

REACH24H

# 2018

## 年度报告

### *Annual Report*

合规创造价值  
Value in Compliance

杭州华测瑞欧科技有限公司  
REACH24H CONSULTING GROUP

2019/1/28

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# 卷首语

## From CEO

寒冬辞旧岁，瑞雪迎新年。时光飞逝，马上要进入华测瑞欧的第十个年头了。回想十年前创办瑞欧时，我们本着一心一意帮助企业走出去的初衷，关注和跟踪欧盟 REACH 法规的实施和进展，为国内的化工企业提供全面的欧盟 REACH 法规合规技术服务。

这十年来，华测瑞欧的服务以欧盟 REACH 合规服务为支点，扩大到全球各个地区的化学品法规技术服务，服务领域也拓展到农药和消杀产品、化妆品、食品和食品接触材料、消费品等多个行业。我们客户数量也从几十家扩大到近万家，十年来经华测瑞欧专业培训的人数也早已超过了十万人次，华测瑞欧提供过技术服务的全球企业总市值更是超过万亿美元。华测瑞欧已经发展成为全球合规领域下的排头兵，REACH24H 的品牌走遍世界，并在合规领域独占一席之地。

2018 年是特别的一年，REACH 法规经过十年发展更迭，悄然度过了最后一个注册缓冲期，迈入了以数据换市场的注册后时代。2018 年对华测瑞欧来说也是不平凡的一年，但是最终我们以包容化解分歧，以挺然之姿向各位交上 2018 年的答卷。2018 年，华测瑞欧取得了骄人的成绩，营业额突破 2.5 亿人民币，营业利润超过 3 千万。感谢这一年里社会各界对华测瑞欧的关爱，感谢各相关方的共同努力，感谢所有从华测瑞欧毕业的员工对公司发展做出的巨大贡献，更感谢未来还将一路同行的伙伴对法规合规事业的支持和热爱。

自我更新是华测瑞欧保持生命力的核心。在新的一年里，华测瑞欧将持续深化技术研究、人才发展、品牌建设、质量管理等方面，强化工业化学品法规服务的核心竞争力，扩大各领域合规产品的服务优势，以全新“奔跑”的姿态继续奋力拼搏，为客户、员工和股东创造更多的价值。

重视客户体验，倾听客户声音是华测瑞欧发展各项合规服务工作的行事准则。这十年华测瑞欧的发展，离不开各位的帮助和鞭策。如果在我们的服务过程中，您有任何意见和建议，我们期待听到您的声音，您的批评是我们持续进步的动力，您的赞美是对我们最大的肯定。

最后，再次衷心地感谢您对华测瑞欧的关心和支持，在新年到来之际，祝您新春愉快，万事如意！让我们在新的一年里满怀激情，抢抓机遇，迎接挑战，共谋发展！



魏文锋 总经理  
wwf@reach24h.com  
杭州华测瑞欧科技有限公司

How time flies! It is close to REACH24H's 10th anniversary. Thinking back of the time when we founded REACH24H 10 years ago, our main driver was to help China's domestic chemical companies step out, so we decided to track the implementation and progress of EU REACH regulations to provide comprehensive EU REACH compliance technology services.

In the past ten years, REACH24H's services have progressively extended from Europe to the rest of the globe, covering chemicals, pesticides, disinfectants, cosmetics, consumer goods, food, food contact materials and other Industries. The number of our customers has also grown from dozens to nearly 10,000. The number of professionals trained by REACH24H has exceeded 100,000 and the total market value of the global companies that REACH24H has provided technical services to is more than one trillion US dollars. Developed into a leader in Global Regulatory Compliance, REACH24H's name has become increasingly well-known around the world.

2018 was a special year. With ten years development on its back, the EU's REACH regulation has quietly passed the last registration buffer period and entered the post-registration era of data-for-market. This year was not a smooth year for REACH24H so we had differences to overcome, but we succeeded and managed to achieve remarkable results, with a turnover of over RMB 250 million and an operating profit of over RMB 30 million. For this reason, I would like to thank our community and each of our employees for their support and contribution.

Self-renewal is at the core of REACH24H. For this upcoming New Year, REACH24H will continue to deepen its technical research, talent and brand development as well as quality management, strengthening the core competitiveness of our industrial chemical regulatory services, and expanding the service advantages of compliance products in various fields. With this new "growth" attitude, we will continue to work hard to create and provide more value for our clients, employees and shareholders.

Customer experience remains as one of our most fundamental working principles. That's why our clients' help and encouragement cannot be separated from REACH24H's development. We will continue to welcome all comments and suggestions on our service, so please feel free to contact us. This is our main tool to never stop improving.

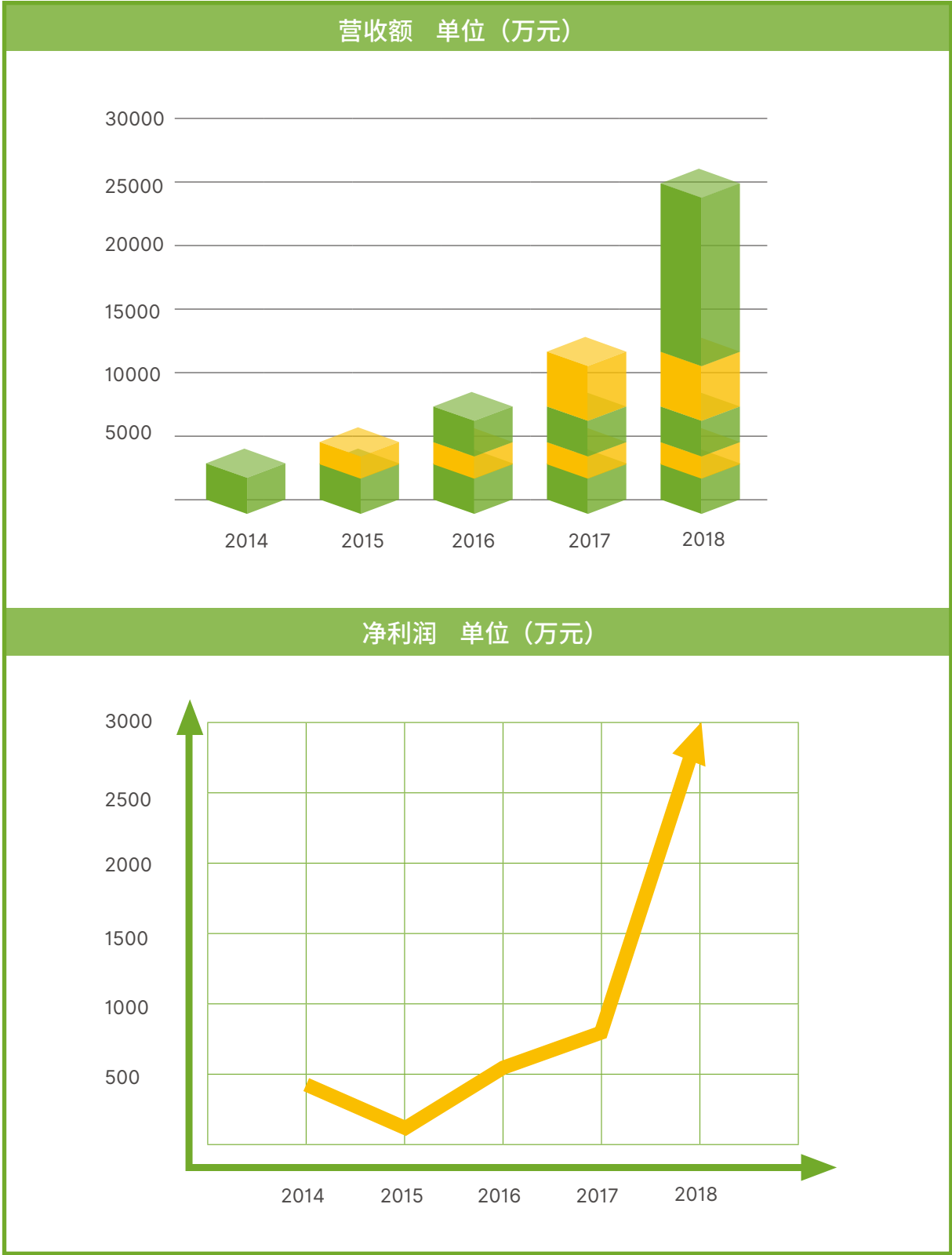
Last but not least, I would like to sincerely thank you for continuously supporting us at REACH24H. On this New Year, I wish you a truly happy new beginning! Let us start this 2019 with passion, seize opportunities, meet challenges, and seek common development!

Jim Wei General Manager  
wwf@reach24h.com  
REACH24H Consulting Group

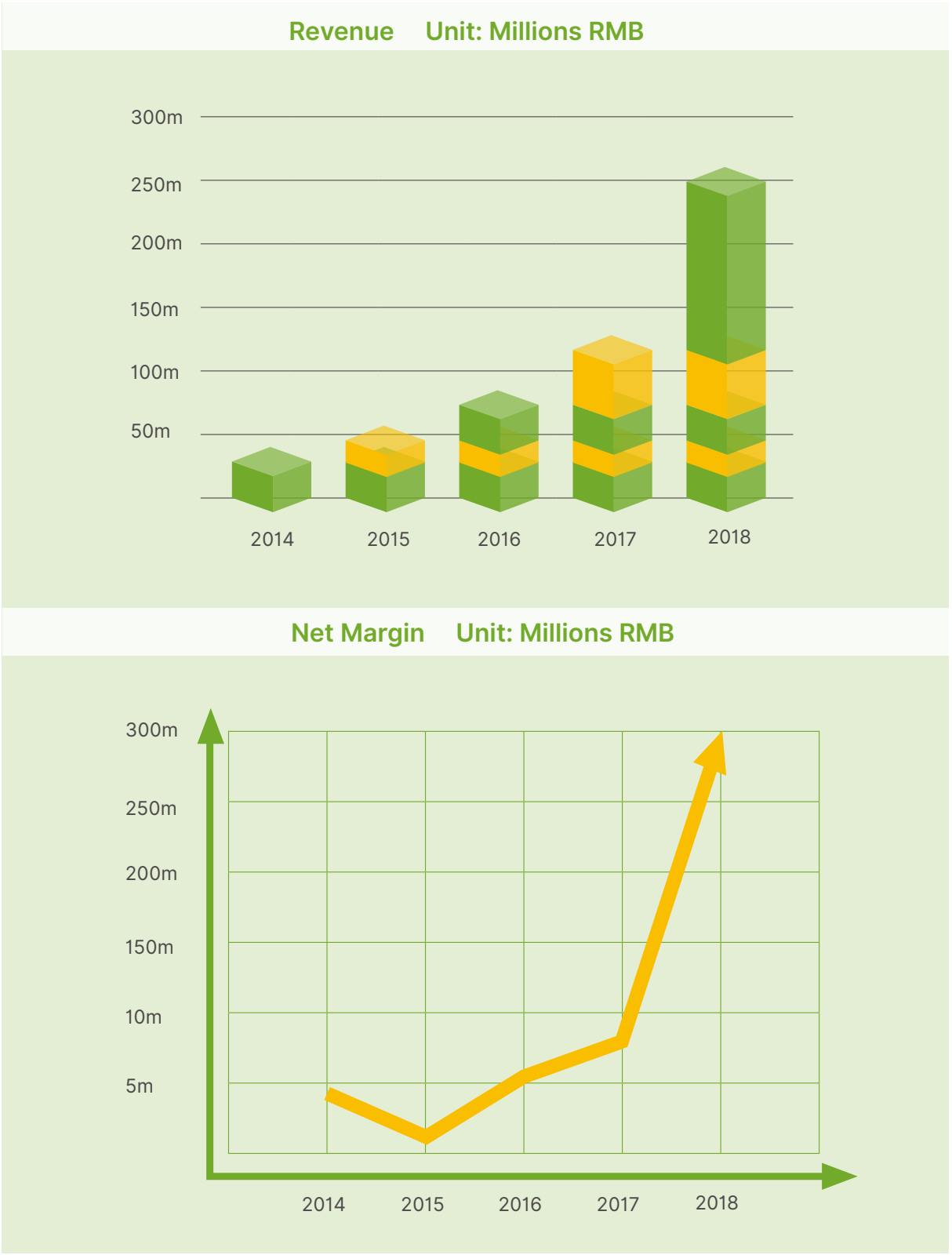


数读瑞欧  
2019 Annual Statistics  
REACH24H

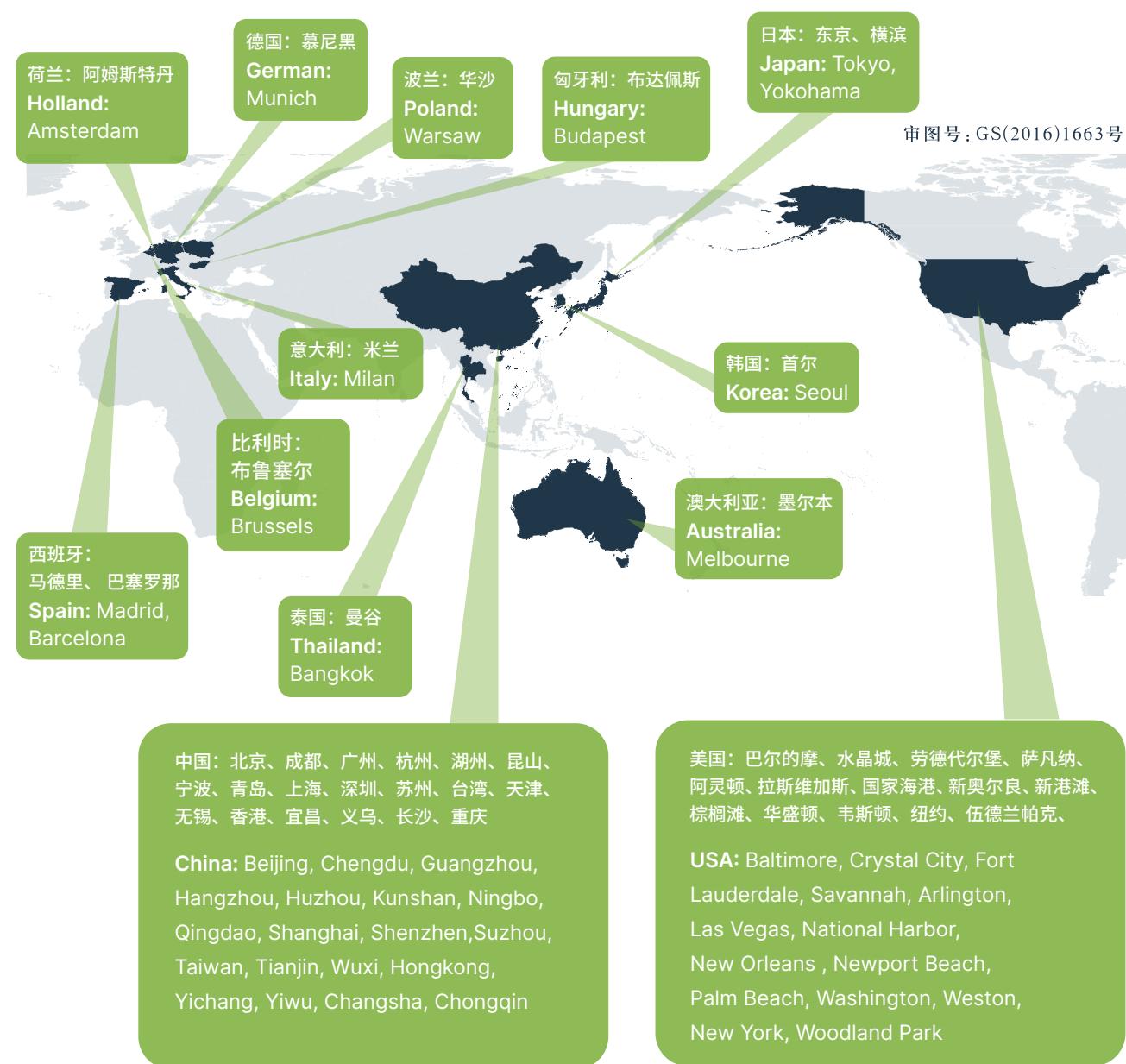
# 财务概要



# Financial Review



# 会议活动



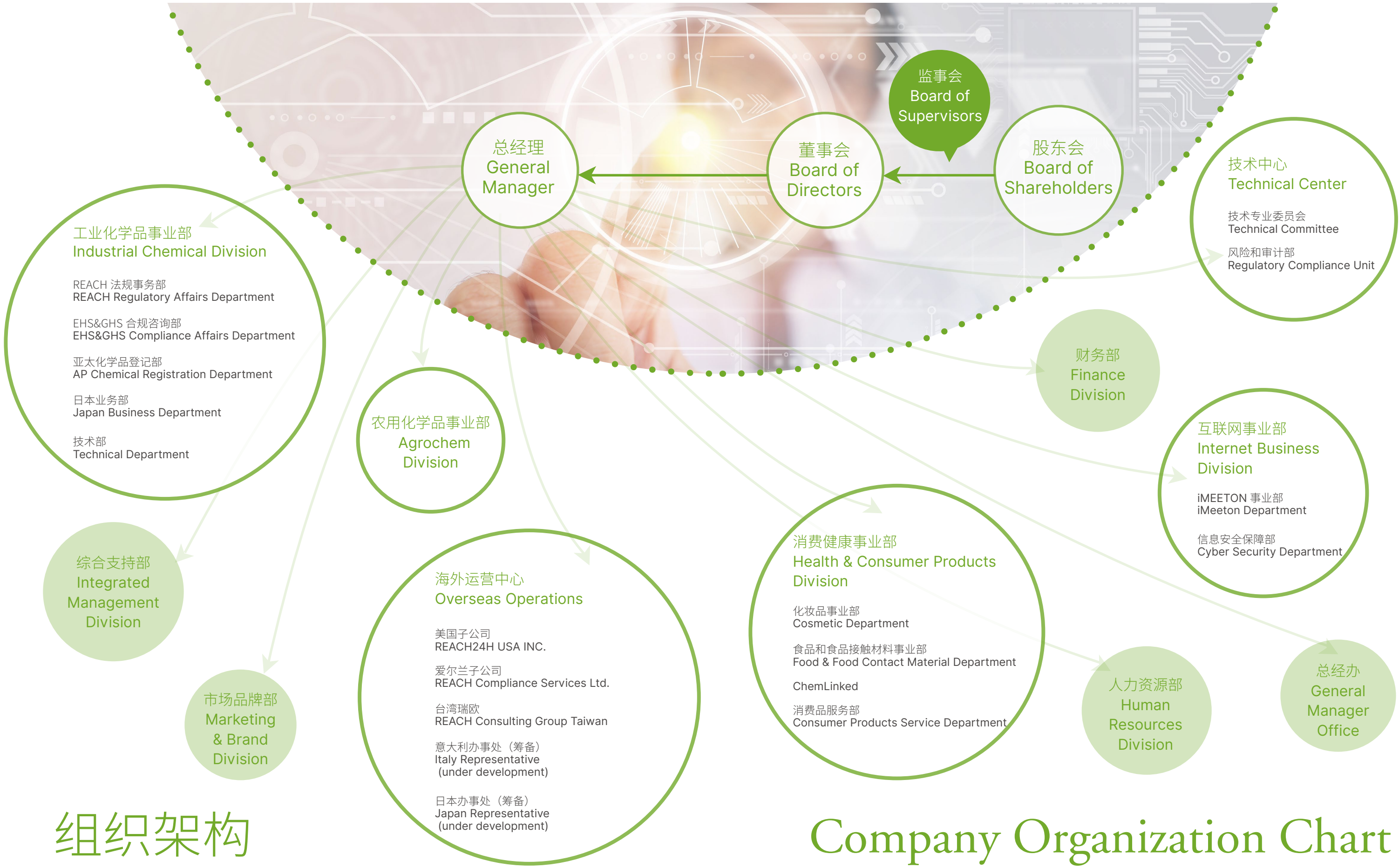
13 个国家, 46 个城市  
126 场, 上万人次

13 countries, 46 cities  
126 times with over 10,000 attendees

# Events







组织架构

Company Organization Chart



# 共享发展 Sharing the Benefits of Development

华测瑞欧始终坚持客户为先，为客户创造价值，与客户共同发展。2018 年，得益于欧盟和中国地区法规技术服务的稳步增长，华测瑞欧在工业化学品领域、农用化学品领域的增长实现大举突破，在食品、化妆品等大健康消费领域赢得更多客户的信任，并持续耕耘 ChemLinked 资讯平台，使其实现连续增长。

REACH24H adheres to the Customer First principle, creating value and sharing growth with its customers. In 2018, thanks to the steady development of regulatory and technical services in the EU and China, REACH24H achieved a major breakthrough in the growth of industrial chemicals and agrochemicals, reaching over to new customers in the fields of food, cosmetics and other large health-products. At the same time, its regulatory platform – ChmeLinked has managed continuous growth.

# 工业化学品

## REACH 法规， 截止期这一年

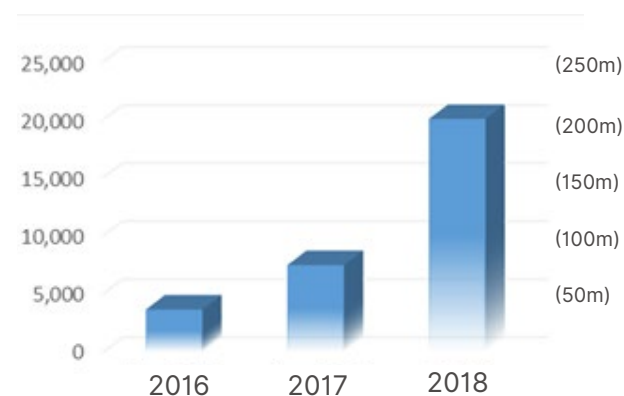
在欧盟 REACH 法规截止期到来的 2018 年，在英国即将脱欧的 2018 年，在中美贸易战打响的 2018 年，在巨大环保压力的 2018 年，我们看到了中国出口型企业旺盛的生命力，也看到了化工行业优胜劣汰的残酷竞争。2018 年无疑是产品成本大幅上升的一年，对于出口型化工企业来说，其中欧盟市场准入的 REACH 法规合规是主要成本之一。

2018 年 5 月 31 日是欧盟 REACH 法规最后一个注册缓冲期截止日，大量的低吨位物质必须在注册截止期前完成注册并拿到注册号，否则输欧贸易将被中断。截止期前大量化工企业涌入赛道，如何及时完成注册，与时间赛跑成为了今年的工作难点。

华测瑞欧技术团队自 2008 年起跟踪研究欧盟 REACH 法规，凭借多年的法规应对经验及技术实力，同各领头注册人积极接触，扫清注册障碍，高效地完成了超过 **500** 个联合注册和**数十个**领头注册项目。截止 2018 年底，华测瑞欧协助企业完成的注册项目已超过 **2000** 个。

从今年的统计数据来看，有能力且积极完成欧盟市场产品注册的企业都是行业内的标杆及领军企业，不仅产品工艺先进，而且在环保和产品市场准入方面的投入占比也属行业领先。企业普遍意识到，除了关注产品的质量和性能外，还应该多多关注产品在各国的市场准入。因为大部分国际客户在筛选供应商时，都会要求产品同时符合各个进口国家的法规，并在生产国的合规情况良好。产品危害分类识别和风险评估作为合规工作的重要部分，也逐渐影响企业将其纳入产品研发和上市中的生命周期评估。

2016-2018 年 EU REACH 业务发展情况  
(单位：万元)



2016-2018 EU REACH Business Development  
(Unit: Millions RMB)



# Industrial Chemicals

## Deadline Year for Registration under REACH

2018 was quite an intense year, with the last deadline for the registration under REACH adding to the UK's preparatory work before leaving the EU, the Sino-US trade conflict and the increasing pressure on environmental protection. In parallel, we witnessed the vitality of Chinese export-oriented enterprises and an intensive level of competition among those in the chemical industry, making 2018 undoubtedly a year of significant increase in production costs. For export-oriented chemical companies, REACH compliance in EU market access was one of the main costs.

