### Use category for notifications for biocidal use

Biocidal use in Tunisia is classified under the industrial chemicals use category. Therefore, for exports of biocidal products, the checkbox "industrial" in section 3 of the export notification form should be selected.

Enclosure: Email from Tunisian DNA for Pesticides (24 October 2017).

### 3.3 Foreseen category and foreseen use in importing country:

Industrial chemical  Pesticide

**Pesticide use foreseen in importing country:**

**Industrial use foreseen in importing country:**  
biocides for hard surface disinfectants



# Exported PIC chemical's concentration range

- Concentration mismatch in export notification vs. safety data sheet

Concentration ( % ) and information of substance(s):

Annex I Chemical

Nonylphenol ethoxylates (C<sub>2</sub>H<sub>4</sub>O)<sub>n</sub>C<sub>15</sub>H<sub>24</sub>O

| CAS number | EC number | (%)  |
|------------|-----------|------|
| 9016-45-9  | -         | 11.7 |

| Chemical name  | %       | CAS-No. / EC No.       |
|--|---------|------------------------|
| Nonylphenol, ethoxylated   | 1 - < 3 | 9016-45-9<br>500-024-6 |
| <b>Classification:</b> Acute Tox. 4-H202, Skin Irrit. 2-H315, Eye D. |         |                        |

| Chemical name  | %     | CAS-No. / EC No.       |
|--|-------|------------------------|
| Nonylphenol, ethoxylated   | 10-15 | 9016-45-9<br>500-024-6 |
| <b>Classification:</b> Acute Tox. 4-H202, Skin Irrit. 2-H315, Eye D. |       |                        |



## Section 6.2: allowed/prohibited uses

- Information provided in allowed/prohibited uses about the product

**1.1 Common name:**

**Permethrin** (Part 1 of Annex I)

**6.2 The final regulatory action has been taken for the category:**

Industrial chemical  Pesticide

**Prohibited uses:**

**Allowed uses:**

Spray to be used on different surfaces.



**1.1 Common name:**

**Permethrin** (Part 1 of Annex I)


**6.2 The final regulatory action has been taken for the category:**

Industrial chemical  Pesticide

**Prohibited uses:**

**Allowed uses:**

Insecticides, acaricides and products to control other arthropods.

| Substance name | EC /List no     | CAS no     | Product-type   | Approval start date | Approval end date |
|----------------|-----------------|------------|--|---------------------|-------------------|
| Permethrin     | -;<br>258-067-9 | 52645-53-1 | PT18 - Insecticides, acaricides and products to control other arthropods                   |                     | 30/04/2026        |
| Permethrin     | -;<br>258-067-9 | 52645-53-1 |  PT18 | 01/05/2016          | 30/04/2026        |



## Section 6.2 Allowed/Prohibited uses

- Information in allowed/prohibited uses can not be verified against regulatory decisions in EU
- Information is confused with indented use in section 3

1.1 Common name:  


3.3 Foreseen category and foreseen use in importing country:

Industrial chemical  Pesticide

**Pesticide use foreseen in importing country:**


powder against fungal pathogens in open areas.

**Industrial use foreseen in importing country:**



### EXPORTING COUNTRY

6.1 Summary of and reasons for the final regulatory action and date of entry into force:

It is prohibited to place on the market or use plant protection products containing  because this active substance has been prohibited in accordance with Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC (OJ L 309, 24.11.2009, p. 1-50).

6.2 The final regulatory action has been taken for the category:

Industrial chemical  Pesticide

**Prohibited uses:**

Banned in EU to be used in plant protection products. Still allowed as powder against fungal pathogens in open areas.



# Rejections: main reasons




# Mismatches

- Address of the importer does not match with the country of destination


## 3.4 Importer name, address, telephone, fax and email:

Address:   
Hong Kong  
China



\* Importing country:

- Honduras
- Hong Kong, China



- Template for export notification does not match with safety data sheet information

## Export notification for a chemical:

Importing country:  
Tunisia  
[Click here to view the information provided for the importing country](#)

**Section 1 - IDENTITY OF THE CHEMICAL SUBJECT TO THE EXPORT NOTIFICATION**

1.1 Common name:  
Cholecalciferol (Part 1 of Annex I)

1.2 Chemical name according to an internationally recognized nomenclature (e.g. IUPAC):  
2,4,4'-Trichloro-2'-hydroxy diphenylether 5-Chloro - 2-(2,4-dichlorophenoxy) phenol

