



GLOBAL REGULATORY
COMPLIANCE



Chemical Compliance

Asia Guide - India

Hazardous Chemicals and Dangerous Goods Expert, GBK China



Start

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17



Guide Development Team Introduction

What is GBK China?



GBK China

Regulatory Compliance Consultant

GBK GmbH Global Regulatory Compliance was founded in 1986, Germany, specialising in hazardous chemicals and dangerous goods compliance consulting with over 30 years industrial experience.

GBK China established its branch office in Shanghai, focusing on the consultancy business in Asia-Pacific region as China, Japan, Korean, etc.



Guide Development Team Introduction

Why you can believe us

750+

Global Partners & Customers

BMW, L'Oreal, Schneider...

12+

Countries We Do

Japan, Singapore, Australia...



Competitiveness
Experience
Reliability



10+

Type of Our Services

24h Emergency Telephone,
GHS and SDS Consulting,
Company Training ...

And...

- **Seats We Hold**
Members or counsellors in
FIATA, ESMCG, SCBA...
- **Services Online**
Live broadcast, webinar,
weekly compliance report...



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#01

India GHS

Hazard Chemicals

The World Summit on Sustainable Development (WSSD) encouraged countries to implement the GHS as soon as possible, but India has not released an official local GHS standard yet.



#01 India GHS

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Regulations

01

Standard - No officially adopted local GHS regulations. But India accepts the UN standard GHS label and safety data sheets

02

Regulation - *Globally Harmonized System of Classification and Labeling of Chemicals* (Rev.8) (2019)

03

Other - *Chemicals (Management and Safety) Rules (CMSR)*

GHS is not mandatory required in India

But can be used as a reference for hazardous chemicals management import



#01 India GHS

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GHS 1+1

SDS and Label

Manifestations of GHS Hazard Communication

Non-mandatory

Up to now, India has not released an official local GHS standard, therefore, the GHS implementation standard in India can refer to the [UNECE GHS](#)

SDS/MSDS

Safety Data Sheets (SDS) should provide:

1. Information of [safety, health and environmental protection](#)
2. Standard [16-section](#) SDS
3. Should be prepared in English

Elements need on the label:

Label

1. Product identifier
2. Precautionary statements and [pictograms](#)
3. Signal word
4. Hazard statements
5. Supplier identification



#02

India REACH

Chemical Management Regulation

Chemicals (Management and Safety) Rules (CMSR) is also called as India REACH, which is also the current primary regulation for the management of hazardous chemicals in India.



#02 India REACH

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What is CMSR?

Chemical Substances Control Law



Chemicals (Management and Safety) Rules (CMSR) includes India chemical substance notification, registrations, restrictions, and other safety management part.

The newly released **fifth edition** of the CMSR adds sections on the control of new and existing chemical substances.





#02 India REACH

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Based on CMSR....

Classification

New Chemicals
Existing chemicals
Priority Chemicals
Hazardous Chemicals

Compliance Procedure

Chemical Notification
Chemical Registration
Annual report after notification/
registration



Competent Body

- The National Chemical Authority
- Steering Committees
- Scientific Committees
- Risk Assessment Committees

Registration Body

- India importers
- India manufacturers
- Overseas manufacturers - need a India natural/legal person as Authorized Representative



#02 India REACH

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CMSR Timeline





#02 India REACH

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Notification

- **Scope** - Chemical substances produced or imported in amount **> 1 ton/year**
- **Required Info** - Chemical information, spectral data, hazard classification, use details, downstream user information, tonnage, storage capacity and SDS
- **Annual Report** - should be submitted within **60 days of the start of each year**
- **New Chemicals** - Need to notify at least 60 days before entering India

Registration

- **Scope** - Only **priority chemical substances listed in Appendix 2** and with the amount of **> 1 ton/year** need to be registered
- **Required Info** - Added a technical file based on the info of notification.
 - **1-10 t/a** - Need to provide an exposure risk assessment
 - **> 10 t/a** - Need to provide a chemical safety risk assessment
- **Time Period** - **Within 180 days** of the date of listing of the substance in Appendix 2
- **Annual Report** - should be submitted within **60 days of the start of each year**



#02 India REACH

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Exempted Substances

The CMSR applies to all chemical [substances](#), [mixtures](#), or [intermediates](#) that enter or are stored in India. However, there are some exemptions:

1. Radioactive material
2. Customs [specially regulated](#) substances
3. Substances stored in customs bonded areas [for re-export only](#)
4. Substances used for [national defence](#)
5. Food, nutrients, or animal feed
6. Waste as defined in the [Hazardous Waste Management Regulations 2016](#)
7. Substances in CMSR Appendix 4



#03

BIS Chemical Certification

Imported Chemical Substances Certification

Certain goods can only be imported into India with the Standard Mark and a licence from Bureau of Indian Standards (BIS).



#03 BIS Chemical Certification

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Foreign Manufacturer Certification Scheme (FMCS)

Products of foreign manufacturers are required to follow Quality Control Orders (QCOs) for entry into India and some products **must be certified** by the Bureau of Indian Standards (BIS) before they are allowed to enter.

Certification Schemes

For specific chemicals regulations, there are two schemes:

- **Scheme 1** - Indian Standard Institution Mark Scheme (ISI Mark Scheme)
- **Scheme 2** - Compulsory Registration Scheme (CRS)





#03 BIS Chemical Certification

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Scheme 1



Time Period - Within 90 working days

Inspector Audit - Review of plant location

Chemical List - includes 60 chemicals under the heading of Chemicals, Fertilizers, Polymers & Textiles

Application Mode - Offline manual mode

Fee - A bank guarantee of 10,000 USD needs to be submitted (for foreign manufacturers)



Scheme 2

Time Period - Within 20 working days

Inspector Audit - Review based on self-declaration of conformity of the product

Chemical List - Includes three chemicals

Application Mode - Can be online mode

Fee - If renewal is applied for a period of more than two years, ₹25,000 shall be charged for each additional year



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