May 31 was the Final Registration Deadline for the EU's REACH. Low-tonnage substances had to be registered in order to get the registration number before the deadline, or otherwise have trade of their chemicals within the European Union interrupted. With a large number of chemical companies applying for registration, completing the registration process in time became one of the main tasks this year.

Having accumulated years of regulatory experience and technical strength, REACH24H actively engaged with lead registrants, cleared up registration barriers, and efficiently completed over 500 joint registrations and dozens of leading registration projects. By the end of 2018, REACH24H had helped register over 2,000 projects.

According to this year's report, companies with the ability to actively complete product registration in the EU market were regarded as benchmarks and leading companies in the industry. They do not only have advanced product technology, but also lead the industry in terms of environmental protection and product market access. It has been a common realization among enterprises that in addition to products' quality and performance, they should also pay more attention to their market access strategy for their products across countries. The reason behind this is that when screening suppliers, most international customers require products to comply both with the regulations of the importing country as well as the original country. An important part of compliance work, product hazard classification and risk assessment gradually affect the company's assessment for product development and listing.



## “注册完成后，这些工作也同样重要”

### 1、供应链信息传递

注册完成不代表完全合规，注册人必须履行供应链信息传递的义务，即传递安全数据表（Safety Data Sheet，简称 SDS）或扩展的安全数据表（Extended Safety Data Sheet，简称 eSDS），注册号必须列明在 SDS/eSDS 上，SDS/eSDS 中物质的危害分类、理化、毒理和生态毒理相关数据必须和注册卷宗保持一致。

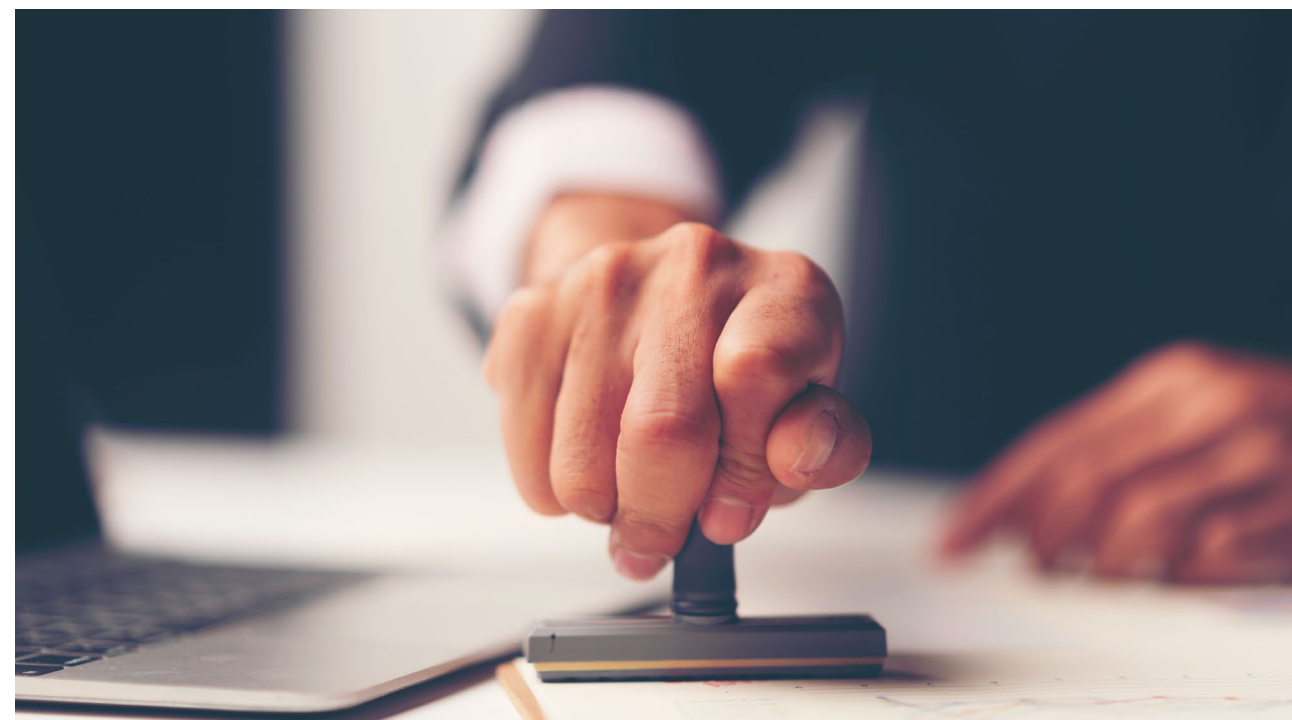
### 2、及时更新注册卷宗

注册者需要每年统计自己的出口吨位，出口吨位即将超过注册吨位范围时，需尽早完成注册吨位升级，以免输欧贸易吨位受影响；对于已经停产的物质，及时操作停产，以免后续收到官方审核决议终稿后必须履行补充数据或分摊补充数据的费用；如下游用户反馈有新用途或未被注册涵盖的用途，需要及时更新卷宗，增加新用途；收到领头注册人更新后的卷宗及化学品安全报告后，也需要相应更新自己的个人卷宗。

### 3、及时关注官方审核动态

自 2019 年 1 月 1 日起，欧洲化学品管理局（European Chemicals Agency，简称 ECHA）将开始对特定物质所有卷宗（包括领头卷宗、成员卷宗、opt-out 卷宗）的合规性进行审查，并向所有不合规卷宗的注册者发送审查结果决议，而不仅仅是发送给领头注册人。同样，官方也会将测试提案的审核决议发送给所有依靠测试提案来满足注册信息要求的注册人。官方在向相关注册人发送卷宗评估决议草案后，不再接受注册人通过调整吨位范围、用途或中间体状态来让官方改变卷宗评估决议内容。

注册人必须定期查看自己的 REACH-IT 账号，以及及时收到 ECHA 发送的卷宗评估决议草案。收到官方评估决议草案后，注册人仅有两个选择：一是积极应对卷宗评估决议，按照决议要求补充开展测试；二是不继续应对法规注册，则需尽快申请停产并放弃注册号。注册人务必及时做出是否要继续应对的决策，以免后续不想应对、但又错过申请停产的时间。一旦收到卷宗评估最终决议后，注册人只能按决议要求补充开展测试。



## Main Steps After REACH Registration

### 1. Information Transfer in the Supply Chain

Having completed a registration process does not mean full compliance. The registrant must still fulfill the obligation of supply chain information transfer, that is, delivering the Safety Data Sheet (SDS) or the Extended Safety Data Sheet (eSDS), registration number. It should be reminded that the hazard classification, physical and chemical, toxicological and ecotoxicological data of the substances contained in the SDS/eSDS must be consistent with the registration dossier.

### 2. Timely Update of the Registration File

Registrants need to calculate their own export tonnage every year. When the export tonnage is about to exceed the registered tonnage range, the corresponding update should be done as soon as possible to avoid affecting trade. For substances that have been discontinued, production should be stopped in time to avoid subsequent official review. Supplementary data must be accounted for after the final draft of the resolution. If the downstream user's feedback has new or unregistered uses, it will be necessary to update the dossier in a timely manner and add new uses, once the updated dossier and chemistry results have been received from the lead registrant. Following product safety report, the personal file should also be updated.

### 3. Keeping Track of Official Review Trends

As of January 1, 2019, ECHA will begin reviewing the compliance of all dossier- files (including lead files, member files, opt-out files) and send dossier evaluation decisions to all non-compliant file registrants, not just to LR. Similarly, ECHA will also



send reviews for testing proposals to all registrants who rely on them to meet registration information requirements. After a draft decision is received by a registrant, no adjustment to the tonnage band, uses or intermediate status of a registration will be allowed.

Registrants must regularly check their REACH-IT account to check the draft decision from the ECHA. Once they have received the draft decision, a registrant will only have two choices: one is to actively supplement the test as indicated in the draft decision or alternatively, to continue to apply for production suspension and abandon the registration number as soon as possible. The registrant must make a timely decision on whether to respond or not, so as not to delay the application, but must closely follow the application deadline for the suspension of production. Once the final decision on the file assessment is received, the registrant will only be allowed to supplement the test according to the decision.



## “英国脱欧那点事儿”

就欧盟 REACH 法规而言，英国脱欧将带来重大实际影响。因为针对内部市场经济的众多领域建立的欧盟监管制度将不再适用于英国，这意味着，英国将不再受欧洲化学品立法的约束，欧洲化学品管理局也没有针对与英国相关方合作的法律条款。英国退出欧盟后，一方面不同的注册主体需要根据在供应链中的角色考虑如何使物质的注册保持合法性，确保输欧贸易不受影响；另一方面还需根据英国立法发展并遵循英国相应的注册义务。

### 不同身份企业如何应对英国脱欧？

#### 1. 英国的企业

欧盟 REACH 法规规定只有欧盟 / 欧洲经济区 (EU/EEA) 的企业才能进行注册。如果您的企业位于英国，并且在 REACH 法规下已注册了物质，那么在英国退出欧盟后，该注册将不复存在。这也意味着，在 2019 年 3 月 30 日之后，您将不再需要更新 REACH 注册卷宗。

如果您打算在英国脱欧后继续在 EU/EEA 国家进行贸易，您可以委托唯一代表来管理您的注册。您也可以选择将注册物质相关的业务转移到欧盟境内的企业。注册者需对其所注册的物质负责，这意味着注册地址处必须存在负责人员和相关文件 -- 仅在 EU/EEA 国家设立名义上的公司是不行的。

#### 2. 英国的唯一代表

如果您的英国企业是非欧盟企业的唯一代表，英国脱欧后，您的企业将不能再担任唯一代表，除非您将企业迁移到欧盟 27 国或者欧盟经济区 (EU-27/EEA) 国家。如果要想合法地留在欧盟市场，您的非欧盟制造商需要在 EU-27/EEA 国家重新委托一名唯一代表，所有的注册都必须被转移到新的唯一代表名下。

#### 3. 欧盟 27 国 / 欧洲经济区的企业

如果您的企业位于 EU-27/EEA，欧盟法规仍然适用。



但是，您的英国商业伙伴将需要调整他们的业务，以遵循新的英国化学品立法。如果您从英国企业采购一个已注册的化学物质，在英国脱欧后，您将不能再继续使用该物质的注册号。为了使该物质的注册保持合法性，英国企业需要在 EU-27/EEA 国家指定一名唯一代表。或者，您可以选择以进口商名义重新完成注册。

如果您的企业是联合注册的成员，联合注册的领头注册人且数据持有人是一家英国企业，注册情况也将有所变化。

如果该领头注册人是生产商，他们可以委托 EU-27/EEA 的唯一代表来处理注册和领头注册人的职责。下述情形中，他们也可以通过法人实体变更将现有的注册转移到 EU-27/EEA 的企业，并保有生产商的身份：

- (A) 英国的生产商通过收购或者搬迁的方式转移到 EU-27/EEA；
- (B) 集团内部将运营 / 制造活动转移到 EU-27/EEA。

随着法人实体的变更，英国企业必须停止生产，直到英国退出欧盟。

如果领头注册人是进口商，他们保持领头注册人身份的唯一途径就是将进口活动转移到 EU-27/EEA，然后在

## Updates on Brexit

Brexit will have a significant practical impact on REACH. As the EU regulatory system on many areas of its internal market economy will no longer apply to the UK, the latter will therefore no longer be bound by European chemical legislation and ECHA will not have applicable Legal terms for its UK counterparts. Consequently, ECHA's cooperation with the UK will thereon no longer be based on these EU regulations. After the UK withdraws from the EU, different registered entities need to consider how to keep the registration of substances in the supply chain and ensure trade in the EU is not affected. Nevertheless, registration procedures also need to observe British legislation and follow the corresponding British Registration process.

### How Do Different Entities Deal with Brexit?

#### 1. British Companies

EU REACH regulations require only registration from companies within the EU/EEA. If a business is located in the UK and the substance has been registered under REACH, the registration will no longer exist after the UK exits the EU, which means after March 30, 2019, you will no longer need to update the REACH registration file.

If said companies intend to continue trading in EU/EEA countries after Brexit, they may entrust a sole representative to manage their registration or alternatively transfer their registered substance-related business to companies within the European Union. Registrants are responsible for the substances they register, which means that there must be responsible personnel and related documents at the registered address - it is not possible to set up a nominal company only in EU/EEA countries.

#### 2. UK Company as Only-Representative

If a UK company is registered as the only representative of a non-EU company, said company will no longer be the sole representative after Brexit, unless they relocate to the EU-27 or the EU-27/EEA countries. Provided they wish to stay legally in the EU market, the non-EU manufacturer will need to delegate a single representative in one of the EU-27/EEA countries, and all registrations will have to be transferred to the new sole representative.

#### 3. Companies in the EU-27/European Economic Area

If a business is located in EU-27/EEA, EU regulations still apply. However, UK business partners will need to adjust their business to comply with the new UK chemicals legislation. If a registered chemical from a UK company is purchased, the company will no longer be able to use the registration number of the substance after they leave the UK. In order to maintain the legality of the registration of the substance, UK companies will need to designate a single representative in the EU-27/EEA country. Alternatively, they can choose to re-register as an importer.

If a business is a member of a joint registration with the LR of the joint registration and the data holder being a UK company, the registration status will also change.

If the lead registrant is a manufacturer, they can entrust the sole representative of the EU-27/EEA to handle the duties of the registration and role as lead registrant. In the following cases, they may also transfer the existing registration to the EU-27/EEA through a legal entity change to maintain the identity of the manufacturer:

- (A) British producers transfer to EU-27/EEA through acquisition or relocation;
- (B) Transfer of operations/manufacturing activities to the EU-27/EEA within the Group.



REACH-IT 系统中进行法人实体的变更。

但是，如果英国企业不希望留在 EU-27/EEA 市场，因此没有采取必要的行动，那么联合注册人就需要选出一名新的领头注册人。所有的联合成员都有资格担任领头注册人。联合注册人之间需要达成一些协议，包括原领头注册人不再行使其职责，共享资料能可预见性地被转移到新的领头注册人名下，同时确保数据共享和费用分摊在未来能继续执行。

#### 4. 非欧盟的制造商和配制品生产商

如果您是欧盟的制造商和配制品生产商并且委托了一名英国的唯一代表，那么您可以重新委托一名 EU-27/EEA 的唯一代表。您必须在英国退出欧盟之前重新进行委托，并及时通知 ECHA (通过 REACH-IT 中的“法人实体变更”功能)。如果您的物质已由英国进口商注册，那么在英国脱欧后，该注册将不再存在。如果要想继续进入欧盟市场，化学物质需要由 EU-27/EEA 的法人实体来注册。因此，您可以委托 EU-27/EEA 的唯一代表来注册相关物质。或者，您在 EU-27/EEA 的客户自己来注册他们进口的物质。



## 如何应对英国无协议脱欧？

目前看来英国无协议脱欧的可能性也是存在的，英国卫生安全管理署 (Health and Safety Executive, HSE) 也做好了最坏的打算，一旦英国在没有达成任何协议的前提下离开了欧盟，为了尽可能减少对企业的影 响，英国政府提供一个过渡期方案。

1. 对于已完成 REACH 注册的英国企业，可直接将注册转移到英国的新法规下；
2. 对于需从欧洲经济区 (EEA) 采购化学品而尚未完成注册的英国企业，允许其向英国官方提交一个简易的通报后继续贸易；
3. 对于已取得 REACH 授权的 SVHC 物质，在新的法规中仍能继续使用。

当然，为了确保贸易的延续性，相关的英国企业也需要采取一些行动。

1. 在英国脱欧之日起 60 天内，英国企业需要在英国的 IT 系统中申请账号，提供注册物质的基本信息，使得自动转入新法规的注册和授权有效；
2. 对于已自动转入的注册，英国企业需要在脱欧之日起 2 年内向 HSE 提供完整的注册数据；
3. 从欧洲经济区采购化学品而尚未完成注册的英国企业，需要在脱欧之日起 180 天内向官方进行通报并提供物质的基本信息，不需要马上完成注册。但是这只是临时措施，之后依然会要求企业完成注册；
4. 进口企业有责任确定合适的风险管理措施并传递给下游用户。

英国脱欧一波三折，虽然目前还不能确定是否真的能够如期脱欧，但可以预见的是对相关企业的重大影响。潜在受英国脱欧影响的企业，需要积极跟进英国脱欧进展，尽早做好准备，确保贸易顺利进行。

With the change of legal entities, British companies must stop production until the UK withdraws from the EU. If the LR is an importer, the only way to keep the LR identity is to transfer the import activity to the EU-27/EEA and then make changes to the legal entity in the REACH-IT system.

However, if a UK company does not wish to remain in the EU-27/EEA market, then there will be no need to take any necessary action, and the joint registrant will need to elect a new LR. All joint members are eligible to become LR. In this case, agreements will have to be executed between the joint registrants, including a provision explaining that the original lead registrant will no longer exercise its duties. All shared information will be forwarded to the new LR, so the parties must ensure data sharing and cost sharing can continue in the future.

#### 4. Non-EU Manufacturers and Component Manufacturers

Non-EU manufacturers and component manufacturers with a single representative from the UK can re-delegate a single representative from the EU-27/EEA. This must take place before Brexit and ECHA should be notified in a timely manner (accessible through the “Corporate Entity Change” function in REACH-IT). If a substance has been registered by a British importer, the registration will no longer exist after Brexit. Therefore, provided the importer intends to continue accessing the EU market, the chemical substances will need to be registered by the legal entity in the EU-27/EEA. As an option, the only representative of the EU-27/EEA may be entrusted to register the substance. Alternatively, customers in the EU-27/EEA can register the imported substances by themselves.

## Is it Possible to have a “no deal” Brexit?

At present, it is possible for the UK to leave EU without reaching an agreement. The UK's Health and Safety Executive (HSE) has also devised a contingency plan provided the UK leaves the EU

without reaching an agreement. In order to minimize the impact on businesses, the British government will provide a transitional program.

1. For UK companies that have completed REACH registration, they can transfer registration directly to the new UK regulations;
2. For UK companies that need to purchase chemicals from the European Economic Area (EEA) and have not yet completed their registration, they are allowed to submit a brief notification to the British authorities to continue trading;
3. SVHC substances that have been authorized by REACH can continue to be used under the new regulations.

Of course, in order to ensure the continuity of trade, relevant British companies also need to take some action.

1. Within 60 days from the effective date of Brexit, UK companies will need to apply for an account in the UK's IT system to provide basic information on their registered substances, making the registration and authorization of the new regulations automatically valid;
  2. For registrations that have been automatically transferred, UK companies are required to provide complete registration data to HSE within 2 years from the date of Brexit;
  3. UK companies that have purchased chemicals from the EEA and have not yet completed their registration need to notify the corresponding officials and provide basic information about the substance within 180 days of the date of Brexit. Registration is not required immediately. However, this is only a temporary measure and will still require the company to complete the registration process;
  4. The importing company is responsible for determining appropriate risk management measures and passing them to downstream users.
- Although Brexit negotiations in the UK are full of twists, the impact of Brexit is significant. Therefore, companies are still urged to pay close attention to the progress of Brexit to be prepared as early as possible to ensure a continued and orderly trading.

# 中国新化学物质登记

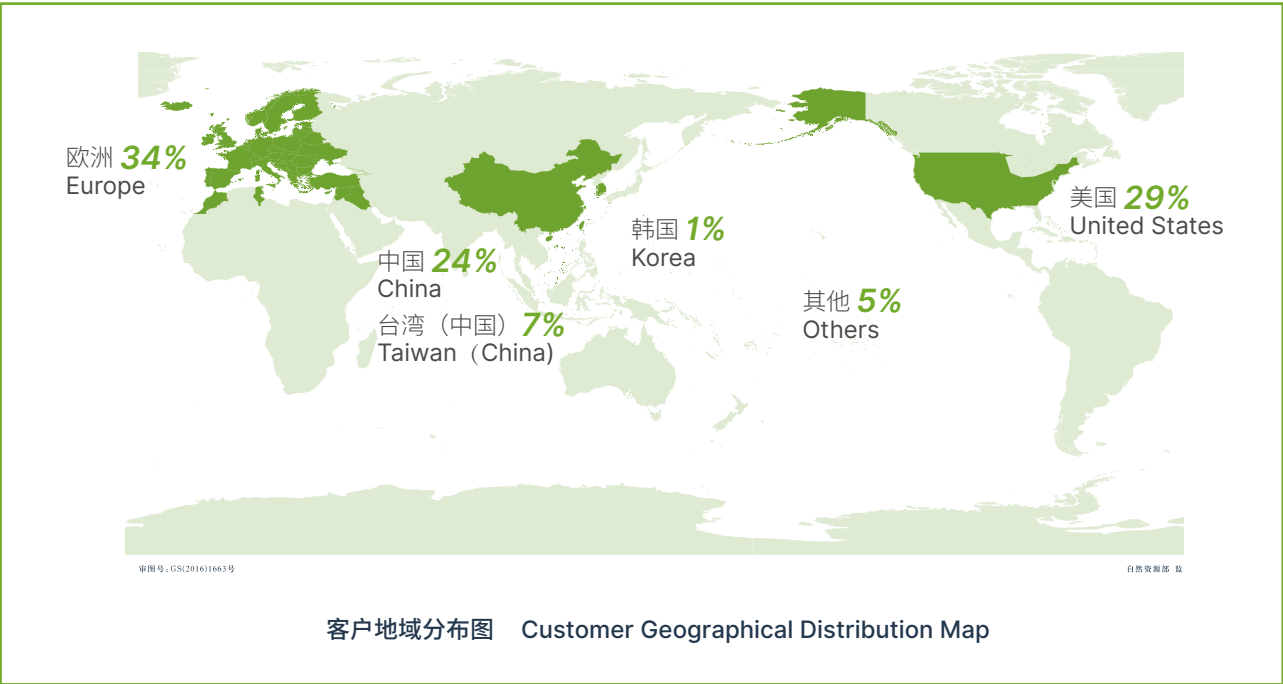
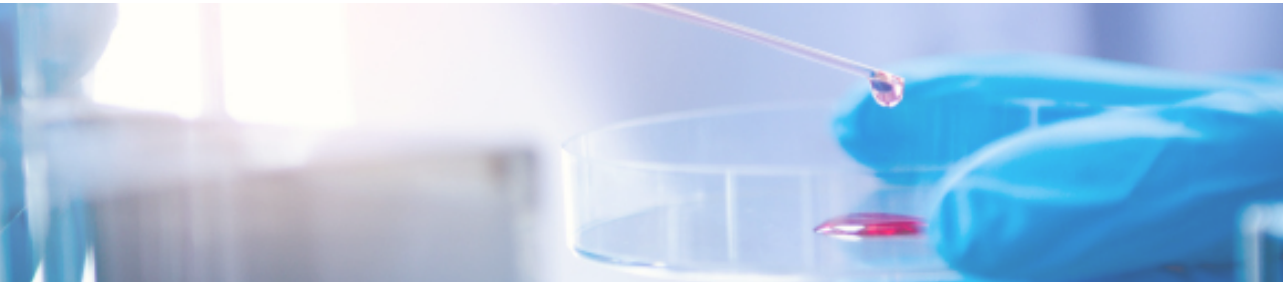
中国是世界上最大的化工产品生产国和消费国，其产能和需求占到全球四成。在从化工大国迈向化工强国的道路上，高端化学品如电子化学品、新材料、精细化工品和医药中间体等的引进与制造带来了每年上千种新的化学物质问世，其生产、使用或者报废处置可能会对生态环境及人类健康造成未知的严重危害。

为了加强对新化学物质的环境风险管理，保证人体健康，防止环境污染，原国家环境保护总局对新化学物质的申报、登记和监督管理做出了详细的规定，规定凡未列入《中国现有化学物质名录》的新化学物质，在生产或进口前必须办理新化学物质申报，领取新化学物质环境管理登

记证。

华测瑞欧从 2009 年开始深入研究《新化学物质环境管理办法》，结合自身在欧盟 REACH 法规的研究和应对经验，为《新化学物质环境管理办法》及配套文件的出台和实施献计献策，同时也为全球新化学物质生产和进口企业提供一站式合规服务。

2018 年 8 月，华测瑞欧成功协助企业顺利完成中国新化学物质常规四级申报工作，至此实现了中国新化学物质所有申报类型服务的全覆盖。强大的技术团队、丰富的申报经验和严格的信息安全管理，华测瑞欧为全球新化学物质生产和进口企业顺利进入中国市场提供有力的保障。



# China New Chemical Substance Notification

China is the world's largest producer and consumer of chemical products, with 40% of the global production capacity and demand. In line with this the introduction and manufacture of high-end chemicals such as electronic chemicals, new materials, fine chemicals and pharmaceutical intermediates has brought about thousands of new chemical substances every year. The manipulation of chemicals comes nevertheless with new responsibilities, as their use and disposal may cause or indirectly lead to unknown serious hazards to the environment and human health.

