

# **Frequently Asked Questions for Chemical Importation Management**

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Environmental Protection Administration,  
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**Q1 : Why is importation management under chemical substances registration scheme necessary?**

A: According to Article 7-1 of Toxic Chemical Substances Control Act (TCSCA) and the Regulation of New and Existing Chemical Substances Registration under Environmental Protection Administration (EPA), manufacturing or import of existing and new chemical substances shall only be allowed when the registration is approved. The competent authority needs to confirm that chemical goods imported to Taiwan are in compliance with all the requirements under chemical substances registration scheme. Therefore, importation management for chemical commodity is critical for both the competent authority and the business to confirm that all the chemical substances in the imported goods comply with any applicable rules or orders under Article 7-1 of TCSCA and the Regulation of New and Existing Chemical Substances Registration.

**Q2 : What is the mechanism of importation management under chemical substances registration scheme in Taiwan?**

A: Considering global trade facilitation and the efficiency of customs clearance of goods, EPA introduced the action of declaration and confirmation by a business itself as the main implementation of importation management under chemical substances registration scheme in Taiwan. Moreover, enforcement including post-market inspection/surveillance is performed according to TCSCA.

**Q3 : What information or documents should I prepare for importation management?**

A: You do not need to submit any documents to EPA at this moment. The importation management under chemical substances registration scheme only requires a user (e.g., a domestic importer (registrant), a TPR, a person from foreign business, or other eligible entity) to voluntarily offer essential information of the **domestic importer (registrant)**, the **goods**, and the **chemical substances in the goods** through the IT platform of Chemical Commodity Importation Pre-Confirmation (CCIP) online. It

is suggested to keep supporting documents (e.g., SDS, Chemical Substance Nomination and Notification ( MoL CSNN website, [http://csnn.osha.gov.tw/content/home/Substance\\_Home.aspx](http://csnn.osha.gov.tw/content/home/Substance_Home.aspx)) Taiwan Chemical Substance Inventory (TCSI) Search Record Printout, approved document for Scientific Research and Development and/or Polymer of Low Concerns uses, other legal documents approved by related competent authorities, etc.) for reference during future inspection/surveillance.

**Q4 : When does the importation management start?**

A: The importation management under chemical substances registration scheme has been deployed since 2016. A company needs to make sure the chemical substances in the goods meet all regulatory requirements under chemical substances registration scheme (refer to Q1) before importing the goods into Taiwan. After self-checking, the company can file a pre-confirmation by providing certain essential information of the **domestic importer (registrant)**, the **goods**, and the **chemical substances in the goods** through CCIP IT platform online. Also this platform serves as a reference for the enforcement and inspection/surveillance by the competent authority to examine the imported good is in conformity with the registration rule under TCSCA.

**Q5 : How do I access to the latest information of importation management under chemical substances registration scheme?**

A: You can visit CCIP IT platform (<http://chemreg-border.epa.gov.tw/content/info/Index.aspx>), searching for the latest news and downloading guideline documents and information brochure.

**Q6 : What goods/commodities should I file pre-confirmation for on CCIP IT platform?**

A: The pre-confirmation is applicable to those commodity containing any chemical substances subject to Article 7-1 of TCSCA and the Regulation of New and Existing Chemical Substances Registration under EPA.

**Q7 : Who can file a pre-confirmation of the chemical commodity on CCIP IT platform?**

A: The CCIP IT platform is open to all stakeholders. The pre-confirmation can be made by a domestic importer (registrant), a TPR, a person from foreign business, or other eligible entity.

**Q8 : What is the possible consequence if I miss to file the pre-confirmation?**

A: The pre-confirmation is voluntary. Miss to complete the pre-confirmation **will not affect the import procedures of your goods immediately**. With the post-market surveillance taking place by the competent authority, special attentions are paid to those goods missed to have pre-confirmation in advance. A fine according to Article 35-1 of TCSCA will be imposed if the registration of chemical substances in the goods is incomplete.

**Q9 : Should I file pre-confirmation every time when I import a good?**

A: If a good contains the same chemical substances with the same composition, you only need to file pre-confirmation of this good once at its first importation. However, goods with different chemical substances and composition should be pre-confirmed on CCIP IT platform separately.

**Q10 : Can I file batch pre-confirmation for more than one good or chemical substance at the same time?**

A: Currently, you can only file one good at a moment on the CCIP IT platform. Future improvement and expansion of the function of CCIP IT platform would be possible as EPA continuously receiving the feedback from the users.

**Q11 : CAS No./Serial No. are required for chemical substances registration. In importation management, when filing a pre-confirmation of goods, is there any risk of disclosure of confidential information of the chemical substances in the goods?**

A: On the CCIP IT platform, several information fields, such as Chinese name, English name and/or CAS No., are designed as “optional” to protect the confidential business information. Basically, for new and existing chemical substances, Registration No. are the only information “required” to be offered on CCIP IT platform.

**Q12 : I may only have the information of importing goods/commodities, but may not know the specific Registration No. corresponding to certain chemicals or goods/commodities. How do I file a pre-confirmation under such circumstances?**

A: The CCIP system takes into account that a business may be unable to obtain complete corresponding chemical information (including Registration No.) of importing goods/commodities, due to CBI concern, or the lack of chemicals’ Registration No. according to Article 19 of Regulation of New and Existing Chemical Substances Registration. To address this issue, the information of chemical substances in the goods is optional. A domestic importer is allowed to decide whether or not to provide chemical information, such as chemical names, Registration No., and percentage of the substance contained in the goods %(w/w). Or, a domestic importer can “skip” and leave this section blank.