1.3.1 CAS number:  
67-97-0

1.3.2 EC number:  
200-673-2


1.3.3 Harmonized system customs code:

1.3.4 CN code:  
2936 29 90

1.3.5 CUS code:  
0013615-2

1.3.6 Other numbers (if applicable, specify the numbering system) :

**Section 3 - INFORMATION CONCERNING THE EXPORT**




- 3.1 Substances  
Not applicable
- 3.2 Mixtures

### Hazardous components

| Chemical name  | CAS-No.<br>EC-No.<br>Registration number    |   |
|--|---|---|
| 3,4-dihydro-2,5,7,8-tetramethyl-2-(4,8,12-trimethyltridecyl)-2H-benzopyran-6-ol (dl- $\alpha$ -tocopherol) | 10191-41-0<br>233-466-0<br>01-2120086658-39 | Skin Sens   |
| cholecalciferol (Vitamin D3)   | 67-97-0<br>200-673-2                        | Acute Tox<br>Acute Tox<br>Acute Tox<br>STOT RE<br>Aquatic C |


Export Notifications

- Notification for chemical
- Notification for mixture
- Notification for article




# Duplicates of export notifications

**Export notification for a chemical:** [REDACTED] (draft)

 Continue editing

 Submit notification to DNA

Confirm details and submit

 Your company has already submitted a notification for the same chemical, importing country and year - RIN: 1Z [REDACTED]

Please press the "Submit notification to DNA" button if you agree with all the information provided below and also select the declaration te

# Annual reporting on PIC exports and imports

Obligations under  
PIC Regulation

- Exports
- Imports

Generating Article  
10 report

- Exports
- Imports



# Generating Article 10 report

## Exports

- **ePIC provides industry users with a web form**
- **Report for exports is pre-filled by ePIC when data is available in the system and includes:**
  - Validated export notifications
  - Special RIN requests for Annex I part 3 chemicals where intended use corresponds to PIC use category and there is a positive import response in latest PIC Circular
  - Special RIN requests for countries that waived their right to receive export notifications. (Ceuta and Melilla)



### Exempted

- Special RIN requests for exports in quantities below 10 kg/year and per importing country for purpose of research and analysis

## Imports

- Format is similar to report on exports
- All information on imports to be entered manually



 **Article 10 reports**  
Create report on exports  
Create report on imports  
Search & view

# Verify report data (1)

- If export did not take place, a nil (0) quantity should be reported for referenced RIN(s)

|                      |                          |     |   |   |
|----------------------|--------------------------|-----|---|---|
| Dibutyltin compounds | <input type="checkbox"/> | 0   | Unit: Shanghai (Shanghai) Co., Ltd.<br>Lane 600, Tianshan | 1 |
| Dibutyltin compounds | <input type="checkbox"/> | 600 |   | 1 |

- Importer information should include all company names and addresses to which chemicals were exported

|                      |     |  |   |
|----------------------|-----|--|---|
| Dibutyltin compounds | 600 | <div style="border: 2px solid blue; padding: 5px;">         CI<br/>G<br/>ro<br/>PI<br/>F<br/>E       </div> <div style="border: 2px solid blue; padding: 5px; margin-top: 10px;">         SI<br/>32<br/>(W<br/>PI<br/>F<br/>E       </div> | 1 |
|----------------------|-----|--|---|

## Verify report data (2)

- Report must contain **quantities in kg** - consider converting quantities known from exports

Export documents: Dibutyltin compounds = 0,1935 T

| Annex I entry        | Quantity (kg) | Importer              | RIN |
|----------------------|---------------|-----------------------|-----|
| Dibutyltin compounds | 193.5         | E<br>N<br>F<br>F<br>E | 1   |


- For mixtures and articles, quantity refers to the **Annex I chemical** within mixture/article and not to mixture/article as a whole


## Verify report data (3)

- If you had exports that were not notified (i.e. no RIN is available in the system), you must insert them manually
- If you exported PIC chemicals but never submitted any export notifications, report has to be generated and filled in manually in ePIC

### Create Article 10 annual report (manual)

---



 Article 10 reports

Create report on exports

Create report on imports

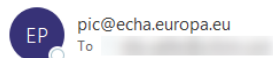
Search & view



# Submitting the Article 10 report

- Deadline (31 March)
- You will receive a reminder for the Article 10 submission deadline through ePIC

ePIC automated message: Article 10 Report - ART- [REDACTED] - Deadline reminder



This is a message automatically generated by the ePIC application to inform you that the deadline the link to the ePIC application to start editing your report.