In order to strengthen the environmental risk management of new chemical substances, ensure human health and prevent environmental pollution, the former State Environmental Protection Administration of China (SEPA) decided to regulate in detail the registration and supervision of new chemical substances, stipulating that substances which are not included in the Inventory of Existing Chemical Substance in China (IECSC) should be processed as new chemical substances before they are produced or imported, additionally stating as a mandatory requirement an environmental

management registration certificate for new chemical substances.

Since 2009, REACH24H has engaged in an in-depth research on the “Measures on Environmental Management of New Chemical Substances”. In combination with its own research and response experience in EU REACH regulations, REACH24H contributes to the promulgation and implementation of the Environmental Management Measures for New Chemical Substances and supporting documents. It also provides one-stop compliance services for new chemical production and import companies worldwide.

In August 2018, REACH24H successfully began assisting companies in completing the four-level notification of new chemical substances in China, thus fully covering all types of new chemical substances. Backed by a strong technical team, rich reporting experience and sound security data management, REACH24H provides strong support for the global production and import of new chemical substances by enterprises to ensure their smooth access to the Chinese market.

## New Chemical Substance Declaration Data

Since the implementation of the Order No.7 from the Ministry of Environmental Protection (MEP), the number of applications for approval of notifications has shown a slight increase. Most of them are new substances, both hazardous and hazardous with priority environmental concern, showing the need for risk management in new chemical substances notifications and registrations in China. In 2018, the Ministry of Ecology and Environment released a total of 12 batches of new chemical substances regular notifications of environmental management registration certificate approval results involving 152

substances which main categories are hazardous with 69 priority environmental concern substances 56 dangerous substances and 28 general substances. MEP Order 7, currently under revision, has also brought the current environmental management classification criteria into discussion. In terms of typical notifications, in the recent years the number has remained high and relatively stable. In 2018, the Ministry of Ecology and Environment released a total of 23 batches of new chemical substances for environmental management registration certificate



新化学物质申报数据

环保部 7 号令实施 8 年以来，常规申报批准申报份数呈现小幅上涨态势，危险和重点环境管理危险类新物质居多，凸现我国新化学物质申报登记风险管理的必要性。2018 年全年，生态环境部共发布了 12 批新化学物质常规申报环境管理登记证审批结果的公开，涉及物质 152 个，危险类物质 55 个，其中管理类别为重点环境管理危险类物质 69 个，危险类物质 55 个，一般类物质 28 个。

目前正在修订的 7 号令，已将是否要修改现行的环境管理类别划分标准纳入商讨中。对于简易申报，这几年的申报数量持续量大，较为平稳。2018 年全年，生态环境部共发布了 23 批新化学物质简易申报环境管理登记证审批结果的公开，包括简易申报基本情形 446 份，简易申报特殊情形 2437 份。其中聚合物类简易申报数量多，考虑到聚合物风险较低，7 号令也将在后续的修订中考虑简化管理。

执法检查

和所有化学品法规一样，行之有效的监督管理是法规施行的有力保障。相较于欧洲化学品管理局专门建立了执法信息交流论坛，最新的 REACH 全面执法检查项目计划已列至 2019-2023 年，中国新化学物质的实施管理还一直停留在初级阶段，以局部地区的随机抽查和有因检查为主，缺少全面、有计划性的区域性检查。造成该现状的原因之一是中国的化学品环境管理本身起步较晚，需要时间来理顺环保部和地方环保局之间的配合方式；二是地方环境执法千头万绪，环保部门本身在查处偷排和违规倾倒方面就任务繁重；三是新化学物质的监督管理有较高的技术门槛，比如说如何判定企业是否生产或使用了新化学物质，如何检查风险控制措施是否得到落实等，都要求在地方环保执法人员的技能培训方面给予相应的投入。

2018 年 9 月底，上海市环保局启动上海市 2018 年度新化学物质跟踪控制检查工作，以各区县环保局为单位，

《中国现有化学物质名录》增补

2018 年 11 月 30 日，生态环境部发布了关于增补《中国现有化学物质名录》的公告（公告 2018 年 第 58 号）。2 种环境保护部令第 7 号下已登记新化学物质和 43 种原国家环境保护总局令第 17 号下已登记新化学物质增补列入《中国现有化学物质名录》，按现有物质进行管理。此次公告的 45 种物质为现行《新化学物质环境管理办法》（环境保护部令第 7 号）实施后第二批加入《中国现有化学物质名录》的登记物质，第一批名录增补物质公告发布的时间是 2016 年 3 月 10 日。



对辖区内 2013 年至 2017 年期间获得新化学物质登记证的企业发送了新化学物质跟踪控制检查专项评估通知，并从中筛选出部分企业陆续开展了现场核查工作。这是上海市连续开展的第二次新化学物质跟踪控制检查，预计将成为上海市今后每年的例行检查项目。

上海市作为众多大型化工制造商和贸易商的集中地，新化学物质相关活动的活跃程度较高。

自 2017 年首次尝试开展新化学物质跟踪控制检查工作，今年是该项检查工作开展的第二年。相比上一年，不论是上海市环保局，还是各所在辖区的生产进口企业，都准备得更加充分。其他省市暂时还没有要跟进的消息。上海市环保部门的检查工作，为管理部门加强化学物质风险防控提供参考，也将为后续 7 号令在监管部分的修订带来更多实际操作层面的信息。

approval results, including 446 basic cases of simplified notification and 2437 special cases of simplified notification. Among them, there are a large number of simplified notification of polymers. Considering the low risk of polymers, Order No.7 will also consider simplifying management in subsequent revisions.

Supplement to the List of Existing Chemical Substances in China

On November 30, 2018, the Ministry of Ecology and Environment issued a notice on the addition of the "Inventory of Existing Chemical Substances in China" (Announcement No. 58, 2018). Two types of new chemical substances registered under Order No. 7 of the Ministry of Environmental Protection and 43 new registered chemical substances under the order of the former State Environmental Protection Administration Order No. 17 are included in the "Inventory of Existing Chemical Substances in China". The 45 substances announced are the second batch of registered substances in the "Inventory of Existing Chemical Substances in China" after the implementation of the "Measures on the Environmental Management of New Chemical Substances" (Order No. 7 of the Ministry of Environmental Protection). The announcement was released on March 10, 2016.

Enforcement Inspection

As with all chemical regulations, effective supervision and management is a powerful tool to guarantee the correct implementation of regulations. As opposed to the European Chemical Agency's Forum for Exchange of Information on Enforcement (Forum), where the latest REACH comprehensive law enforcement inspection project plan was submitted for 2019-2023, the implementation management of new chemical substances in China has remained at its initial stage. There are many reasons for this. Firstly, China's chemical environmental management began at a later stage and as such it takes time to effectively manage

the links and establish the proper channels between the Ministry of Ecology and Environment and local Environmental Protection Departments. Secondly, it is an arduous task for local Environmental Protection Departments to investigate smuggling and illegal dumping due to various local law enforcement situation. Thirdly, there are high technical thresholds for the supervision and management of new chemical substances, such as how to determine whether a company produces or uses new chemical substances, and how to check that risk control measures are effectively implemented. All requires corresponding investment in the skills training of local environmental law enforcement personnel.

In September 2018, the Shanghai Environmental Protection Bureau launched the 2018 New Chemicals Inspection Campaign. Each district-level environmental protection authority must send the inspection notification of new chemical substances to the enterprises that obtained the registration certificate for new chemical substances from 2013 to 2017 within their jurisdiction and carry out screening for on-site inspection. This is the second time Shanghai has carried out the tracking and control inspection of new chemical substances, expected to become an annual routine inspection project. In Shanghai, due to the large concentration of chemical manufacturers and traders, the activity level of new chemical-related activities is relatively high.

This year marks the second year that a new chemical tracking control inspection is effected since 2017. Compared with the previous year, both the Shanghai Environmental Protection Bureau and production/ import enterprises in their respective jurisdictions are better equipped, while other Chinese provinces and cities have not submitted any follow-up. The inspection work provides a reference for the management agency to improve the prevention and control of chemical risks, and brings more practical information for the subsequent revision of the regulatory content of MEP Order 7.

部委机构改革

伴随 2018 年国务院机构改革的深化与落地，新组建的生态环境部整合原环境保护部职责及其他 6 部门相关职责，统一行使监管与行政执法职责。2018 年 9 月，《生态环境部职能配置、内设机构和人员编制规定》正式出炉，其中新增固体废物与化学品司，设立综合处、固体废物处和化学品处三个内设机构。固废和化学品管理司的设立，进一步明确和强化了对化学品的监督管理。随着行业竞争加剧及环保压力加大，我国化学品行业正进入生态型阶段的整合期。企业应当注意需求层次和需求内容的转变，关注产品映射和核心价值的变化，把控环境与安全的风险。



动态更新

4-26

● 2018 年 4 月 26 日，中国固废化学品管理网对于沈阳化工研究院有限公司安全评价中心新化学物质测试数据质量现场核查情况发布了公示，这是自《新化学物质环境管理登记生态毒理测试数据现场核查指南》发布并实施后，官方有公示记录的第一次、也是截至目前唯一一次核查。

10-12

● 2018 年 10 月 12 日，环境保护部固体废物与化学品管理技术中心发布“关于调整新化学物质和固体废物进口申报系统的通知”，对新化学物质常规申报系统进行了升级，升级后统一由生态环境部政务服务大厅平台登录，原申报系统入口关闭。相比于旧申报系统，新申报系统新增审核受理进度显示、短信提醒等功能。

12

● 截止 2018 年 12 月，在生态环境部固体废物与化学品管理技术中心上线的“化学品测试数据质量管理体系”中自我声明可以开展新化学物质生态毒理学测试的测试机构已有 19 家，在 2017 年基础上新增 4 家。通过该系统，企业可以对有能力开展某一测试项目的机构进行查询。

12-17

● 2018 年度新化学物质年度报告工作启动。2018 年 12 月 17 日，环境保护部固体废物与化学品管理技术中心发布关于开展 2018 年度新化学物质年度报告工作的通知，网上填报系统于 2019 年 1 月 1 日起开放，按“新化学物质环境管理办法”要求，登记证持有人需要在 2019 年 2 月 1 日以前提交全套完整的年度报告材料。

Ministerial Reform

With the deepening and landing of the institutional reform of the State Council in 2018, the newly formed Ministry of Ecology and Environment will integrate the duties of the former Ministry of Environmental Protection and other relevant duties that were previously distributed amongst six agencies and uniformly exercise the duties of supervision and administrative law enforcement. In September 2018, the “Regulations on the Functional Allocation, Internal Institutions and Staffing of the Ministry of Eco-Environment” was officially launched, including the addition of the Department of Solid Waste and Chemicals, and the establishment of three integrated agencies,

the General Affairs Division, the Solid Waste Division and the Chemicals Division. The establishment of the Department of Solid Waste and Chemicals further clarified and strengthened the supervision and management of chemicals. As the industry's competition intensifies and environmental protection pressures increase, China's chemical industry is entering the integration phase of the ecological stage. Enterprises should pay attention to changes in the level of demand and its content, to the changes in product mapping and core values, and ensure they control potential risks on the environment and security.

Dynamic Update

April 26

● On April 26, 2018, China Solid Waste Chemicals Management issued a public notice on the on-site verification of the quality of new chemical substances by the Shenyang Research Institute of Chemical Industry Safety Evaluation. The former is the first official public record and inspection notice after the release and implementation of the guidance for on-site inspection of eco-tox test data for China New Chemical Substance Notification (NCSN) ("Inspection Guidance").

December

● As of December 2018, 19 test facilities (15 in 2017) claim they are able to carry out the ecological toxicological test for China NCSN on the center of solid waste and chemical management technology of online test data quality management system of "Chemical testing data quality management system". Through this system, companies can verify an organization's qualifications to conduct a test project.

October 12

● On October 12, 2018, the China Solid Waste and Chemical Management Center of the Ministry of Ecology and Environment issued the “Notice on the Adjustment of the Import Declaration System for New Chemical Substances and Solid Waste”, upgrading the regular notification system for new chemical substances. After upgrading, the platform of the government affairs service hall of the Ministry of Ecology and Environment will become available, and the link to the original application system will be shut down. Compared with the old reporting system, the new reporting system adds functions such as Content Review Progress & Display and SMS reminder.

December 17

● Launching of the 2018 Annual Report on new chemical substances. On December 17, 2018, the Chinese Solid Waste and Chemical Management Center of the Ministry of Ecology and Environment issued a notice about this annual report. The online filing system opened on January 1, 2019. According to the description of “new chemical substances”, registration holders need to submit a full set of annual report materials by February 1, 2019.



## “典型案例分析——“四三二一”项目”

新化学物质常规四级申报因其高额的测试费用和漫长的申报测试周期，对企业来说一直都是一项巨大的挑战。华测瑞欧自 2010 年开始提供新化学物质申报服务以来，承接了多个常规四级申报项目，本文将以期近的一个重点项目为例，介绍常规四级申报中非测试数据应用的经验。

**四级申报 + 三次上会 + 二次建议登记 + 一张登记证，是整个项目的概括。**

项目初期，客户出于市场需求压力，对申报周期提出了一年完成的苛刻要求，且申报吨位高达数十万吨。技术团队对产品特性和数据模型进行了全面的分析评估，充分和客户沟通申报策略及项目风险，在征得客户同意的前提下，我们突破了新化学物质申报中非测试数据通常只能作为参考数据的固有经验，将毒理数据要求中耗时最长且费用最高的几个节点以非测试数据的形式提交，其中两代生殖毒性、慢性毒性采用 read-across 报告，毒代动力学、致癌性采用专家评估报告的形式提交，预计能将整个项目的测试周期缩短到客户需要的时间内。

第一次申报材料提交固管中心后，如我们所料，在第一次专家评审会上被要求补充慢性毒性和两代生殖毒性测试数据后再次上会。与此同时技术团队仔细查阅文献，反复推敲类似物和申报物质的关联度，修改完善了 read-across 报告，确保数据的科学性，再次提交上会评审。第二次专家评审会后，我们获知申报物质已“建议登记”。

按照以往经验，专家评审会建议登记的物质全部会获准通过。然而等来的官方公示，却是生态环境部“暂不批准”的处理意见。主要是对于非测试数据存疑、以及对于高申报吨位（30 万吨）下暴露信息不够充分存在顾虑。这也是材料上报部里后还被要求补充信息并上会的第一例。技术团队与固管中心以及部里化学品处的工作人员再次紧密沟通，制定申报补正计划。我们充分理解官方的顾虑，因此一方面再次就非测试数据部分进行完善，使其更加充分和有效，另一方面，改进暴露相关信息，就物质的使用吨位和暴露场景跟客户以及使用下游进行多次开会讨论，在满足近年贸易需求的前提下，降低吨位至 10 万吨 / 年，并且细化暴露场景，提供更为详细的暴露场景信息，提出

## Case Study – “4321”Project

The usual four levels of notification for new chemical substances has always represented a huge challenge for enterprises due to its high testing costs and long notification test cycle. Since the introduction of the new chemical substance notification service in 2010, REACH24H has undertaken a large number of projects. What follows is a recent key project of non-test data application which followed the conventional four notification levels pattern.

**Full life cycle of a project: four notification levels + three meetings + two times proposal registration + one registration certificate.**

In the initial stage of the project, due to the pressure of market demand, REACH24H's client put forward a one-year notification period requirement with a declared tonnage of one hundred thousand tons. The technical team conducted a comprehensive analysis and full evaluation of the product characteristics and data model. After communication on the reporting strategy and project risks, we broke through the traditional method of new chemical substance notification that the non-test data is usually only used as a reference, creatively submitted the longest and most expensive nodes in the toxicological data, including two generations of reproductive toxicity and chronic toxicity reports in read-across and toxicokinetic and carcinogenicity in experts review to shorten the test cycle of the entire project as requested by the client.

After the first submission with SCC, we were asked to supplement the chronic toxicity and two-generation reproductive toxicity test data on the

first expert review meeting (a common part of the process). At the same time, we carefully consulted specialized literature, repeatedly scrutinized the log and the declared substance, revised and improved the read-across report, and ensured the scientificity of the data for a second review. After the second expert review meeting, we were informed that the declared substance had been “recommended for registration”.

Based on past experience, all registered substances would generally be recommended for approval. However, the Ministry of Ecology and Environment finally issued a negative opinion. The main issues were non-test data and insufficient information on the exposure of high declared tonnage (300,000 tons). This was also the first case where the material reporting body was asked to provide additional data and attend the meeting. The technical team worked closely with the staff of the CWR and the Chemicals Department of the Ministry of Health to develop a reimbursement plan. REACH24H experts fully understood official concerns, so they initially refined the non-test data part to make it more complete and effective. Additionally, they improved the exposure data, and discussed the tonnage and exposure information with customers and downstream users. The meeting was held to reduce the tonnage to 100,000 tons/year on the premise of meeting the trade demand in recent years, and refined the exposure scenarios, provided more detailed information on the exposure levels, and proposed more targeted and strict risk control measures to ensure environmental risks were strictly managed. At the same time, the technical team also fully analyzed



更具针对性更严格的风险控制措施，确保环境风险严格可控。与此同时，技术团队还充分分析说明了物质的市场需求、使用地域分布、进口计划等，并充分对比现有被替代产品的危害特性，突出申报物质的环境友好性。再次提交了补正信息，第三次专题评审会上，与会专家第二次给出了“建议登记”的决定，中心再次报送到部里。

一个多月后，终于等到了一张沉甸甸的常规四级申报登记证。回首这个项目，虽然历经坎坷，但是为企业节省了数百万测试费以及至少 2 年的测试时间，进而帮助抢占市场、取得贸易主动权，其中间接获取的收益是长远而不可估量的，我们的技术能力和经验也因此沉淀。

我们充分分析了这个案例中的经验，根据申报物质的特定情况制定科学的个性化方案是申报初期极其重要的工作，也是服务机构的知识、智力和经验的充分体现。从这个案例中可以获知的一个重要经验是，虽然包括文献、QSAR、read-across 在内的非测试数据在中国新化学物质

申报下通常只作为参考数据，但是若能阐述清楚采用的方法、来源和依据等信息，有充足的理由说明提供这些数据的合理性，比如采用交叉参照时选取的类似物相关程度很高，且类似物的数据是科学、充分、有效的，交叉参照报告能很好地说明申报物质的毒理学特性的，那么高质量的非测试数据被接受的可能性也很高。

我们认为，非测试方法引入中国新化学物质管理体系是一个必然趋势，但是非测试报告的引入，不应当作为所有申报中降低费用缩短周期的必由捷径，一份怀抱侥幸、无法说服自己的报告是无法说服专家的。我们需要充分理解化学品申报和管理的思路，非测试数据的接受度应当在科学、有效的前提下具体情况具体分析。非测试报告必须确保模型原理和适用范围清晰，选择的数据模型科学有效，经得起反复验证。华测瑞欧作为服务机构，有责任强化自身能力建设，学习先进经验，推广先进技术工具，从而影响和带动全行业的发展。

the market demand for materials, the geographical distribution, import plans, etc., and compared the hazard characteristics of existing substitute products in full, highlighting the environmental positive impact of the declared substances. The corrected information was submitted again. At the third special review meeting, the participating experts issued the decision to “recommend registration” for the second time, and the center reported it to the body.

A month later, we finally received the general four-level registration certificate. Looking back at this project, although it was not as simple a process, we saved our client millions of test fees and at least 2 years of testing time, allowing them to seize the market and gain trade initiative. We likewise benefited from all the knowledge we gained from this project.

It is extremely important to customize a scientific plan according to the conditions of substance in the early stages of a notification, which is also a full expression of knowledge, intelligence and experience of the service organization. An important lesson that can be learned from this case is that although non-test data includes literature, QSAR, and read-across are usually only used as reference data in China's new chemical substance notification, so long as the method and source can be clearly explained and data can be proved rationally. For example, if the similarity selected in the cross-reference is highly correlated, and the data is scientific, sufficient and effective, and the cross-reference report can well describe the toxicological characteristics of the declared substance, then the possibility of acceptance of high-quality non-test data will also be high.

We believe that the introduction of non-test methods into China's new chemical substance management system is an inevitable trend. However, the introduction of non-test reports should not be used as a shortcut to reduce the cost and shorten the cycle in all notifications. We need to fully understand the concept behind chemical notifications and management, and the acceptability of non-test data should be analyzed scientifically and effectively on a case-by-case basis. Non-test reports must ensure that the model principles and scope of application are clear, the selected data model is scientific and effective, one which can withstand repeated verification. As a service organization, REACH24H has the duty to strengthen its capacity building, gain first-level experience and promote advanced technology tools, so as to influence and drive the development of the industry.





## 台湾地区化学品管理

化学工业是台湾地区最重要的产业之一，约占台湾地区制造业总产值的 1/3。台湾地区化学工业的特点鲜明，天然资源缺乏，下游加工实力强，全球营销网络完整，外商当地设厂不多。同时，台湾地区在半导体，医药，航天，大型船只，新能源汽车等领域的处于领先地位，对于其相关的电子化学、医药中间体、精密涂料、颜料、新型电池等高端化学物质保持着较高的需求。因此每年有大量的现有和新型化学品输入至台湾地区。

基于对化学物质的风险管理，台湾地区的新化学物质及现有化学物质由《毒性化学物质管理法》下的《新化学物质及现有化学物质资料登录办法》及《职业安全卫生法》下的《新化学物质登记管理办法》共同监管。两部办法要求生产或进口化学物质的企业向主管机关（环保署 EPA）和（劳动部 MOL）申请登录化学物质数据。物质经官方核准登录后，才可进行生产或进口活动，违法者将面临高额罚款、停工停业或者退运出口。其中《毒性化学物质管理法》，对进入台湾地区市场的化学品进行全方位监督和管理。明年即将颁布实施的修订版台湾地区《新化学物质及既有化学物质资料登录办法》，对全球化学品企业将带来新的挑战。企业应当注意供应链信息管理，明确各环节职责所在，梳理公司内部全球化学品法规应对的现状，把控贸易及生产的合规风险。

华测瑞欧从 2011 年开始深入研究台湾地区《毒性化学物质管理法》，并实时关注其实施现状和动态更新，并于 2015 年在台湾地区设立了分公司，更好地跟进台湾地区化学品管理法规的实施与动向，为开展台湾地区化学品法规服务、帮助全球化工企业产品全面合规提供有力保障。



## Chemical Management in Taiwan of China

The chemical industry is one of the most important industries in Taiwan, accounting for about 1/3 of the total output value of the manufacturing industry. The industry has distinct characteristics, limited natural resources, strong downstream processing strength, complete global marketing network, and few foreign factories. At the same time, Taiwan is regarded as a leading power in the fields of semiconductors, medicine, aerospace, large vessels, new energy vehicles and other fields, maintaining a high demand for its related electronic chemicals, pharmaceutical intermediates, precision coatings, pigments, new batteries and other high-end chemicals. Therefore, a large number of existing and new chemicals are imported into Taiwan on an yearly basis.

Based on the risk management of chemical substances, new and existing chemical substances in Taiwan are jointly supervised by the Regulation of New and Existing Chemical Substances Registration under the Toxic Chemical Substances Control Act (TCSCA) and the Regulations on New Chemical Substances Registration under the Occupational Safety and Health Act (OSHA). Both regulations require companies that produce or import chemicals to apply to the competent authorities (EPA) and (MOL) of the Ministry of Labor for access to chemical data. Only after the material has been officially registered can it be produced or imported, with noncompliant parties facing heavy fines, work stoppage or return of exports. Among them, TCSCA provides comprehensive supervision and management of chemicals entering the Taiwan market.