However, for reference of future inspection/surveillance, it is highly suggested that domestic importers keep supporting documents. (e.g., SDS, Registration No. or approved documents for new and existing chemical substances registration, approved document for Scientific Research and Development and/or Polymer of Low Concerns uses, Chemical Substance Nomination and Notification (MoL CSNN website, [http://csnn.osha.gov.tw/content/home/Substance\\_Home.aspx](http://csnn.osha.gov.tw/content/home/Substance_Home.aspx)) Taiwan Chemical Substance Inventory (TCSI) Search Record Printout, other legal documents approved by related competent authorities, etc.) In addition, a TPR or a foreigner supplier who have the chemicals or goods

information, can also file the pre-confirmation on CCIP IT platform.

**Q13 : Is there any enforcement imposed by the competent authority at equal strength for domestic manufacturers as well to ensure their manufactured chemicals are in compliance with Article 7-1 of TCSCA?**

A: Those that manufacture and import chemical substances have equal obligation to comply with chemical substances registration scheme under Article 7-1 of TCSCA. According to the law, the competent authority shall perform inspection on both manufacturers and importers of chemical substances. It is suggested for manufactures to keep supporting documents (e.g., SDS, Registration No. or approved documents for new and existing chemical substances registration, approved document for Scientific Research and Development and/or Polymer of Low Concerns uses, Chemical Substance Nomination and Notification ( MoL CSNN website, [http://csnn.osha.gov.tw/content/home/Substance\\_Home.aspx](http://csnn.osha.gov.tw/content/home/Substance_Home.aspx)) Taiwan Chemical Substance Inventory (TCSI) Search Record Printout, other legal documents approved by related competent authorities, etc.) for reference during future inspection/surveillance.

**Q14 : Chemical Commodity Importation Pre-Confirmation (CCIP) is currently proceeded voluntarily by the business. Will this pre-confirmation become mandatory in the future? Moreover, what is the regulation base for CCIP?**

A: According to Article 7-1 of TCSCA, manufacturing or import of existing and new chemical substances shall be allowed when the registration is approved by the competent authority. EPA thus developed the border control measure to confirm that chemical goods imported to Taiwan are in compliance with all the requirements under chemical substances registration scheme. At this stage, EPA encourages business to voluntarily file pre-confirmation for chemical goods/commodities prior to importation on CCIP IT platform. Follow-up enforcement including post-market inspection/surveillance is performed to ensure the importing good/commodity comply with the registration rules under

TCSCA and the Regulation of New and Existing Chemical Substances Registration. EPA will assess the feasibility of collaboration with Customs Administration, Ministry of Finance to affix specific import regulations on the importing chemical good/commodity as one of the option of mandated measures in the future.

**Q15 : When shall I complete declaration and confirmation on CCIP IT platform? Is there any official deadline for people to complete the pre-confirmation on CCIP IT platform?**

A: **After** completing the registration obligation for new and existing chemical substances (including chemical substances for Scientific Research and Development and/or Polymer of Low Concerns uses as well) and **before** importing the chemical good/commodity containing those registered chemical substances, the importers can file the pre-confirmation on CCIP IT platform.

**Q16 : To ensure the importing goods/commodities comply with the registration rules under TCSCA and the Regulation of New and Existing Chemical Substances Registration, the business are responsible to offer information of “registered” new and existing chemical substances. However, why the information for “Chemical substances not subjected to the registration requirement” should also be provided? What is the regulation base for business to provide such information?**

A: The CCIP IT platform is designed based on the Regulation of New and Existing Chemical Substances Registration to assist business to voluntarily confirm if all the chemical substances in the importing goods/commodities are comply with registration rules in Taiwan. This confirmation prior to importation may include whether the chemical substances require registration as well as acquisition of Registration No. under TCSCA and the Regulation of New and Existing Chemical Substances Registration. The reasons for a chemical substance without Registration No. could be various. A chemical substance which is eligible for exemption as referred to the Article 4 of Regulation of New and Existing Chemical Substances Registration under the EPA, verified as Polymer of Low Concerns (annual volume < 1 ton), used for

Scientific Research and Development (annual volume < 1 ton), or an existing chemical substance(annual volume < 100 kg) may not have Registration No.

**Q17 : The importing goods/commodities render the same chemical substances and composition while having different “Goods Names” . Under such circumstances, do I need to file pre-confirmations respectively for each good or do I only need to file a pre-confirmation once?**

A : The CCIP and border control system has been developed referencing to Taiwan’s national clearance and licensing operation system. An enterprise will quickly get familiar with the national custom clearance beforehand since the CCIP IT platform uses the same terminology. A “C.C.C. Code and CD” and a “Goods Name” are bundled together as a checking unit for CCIP. Therefore, each pre-confirmation is filed for goods within the same checking unit. In this way, for commodities of the same constituent substances, but different goods names, separate pre-confirmations shall be made. For example, there are three importing goods, with the same chemical substances and compositions, named “A”, “B” and “C”. The business need to file three separate pre-confirmations for “A”, “B” and “C” on CCIP IT platform.