**Case:** Article 10 Report - ART- [REDACTED]  
**Event:** Deadline reminder  
**Generated On:** 15/03/2020 01:22  
**Company:** [REDACTED]  
**Link (ePIC):** [https://epic.echa.europa.eu/pic-industry-web/article10/\[REDACTED\]](https://epic.echa.europa.eu/pic-industry-web/article10/[REDACTED])

Please do not reply to this message as replies are routed to an unmonitored mailbox. If you have : following link: <http://echa.europa.eu/contact>

- After the deadline, you can no longer create a manual report or submit a pre-generated report
- Only resubmissions of previously submitted reports are still possible
- **If you miss the submission deadline, contact your designated national authority**

**⚠ ERROR – The deadline for submitting this report was 31/05. You can no longer submit the Article 10 report within ePIC so please contact your DNA.**

# Concluding remarks

Webinar: Know your obligations  
when exporting hazardous  
chemicals outside the EU

24 September 2020

Ramona Cioata  
European Chemicals Agency



## Take home messages

- As a PIC chemicals exporter/importer get familiar with:
  - Your obligations under PIC
  - Procedures depending on exported/imported chemicals
- Ensure you provide accurate information in the export notifications
  - pay particular attention to sections 3 (uses foreseen in the importing country) and 6 (uses within the EU)
- Keep in mind that explicit consent from importing country is a procedure dealt between authorities
- Follow-up on submitted export notifications
- Check our guidance





# Useful links

## ePIC manuals and factsheets

[echa.europa.eu/support/dossier-submission-tools/epic/epic-manuals](https://echa.europa.eu/support/dossier-submission-tools/epic/epic-manuals)

## Other useful pages

[echa.europa.eu/regulations/prior-informed-consent/understanding-pic](https://echa.europa.eu/regulations/prior-informed-consent/understanding-pic)

### Manuals

- [ePIC User Manual for Industry \[PDF\]](#)
- [ePIC User Manual for Industry \[PDF\] \(Outdated\)](#)  
[bg](#) [cs](#) [da](#) [de](#) [el](#) [es](#) [et](#) [fi](#) [fr](#) [hr](#) [hu](#) [it](#) [lt](#) [lv](#) [mt](#) [nl](#) [pl](#) [pt](#) [ro](#) [sk](#) [sl](#) [sv](#)
- [ePIC User Manual for Designated National authorities \[PDF\]](#) )
- [ePIC User Manual for National Enforcement authorities \[PDF\]](#)
- [ePIC User Manual for European Commission \[PDF\]](#)
- [ePIC User Guide for Customs \[PDF\]](#)  
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### Factsheets

- [Waiver information sheet](#)
- [Special RIN Requests \[PDF\]](#)
- [Article 10 Reporting \[PDF\]](#)
- [How to provide information on prohibited and allowed uses in PIC export notifications](#)

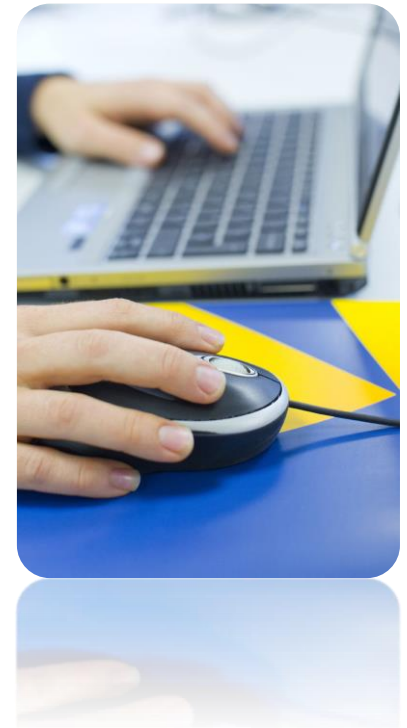
ECHA also provides assistance as well as technical and scientific guidance to industry, the designated national authorities both from the EU and from third countries and the European Commission.