Next year, the revised TCSCA will be published and

implemented, which will bring new challenges to global chemical enterprises. Enterprises should pay attention to supply chain information management, clarify the responsibilities of each link, sort out the status quo of corporate internal chemical rules, and control the compliance risks associated to trade and production.

Since 2011, REACH24H has conducted in-depth research on the Toxic Chemical Substances Control Act in Taiwan, following its implementation and updates closely. In 2015, it established a branch office in Taiwan to better manage its developments in the chemical industry.



“ 典型案例分析——吨位提升项目 ”

2018 年 11 月，华测瑞欧作为第三方代理人协助企业提交了一份标准三级登录。此前，在华测瑞欧的技术支持下，该企业已经完成了该物质的标准二级登录，由于企业贸易量增加，所以此次登录相当于是吨位的提升申请。以我方的经验，升吨位有两种操作方式，一个是在原有的案件的基础上做吨位提升，另一种把它当做一份全新的案件单独提交。



两种操作方式比较如下：

	原案件吨位提升	单独提交
费用	不用重新提交行政费和保密费	重新提交行政费和保密费
登录码	沿用旧案件的登录码，比如标准二级升标准三级，标准二级会作废，企业把标准二级寄回化学局之后才会发放标准三级的登录文件，标准三级会沿用之前通过的标准二级的登录码	发放新的登录码，但是只能按照较高级别的登录进行活动不得叠加。并且高吨位的批准后低吨位的登录应废止，企业应该把低吨位的登录文件寄回化学局
有效期	按照一开始批准的低吨位的申请计算登录有效期和保密有效期	登录有效期和保密有效期都是 5 年



两种方案比较，原案件吨位提升的方式比较节省费用，但是登录批准后的有效期以及保密有效期都参照原案件，相当于物质列入名录的周期和保密的周期都变短了，这对有些企业来说并不是一件好事。如果选择单独提交，需要重新缴纳行政费和保密费，台湾地区的标准登录行政费是 50000 TWD，保密资讯如果选择四项全部勾选的话额外增加 50000 TWD，费用共计 100000 TWD，对小微企业来说是一笔不小的负担，但是登录批准后的有效期和保密期都是 5 年。

在征求了企业的意见之后，费用是企业考虑的第一要素。最终我们选择以第一种方式 - 原案件吨位提升，帮助企业以最低的成本顺利完成项目。作为技术服务机构，充分考虑企业的需求，制定切实可行的项目计划是非常必要的，如果有企业特别关注产品信息保密和市场活跃时限，则应适时改变吨位提升策略。

Case Study: Chemical Registration in Taiwan

In November 2018, REACH24H as a third-party agent helped a company submit a standard three-level login. Before that, with the technical assistance of REACH24H, the company had completed the standard secondary registration of the substance. Due to the increase in the volume of trade, the registration is equivalent to an application for tonnage enhancement. According to our experience, there are two ways of operating the tonnage. One is to make a tonnage increase based on the original case, and the other is to submit it separately as a new case.

Comparison of two methods：

	Tonnage increase based on the original case	Tonnage increase submitted separately as New Case
Fee	No need to re-pay administrative fees and confidentiality fees	Need to pay administrative fees and confidentiality fees
Login code	The login code of the old case is still working, for example, the standard level 2 is upgraded to level 3, and the standard level 2 will be invalidated. After the company sends the standard level 2 to the Chemistry Bureau, the standard level 3 login file will be issued. The standard level 3 will be passed before. Standard secondary login code.	A new login code is issued, but activities can only be superimposed according to higher level logins. And the registration of low tonnage after approval of high tonnage should be canceled, companies should send low tonnage registration documents back to the Chemistry Bureau.
Validity	Calculate the validity period of the login and the period of validity of the confidentiality according to the application of the low tonnage approved at the beginning	Login validity period and confidential validity period are 5 years

The way to increase the tonnage of the original case is more cost-effective, because the standard registration administrative fee in Taiwan is 50,000 TWD. If you choose all four items, the confidential information will be 50,000 TWD, 100,000 TWD in tota, which is a burden for small and micro enterprises. However, due to the increase in the tonnage of the original case, the validity period after the approval of the registration and the period of validity of the confidentiality refer to the original case, which is equivalent to the period in which the substance is listed and the period of confidentiality is shortened, not the first choice for some enterprises. If you choose to submit separately, the disadvantage is that you need to re-pay the administrative fee and confidentiality fee, but the validity period and confidentiality period after the login approval are 5 years.

After soliciting the opinions of the company, cost was one of their top concerns. Therefore, we chose the first way - the original case tonnage upgrade, in order to offer reduced fees. If a company pays special attention to product information confidentiality and market active time limit, it should change the tonnage promotion strategy in due course.



## “2018 年台湾地区化工行业合规动态盘点”

1. 2018 年 3 月 29 日，台湾地区环保署发布了《新化学物质及既有化学物质资料登录办法》的修正草案，第一批既有化学物质标准登录的名单作为附件出现在了《登录办法》中，既有物质标准登录的数量从原先的 122 个减少到了 106 个。并且修正草案引入了年报制度，自 2019 年 1 月 1 日起，登录人需要在核准登录后申报前一年制造或进口的新化学物质或既有化学物质吨位。

3-29

2. 2018 年 5 月，台湾毒物及化学物质局召开了三场公听会，就《新化学物质及既有化学物质资料登录办法》修订的各个条目向社会各界征求意见。其中聚合物的百分之二规则、既有物质标准登录的数量参考以及标准登录的数据获取方式引起了广泛讨论。

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3. 2018 年 6 月 28 日，环保署公告 16 种化学物质为毒性化学物质，包含苏丹色素等 14 种可能非法添加于饲料或食品中的色素，以及环境中不易分解的月桂酸五氯苯酯及全氟辛酸 2 种持久性有机污染物。经公告后，这 16 种物质无论制造、进口、贩卖、使用、贮存等，都必须符合《毒性化学物质管理法》才可以运作。相关企业必须履行的义务包括 2019 年 1 月 1 日起进行定期申报、2019 年 7 月 1 日前完成标示、2020 年 1 月 1 日前取得核可文件，违法可按照《毒性化学物质管理法》处新台币 6 万元至 500 万元罚款。另外，苏丹色素等 14 种具有食品安全隐患的物质另须在容器包装上标示「禁止用于食品及饲料」，以降低误用的可能。

6-28

4. 2018 年 8 月 22 日，台湾毒物及化学物质局举办了既有物质标准登录配套措施说明会，邀请企业与行业代表共同磋商法规细则。会上官方重点说明了既有物质标准登录的判断流程、登录期限、资料要求与接受形式，并对即将开放的标准登录的提交平台与登录工具进行了简单演示。

8-22

## Latest Updates on Chemical Industry Compliance in Taiwan in 2018

1. On March 29, 2018, the Taiwan Environmental Protection Agency issued a draft amendment to the "Measures for the Registration of New Chemical Substances and Existing Chemical Substances". The first list of existing chemical substance registrations appeared as an attachment in the "Login Measures". The number of existing material standard registrations has been reduced from the original 122 to 106. And the amendment draft introduces the annual report system. From January 1, 2019, the registrant needs to declare the new chemical substance or the tonnage of the existing chemical substance manufactured or imported the year before the approval of the registration.

4. On August 22, 2018, Toxic Substances and Chemical Substances Agency of Taiwan held a briefing on the registration of supporting measures for existing material standards, and invited enterprises and industry representatives to jointly negotiate regulations. At the meeting, the official highlighted the judgment process of the entry of the existing material standards, the registration period, the data requirements and the form of acceptance, and a simple demonstration of the submission platform and login tool of the standard login that will be opened soon.

2. In May 2018, the Taiwan Toxicology and Chemical Substances Bureau held three public hearings to solicit opinions from all sectors of the community on the amendments to the "Measures for the Registration of New Chemical Substances and Existing Chemical Substances". The two percent rule of polymers, the quantitative reference to the entry of existing material standards, and the way in which data is accessed by standard logins have been widely discussed.

3. On June 28, 2018, the Environmental Protection Agency announced that 16 chemical substances as toxic chemical substances, including 14 kinds of pigments that may be illegally added to feed or food, such as Sudan pigment, and pentachlorophenyl laurate and perfluorooctanoic acid, which are not easily decomposed in the environment and 2 kinds of persistent organic pollutants. After the announcement, these 16 substances, whether manufactured, imported, sold, used, stored, etc., must comply with the Toxic Chemical Substances Management Act before operating. The obligations that the relevant enterprises must fulfill include the regular declaration from January 1, 2019, the completion of the mark before July 1, 2019, and the approval of documents before January 1, 2020. The illegal law will be managed in accordance with the Toxic Chemical Substances Management Law, which provides for a fine of NT\$60,000 to RMB5 million. In addition, 14 kinds of substances with food safety hazards such as Sudan pigments must be marked on the container packaging as "prohibited for food and feed" to reduce the possibility of misuse.

## 危险化学品管理

为深刻吸取 2015 年天津港“8·12”瑞海公司危险品仓库特别重大火灾爆炸事故教训，国务院办公厅印发了《危险化学品安全综合治理方案的通知》（国办发〔2016〕88 号），在全国范围内开展为期三年（2016 年 12 月 -2019 年 11 月）的危险化学品安全综合治理工作，对危险化学品安全综合治理部署了 10 个方面、40 项具体工作任务，原国家安监总局、交通运输部、原质检总局等有关部门以及各省市也都陆续出台了相应的危险化学品综合治理方案，部署了危险化学品综合治理工作。根据《危险化学品安全综合治理》的要求，国家要建立危险化学品安全公共服务互联网平台，公开已登记的危险化学品相关信息，现已发布。



经过各地区及有关单位企业的共同努力，综合治理工作有一定进展成效，但仍存在突出问题，事故时有发生，尤其是今年 11 月份可谓是危险化学品及危险货物领域的黑色 11 月。据统计有 26 起事故，涉及 12 个省份，68 人死亡 146 人受伤，教训极其惨痛，安全生产形势十分严峻。危险化学品安全是安全生产工作的重点，涉及企业数量多、行业领域多、监管部门多、潜在安全风险大。有关部门在党中央国务院的领导下，需要进一步加大工作力度，积极落实责任，加强安全生产监督检查执法，推进危险化学品危险货物相关法规标准体系建设，把危险化学品安全综合治理作为安全生产工作的重中之重。

华测瑞欧基于自身多年化学品合规服务经验和专业技术优势，对全球各国 GHS 实施具有多年专业的深入研究，凭借在危险化学品和危险货物法规跟踪解读及危害辨识、SDS/Label 编写、风险评估和应对策略制定等方面的深厚实践积累。通过搭建与国内外众多企业和政府机构的沟通平台，致力于为企业和政府提供一些帮助，共同促进危险化学品安全管理，提升危险货物运输安全水平。



## Hazardous Chemicals Management

In order to deeply absorb the lessons of the major fire and explosion accidents which occurred at the warehouse of the “8•12” Ruihai Company in Tianjin Port in 2015, the General Office of the State Council issued the Notice on the Comprehensive Management Plan for the Safety of Hazardous Chemicals (Guo Ban Fa [2016] No. 88. This Notice has been implemented to provide for the nationwide management of hazardous chemicals for three years (December 2016 - November 2019), including 10 aspects and 40 specific tasks for the comprehensive management of hazardous chemicals safety. The original State Administration of Safety Supervision, the Ministry of Transport, the General Administration of Quality Supervision, Inspection and Quarantine, and other provinces and municipalities have successively issued corresponding comprehensive management plans for hazardous chemicals, and deployed comprehensive management of hazardous chemicals. According to the requirements of the Comprehensive Management of Dangerous Chemicals Safety, the State has to establish an Internet platform for the safety of public services for hazardous chemicals and disclose information on registered hazardous chemicals, which has been released.

Through the joint efforts of enterprises in various regions and related units, the comprehensive management work has achieved certain progress, but there are still limitations. Accidents have occurred from time to time, especially in November this year, which has been named black November for dangerous chemicals and dangerous goods. According to statistics, there were 26 accidents involving 12 provinces and 68 deaths and 146 injured. The lessons were extremely painful and the situation of safe production was very serious. The safety of hazardous chemicals is the focus of safety production. Under the leadership of the Party Central Committee and the State Council, the relevant departments need to further increase their efforts, actively implement their responsibilities, strengthen the supervision and inspection of safety production, promote the construction of relevant standards and standards for dangerous goods for dangerous chemicals, and take safety and the comprehensive management of hazardous chemicals as the top priority.

Based on years of experience in chemical compliance services and its expertise, REACH24H has conducted extensive in-depth research on GHS implementations in different areas across the globe, achieved by tracking and interpreting hazardous chemicals and dangerous goods regulations, Hazard Identification, SDS/Label, deep practice accumulation in risk assessment and response strategy formulation. Through the establishment of a communication platform between many domestic and overseas enterprises and government agencies, we are committed to providing assistance to enterprises and governments to jointly promote the safe management of dangerous chemicals and improve the safety level of dangerous goods transportation.

# “ 典型案例分析 ——某知名 CPU 制造商及供应链 SDS 合规性审核 ”

原国家质检总局要求对危险化学品管理实施全覆盖，将两个“百分百”（100% 实施口岸现场安全查验，100% 取样送实验室检测）作为 2018 年工作重点，严格落实危险化学品进出口检验监管工作，行业内大多数企业都遇到过产品在进出口时被检查出不合规情况，产品的 SDS 和标签不合规是常见问题，也是检查重点。

某知名 CPU 制造商其工厂和供应商遍布全球，其 SDS 和标签面临标准不一、分类不协调的问题。尤其近几年随着化学品进出口监管趋严，其供应商所提供 SDS 和标签在进关时经常会面临我国海关和商检的检查和质疑，导致货物不能如期进出口，合规成本骤增。华测瑞欧作为其危险化学品合规性管理的技术服务机构，为客户制定了多轮的技术审核和咨询服务：

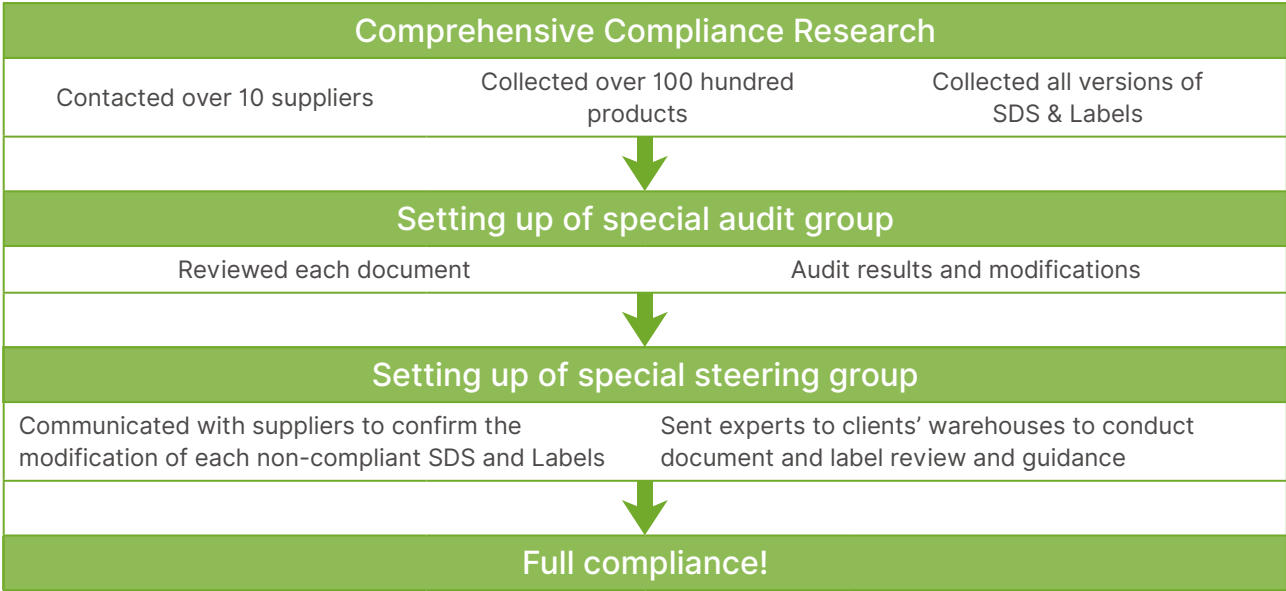


# Supporting CPU Manufacturer on Compliance Audit for Supply Chain SDS

The former AQSIQ required full coverage of import-export hazardous chemicals management. This was implemented through port-site inspection of 100% of hazardous chemicals and 100% laboratory sampling as one of the core focus of their work in 2018. As a result, most companies in the industry have encountered product non-compliance at the time of import and export. Product SDS and label non-compliance is the focus of AQSIQ inspection and therefore one of the most common non-compliance issues.

Well-known CPU manufacturers have factories and suppliers all over the world, and their SDS

and product labels face the problems of different standards and classification. This is especially true in recent years where supervision of the import and export of chemicals has become stricter. When entering Customs, the SDS and product labels provided by suppliers often face inspection and questioning by China's Customs and Commodity Inspections. Often this results in the failure of goods from being imported and exported on schedule, as well as rapidly increasing the cost of compliance. As a technical service organization for hazardous chemicals compliance management, REACH24H has developed a number of rounds of technical review and consulting services for its clients:



“Value in Compliance” is the core principle of REACH24H. For years, our team has specialized in the tracking and management of hazardous chemical regulations and their implementation. REACH24H has completed over 30,000 SDS and label preparations, providing domestic and foreign companies with professional and efficient service solutions that reduce their compliance costs for dangerous chemicals in the global market. In addition, REACH24H's GHS Compliance Department is also committed to providing China's hazardous chemicals registration, EU CLP notification, Wercsmart registration, TRA and other registration work, China's hazardous chemicals 24-hour emergency telephone, physical danger test supervision and compliance consulting and training services for hazardous chemicals and dangerous goods related warehousing and transportation in China.



“2018 年全球危险化学品和危险货物合规动态盘点 ”

1. 第 39-18 版国际海运危险货物运输规则（IMDG Code, 39-18 版）发布

2018 年第 39-18 版国际海运危险货物运输规则（IMDG Code, 39-18 版）发布，将于 2019 年 1 月 1 日起自愿实施，2020 年 1 月 1 日起强制实施。

3. 2018 年 11 月，台湾地区劳动部发布修订版《危害性化学产品标示及通识规则》部分条文及附表 4

5. 墨西哥自 2018 年 10 月 8 日起强制实施新标准 GHS（NOM-018-STPS-2015）

7. 加拿大 GHS（新标准 HPR 法规）推迟至 2018 年强制实施，制造商与进口商于 2018 年 6 月 1 日其强制实施，分销商于 2018 年 9 月 1 日起强制实施。



2019  
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2. 第 60 版国际航空运输协会危险品规则（IATA DGR, 60th 版）发布

2018 年第 60 版国际航空运输协会危险品规则（IATA DGR, 60th 版）发布，并将于 2019 年 1 月 1 日起实施。

4. 《危险品货物航空运输存储管理办法》发布

2018 年 10 月 8 日，中国民航局运输司发布了《危险品货物航空运输存储管理办法》（AC-276-TR-2018-01）。

6. 《危险货物道路运输规则》（JT/T 617-2018）发布实施

2018 年 9 月 6 日，《危险货物道路运输规则》经审查通过并发布，并于 2018 年 12 月 1 日开始实施。

8. 《船舶载运危险货物安全监督管理规定》（交通部令 2018 年第 11 号）发布实施

2018 年 8 月 9 日，《船舶载运危险货物安全监督管理规定》经交通运输部第 12 次部务会议通过并予以发布，自 2018 年 9 月 15 日起施行。

9. 《危险货物道路运输营运车辆安全技术条件（征求意见稿）》发布

2018 年 8 月 1 日，由交通运输部公路科学研究院起草的行业标准《危险货物道路运输营运车辆安全技术条件》（计划编号：JT 2018-17）完成征求意见稿，公开征求意见。

2018 Compliance Review of Global Dangerous Chemicals and Goods

1. The 39th-18th Edition of the International Maritime Dangerous Goods Transportation Regulations (IMDG Code, 39-18 Edition) is released

The 39th -18th edition of the International Maritime Dangerous Goods Transportation Regulations (IMDG Code, 39-18 Edition) will be voluntarily implemented on January 1, 2019, and will be imposed on January 1, 2020.

2. The 60th edition of the International Air Transport Association Dangerous Goods Regulations (IATA DGR, 60th Edition) is released

The 60th edition of the International Air Transport Association Dangerous Goods Regulations (IATA DGR, 60th Edition) was released in 2018 and will be implemented on January 1, 2019.

3. November 2018: Revision by Taiwan Ministry of Labor of the "Hazardous Chemicals Labeling and General Rules" section and Schedule 4

4. Release of "Measures for the Administration of Air Transport of Dangerous Goods"

On October 8, 2018, the Transportation Department of the Civil Aviation Administration of China issued the "Administrative Measures for the Storage and Transportation of Dangerous Goods by Air" (AC-276-TR-2018-01).

5. Mexico imposes a new standard GHS as on October 8, 2018 (NOM-018-STPS-2015)

6. "Dangerous Goods Road Transportation Rules" (JT/T 617-2018) is implemented

On September 6, 2018. The "Rules for the Transport of Dangerous Goods" was reviewed and approved, and was implemented on December 1, 2018.

7. Canada's GHS (new standard HPR regulations) postponed until 2018. The regulation was officially enforced for manufacturers and importers on June 1, 2018, and for distributors on September 1, 2018 .

8. Implementation of Regulations on the Safety Supervision and Administration of Ships Carrying Dangerous Goods (No. 11 of the Ministry of Communications, 2018) .

August 9, 2018, the "Regulations on the Safety Supervision and Administration of Ships Carrying Dangerous Goods" were approved and issued by the 12th meeting of the Ministry of Transport of the Ministry of Transport. This was implemented on September 15, 2018.

9. Release of "Vehicle Safety Technical Conditions for Dangerous Goods Road Transportation Operation (Draft for Comment)"

On August 1, 2018, the industry standard for "Vehicle Safety Technical Conditions for Dangerous Goods Road Transportation Operation" (Plan No.: JT 2018-17) was drafted by the Highway Science Research Institute of the Ministry of Transport and publicly solicited for opinions.

10. 第一届危险货物道路运输专家组成立并公布

2018 年 7 月 16 日，交通运输部公布第一届危险货物道路运输专家组名单，充分发挥专家团队在危险货物道路运输行业政策研究等方面的决策咨询和技术支撑作用，进一步加强和改进我国危险货物道路运输管理。

12. 应急管理部公告 2018 年第二批安全生产失信联合惩戒“黑名单”单位名单

2018 年 5 月 17 日，应急管理部根据《对安全生产领域失信行为开展联合惩戒的实施办法》（安监总办〔2017〕49 号）的规定，经审核公告 2018 年第二批安全生产失信联合惩戒“黑名单”单位名单。

14. 中国民航局发布 2017 年危险品航空运输违规行政处罚情况

2018 年 5 月 4 日，中国民航局依据《民用航空危险品运输管理规定》第一百三十条的规定，公告 2017 年民航行业管理部门对违规航空运输危险品责任单位的行政处罚情况。

16. 《快递暂行条例》（国务院令 697 号）发布

2018 年 3 月 27 日，国务院发布《快递暂行条例》（中华人民共和国国务院令 697 号），自 2018 年 5 月 1 日起施行。

18. 国务院安全生产委员会印发 2018 年工作要点

2018 年 2 月 4 日，国务院安全生产委员会印发了《国务院安委会 2018 年工作要点》，强调十项重点工作内容。



11. 国务院安委会办公室关于进一步加快推进危险化学品安全综合治理工作的通知

2018 年 7 月 10 日，国务院安委会办公室发布了危险化学品安全综合治理有关工作任务清单，加快推进危险化学品安全综合治理工作。

13. 《危险化学品生产储存企业安全风险评估诊断分级指南（试行）》发布

2018 年 5 月 10 日，应急管理部印发了《危险化学品生产储存企业安全风险评估诊断分级指南（试行）》，要求各地安全监管部门对辖区内危险化学品企业进行安全风险评估诊断分级，并根据分级情况采取针对性的监管措施。

15. 中美交通论坛第九次会议在京召开

2018 年 4 月 24 日，中美交通论坛第九次会议在北京如期召开。

17. 2018 年 3 月，欧盟整合之前 10 次 ATP 修订内容，发布新的整合版 CLP 法规 2018 年 4 月，欧盟发布了第 11 次 ATP 修订 CLP 法规；10 月，欧盟发布了第 13 次 ATP 修订 CLP 法规



10. The first expert group on road transport of dangerous goods is established and announced

On July 16, 2018, the Ministry of Transport announced the first list of expert groups on road transport of dangerous goods, giving full play to the decision-making, consultation and technical support role of the expert team in policy research on the topic in order to strengthen and improve the management of dangerous goods transportation in China.

11. Notice from the Office of the State Council Security Committee on Further Accelerating the Comprehensive Management of Hazardous Chemicals Safety

On July 10, 2018, the Office of the Security Council of the State Council issued a list of tasks related to the comprehensive management of hazardous chemicals safety to accelerate the comprehensive management of hazardous chemicals.

12. The Emergency Management Department announces the second batch of safety production failure units

On May 17, 2018, the Emergency Management Department issued the second batch of blacklisted safety production failure units in 2018 according to "Implementation Measures for Joint Disciplinary Actions on Untrustworthy Behavior in the Field of Safety Production" (Safety Supervision Office (2017) No. 49).

13. "Guidelines for the Classification and Diagnosis of Safety Risk Assessment of Hazardous Chemicals Production and Storage Enterprises (Trial)"

On May 10, 2018, the Emergency Management Department issued the "Guidelines for the Classification and Diagnosis of Safety Risk Assessment of Hazardous Chemicals Production and Storage Enterprises (Trial)", requiring local safety supervision departments to conduct safety risk assessments and classification of hazardous chemical enterprises within their jurisdiction. Targeted regulatory measures are taken based on the grading situation.

14. China Civil Aviation Administration releases administrative penalty for the violation of dangerous goods air transport in 2017

On May 4, 2018, the Civil Aviation Administration of China announced the administrative punishment of the relevant departments within the civil aviation industry management department for illegal air transport of dangerous goods in 2017 in accordance with the provisions of Article 130 of the Regulations on the Administration of the Transport of Dangerous Goods for Civil Aviation.

15. April 24, 2018: the Ninth Meeting of the China-US Transportation Forum is held in China's capital city Beijing.

16. "Provisional Regulations on Express Delivery" (State Council Order No. 697)

On March 27, 2018, the State Council issued the "Provisional Regulations on Express Delivery" (Order No. 697 of the State Council of the People's Republic of China), which came into force on May 1, 2018.

17. March 2018: the EU consolidates 10 ATP revisions and releases a new integrated CLP regulation. April 2018: EU issues 11th ATP revision for CLP regulations; October 2018: EU issues 13th ATP revision for CLP regulations.

18. The State Council Safety Production Committee issues main points of work in 2018

On February 4, 2018, the State Council Safety Production Committee issued the "Key Points of Work of the State Council Security Committee in 2018", emphasizing ten key points.

# EHS 规范化管理

随着我国化学工业迅猛发展，化学品的生产、使用量以及有毒有害物质的排放量急剧增加，因缺乏有效管理而引发的化学品安全事故和环境污染事件呈高发态势。为有效遏制危险化学品重特重大事故，保障人民生命财产安全，同时保护和改善环境，保障公众健康，政府正在积极健全和更新安全环保法律法规体系，并且逐步加重对企业违法违规行为的处罚力度。环保政策日益严格，因环境污染和生态保护遭到追责的案例层出不穷，环境资源案件激增。国家用“壮士断腕”的决心应对环境污染问题，持续实施各级环保督察已成为新常态。在中国严格环境执法新形势

## “ 典型案例分析 ”

### EHS 法规咨询和审核服务

#### 项目 1 中国 VOCs 产品管控政策报告

**项目背景：**目前中国以细颗粒物（PM2.5）和 O<sub>3</sub> 为特征污染物的大气复合污染形势依然严峻。2013 年 9 月《大气污染防治行动计划》实施以来，全国环境空气质量持续改善，京津冀（即指北京市、天津市、河南省）、长三角（即指上海市、江苏省辖部分城市、浙江省辖部分城市）、珠三角（即指广东省中南部城市）等重点区域 PM2.5 浓度下降 30% 以上，但仍处于高位，京津冀及周边地区远超过国家环境空气质量二级标准（年平均 PM2.5 浓度 35µg/m<sup>3</sup>，24 小时平均 PM2.5 浓度 75µg/m<sup>3</sup>）；同时，重点区域 O<sub>3</sub> 浓度呈现上升趋势，尤其是在夏秋季已成为部分城市的首要污染物。步入“十三五”（2016-2020 年），以改善环境质量为核心的各项 VOCs 污染防治工作加速推进。由于 VOCs 种类多、排放源复杂，政府要求率先对石化、化工、包装印刷、工业涂装等涉 VOCs 排放的主要行业实施综合治理，各省市可结合地方产业结构特征和 VOCs 治理重点，将电子行业、制鞋、纺织、木材加工等行业纳入

下，企业的环保合规关乎企业的生存和可持续发展。

#### 企业 EHS 合规践行道路上最忠实的合作伙伴

华测瑞欧 EHS 团队坚持以提供优质环境安全合规咨询服务为核心，深入探索、用心钻研，通过多年的不懈努力，厚积薄发，在 2018 年实现多个咨询项目的重大突破，开创性的法规调研项目更是创造了百万佳绩。团队秉承“合规创造价值”的宗旨，以专业、高效、优质的服务获得客户的一致好评。

综合治理范围。综合治理的原则和方式逐步从末端治理为主、源头控制为辅向二者并重的方向转变。这种转变意味着政府将对 VOCs 排污企业，尤其是包装印刷、工业涂装、电子等 VOCs 产排主要源自其使用含 VOCs 原辅材料的行业，提出更为严格的源头控制要求，例如限制使用高 VOCs 含量产品、强制使用低（无）VOCs 含量原辅材料和清洁工艺。然而对于工业企业，环保型原辅材料的替换或清洁工艺的改进非短期能实现，因此及时掌握政府对含 VOCs 产品的管控要求和政策趋势，及早布局研发、策划应对方案是排污企业谋求可持续发展不容忽视的工作。

在如此背景下，受全球知名电子产品制造企业委托，EHS 团队对中国地区含 VOCs 产品的管控政策展开调研咨询，为确保其在华业务更好的履行环保责任提供政策预警和决策依据。

**项目难点：**企业在华供应商数量多、区域分布广、行业跨度大，加之各省市 VOCs 治理策略、政策发布进度、监管重点和力度存在差异，导致该项目调研的目标区域和目标

# EHS Standardized

necessary sacrifices to continuously push the implementation of environmental protection inspectors at all levels. Under this situation, the environmental compliance of enterprises is related to the survival and sustainable development of enterprises.

**Enterprise EHS, the Loyal Partner on the Road of Compliance**  
The EHS team of REACH24H insists on providing high-quality environmental safety compliance consulting services. With year's in-depth exploration, research, unremitting efforts and knowledge accumulation, in 2018, EHS team achieved major breakthroughs in multiple consulting projects. The working principle of "Value in Compliance" has brought our specialists great praise.

With the rapid development of China's chemical industry, the production and use of chemicals and the discharge of toxic and hazardous substances have increased sharply. Chemical accidents and environmental pollution incidents caused by the lack of effective management have also experienced a rise. In order to effectively contain accidents of large amounts of hazardous chemicals, to protect people's lives and property as well as to safeguard the environment and public health, the Chinese government has been active updating its environmental laws and regulations, and has gradually increased the penalties for related violations. Environmental protection policies have become increasingly strict, with cases of environmental pollution keeping them under scrutiny, environmental resource cases have proliferated. There has been a level of determination to make

## EHS Regulatory Consulting Case Study

### Project 1. China VOCs Product Control Policy Report

At present, the atmospheric combined pollution situation characterized by fine particulate matter (PM2.5) and O<sub>3</sub> in China is still grim. Since the implementation of the Air Pollution Prevention and Control Action Plan in September 2013, the situation of the air quality in China has nevertheless shown signs to improve. The concentration of PM2.5 in key areas such as Jing-Jin-Ji (referring to Beijing, Tianjin, Henan Province) and the Yangtze River Delta (referring to Shanghai, Jiangsu Province and some cities in Zhejiang Province) was reduced by over 30% although it remains high. The Jing-Jin-Ji

region and surrounding areas far exceed the second national ambient air quality level standard (annual average PM2.5 concentration 35µg/m<sup>3</sup>, 24-hour average PM2.5 concentration 75µg/m<sup>3</sup>); at the same time, the concentration of O<sub>3</sub> in the key areas shows an upward trend, especially in summer and autumn when it becomes the primary pollutant in some cities. Stepping into the “Thirteenth Five-Year Plan” (2016-2020), the prevention and control of VOCs pollution is accelerating with the focus on environment improvement. Due to the different types of VOCs and complex emission sources, the government has

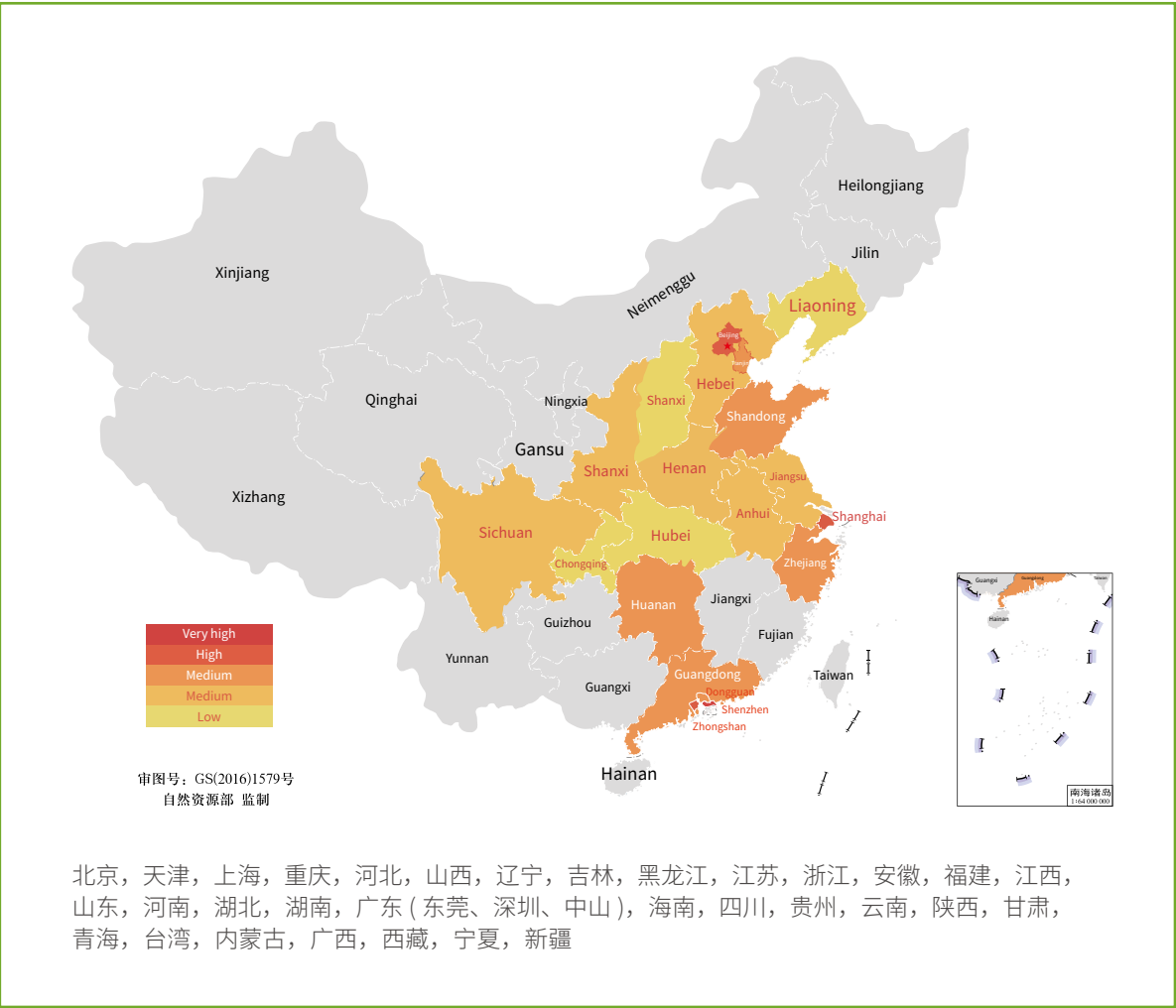


行业、目标信息数量庞大。因此如何在较短的时间内实现对有效信息的收集、梳理、提炼和总结，并最终整理出逻辑严密、可读性强、高度概括、且能满足企业不同层级人员参考需求的咨询报告，难度非常大。

项目实施：

- 1. 基于深入的企业需求访问和丰富的法规咨询经验，制定详细的调研实施方案，明确调研范围和目标信息，统一法规收集方法和信息梳理规则，制定工作时间表分工实施。
- 2. 对 17 个 VOC 重点治理省和直辖市、以及近百个下辖城市 VOCs 产品的环保管控政策进行调研，查阅了近百部法律法规及规范性文件，梳理出各省市针对不同行业的 VOC 产品管控政策要点、标准要求和关键信息的跟踪或访问计

6. 部分图文内容展示：



taken the lead in managing major industries involving VOCs in a comprehensive manner, including the petrochemical, chemical, packaging and printing, and industrial coating industries. All provinces and cities must match their local industrial structural characteristics with the current VOCs governance priorities to ensure the comprehensive management for the industries of electronics, footwear, textiles, and wood processing, etc. The principles and methods of comprehensive management have gradually shifted from end-of-pipe techniques to end-of-pipe techniques and source control. This means the government will provide more stringent source control requirements for VOCs polluting enterprises, especially working in the packaging, printing, industrial coatings, electronics and other VOCs emission industries, such as capping the use of high VOCs content products, requiring low ( or no) VOCs content raw materials and defining cleaning processes. For industrial enterprises, neither the replacement of environmentally-friendly raw/ auxiliary materials nor the improvement of cleaning processes may be realistically achieved in the short-term. Therefore, it is necessary for VOC emitting enterprises to timely grasp government's control requirements and policy trends for VOCs-containing products and develop plans accordingly to maintain the sustainable development objectives.

Against this backdrop, commissioned by world-renowned electronics manufacturer, the EHS team conducted a study and further consulted on the VOC control policies in China, providing policy warning and decision-making basis to ensure that its business in the country would effectively fulfill its environmental responsibilities.

**Barriers:** Due to the uneven distribution of supplier companies in China, both in geography and industries, and different VOCs governance strategies in place, policy release schedules, supervision focus and periods vary among provinces and cities, the

investigation workload of the target area and target industry and target information is huge. Therefore, it raised the question of how to collect, sort, refine and summarize relevant information in a short period of time, to ensure the final report would follow a strict logic, as well as be easily readable to ensure it met the reference needs required by the different levels of the manufacturer .

Project implementation：

- 1. Based on the needs of the enterprise and REACH24H's regulatory consulting experience, the EHS expert team developed detailed research and implementation plans, clarified the scope of the study and target information, unified the data collection method and presentation, and finally formulated clear task schedules to deliver the output in time.
- 2. Following the study on the environmental management and control policies of 17 VOCs in the provinces and municipalities directly under the Central Government, nearly 100 cities under the jurisdiction of the VOCs regulation and nearly 100 laws and regulations and regulatory documents, the EHS team was able to organize the main VOC product control policy points, standard requirements and key information tracking or access plans of various provinces and cities for different industries. All this gathered data finally formed the key points used as control records.
- 3. Interviews were conducted with key management departments and technical support units in target areas to further verify regulatory requirements and the status of law enforcement, eventually coordinating hundreds of local management visits.
- 4. Based on the analysis and refinement of research information, combined with the specific needs manifested by enterprises, the EHS team devised a VOC product control policy and organized a compliance risk assessment scoring system, assessing and warning of corporate compliance risks.
- 5. The report includes a large number of charts

**项目总结：**华测瑞欧 EHS 咨询团队为客户提供的中国 VOCs 产品管控政策报告，覆盖了该企业从最高决策层、到 EHS 管理层级和一线环保安全工作人员等不同角色层级的咨询需求，填补了国内 VOCs 管理政策和执行情况系统梳理的空白。从项目立意、方案设计、资料收集、访问调研、分析汇总到报告呈现，充分发挥了团队政策把控、专业咨询和高效协作的能力。通过明确客户需求、优化分析策略、完善评估系统，为企业提供了符合 VOCs 产品调研咨询报告。专业的内容、即时的响应、优质的服务深得客户赞赏与青睐。

项目 2 EHS 合规审查报告

**项目背景：**EHS 咨询团队受欧洲某大型药企的委托，对其分布在中国三个省、十二个地级市的近二十家供应商开展 EHS 合规性审核，并出具审查报告。

**项目难点：**中国的环保政策、法规更新频繁，各地方政府的执法要求与重点差异明显，客户分布区域又广，传统 EHS 审核中主要依靠专家经验的审核思路已经无法及时、准确地判断企业的合规性风险。

**项目实施：**此项目开创性地将完整、深入的法规调研作为审核的基础，力求在现场审核工作开始之前就全面掌握供应商 EHS 合规性风险的主要来源和政府环保执法的具体依据。项目研究了中央和地方对于环保、安全、产业调整、园区管理、生态文明建设等领域的政策与法规，总结提炼会导致供应商被搬迁或关停限产的诸项关键因素，与掌握的供应商信息相对比，结合对地方执法部门的电话访问，评估出各供应商因 EHS 合规问题而无法正常生产的风险等级。

**项目总结：**近年来随着中国的环保政策收紧、环保督查频仍，大量跨国企业在中国的制造商与供应商的正常生产受到影响，甚至被搬迁、关停，使企业的供应链承受了巨大压力。基于此种背景，该项目的研究方法聚焦于政府部门执法的理论依据，紧跟政策、法规的更新动态，从庞杂的政策与法规要求中精确地筛选出最直接影响供应商正常生产的关键因素，使合规审核工作的重点更加明确、效率进一步提高。同时，该项目还初步判断了各供应商在两年内的合规风险等级，为委托方进一步宏观掌握供应链信息提供依据。

“EHS 法规平台——与法规零距离，让合规更轻松”

企业适用性 EHS 法规识别和更新以及条款解读是 EHS 咨询部的重要服务内容。2018 年我们已成功为上百家来自化工行业、电子行业、汽车制造行业、机械制造行业、食品行业等行业企业提供 EHS 法规辨识和更新服务。

为了提升用户体验和服务质量，经过 2018 年的充分筹备，即将于 2019 年推出 EHS 法规平台。平台特点：

1. 从海量法律法规中精准匹配与企业生产经营活动适用的 EHS 法规信息，告别法规搜索和适用性条款辨识的繁重任务，打造企业专属的法规信息数据平台。

2. 企业可通过平台轻松享受法规数据的查询、管理和内部共享，及时掌握法规更新，一键生成 EHS 合规性评估工作表等，让企业的合规工作更加便捷高效。

3. 如果企业已创建 EHS 法规库数据，但受困于传统 EXCEL 承载方式不便查询和共享，企业可享受法规数据重构服务，实现一键导入，创建企业特色的法规信息数据平台，体验平台集成的数据管理和应用功能。

and graphs, highly concentrating key information, summarizing research results supported by detailed text descriptions to ensure they are highly readable and meet the consulting needs of all levels of management.

**Project Summary:** The China VOCs product control policy report produced by the EHS team of REACH24H, which covers the needs of the company from the highest decision-making level to the EHS management and the first-line environmental security staff levels, fills the blank in terms of the domestic VOCs management policy and implementation. From the project conception, program design, data collection, interview research, analysis and summary to the final report, EHS fully applied its resources in policy control, professional consultation and efficient collaboration.

Having previously clarified customer needs, optimized the analysis strategy and improved the evaluation system, EHS provided its VOCs product research and consulting reports. The professional content, instant response to queries, and quality service were all points highly recommended by clients.

Project No.2: EHS Compliance Auditing Report

**Project Background:** Commissioned by a large European pharmaceutical company, the EHS consulting team conducted EHS compliance audits for nearly 20 suppliers in three provinces and 12 prefecture-level cities in China, and issued a review report.

**Barriers:** China's environmental protection policies and regulations are updated frequently, the local government's law enforcement requirements and focus are different, and the customer distribution area is wide. Due to this situation, the traditional EHS

audit, which mainly relies on auditing experience, has been unable to judge the enterprise's regulatory risk in a timely and accurate manner.

**Project Implementation:** This project pioneered the complete and in-depth legal investigation as a basis for the audit, striving to fully grasp the main source of supplier EHS compliance risk and the specific basis of government environmental law enforcement before the on-site audit work began. The project studied central and local policies and regulations on environmental protection, safety, industrial adjustment, park management, and ecological civilization construction, summarizing the key factors that would cause suppliers to be relocated or shut down. Through the comparison with supplier's information, EHS team evaluated the risk level of each supplier that was unable to carry out normal production due to EHS compliance problems.

**Project summary:** In recent years, with the tightening of China's environmental protection policies and the frequent supervision in the name of environmental protection, a large number of multinational companies in China' manufacturers and suppliers' normal production have been affected, even worse, some of them were relocated or shut down, which put huge stress on their supply chain. The research method applied for this project focuses on the theoretical basis of government law enforcement, closely following the update of policies and regulations to accurately select the key factors that directly affect the normal production of suppliers from the complex policy and regulatory requirements to further improve the efficiency of compliance auditing. At same time, the project also preliminarily assessed the compliance risk level of each supplier over a period of two years, providing a basis for the entrusting party to further grasp the supply chain information.

## “化学品全过程管理课程系列——2019 年即将开启”

为帮助企业从纷繁复杂的管理政策、规范标准和技术手段中梳理出其对化学品管理的思路和策略，EHS 咨询团队于 2017 年设计并策划了“化学品全过程管理培训系列”。培训系列围绕着化学品进出口、生产使用、储存、运输和废弃处置几个重要流通环节展开，系统、全面的梳理和解读化学品管理的法规要求、基础知识、技术方法和管理工具等内容，并会辅以最佳实践分享和课程互动，缩短学员由知识向实践转化的过程。

培训以 1V1 针对性内训及公开课形式进行，课程讲师由参与国内化学品管理政策制定和监管的技术专家、具备丰富化学品管理实践经验的专业讲师、资深安全和环保咨询顾问、资深化学品法规顾问、国际一流应急管理专家、危险货物运输专家等组成。通过深入的课题讲解和案例剖析，结合分组讨论、模拟演练等互动形式，帮助企业更全面掌握法规体系、深入的理解政策和立法，掌握合规要点，并结合管理实践融会贯通，提升化学品管理能力。



## EHS Regulatory Platform - Keeping Regulations Close, Simplifying Compliance

The analysis and regulatory identification of enterprises and the update of EHS regulations and interpretation of its terms are all highly relevant service contents of the EHS department. In 2018, REACH24H EHS experts successfully provided EHS regulatory identification and update services to hundreds of enterprises from the chemical, electronic, automobile manufacturing, machinery manufacturing, food and other industries. In order to improve user experience and service quality, after 2018's full year preparation, the EHS regulation platform has been set to be launched in 2019. Among other features, this platform will:

1. Accurately match EHS regulations applicable to the company's production and operation activities amongst the vast amount of laws and regulations,

and build a company-specific regulatory information data database.

2. Allow enterprises to directly forward queries, manage and internally share regulatory data through the platform, grasp regulatory updates in a timely manner, and generate EHS compliance assessment worksheets with one click, greatly simplifying compliance work .

3. Provided enterprises decides to use the EHS regulatory database, they will have access to the regulatory data reconstruction service, where they can import their data by one simple click, and experience its platform integrated data management and full application functions.