### RELATED

- [Getting started with EU chemicals legislation](#)
- [Guidance on PIC](#)
- [Rotterdam Convention](#)

# Questions

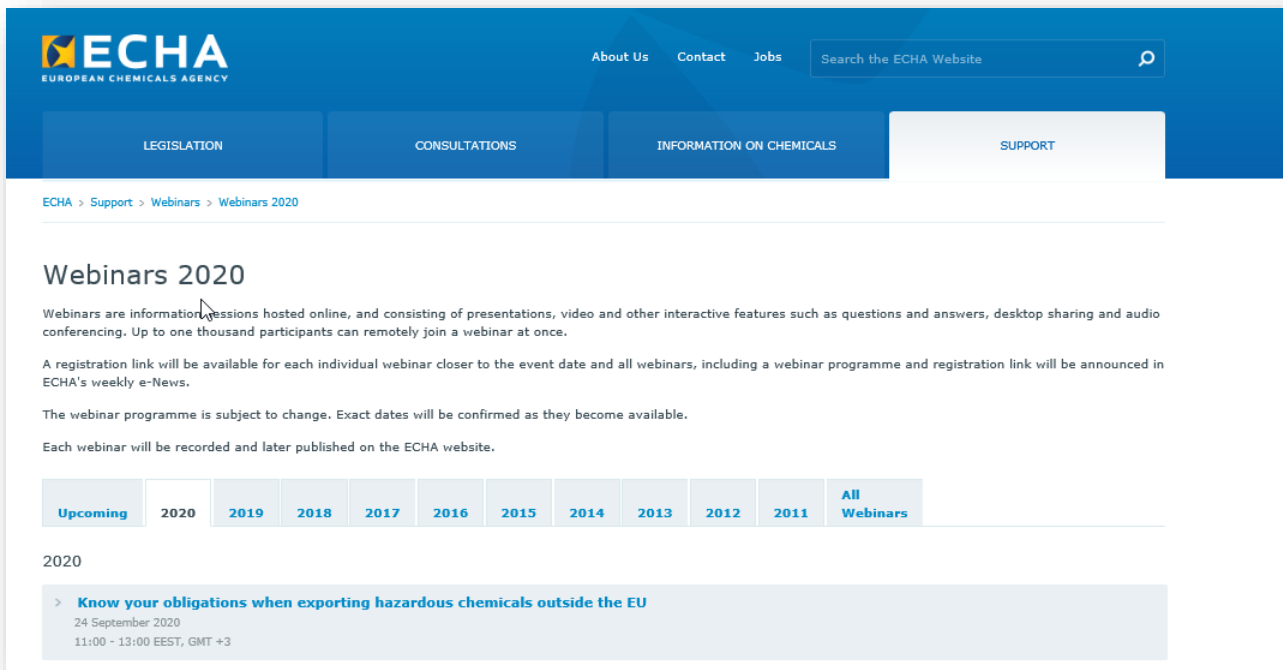
- Join Q&A at: [slido.com](https://www.slido.com)  
Event code:
- Send questions from **11:00 to 13:00 Helsinki Time**
- Only questions within webinar scope
- Question not answered?  
Contact us: [echa.europa.eu/contact](https://echa.europa.eu/contact)



# Material published

Video recording, presentations and Q&A

[echa.europa.eu/support/training-material/webinars](https://echa.europa.eu/support/training-material/webinars)



The screenshot shows the ECHA website's 'Webinars 2020' page. The header includes the ECHA logo, navigation links for 'About Us', 'Contact', and 'Jobs', and a search bar. The main navigation menu has 'LEGISLATION', 'CONSULTATIONS', 'INFORMATION ON CHEMICALS', and 'SUPPORT'. The breadcrumb trail is 'ECHA > Support > Webinars > Webinars 2020'. The page title is 'Webinars 2020'. The text explains that webinars are information sessions hosted online with interactive features like Q&A, desktop sharing, and audio conferencing. It notes that registration links will be available closer to the event date and will be announced in ECHA's weekly e-News. It also states that the webinar programme is subject to change and that each webinar will be recorded and published on the ECHA website. A navigation bar shows years from 2020 to 2011, with '2020' selected. Below this, a list of webinars is shown, with the first entry being 'Know your obligations when exporting hazardous chemicals outside the EU' on 24 September 2020, from 11:00 to 13:00 EEST, GMT +3.

**ECHA**  
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ECHA > Support > Webinars > Webinars 2020

## Webinars 2020

Webinars are information sessions hosted online, and consisting of presentations, video and other interactive features such as questions and answers, desktop sharing and audio conferencing. Up to one thousand participants can remotely join a webinar at once.

A registration link will be available for each individual webinar closer to the event date and all webinars, including a webinar programme and registration link will be announced in ECHA's weekly e-News.

The webinar programme is subject to change. Exact dates will be confirmed as they become available.

Each webinar will be recorded and later published on the ECHA website.

Upcoming 2020 2019 2018 2017 2016 2015 2014 2013 2012 2011 All Webinars

2020

> **Know your obligations when exporting hazardous chemicals outside the EU**  
24 September 2020  
11:00 - 13:00 EEST, GMT +3

# Thank you!

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