## Chemical Process Management Course Series - Coming Soon in 2019

In order to help enterprises organize their strategies for chemical management in accordance with complex management policies, normative and technical standards, in 2017 the EHS consulting team designed the "Chemical Process Management Training Series". The training series is organized around several important topics related to the import, export, production, storage, transportation and disposal of chemicals, systematically and comprehensively combing and interpreting regulatory requirements, basic knowledge, technical methods and chemical management tools. These trainings also count on practice tasks and discussions to ensure participants are able to put knowledge into practice.

The training is conducted following the 1V1 targeted

internal training - open course format. Course instructors are technical experts involved in the formulation and supervision of domestic chemical management policies, professional lecturers with wide experience in chemical management practices, senior safety and environmental consultants, senior chemical regulatory consultants, world-class emergency management experts and dangerous goods transport experts. The course is designed to help enterprises fully grasp the legal system, understand policies and legislation in depth, master compliance points, integrate management practices and enhance chemical management capabilities through in-depth topic development, case analysis, group discussion, simulating exercises and others.



化学品全过程管理课程系列——公开课 2019

化学品安全环保管理课程	
<div>危险化学品法规政策解读及企业合规要点<ul style="list-style-type: none"><li>中国化学品管理法规概况</li><li>法规解读和合规实操</li></ul></div> <div>危险化学品安全管理实践<ul style="list-style-type: none"><li>化学品采购管理良好实践分享</li><li>化学品仓储安全</li><li>实验室化学品安全</li><li>化学品应急管理</li></ul></div> <div>企业环保管理培训<ul style="list-style-type: none"><li>环保政策重点解读与趋势发展分析</li><li>VOCs 政策动态和标准解读</li><li>危险废物管理和资源化处置探讨</li></ul></div>	<div>第一场: 4.25-26 杭州 / 上海</div> <div>第二场: 10.17-18 杭州</div>
危险货物运输管理课程	
<div>危险货物运输法规概述（国际及国内） 危险货物运输重点内容详解（道路为例）<ul style="list-style-type: none"><li>危险货物运输各参与方责任概述</li><li>危险货物 9 大类危害分类及特性</li><li>危险货物品名表介绍及其使用</li><li>危险货物包装规范要求</li><li>危险货物标签及运输文件要求</li><li>危险货物装卸、运输及作业要求</li></ul></div> <div>中欧危货道路运输管理差异对比</div> <div>小包装危险货物道路运输应对</div> <div>案例讨论分享</div>	<div>第一场: 6.13-14 杭州</div> <div>第二场: 11.7-8 杭州</div>

Chemical Process Management Course Series - Open Class 2019

Chemical Safety and Environmental Management Course	
<div>Interpretation of Hazardous Chemicals Regulations &amp; Policies and Corporate Compliance Points<ul style="list-style-type: none"><li>Overview of China's Chemical Management Regulations</li><li>Interpretation of Regulations and Compliance Practice</li></ul></div> <div>Hazardous Chemical Safety Management Practices<ul style="list-style-type: none"><li>Good practice sharing of chemical management procurement</li><li>Chemical storage safety</li><li>Laboratory chemical safety</li><li>Chemical emergency management</li></ul></div> <div>Enterprise Environmental Management Training<ul style="list-style-type: none"><li>Environmental protection policy key interpretation and trend development analysis</li><li>Interpretation of VOCs policy dynamics and standards</li><li>Discussion on hazardous waste management and resource disposal</li></ul></div>	<div>First round: 4.25-26 Hangzhou/ Shanghai</div> <div>Second round: 10.17-18 Hangzhou</div>
Dangerous Goods Transport Management Course	
<div>Overview Of Dangerous Goods Transport Regulations (International and Domestic) Detailed information on the transport of dangerous goods (Focusing on Road Transportation as primary example)<ul style="list-style-type: none"><li>Overview of the responsibilities of all parties involved in the transport of dangerous goods</li><li>Classification and characteristics of 9 categories of dangerous goods</li><li>Introduction and usage of dangerous goods name list</li><li>Dangerous goods packaging specification requirements</li><li>Dangerous goods labeling and shipping document requirements</li><li>Dangerous goods requirements for handling, transportation and operation</li></ul></div> <div>Comparison Between in the Management of Dangerous Goods Transported by Roads in China and Europe</div> <div>Small-Package Dangerous Goods Road Transport Response Case Study</div>	<div>First round 6.13-14 Hangzhou</div> <div>Second Round: 11.7-8 Hangzhou</div>

# 全球农药和消毒剂

## 农药行业总览

### ● 中国农药行业挑战增加

由于我国农药企业数量众多，行业集中度较低，随着行业竞争的加剧以及环保压力加大，我国农药行业正进入新一轮整合期。不少安全环保隐患多、技术装备水平落后、环保安全投入不足的企业在 2018 年已经面临了寒冬，预计 2019 年行业整合还会持续加速。农药企业应当提高产业集中度，促使农药工业朝着集约化、规模化、专业化、特色化的方向转变，注意在生产过程中时刻关注环保问题，优化生产工艺，把控环境污染风险。

### ● 全球农药市场逐步回暖

自 2016 年下半年以来，国际原油价格企稳回升，带动相关基础材料和中间体价格上涨；加之国际农化巨头经历了两年多的去库存之后，补库存行情开启带动了海外需求回暖。同时受前期环保督察、企业停产、市场需求增加等多重因素影响及农药行业相关政策的推进，农药产品价格呈现回涨势头，全球农化市场销售规模逐步恢复。随着 2018 年农药出口量的增加，农药出口登记需求量也大幅度上升。



### ● 农药登记成果显著

华测瑞欧农化和材料事业部为客户提供全球技术壁垒解决方案，包括美国 EPA 农药及消毒剂登记、欧盟生物杀灭剂产品登记（BPR）、欧盟农药登记（PPP）、中国农药登记及中国农药风险评估报告、中国消毒剂合规、巴西农药登记、缅甸农药登记以及全球食品接触材料合规咨询等服务。

2018 年全年，华测瑞欧成功帮助几十家全球 500 强农药企业完成欧盟原药等同性评估（TE 评估）80 余个，欧盟新卫生农药登记项目 10 余个，美国 EPA 农药登记项目 50 余个，中国农药登记项目 20 余个，中国农药风险评估报告 50 余份，为客户创造了上千万以至数亿美元的贸易值。特别在欧美国国家农药登记方面，我们为中国（包括台湾地区）80% 的供应商提供了合规服务。另外，华测瑞欧还支持技术等同性评估申报、中小微企业评估申报、活性物质的批准工作。技术团队在申报策略、试验监理、非测试方法、风险评估等申报涉及的各方面均积累了宝贵经验，能够为企业量身定制合规方案，为企业提供全方位的申报服务。



# Global Pesticides and Disinfectants

## General Overview of the Pesticides Industry

### ● Increasing Challenge in China Pesticides Industry

Due to the large number of pesticide enterprises in China and the low concentration of the industry, China's pesticide industry is entering a new round of integration with the intensification of industrial competition and the increasing pressure due to the government's focus on environmental protection. Numerous enterprises posing safety and environmental risks, with backward technology and equipment, and insufficient investment in environmental protection and safety, have already faced a cold winter in 2018. It is expected that industrial integration will continue to accelerate in 2019. Pesticide enterprises should improve industrial concentration, pay attention to environmental protection issues at all times in the production process, optimize the production process and control the risk of environmental pollution to promote the transformation of the pesticide industry towards intensification, scale, specialization and specialization.

### ● The Gradual Warming-Up of the Agrochemical Market

Since the second half of 2016, international crude oil prices have stabilized and rebounded, driving the prices of relevant basic materials and intermediates. In addition, after international agrochemical giants' two years destocking, the start of inventory replenishment drives the overseas needs of pesticides. At the same time, affected

by multiple factors such as early environmental protection supervision, enterprise stoppage and limited production, increasing market demands and the promotion of relevant policies, there are signs of recovery in pesticide product prices and the global agrochemical market. With the increase of pesticide export volume in 2018, the demand for pesticide export registration has also increased substantially.

### ● Remarkable Achievements in Pesticide Registration

Agrochemical and Food Contact Materials Department of REACH24H is committed to provide clients with technical solutions to global barriers, including US EPA pesticides and disinfectant registration, EU biological pesticides registration (BPR), EU pesticide product registration (PPP), China pesticide registration and pesticide risk assessment report, China disinfectant compliance, Brazil pesticide registration, Myanmar pesticide and compliance consulting services on global food contact materials.

In 2018, REACH24H successfully helped dozens of top 500 global pesticide enterprises complete more than 80 EU technical equality assess (TE evaluation), over 10 EU new health pesticide registration projects, more than 50 US EPA pesticide registration projects, more than 20 pesticide registration in China and 50 Chinese pesticide risk assessment reports, creating the millions or even hundreds of millions dollars of trade for its clients. Especially in terms of pesticide registration in European and American countries, we

## 2018 农化和材料事业部大事记

### 1. 再次获批美国 EPA 农药登记证

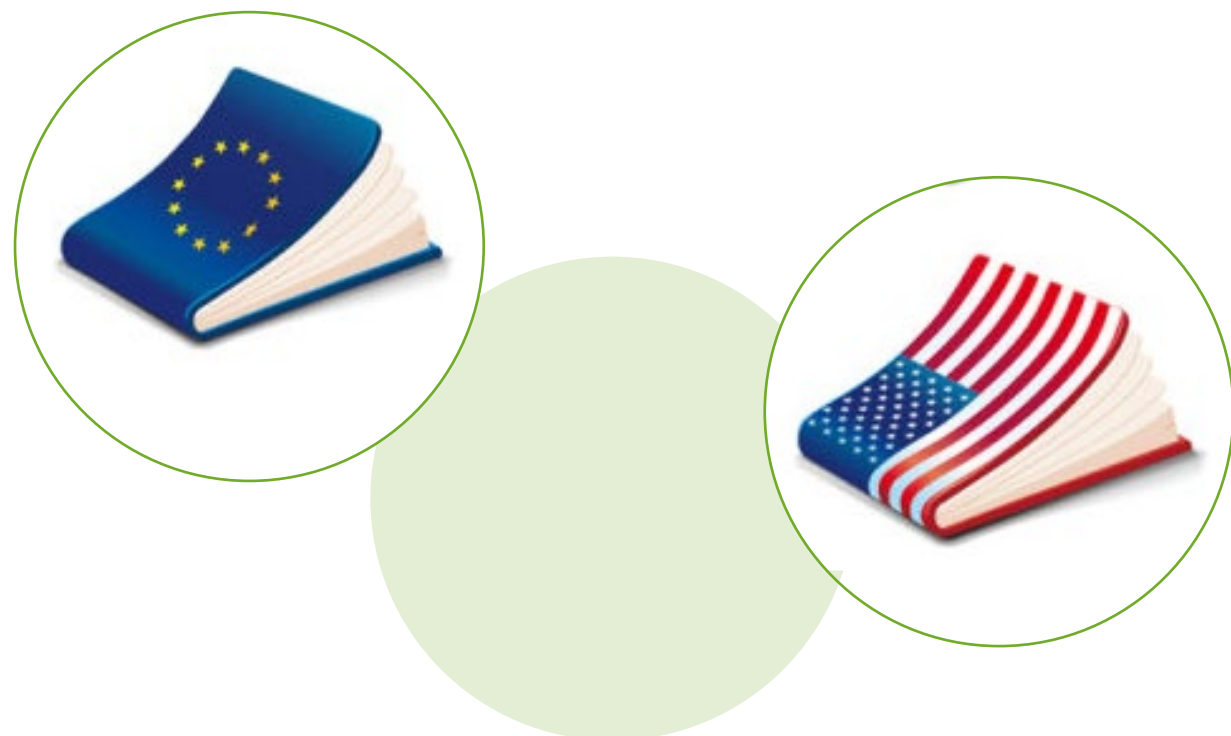
2018 年 7 月 20 日，华测瑞欧收到美国环保局（Environmental Protection Agency, EPA）的登记最终确认信，我们协助客户提交的抗菌农药产品登记已于 2018 年 7 月 19 日正式生效。此次华测瑞欧代理登记的抗菌农药产品，于 2018 年 1 月中旬正式开始向官方递交申请材料，7 月 20 日收到最终确认信，历时仅 6 个月。完成 EPA 登记不仅能够很好地保护申报人的利益，而且可以大大提高企业的市场竞争力，为开拓美国市场抢占先机，取得更大的经济效益。

### 2. 再次成功递交活性物质批准申报

2018 年 9 月，华测瑞欧再次成功向欧洲化学品管理局递交活性物质批准申报。此次华测瑞欧代理的活性物质是原位生成的二氧化氯，于 2016 年帮助企业向官方递交通报，应企业要求于 2017 年开始正式准备批准申报资料，2018 年 9 月顺利完成卷宗递交，历时仅 1 年半时间。

### 3. 成功完成欧盟统一授权递交

2018 年 12 月，华测瑞欧成功为 2 家亚洲企业完成欧盟统一授权递交，同时顺利为 13 家欧洲企业提供了统一 / 成员国相同产品授权的合规支持。此次产品授权所涉及的活性物质是次氯酸钙（CAS: 7778-54-3），产品递交截止期为 2019 年 1 月 1 日。为了顺利解决企业的燃眉之急，华测瑞欧全程和欧洲官方保持高效沟通，由理化、毒理、生态毒理、环境和非测试方法等拥有多年相关经验的专家组成的法规技术团队与各企业进行了深入的交流与探讨，对产品进行了全面评估，并为各企业量身定制了合规方案，大大减少了申报时间和费用。最终，仅在短短一个月的时间内成功协助 13 家欧洲企业顺利完成统一 / 成员国相同产品授权合规工作。



have provided compliance services for 80% of suppliers in China (including Taiwan).

In addition, REACH24H also offers guidance on applications for technical equivalence, support for small and medium enterprises applications, as well as for active substance applications. The technical team has accumulated valuable experience in various aspects related to the declaration, including the strategy, test supervision, non-test methods, risk assessment, etc., enabling us to customize our compliance service based on the specific needs of clients and provide comprehensive declaration services.

## 2018 Review of Agrochemical and Food Contact Materials Department

### 1. Re-approval of US EPA Pesticide Registration Certificate

On July 20, 2018, REACH24H received the final confirmation letter from the US Environmental Protection Agency (EPA) stating the registration of antibacterial pesticide products that its experts prepared submit would officially take effect on July 19, 2018. This anti-bacterial pesticide product registered by REACH24H was officially filed mid-January 2018, and received the final confirmation letter on July 20, which only took 6 months. The completion of EPA registration does not only protect the interests of the applicants but also enhances the enterprise's market competitiveness greatly to seize opportunities in the US market and achieve greater economic benefits.

### 2. Successful Submission of the Active Substance Application Again

In September 2018, REACH24H successfully submitted the application of the active substance to the European Chemicals Agency. The active substance is chlorine dioxide generated in-situ. Delivering the report to the official in 2016, starting the material preparation in 2017, the team successfully completed the file submission in September 2018, which only took one and a half years.

### 3. Successful Completion of EU Unified Authorization Submission

In December 2018, REACH24H successfully completed the submission of EU's Union authorization for two Asian companies, and simultaneously provided 13 European companies with support for the same product licenses. The active substance involved in the product authorization was calcium hypochlorite (CAS: 7778-54-3), due for submission on January 1, 2019. In order to successfully meet the urgent needs of the company, REACH24H kept regular communications with European authorities, and its regulatory technical team of experts in physicochemical, toxicological, ecological toxicology, environmental and non-test methods organized in-depth meetings and discussions with the companies. Through detailed evaluation, the team offered compliance solutions tailored to each client which greatly reduced the time and processing costs. After one month, REACH24H had successfully assisted 13 European companies to complete their union authorization compliance work.



# 2018 年十大农药法规动态盘点

## 1. 中国新《农药管理条例》下风险评估指南和模型发布

为了企业能够更好的满足新《农药管理条例》下产品风险评估的要求，一系列风险评估指南（或征求意见稿）和模型陆续发布。

健康风险评估	《卫生杀虫剂健康风险评估指南 第 4 部分 驱蚊帐（征求意见稿）》发布
	《背负式喷雾施药人员单位暴露量（第一版）使用说明》发布
	农药施药者风险评估模型 COPrisk 发布
环境风险评估	《农药登记环境风险评估指南 第 8 部分：土壤生物》开始实施
	《农药登记环境风险评估指南 第 9 部分：混配制剂（征求意见稿）》发布

## 2. 中国新《农药管理条例》下第一批通过认定的农药登记试验单位公布

2018 年 9 月，农业农村部按照《行政许可法》《农药管理条例》有关规定，将 26 家通过认定的农药登记试验单位予以公示，其中 8 家实验室通过多个不同试验的认定。主要如下，获得产品化学试验认定的有 8 家，获得毒理试验认定的有 7 家，获得药效试验认定的有 6 家，获得残留试验认定的实验室有 5 家，获得环境影响试验认定的有 9 家。

## 3. 中国环境保护部发布《环境保护综合名录（2017 年版）》

2018 年 2 月，环保部发布了《环境保护综合名录（2017 年版）》，该名录包含“高污染、高环境风险”产品（简称“双高”产品）名录和环境保护重点设备名录两部分。其中，有 65 种化学农药被列入“双高”产品名录。目前，该综合名录已在税收、贸易、金融等领域发挥积极作用，多批“双高”产品被先后取消出口退税，禁止加工贸易。

## 4. 欧盟农药内分泌干扰物识别标准及配套指南文件发布

由欧洲化学品管理局和欧洲食品安全管理局 (European Food Safety Authority, EFSA) 共同起草的内分泌干扰物识别标准及配套指南文件于 2018 年 6 月 7 日正式发布，该指南文件旨在通过设定一系列科学标准以用于对内分泌干扰物的识别。在此之前，欧盟农药 (PPP) 已于 2018 年 5 月 10 日在欧盟农药法规 Regulations (EC) No 1107/2009 基础上修订并生效了相应的内分泌干扰物甄别标准 (Commission regulation (EU) 2018/605)。从 2018 年 11 月 10 日开始，正在评审或新申请的欧盟农药登记，都需要运用该标准并配合指南文件对产品进行内分泌干扰评估。

## 5. 欧盟 27 国批准英国脱欧协议草案

经过一年的多的谈判，2018 年 11 月 25 日，欧盟 27 国领导人一致通过了英国脱欧协议草案，这意味着欧盟方面就英国脱欧达成了一致，无协议脱欧的风险减小。2018 年 12 月 11 日，英国首相府确认，被推迟举行的英国“脱欧”草案议会投票将在 2019 年 1 月 21 日之前举行。英国脱欧后，农药产品的管理在过渡期内仍会延续欧盟的法规要求，目前的活性物质批准、PPP 授权和最大残留水平 (MRLs) 在英国和欧盟仍然有效。后续针对农药产品，英国会颁布国家层面的管理要求。

# 2018 Top Ten Updates for Pesticide Regulations

## 1. China's "New Pesticide Management Regulations" includes the release of risk assessment guidelines and modes:

To help enterprises better meet the requirements of product risk assessment under China's New Pesticide Management Regulations, a series of risk assessment draft guidelines and models were released:

Health Risk Assessment	Guidelines for Health Risk Assessment of Hygienic Pesticide Section 4: Mosquito Repellent (Consultation Draft)
	"Knapsack Spray Application Unit Exposure Instruction (First Edition)"
	Pesticide Applicator Risk Assessment Model released by COP risk
Environmental Risk Assessment	Implementation of the Guidelines for Environmental Risk Assessment of Pesticide Registration, Part 8: Soil Biology
	Release of Guidelines for Environmental Risk Assessment of Pesticide Registration, Part 9: Mixed Formulations (Draft for Comment)

## 2. Announcement for the first batch of approved pesticide registration testing units under China's "New Pesticide Management Regulations"

In September 2018, the Ministry of Agriculture and Rural Affairs MoARA announced 26 approved pesticide registration testing units in accordance with the relevant provisions of the Administrative License Law and the Regulations on the Administration of Pesticides. Eight units passed the certification of several different tests. The exact tests passed are detailed as follows: 8 units obtained product chemical test certification, 7 units obtained toxicological testing certification, 6 units obtained drug efficacy test certification, 5 units obtained residue test certification and 9 units obtained environmental impact test certification.

## 3. Release of the "Environmental Protection Comprehensive List (2017 Edition)" by China's Ministry of Environmental Protection

In February 2018, the Ministry of Environmental Protection (MEP) issued the "Environmental Protection Comprehensive List (2017 Edition)". The list contains two parts: the list for "high pollution, high environmental risk" products (referred to as "double high" products) and the list of key environmental protection equipment. In all, 65 kinds of chemical pesticides were listed in the "double high" product list. At present, the comprehensive list has played an active role in the fields of taxation, trade and finance. Many batches of "double high" products have been canceled export tax rebates and prohibited processing trade.

## 4. Release of EU Pesticide Endocrine Disrupter Identification Standards and Supporting Guidelines

The endocrine disruptor identification standard and supporting guidelines, jointly drafted by the European Chemicals Agency and the European Food Safety Authority (EFSA), was officially released on June 7, 2018. The guidance document is intended to set the range of scientific standards for the identification of endocrine disruptors. Prior to this, EU Pesticide (PPP) revised and implemented the Endocrine Disruptor Screening Standard (Commission Regulation (EU) 2018/ 605) on the basis of EU Pesticide Regulations (EC) No 1107/2009 on May 10, 2018. Beginning on November 10, 2018, all EU pesticide registrations that are being reviewed or newly applied for will need to adhere to this standard and conduct an endocrine disruption assessment for each product accordingly.

6. 欧盟公布低风险活性物质清单

2018 年 7 月，欧盟委员会公布了低风险农药活性物质清单，该清单一共包含 55 种物质，其中 30 种是微生物菌株。低风险物质获得批准后有效期为 15 年，比普通活性物质 10 年的有效期长。另外，跟普通制剂产品相比，含低风险活性物质的制剂产品数据保护期也会相应延长。

7. 欧盟 PPP 法规附件 III- 禁用助剂清单预计今年年底或明年年初发布

欧盟将于今年年底或明年年初发布 PPP 法规 (Regulations (EC) No 1107/2009) 中附件 III，即农药制剂禁用助剂清单。据悉，判断是否列入禁用助剂清单，将根据物质危害和风险进行评估。危害方面，满足致癌、致突变和生殖毒性 (CMR 1A or 1B)，持久性、生物富集性和毒性 (PBT, vPvB)，持久性有机污染物 (POP)，内分泌干扰物 (ED) 以及欧盟 REACH 法规附件 XVII 和 XIV 限制要求的物质，将很大可能会列入该清单。此外，各成员国还会评估该助剂的使用是否会带来不可接受的风险。

8. 美国 EPA 农药登记改进法案第三版有效期再次延长

EPA 农药登记改进法案 PRIA 3 经历了 2017 年有效期多次延长后，最近再次延长至 2018 年 12 月 7 日，PRIA 4 的颁布时间仍未确定。预计 PRIA 4 颁布后农药登记的年度维护费将从 \$2780 提高至 \$3100，登记类型将从 189 种增加至 212 种。新增的抗菌农药和常规农药登记会要求增加有机体或害虫的药效数据，新活性成分 / 新用途登记费用将提高 20%。

9. 美国 EPA 对未登记农药加大执法力度

2018 年 2 月 15 日，美国 EPA 宣布，亚马逊公司将支付 120 万美元罚款，作为其非法销售和分销在美国未经批准的进口农药和杀虫剂产品的惩罚。亚马逊同意今后密切监控并从其网站上删除非法农药产品，以“大幅度减少能够通过该在线市场获得的非法农药的数量”。

与此类似，Medline industries 公司也因销售未登记农药，在今年 9 月份被 EPA 处以将近 500 万美元的行政罚款。

10. EPA 更新《农药标签手册》

为帮助相关农药企业更好的制作农药标签，EPA 更新了《农药标签手册》的第 3,7 和 17 章，主要内容涵盖标签的基本要求、预防性声明和净含量的标注要求。EPA 下，农药标签被视为联邦法律的一部分，任何违反标签的使用行为都会被视为违法行为。



5. EU-27 Approval of Brexit Agreement Draft

After more than a year's negotiation, on November 25, 2018, the leaders of the 27 EU countries unanimously adopted the draft Brexit agreement. This indicates that the EU has reached a consensus on Brexit, which reduces the risk of no agreement. On December 11, 2018, the British Prime Minister's Office confirmed that the postponed vote of the "British Exit" draft will be held before January 21, 2019. After Brexit, the management of pesticide products will continue to comply with EU regulations during the transition period. Current active substance approval, such as PPP authorization and maximum residue levels (MRLs), are still valid in the UK and EU. Subsequently, the UK will issue national-level management requirements.

6. Release of Low-risk Active Substance List by the EU

In July 2018, the EU Commission released a list of low-risk pesticide active substances. This list contains 55 substances in total, 30 of which are microbial strains. The low-risk substances are valid for 15 years after approval, which is longer than the 10-year period of normal active substances. In addition, compared with common preparation products, the data protection period of low-risk active substances' preparation product will be extended correspondingly.

7. EU PPP Regulation Annex III – Release of List of Prohibited Additives expected by end of this year or early 2019

The EU will issue Annex III of the PPP Regulations (Regulations (EC) No 1107/2009), the List of Prohibited Auxiliaries for Pesticide Preparations, at the end of this year or early next year. It is reported that the final decision on the list will be based on material hazards and risks. In the case of hazards, substances detected with carcinogenic, mutagenic and reproductive toxicity (CMR 1A or 1B), persistence, bioaccumulation and toxicity (PBT, vPvB), persistent organic pollutants (POP), endocrine disruptors (ED) or those otherwise required by EU REACH Regulation Annex XVII and XIV will most likely be included in the list. In addition, Member States will be allowed to assess whether the use of this additive poses an unacceptable risk.

8. Effective period of US Third EPA Pesticide Registration Improvement Act is once more extended

The EPA Pesticide Registration Improvement Renewal Act (PRIA 3) was extended until the December 7, 2018 yet the date of release of PRIA 4 has yet to be determined. The annual maintenance fee for pesticide registrations after PRIA 4 is expected to increase from \$2,780 to \$3,100, and the number of registrations expected to increase from 189 to 212. The new antimicrobial pesticides and conventional pesticide registrations will require additional information, including efficacy data for organisms or pests, and new active ingredient/new use registration fees will increase by 20%.

9. US EPA increased enforcement on Unregistered Pesticides

On February 15, 2018, the US EPA announced that Amazon would pay a fine of \$1.2 million as a penalty for its illegal sale and distribution of unapproved imported pesticides and pesticide products in the United States. Amazon agreed to remove illegal pesticide products from its website and closely monitor it in the future to "substantially reduce the amount of illegal pesticides that can be obtained through this online market". Similarly, Medline Industries was imposed an administrative fine of nearly \$5 million by EPA in September for selling unregistered pesticides.

10. EPA's Pesticide Labeling Manual is updated

This latest update was released to help pesticide companies better understand the pesticide labeling process, EPA updated Chapters 3, 7 and 17 of the Pesticide Label Review Manual. Under EPA regulations, pesticide labeling is under federal law and any violation in labels is deemed illegal and subject to penalties.



# 2018 年十大农药产品动态盘点

## 1. 甲拌磷等 5 种农药将禁用

甲拌磷、涕灭威、水胺硫磷为高毒农药，为保障农产品质量安全和生态环境安全，根据《中华人民共和国食品安全法》《农药管理条例》有关规定，农业农村部计划自 2020 年 10 月 1 日起，禁止含甲拌磷、涕灭威、水胺硫磷产品在境内的销售和使用。根据《关于持久性有机污染物的斯德哥尔摩公约》规定，我国应自 2019 年 3 月 25 日起停止氟虫胺生产和使用。

另外，根据 2016 年的农药管理措施公告，自 2018 年 10 月 1 日起，全面禁止三氯杀螨醇销售、使用。

## 2. 农业农村部加强百草枯的监督管理

根据农业部第 1745 号公告和 2445 号公告，自 2014 年 7 月 1 日起，撤销百草枯水剂登记和生产许可、停止生产；2016 年 7 月 1 日停止水剂在国内销售和使用。另外，百草枯可溶胶剂登记证于 2018 年 9 月 25 日到期，不再批准境内使用登记延续，自 2020 年 9 月 26 日起禁止百草枯可溶胶剂在境内销售、使用。各级农业部门要严格执行上述规定，严禁百草枯母药在境内销售。

## 3. 美国司法部重新审理毒死蜱禁令

2018 年 5 月，夏威夷州颁布法案 SB3095，规定 2019 年 1 月起禁用毒死蜱，成为美国第一个禁用毒死蜱的州。2018 年 8 月，美国旧金山第九巡回法庭下令美国 EPA 在 60 天内在全美国境内清除所有的毒死蜱销售，禁售毒死蜱。日前，美国司法部要求美国第九巡回法庭重新审理之前发布的禁令，此举实际上延长了毒死蜱在美登记有效期。EPA 正在等待审理结果。

## 4. 美国 EPA 延长麦草畏登记有效期两年

2018 年 10 月 31 日，美国 EPA 宣布将麦草畏登记有效期延长两年，至 2020 年 12 月 20 日。麦草畏主要用于空中喷洒，防治耐麦草畏的转基因棉花、大豆田间杂草。2017 年大量的敏感作物因麦草畏漂移事故受损，因此 EPA 要求更新麦草畏标签，增加其使用限制。

## 5. 欧盟禁止 3 种新烟碱农药的室外用途

为保护数量骤减的蜜蜂种群，2018 年 4 月，欧盟委员会投票通过禁止吡虫啉、噻虫嗪和噻虫胺 3 种新烟碱农药外用途的决议，该决议于 2018 年 12 月 19 日正式实施。此外，法国的禁令更为严格，将于 2018 年 9 月 1 日起禁用五种新烟碱农药（吡虫啉、噻虫嗪、噻虫胺、噻虫啉和啉虫脒），成为欧盟第一个发布此禁令的国家。

## 6. 除草剂敌草快、草铵膦在欧盟禁用

2018 年 10 月 15 日，欧盟发布正式公告 (EU) 2018/1532，决定不再批准除草剂敌草快 (Diquat) 的再评审申请，同时修订活性物质批准清单 (EU) No 540/2011。该公告于 2018 年 11 月 4 日正式生效。此外，从欧盟官方获悉，对于草铵膦的再评审申请，已经没有企业对草铵膦的批准在欧盟进行辩护。正式禁用公告尚未发布。

# Review of Top 10 Pesticides Products Trends in 2018

## 1. MoARA to Ban Five Pesticides

Phosphate, Aldicarb and Sulphate are considered highly toxic pesticides. In order to ensure the quality and safety of agricultural products and the safety of the environment, the Ministry of Agriculture and Rural Affairs of the People's Republic of China (MoARA) has planned to ban the sale and use of products containing Phorate, Aldicarb and Hirudin as from October 1st, 2020, pursuant to the relevant provisions of the Food Safety Law of the People's Republic of China and the Regulations on the Administration of Pesticides. According to the Stockholm Convention on Persistent Organic Pollutants, China should stop the production and use of Sulfluramid from March 25, 2019.

In addition, according to the pesticide management measures in 2016, Dicofol's sale and use would be fully banned as of October 1, 2018.

## 2. The Ministry of Agriculture and Rural Areas strengthens oversight and management of Paraquat

According to Announcement No.1745 by the Ministry of Agriculture and Announcement No. 2445, since July 1, 2014, the registration and production license of Paraquat has been revoked and production has been stopped. On July 1, 2016, the sales and use of water agents was stopped in China. In addition, the Paraquat sol-gel registration certificate expired on September 25, 2018, and the domestic use registration continuation was no longer renewed. As from September 26, 2020, Paraquat sol may no longer be sold nor used in China. Agriculture departments across regions must strictly implement the above provisions and prohibit the sale of Paraquat mother drugs in China.

## 3. US Department of Justice re-examines Chlorpyrifos prohibition

In May 2018, the State of Hawaii enacted Act SB3095, banning Chlorpyrifos as from January 2019, thus becoming the first state in the United States to ban this pesticide. In August 2018, the U.S Ninth Circuit Court of the United States ordered the U.S EPA to clear all Chlorpyrifos sales across the United States within 60 days and banned its sale. Just recently, the U.S Department of Justice asked the U.S Ninth Circuit Court to re-examine the previously issued ban, which actually extended the validity period of Chlorpyrifos registration in the United States. EPA is awaiting the outcome of the trial.

## 4. US EPA extended Dicamba registration validity for two years

On October 31, 2018, the U.S EPA announced it would extend the registration validity of Dicamba for two years until December 20, 2020. The Dicamba is mainly used for aerial spraying to prevent Dicamba-resistant transgenic cotton and weeds on soybean crops. In 2017, a large number of sensitive crops were damaged by drifts of Dicamb, so the EPA requested that the label be updated with use restrictions.

## 5. Outdoor Use of Three Neonicotinoids Banned by EU

In order to protect the decreasing population of bees, in April 2018 the European Commission passed a resolution limiting the use of Imidacloprid, Thiamethoxam and Clothianidin for pesticides. The resolution was officially implemented on December 19, 2018. In particular, the French ban is more stringent, banning five new nicotine





7. 欧盟其他农药活性物质再评审动态

2018 年，先正达杀线虫剂巴斯德杆菌 Pn1、陶氏益农杀菌剂 fenpicoxamid 首次获得批准；杀虫剂啉虫脒，除草剂炔苯酰草胺、灭草松、烯草胺、唑草酮，杀菌剂苯酰菌胺、噁菌胺、肟菌酯、铜化合物，植物生长调节剂氯吡脘等农药活性物质再评审获欧盟批准；杀菌剂丙森锌、福美双、丙环唑、咪唑菌酮、唑氧灵，除草剂环氧嘧磺隆、呋草酮，杀虫剂乙螨唑、灭线磷、吡蚜酮等物质将退出欧盟市场；此外，杀虫剂甲氧虫酰肼、马拉硫磷和杀菌剂啞菌胺仅限温室使用。

8. 草甘膦争议不断

2017 年，草甘膦在欧盟成功获得 5 年续登，EPA 也公布了草甘膦的风险评估草案，得出草甘膦对人类没有致癌作用的结论，但草甘膦的各项争议并没有因此而停止。法国国会在 2018 年 9 月针对禁用草甘膦投票表决，决定使用期限延长 3 年。德国日前正在确认草甘膦最终禁止时间。而美国针对草甘膦致癌的诉讼，也在 18 年 8 月判定孟山都需赔偿患癌园丁 2.89 亿美元。

9. EFSA 发布首部纳米材料的安全性风险评估指南

2018 年 7 月，EFSA 发布了首部对纳米材料的安全性风险评估指南，本次导则主要关注纳米材料使用过程中对人类和家畜健康的影响，重点需要展开风险评估的产品包括了含纳米材料的新型食品、食品接触材料、食物和饲料添加剂以及农药产品等。随着本次指南的发布，相关纳米材料的安全性评估已进入示范性应用阶段，EFSA 将在 2019 年末根据实际使用经验修正并确定最终的评估指南。同时，第二部纳米材料风险评估指南：《纳米材料的环境风险评估指南》，相关的制定工作也将在 2019 年陆续展开。

10. 乙草胺被推荐列入《鹿特丹公约》附件 3

2018 年 9 月，《鹿特丹公约》化学品审查委员会第 14 次会议 (CRC14) 和《斯德哥尔摩公约》持久性有机污染物审查委员会第 14 次会议 (POPRC14) 在意大利罗马背靠背召开。本次会议涉及到的农药产品主要有乙草胺、甲基对硫磷，甲拌磷，氟虫胺等。委员会建议将乙草胺列入公约附件三，交由明年的缔约方大会讨论确定。甲基对硫磷的资料尤其是风险评估方面的资料需要进一步补充完善。

pesticides (Imidacloprid, Thiamethoxam, Clothianidin, Thiacloprid and Acetamiprid) researchers believe are killing off the insects, effective on September 1, 2018. France is the first country in the EU to issue the ban.

6. Herbicide Diquat, Glufosinate Banned in the EU

On October 15, 2018, EU issued an official announcement (EU) 2018/1532, which rejected the application for re-evaluation of the herbicide Diquat, and revised the Active Substance Approval List (EU) No 540/2011. The announcement came into effect on November 4, 2018. In addition, it was learned from the EU Office that no application for Glufosinate has been approved in the EU for the re-appraisal. The official ban announcement has not yet been released.

7. Re-assessment of Other Pesticide Active Substances in the EU

In 2018, Syngenta's Nematode P. aeruginosa Pn1, Dow Agrochemicals Fenpicoxamid was first approved; insecticides acetamiprid, herbicide propyzamide, bentazone, acetochlor, azole Oxalate, fungicide benzoxamide, thiabidine, trifloxystrobin, copper compound, plant growth regulator chlorpyrifos and other pesticide active substances were approved by EU again; fungicides such as zinc, thiram, propiconazole, Imidazolidone, quinoxaline, herbicides, oxysulfuron, furose, insecticides, ethazole, chlorpyrifos, pymetrozine, all withdrew from the EU market. In addition, the application of insecticides oxydans, hydrazide, malathion and fungicide azoxystrobin was restricted to greenhouses.

8. Ongoing Glyphosate dispute

In 2017, Glyphosate was successfully renewed in the EU for five years. The EPA also published a draft risk assessment for glyphosate, which concluded that glyphosate has no carcinogenic effect on humans, however, disputes continue. The French Parliament voted against the ban on Glyphosate in September 2018 and decided to extend the use period by three years. Conversely, Germany is currently confirming its final ban on Gyphosate. In the United States, the lawsuit against carcinogens in glyphosate also determined in August, 2018 that Monsanto should compensate the gardener for an amount of \$289 million.

9. First Guidance for Risk Assessment of Nanomaterials released by EFSA

In July 2018, EFSA released its first guidance for risk assessment of nanomaterials. The guide focuses on the impact the use of nanomaterials has on human health and livestock. Products that require risk assessment include new foods with nanomaterials, food contact materials, food and feed additives and pesticide products. With the release of this guide, the safety assessment of related nanomaterials has entered the demonstration application stage, and EFSA will revise and finalize the evaluation guide based on this actual experience at the end of 2019. At the same time, the second Guidance for nanomaterial in agri/food/feed will be developed in 2019.

10. Acetochlor is recommended to be added in Annex 3 of the Rotterdam Convention

In September 2018, the 14th meeting of the Chemical Review Committee of the Rotterdam Convention (CRC14) and the 14th meeting of the Persistent Organic Pollutants Review Committee (POPRC14) were held in Rome, Italy. The pesticide products involved in these meetings mainly included acetochlor, methyl parathion, phorate and flubendiamide. The Committee recommended that acetochlor be listed in Annex III of the Convention, subject to consideration, with the final decision to be made during the Conference of the Parties next year. Information on methyl parathion, especially in risk assessment, needs to be further refined.

# 2018 年中欧美消毒剂合规动态盘点

## 1. 【中国消毒产品】2018 年颁布的消毒产品相关标准

中国卫计委今年公告了三个重要的消毒产品行业标准：

- GB/T 36758 《含氯消毒剂卫生要求》
- WS 628 《消毒产品卫生安全评价技术要求》
- WS 575 《卫生湿巾卫生要求》

这三个标准的颁布影响了消毒产品备案和卫生湿巾合规的具体要求。

## 2. 【中国消毒产品】全国消毒产品信息服务平台正式上线

全国消毒产品网上备案信息服务平台于 2018 年 10 月 8 日正式上线运行。该备案平台的启动进一步完善和统一了全国的消毒产品合规体系，方便了全国消毒产品责任单位的消毒产品卫生安全评价网上备案，也有利于广大消费者时时监督消毒产品合规动态，对消毒产品合规起到了积极的推动作用。

## 3. 【中国消毒产品】消毒产品监管在路上

为了维护公平、健康的市场秩序，严厉打击制售假冒伪劣消毒产品违法行为，依据《消毒管理办法》的相关规定，市场监管人员对销售的消毒产品的生产企业卫生许可证、产品卫生安全评价报告和标签说明书等进行不定期的登记检查。例如，2018 年上海市制定了具体的消毒产品监督抽查工作计划，具体以问题为导向，以“双随机”抽查方式为基础，加强了对消毒产品的事后监管。仅 2018 年初，上海市检查了 256 家消毒产品经营单位，抽查 500 多个消毒产品，对多家违法违规销售不合格产品的经营单位进行了立案查处。

## 4. 【中国消毒产品】2017-2018 年中国消毒液十大品牌企业排名

根据品牌数据研究院（亚洲）CNPP 大数据平台的数据，以消毒液行业超过 33 个品牌信息及 35043 个网友的投票做为参考，综合分析了消毒液行业品牌的知名度、员工数量、企业资产规模与经营情况等，CNPP 发布了 2017-2018 年中国消毒液十大品牌企业排名（排名不分先后）。

No.	品牌	企业
1	Dettol 滴露	利洁时家化 ( 中国 ) 有限公司
2	威露士 Walch	威莱 ( 广州 ) 日用品有限公司
3	蓝月亮	蓝月亮 ( 中国 ) 有限公司
4	爱特福 84	江苏爱特福股份有限公司
5	MrMuscle 威猛先生	上海庄臣有限公司
6	安洁 anzeel	北京格瑞时代生物科技有限公司
7	开米 Kami	西安开米股份有限公司
8	Pursue 安利必速	安利 ( 中国 ) 日用品有限司
9	威王 Vewin	广州立白企业集团有限公司
10	洁肤柔 JiFro	上海利康消毒高科技有限公司



# 2018 Disinfectants Compliance Review for China, Europe and United States

## 1. [Chinese Disinfectants] Standards Related to Disinfection Products Released in 2018

China Health Planning Commission announced three important industry standards for disinfection products this year:

- GB/T 36758 Hygienic requirements for disinfectants with chlorine
- WS 628 Requirements for the hygiene and safety evaluation of disinfection products
- WS 575 Hygiene Requirements for Wet Wipes

These standards have affected the specific requirements for the filing of disinfection products and sanitary wipes and compliance work.

## 2. [China Disinfectants] National Disinfection Product Information Services Platform Officially Launched

The national disinfection product online filing services platform was officially launched on October 8, 2018 to further improve and unify the national disinfection product compliance system and facilitate the online safety record of disinfection products, and compliance oversight duties for disinfection products. It has had a positive effect in terms of compliance for disinfection products.

## 3. [Chinese Disinfectants] Disinfection Products Supervision On The Road

In order to maintain market order and crack down on illegal activities, according to the relevant provisions of the "Disinfection Management Rules", market supervision authorities conduct inspections at random to check hygiene licenses and product hygiene safety evaluation reports and label specifications. For example, in 2018, Shanghai formulated a specific supervision work plan, which was specifically problem-oriented based on the “double random” sampling method to strengthen post-event supervision of disinfection products. At the beginning of 2018, Shanghai inspected 256 disinfection product business units, spotted more than 500 disinfection products, and managed a number of illegal units that sold unqualified products.

## 4. [Chinese Disinfectants] 2017-2018 Ranking of China's Top Ten Disinfectant Brands

According to data released by the CNPP platform from the Brand Data Research Institute (Asia), CNPP released a ranking of the top ten Chinese disinfectant brands for 2017-2018 (in no particular order).

## 5. [EU BPR] EU Launches Incentives to Encourage Biocide Innovation

In February 2018, ECHA issued a message stating that the EU and member states determined to encourage companies to produce and use safer, less toxic substances by introducing incentives. International companies can apply for the following funding from the EU and member countries: 1) alternatives or innovative R&D funds; 2) loans and guarantees for SMEs. If a company/ individual develops a new safer and more active substance, it may be granted

No.	Brand	Company name
1	Dettol	Reckitt Benckiser (China)Co., Ltd
2	Walch	Walch (Guangzhou) Daily Necessities Co., Ltd
3	Blue Moon	Blue moon (China) Co., Ltd
4	Aitefu 84	Jiangsu Aitefu Group Co., Ltd
5	MrMuscle	Shanghai Johnson Co., Ltd
6	Anzeel	Beijing Gerui Times Biotechnology Co., Ltd
7	Kami	Xian Kami Co., Ltd
8	Pursue	Amway (China) daily necessities co., LTD
9	Vewin	Guangzhou libai enterprise group co., LTD
10	JiFro	Shanghai likang disinfection technology co., LTD



5. 【EU BPR】 欧盟推出鼓励生物杀灭剂创新的激励措施

2018 年 2 月，ECHA 发文指出随着越来越多的生物杀灭剂活性物质被评估为危害大，欧盟以及各个成员国鼓励企业生产和使用更为安全、毒性更小的物质，同时推出激励措施来支持企业寻找安全有效的替代物和研发新物质。有意向的企业可向欧盟和成员国申请资金：1) 替代物或创新研发资金；2) 适合中小型公司的贷款和担保。企业 / 个人如果研发出更为安全有效的新活性物质，则在未获得正式批准的情况下，可被授予临时授权，提前在市场上流通。使用该物质的产品后续开展授权的途径也会更加简便快捷。除此之外数据保护期可延长至 15 年。

6. 【EU BPR】 2018 年，被生物杀灭委员会（Biocidal Products Committee, BPC）禁用的活性物质 / 用途组合

2018 年，生物杀灭委员会 BPC 禁用了以下 4 种药效不达标的活性物质 / 用途组合，分别是：用于液体制冷和加工系统防腐剂的 Willaertia magna c2c Maky；用于私人、公共区域消毒以及胶片防腐用途的银沸石、银铜沸石 (CAS Number: 130328-19-7) 和磷酸锆钠银 (CAS Number: 130328-19-7)。除此之外，欧盟委员会还发布了 26 种因无人提交评估资料而被禁用的活性物质 / 用途组合名单，其中包括用于人体卫生用消毒的柠檬酸 (CAS Number: 77-92-9)；用于私人、公共区域消毒的西吡氯铵 (CAS Number: 123-03-5)；用于人体卫生用消毒，私人、公共区域消毒和兽用消毒的邻苯基苯酚钠 (CAS Number: 132-27-4)；用于纤维、皮革、橡胶和聚合物防腐剂的银 (CAS Number: 7440-22-4)；用于食品和饲料区域消毒的二氧化硫 (CAS Number: 7446-09-5)；用于液体制冷和加工系统防腐剂的氯化溴 (CAS Number: 13863-41-7) 等，相关供应链上的企业注意，做好应对措施。

7. 【EU BPR】 欧盟生物杀灭剂的产品和活性物质信息检索平台发布

2018 年 11 月，ECHA 发布一个生物杀灭剂产品检索平台，通过输入产品的商品名、用途或具体授权国家等信息，便可查阅在欧盟或具体的成员国的授权文件或审批进度，主要成分，使用指导等信息。这个平台的发布，帮助企业 和消费者通过比较做出合理的选择，极大的推动了企业的合法合规，也促进了市场的合理监督。

8. 【EU BPR】 ECHA 推出新网页为英国脱欧做准备

2018 年 11 月，ECHA 专门为英国脱欧发布了网页，告知企业英国脱欧可能带来的影响，并提出建议，指导企业应对英国脱欧。

9. 【US EPA-FIFRA】 EPA 与亚马逊就非法销售消杀产品问题达成协议

2018 年 2 月，EPA 宣布与亚马逊服务有限责任公司就非法销售消杀产品问题达成一项协议。根据协议，亚马逊将需要支付 1,215,700 美元的行政罚款，亚马逊承诺将密切监控并从其网站上下架这些非法消杀产品。此前，亚马逊线上销售的一些消杀产品在美国没有完成合法登记，但是却在亚洲长期使用，熟悉这些产品的消费者更有可能直接从亚马逊等在线渠道订购这些非法消杀产品。通过禁止亚马逊销售这些非法产品并教育第三方机构出售这些不合规的消杀产品会造成的危害，该协议将有效减少这些未登记农药产品的供应从而达到保护弱势消费群体的目的。

10. 【US EPA-FIFRA】 EPA 禁止 Pool Water Products 公司销售中国生产的未在 EPA 登记的杀菌除藻剂。

根据 EPA 的法规要求，公司在注册农药产品时必须向 EPA 提供产品的详细配方和生产数据。目的是为了保证产品的有效性和完整性。但是，Pool Water Products 公司销售的产品名为 ALL CLEAR 3” Jumbo Chlorinating Tablets 的杀菌除藻剂由于与在 EPA 注册的信息不相符（产品是在美国制造的，而 Pool Water Products 公司销售的产品是在中国制造的），从而被 EPA 禁止销售，并建议已经购买该产品的消费者联系当地的废弃物处理中心来销毁该产品。

a temporary authorization without prior approval, allowing it to circulate in the market in advance. It is easier and faster to follow up the authorization of the product using the substance.The data protection period can be extended to 15 years.

6. 【EU BPR】 Active Substance/Utility Combination Banned by the Biocidal Products Committee (BPC)

In 2018, the Biocidal Products Committee (BPC) banned the following four active substances/utility combinations: Willaertia magna c2c Maky for liquid refrigeration and processing system preservatives; disinfection and silver zeolite, silver copper zeolite (CAS Number: 130328-19-7) and sodium zinc zirconium phosphate (CAS Number: 130328-19-7) for private and public areas and anti-corrosion film.

In addition, the EU Commission has issued the banned list of 26 active substances/ utility combinations caused by a lack of assessment data, including citric acid for human sanitation (CAS Number: 77-92-9); cetylpyridinium chloride for disinfection in private and public areas (CAS Number: 123-03-5); sodium o-phenylphenolate for human health disinfection, private, public areas and veterinary disinfection (CAS Number: 132-27-4); silver for fiber, leather, rubber and polymeric preservatives (CAS Number: 7440-22-4); sulfur dioxide for disinfection of food and feed areas (CAS Number: 7446-09-5 ); bromine chloride (CAS Number: 13863-41-7) used for preservatives in liquid refrigeration and processing systems, etc. The companies in the relevant supply chain should follow these notices closely.

7. 【EU BPR】 Release of EU Biocidal Product and Active Substance Information Retrieval Platform

In November 2018, ECHA released a biocidal products search platform, which can access authorization documents, approval progress, main ingredients, and instructions in the EU and specific member countries by inputting the product name, usage or specific authorization of the country. The release of this platform aims to promote at the same time legal compliance by companies and the regular supervision of the market by authorities.

8. 【EU BPR】 ECHA's New Webpage for Brexit

In November 2018, ECHA launched a special website for Brexit to inform interested stakeholders about the possible impact of Brexit and to provide advice to companies on how to manage Brexit.

9. 【US EPA-FIFRA】 EPA and Amazon Reached an Agreement on Illegal Sales of Disinfection Products

In February 2018, the EPA announced an agreement with Amazon Services LLC to address the illegal sale of disinfection products. Under this agreement, Amazon agreed to paying an administrative fine of \$1,215,700, and in exchange Amazon promised to closely monitor and remove these illegal disinfection products from its website. Previously, some of these sold online by Amazon had not completed their legal registration in the United States. Due to the big sales in Asia, consumers familiar with these products were more likely to order these illegal disinfection products directly from online channels such as Amazon. Therefore, by prohibiting selling and educating third parties about the danger posed by these non-compliant disinfectants, the agreement will effectively reduce their supply and thus protect vulnerable consumers.

10. 【US EPA-FIFRA】 EPA Prohibits Pool Water Products, Inc. from Selling Chinese-made Bactericidal Algaecides not Registered with the EPA.

According to EPA regulations, companies must provide EPA with detailed formulation and production data when registering disinfection products to ensure the validity and integrity of the product. However, the sterilization algaecicides ALL CLEAR 3 Jumbo Chlorinating Tablets sold by Pool Water Products, Inc. failed to match the information filed with EPA (the products are made in the US, yet the products sold by Pool Water Products, Inc. are made in China). As a result, the American company was banned from selling these products, and consumers who purchased the product were advised to contact their local waste disposal centers to dispose of the product.



# 健康消费品

## 进口消费品市场分析

2018 年 11 月 5-10 日，首届中国国际进口博览会在上海国家会展中心圆满举行。进博会是全球第一个以进口为主题的大型国家级展会，反映出中国消费者增长推动进口业务持续发展，中国已经成为全球最大进口消费国。未来 15 年，中国预计还将进口 24 万亿美元商品。可以说，中国进口消费市场潜力巨大。来自世界银行的数据显示，2010 年至 2016 年间，中国进口消费品占比一直维持在总进口额的 10% 以上，充分体现出中国消费者对进口消费品的旺盛需求。

2018 年，尽管存在贸易摩擦，但是我国消费品进口值仍维持在高位。据海关统计，今年上半年，我国进口消费品 5585.1 亿元，较去年同期增长 7.7%，占同期我国进口总值的 8.4%。

过去 5 年，中国社会消费品零售总额以持续超过 10% 在增长，在 2017 年达到了 36.63 万亿元。2018 年 1 月到 11 月，达到 34.51 万亿元，同比增长 8.1%，增速虽有所下滑，但是由于总量的持续增加，增长依然十分可观。

社会消费品零售总额持续增长（数据来源：国家统计局）  
Figure 1: Total retail sales of consumer goods continues to grow Sources: NBS



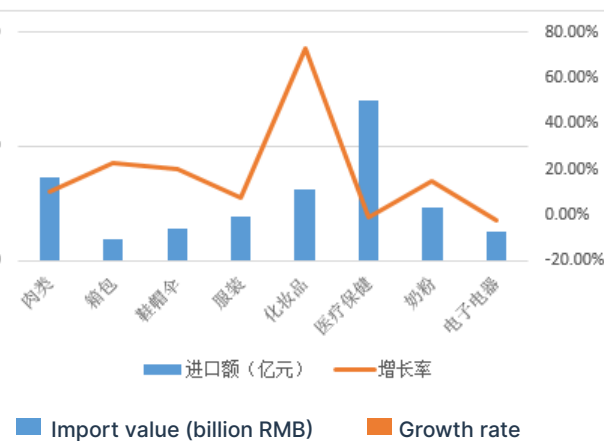
### 进口消费品需求旺盛

据统计，2018 年上半年，我国居民人均可支配收入 14063 元，同比增长 8.7%，人均消费支出 9609 元，同比增长 8.8%。随着我国居民收入水平的提高和消费结构的升级，对进口消费品的需求也越来越旺盛。

来自中国海关数据显示，2018 年上半年中国的进口消费品市场品类如服装、家居、食品、化妆品，文教用品类等消费品的进口都出现不同程度的增长。其中，进口化妆品，大幅增长超过 70%。由于国家的二胎政策，进口母婴用品市场规模扩大，婴幼儿服装和奶粉也是促使进口消费品增长的其中一大重要品类。而由于国产电子品牌的崛起，电子电器类则出现了 2.5% 的负增长。

这里需要注意的是，进口额的下降并不意味着中国消费者对这类进口产品不再有需求，而是会再三对比相似产品的情况。

2018 年上半年进口消费品细分品类进口额和增长率一览  
(数据来源：中国海关)  
Figure 2: Import Value and Growth Rate of imported consumer goods in the first half of 2018  
Source: China Customs



# Consumer Products

## Analysis of Imported Consumer Goods Market

On November 5-10, 2018, the first China International Import Expo was successfully held at the National Exhibition and Convention Center (Shanghai). The Expo is the world's first large-scale national exhibition for imports, which focused on the effect of Chinese consumer growth on the development of the import business, especially since China has now become the world's largest import consumer. In the next 15 years, China is expected to import 24 trillion US dollars' worth of goods. Thus, China's import consumer market has great potential. According to data from the World Bank, from 2010 to 2016, China's consumer goods imports accounted for more than 10% of total imports, fully reflecting the strong demand of Chinese consumers for imported goods.

In 2018, despite the ongoing trade conflict, China's import value for consumer goods remained at a high level. According to customs statistics, in the first half of this year, China imported 558.51 billion RMB worth of consumer goods, an increase of 7.7% over the same period last year, accounting for 8.4% of China's total import value during this time period.

In the past five years, the total retail sales of consumer goods in China has continued to grow by more than 10%, reaching 36.63 trillion RMB in 2017. From January to November 2018, it reached 34.51 trillion RMB, an increase of 8.1% year-on-year. Although the growth rate has been reduced, the level of growth is still considerable due to the continuous increase in the total volume.

### Strong Demand for Imported Consumer Goods

According to statistics, in the first half of 2018, the per capita disposable income of Chinese residents was 14,063 RMB, an increase of 8.7% year-on-year, and the per capita consumption expenditure was 9,609 RMB, which shows an increase of 8.8%. With the improvement of the level of income of residents and the increase in consumption, the demand for imported consumer goods continues its upward trend.

According to data obtained from China Customs, in the first half of 2018, China's imports of consumer goods, such as clothing, household, food, cosmetics, cultural and educational supplies, and other consumer goods increased in varying degrees.

Among them, imported cosmetics grew by more than 70%. Due to the country's second-child policy, the market for imported maternal and child products has expanded, and infant and young children's clothing and milk powder are also amongst the most important categories for the growth of imported consumer goods. Meanwhile, due to the rise of domestic electronic brands, electronic and electrical appliances experienced a 2.5% negative growth.

It should be noted that the decline in imports does not directly mean that there is no demand for such imported products, but consumers will repeatedly compare the demand for similar products.

此外，根据商务部 2018 年 5 月公布的调查显示，消费者对主要消费品的关注度排行如下图，其中食品、服装、化妆品、电子电器、家居和家装用品、母婴用品比例分别为 76.8%、51%、48.4%、36.4%、31.7% 和 27%。



从购买意愿和消费者关注点来看，食品、化妆品，服装鞋帽，电器电子，钟表眼镜，珠宝首饰，母婴用品是消费者未来最有意愿增加购买的品类。消费者对以上品类的关注主要是：安全、品质、价格、设计等。

具体到细分品类，如食品类的水产海鲜和保健品，服装类的运动鞋，母婴类的婴幼儿奶粉和辅食，电子电器类的摄影器材、电动牙刷和家用清洁机器人，钟表类的手表等，这些品类暂时还无法满足消费者的需求。因此，这些品类在进口消费品市场存在较大的发展前景。

2018 年进口消费品类需求调查汇总

	购买意愿	消费者关注点	进口需求较高的品类
食品	较强 ↑ 29.7% ↓ 18.9%	安全 价格 原料	鲜奶 保健品 水产海鲜 鲜果
服装鞋帽	较强 ↑ 26.3% ↓ 19.1%	款式 价格 舒适	运动鞋 休闲服装 鞋 / 靴
化妆品	较强 ↑ 38% ↓ 12.7%	品质 安全	护肤品
电器电子	较强 ↑ 28.5% ↓ 20.6%	功能 安全 价格	摄影器材 净水器 空气净化器 电动牙刷 家用清洁机器人
家居和家装用品	一般 ↑ 25.5% ↓ 23.5%	品质 安全	锅类 箱包
母婴用品	较强 ↑ 36.9% ↓ 19.1%	安全 原料	婴幼儿纸尿裤 婴幼儿奶粉 婴幼儿辅食
乘用车	较强 ↑ 34.7% ↓ 19.7%	安全 性能	SUV 新能源
文教体育休闲用品	稍强 ↑ 26.8% ↓ 19.3%	品质 安全	户外装备 健身器材
钟表眼镜	较强 ↑ 37.1% ↓ 16%	设计 价格 材质 品牌文化	手表 太阳镜 眼镜
珠宝首饰	稍强 ↑ 32.5% ↓ 21.1%	设计 价格 材质 品牌文化	钻石 珍珠玉石 金

In addition, according to the survey released by the Ministry of Commerce in May 2018, consumers' attention to major consumer products follows the trend shown in Figure 3 below. The proportion of food, clothing, cosmetics, electronic appliances, household and home improvement products, maternal and child supplies are 76.8%. 51%, 48.4%, 36.4%, 31.7% and 27%, respectively.

From customers' purchase intention, food, cosmetics, clothing, shoes, electrical appliances, watches and clocks, jewelry, maternal and child products are the products that consumers are most willing to increasingly purchase. The most frequently mentioned factors influencing consumers' intention with respect to the above categories are: safety, quality, price, design, etc. The following specific sub- categories, consumers believe still fail to meet demand, including aquatic seafood and health food products, sports shoes for clothing, infant milk powder and complementary food for mother and babies, photographic equipment for electronic appliances, electric toothbrush and household cleaning robot, watches and clocks etc. Therefore, it can be seen that the above categories still have plenty of space to develop in the imported consumer goods market.

Table 1 Summary of 2018 On-demand Imported Consumer Goods Survey

	Purchasing Will	Customer Concern	Strong demand for imports by product
Food	Strong ↑ 29.7% ↓ 18.9%	Safety Price Material	●Milk ●Health Care Product ●Seafood ●Fruit
Clothing and shoes	Strong ↑ 26.3% ↓ 19.1%	Varity Price Comfort	●Sneaker ●Causal Cloth ●Shoes/Boots
Cosmetics	Strong ↑ 38% ↓ 12.7%	Quality Safety	●Skin care products
Electronics	Strong ↑ 28.5% ↓ 20.6%	Function Safety Price	●Photographic Equipment ●Water Cleanser ●Air Cleanser ●Electric Toothbrush ●Household Cleaning Robot
Home Furnishings	Normal ↑ 25.5% ↓ 23.5%	Quality Safety	●Pan ●Bag
Maternal and Child Products	Strong ↑ 36.9% ↓ 19.1%	Safety Material	●Baby Diaper ●Infant and Baby formula ●Infant and Baby Dietary Supplements
Automobile	Strong ↑ 34.7% ↓ 19.7%	Safety Function	●SUV ●New Energy
Culture, Education, Sports and Leisure Products	Moderate ↑ 26.8% ↓ 19.3%	Quality Safety	●Outdoor Equipment ●Fitness Equipment
Watch and Glasses	Strong ↑ 37.1% ↓ 16%	Design Price Texture Culture	●Watch ●Sunglasses ●Eye Glasses
Jewelry	Strong ↑ 32.5% ↓ 21.1%	Design Price Texture Culture	●Diamond ●Pearls and Jade ●Gold

降低关税助力进口发展

自 2015 年以来，中国多次降低部分消费品进口关税，部分日用消费品进口关税下调，刺激了相关消费品进口增长。

日用消费品关税下调一览（2015 年 - 至今）（数据来源：根据网上公开资料整理）

- 2015.6.1 降低部分服装、鞋靴、护肤品、纸尿裤等日用消费品的进口关税税率，平均降幅超过 **50%**
- 2016.1.1 降低部分箱包和服装，真空保温杯，太阳镜等 **16** 项商品进口关税
- 2017.1.1 进一步降低金枪鱼，北极虾，蔓越莓等特色食品和雕塑品原件等文化消费品，共 **16** 项商品进入降税清单
- 2017.12.1 降低 **187** 项日用消费品进口税率，涵盖食品，保健品，药品，日化用品，衣服鞋帽，家用设备，文化娱乐，日杂百货等各类消费品
- 2018.7.1 降低 **1449** 个税目日用消费品的关税税率，涵盖食品，服装鞋帽，家居用品，日杂百货，文体娱乐，家用电子，日化用品，医药健康等八类日用消费品，平均降幅 **55.9%**
- 2019.1.1 对 **706** 项商品实施进口暂定税率，涵盖生鲜食品、纺织服装、化工制品、医疗器械等多种类别



2018 年 7 月 1 日起的降税涉及 1449 个税目，降税的部分消费品也以中国消费者日常热衷海淘的商品为主，税率平均降幅在 50% 以上。这一利好政策会为中国消费者带来更丰富的进口消费品品类，中国消费者也会有更多的选择，同时价格也会便宜很多。

主要涉及的商品类别	进口关税平均税率变化
服装鞋帽，厨房和体育健身用品等	由 15.9% 降至 7.1%
洗衣机，冰箱等家用电器	由 20.5% 降至 8%
养殖类，捕捞类水产品和矿泉水等加工食品进口税	由 15.2% 降至 6.9%
洗涤用品和护肤，美发等化妆品及部分医药健康类等	由 8.4% 降至 2.9%

主要商品进口关税下调汇总（数据来源：海关总署）

Tariff Reductions to Contribute to Development of Imports

Since 2015, China has repeatedly lowered import tariffs on some consumer goods (Figure 4). The lowering of import tariffs on general consumer goods has considerably increased the domestic consumption of imported goods.

Figure 4 Tariff reduction List for General Consumer Goods (2015-2018)

- 2015.6.1 China slashed import tariffs on selected consumer goods such as clothing, shoes and boots, skincare products and diapers at a rate averaging more than **50%.**
- 2016.1.1 China cut import tariffs on **16** categories of goods, such as suitcases, bags, clothing, vacuum-insulated cups and sunglasses.
- 2017.1.1 China announced tariff reductions for another **16** categories of goods, including specialty food such as tuna, arctic shrimp and cranberry.
- 2017.12.1 China lowered tariffs on **187** taxable items of daily consumer goods, including food, health supplements, pharmaceuticals, household chemicals products, clothing, footwear and headgear, household devices, cultural and recreational products and essential commodities.
- 2018.7.1 China reduced tariffs on **1,449** taxable items of daily consumer goods by **55.9%** on average. The tariff cut involved eight categories of consumer goods, including food, clothing, footwear and headgear, household products, essential commodities, cultural, sports and recreational products, household appliances, household chemicals products, pharmaceuticals and health products.
- 2019.1.1 China began applying a provisional tariff on the import of **706** products, including fresh food, textile and clothing, chemicals products, medical appliances, etc.

A decrease in taxes on 1449 imported goods was implemented on July 1, 2018. Most were goods that consumers would purchase through overseas shopping websites. For such goods the tax rate has on average dropped by more than 50%. This favorable trade policy brought a greater abundance of imported goods to Chinese consumers, ultimately giving more choices for better prices.

Main categories of goods	Change in the average rate of import duty
Clothing , shoes, hats, goods for kitchen and fitness	Drop from 15.9% to 7.1%
Washing machines, refrigerators and other household appliances	Drop form 20.5% to 8%
Processed foods such as aquaculture, fishing aquatic products and mineral water	Drop from 15.2% to 6.9%
Washing products and cosmetics such as skin care, hair and some medical and health products	Drop from 8.4% to 2.9%

Table 2 Tariff Reduction Summary of major imported goods

In addition, since January 1, 2019, China is imposing a temporary import tax rate on 706 items, covering fresh food, clothing, chemical products, medical equipment and other categories. Common foods such as frozen goods, 2019 tentative tax rate is 2%, milk protein partial hydrolysis formula and other special infant formula will be 0 as well as some pharmaceutical production materials will also be 0.



跨境电商市场未来可期

2014 年以来，跨境电商市场规模逐渐增大，通过跨境电商平台可以轻松买到全球各地的商品。越来越多的中国消费者倾向于通过跨境电商购买进口商品。

根据海关统计，2017 年我国跨境电商零售进口 566 亿元，同比增长 75.5%。2018 年 1-10 月跨境电商零售进口 672 亿元，同比增长 53.7%。

2016 年以来，消费者对进口消费品的需求不再是满足生活所需，而是更偏重提升生活的品质。2018 淘宝全球购海淘白皮书显示，值得注意的是，今年“黑科技护肤”的搜索量同比增长 427.19%，美容仪器的增长高达 56%，其中洗脸刷增长 117%，射频仪器增长 156%，瘦脸仪增长 104%，说明科技护肤是中国消费者的需求。当然，除了美容仪器，母婴用品，数码家电、美妆服饰、保健品、食品等进口消费品增速也非常快。

1) 对进口跨境电商的政策支持

我国自 2014 年 7 月出台的“保税跨境贸易电子商务”，推动了跨境电商零售进口保税模式的诞生，是中国对跨境电商监管模式做出的制度创新。

2018 年跨境电商最新政策：

对跨境电商零售进口商品不执行首次进口许可批件、注册或备案要求，而按个人自用进境物品监管。

将政策适用范围从之前的杭州等 15 个城市，再扩大到北京、沈阳、南京、武汉、西安、厦门等 22 个新设跨境电商综合试验区的城市。

在对跨境电商零售进口清单内商品实行限额内零关税、进口环节增值税和消费税按法定应纳税额 70% 征收基础上，进一步扩大享受优惠政策的商品范围，新增需求大量的 63 个税目商品。

以上均是从 2019 年 1 月 1 日起正式实施。值得关注的是，新增了 63 个税目商品，包括部分食品、纺织服装、鞋靴、首饰、小家电、文体用品、健身器材等商品类别，品类包含配方奶粉等食品饮料、服装鞋帽、家用电器，以

及部分化妆品、纸尿裤、塑料马桶坐圈及盖、儿童玩具、保温杯等，调整后的清单共 1321 个税目。这份清单也被业内称为跨境电商零售进口的“正面清单”。

根据相关主管部门的意见，清单内的商品将免于向海关提交许可证件，直购商品按照个人物品监管要求执行，网购保税商品“一线”进区时需按货物监管要求执行，“二线”出区时参照个人物品监管要求执行。依法需要执行首次进口许可批件、注册或备案要求化妆品、婴幼儿配方奶粉、药品、医疗器械、特殊食品（包括保健食品、特殊医学用途配方食品等）等，按照国家相关法律法规的规定执行。

在 2018 年，无论是从 7 月开始降低部分进口消费品关税，还是到 7 月增设跨境电商综合试验区，再到 11 月召开首届进博会，12 月“正面清单”的发布，随着跨境电商政策的不断完善，行业监管日趋明朗，促进跨境电商的健康发展。再加上物流速度的不断提高，跨境网购的购物周期大大缩短。



A Brilliant Future for Cross-Border E-Commerce Market

Since 2014, cross-border e-commerce (CBEC) has grown at a fast pace. Now it is easy and efficient to buy goods from all over the world through CBEC platforms. More and more Chinese consumers resort to CBEC to buy imported goods.

According to customs statistics, China's CBEC retail imports in 2017 were 56.6 billion yuan, a year-on-year increase of 75.5%. From January to October 2018, CBEC imported retail value was 67.2 billion yuan, a year-on-year increase of 53.7%.

Going back to 2016, consumer demand for imported goods could no longer be met, emphasizing a demand for better quality of life. The 2018 Taobao's Haitao White Paper shows that the "black technology skin care" search volume increased by 427.19% in 2018, beauty equipment increased by 56%, of which wash brush increased by 117%, RF instruments increased by 156%, face-lift instruments increased by 104%. This indicated a definite increase in demand for skin care technology by Chinese consumers. In addition, maternal and child care products, digital home appliances, fashion, health products, food and other imported consumer goods also showed a very fast growth rate.

1) Policy support for CBEC imports

In 2014, China's bonded warehouse mode spurred the birth of China's current CBEC imported retail model, which has also been innovative in creating a supervisory system to monitor the high volume level of imported goods now entering the country.

The latest policy updates for CBEC in 2018 are as follows:

- Ø CBEC retail imports, the first-time import license approval, registration or filing requirements will not be implemented in favor of implementation of personal use imported goods instead.
- Ø The scope of policy application will be expanded from 15 to 22 cities designated as CBEC comprehensive experimental zones now including Beijing, Shenyang, Nanjing, Wuhan, Xi'an and Xiamen.
- Ø On the basis of the zero-tariff for commodities on the approved list for CBEC retail import and 70% statutory taxable on import-related value-added tax and consumption tax, the scope of goods enjoying the preferential policies will be further expanded by adding 63 taxable items that show increased demand.

All of the above will be officially implemented on January 1, 2019. The new list added 63 taxable items include commodities in the categories of food, textile and clothing, shoes and boots, jewelry, small household appliances, cultural and sports goods, fitness equipment as well as other commodity categories. The categories include food and beverages such as infant formula, clothing, shoes and hats, and household goods. Electrical appliances, as well as some cosmetics, diapers, plastic toilet seats and covers, children's toys, vacuum flasks, etc., the adjusted list has a total of 1321 taxable items. This list is also referred to as the “positive list” for CBEC retail imports.

According to the relevant authorities, the goods on the list will be exempt from the requirement to submit a license to customs and the direct purchases will be implemented in accordance with the requirements for the supervision of personal goods. The “first line” of online purchase of bonded goods shall be carried out in accordance with the requirements of goods supervision, and the “second line” shall refer to the requirements for personal item supervision. According with national laws and regulations, it is necessary to implement first-time import license approvals for cosmetics registration and/or filing requirements, infant formula, medicines, medical equipment, special foods (including health foods and formulas for special medical use), etc.

In 2018, the following have been the most significant events for Chinese import regulations:

- 1) July - Tariff reduction on a number of imported consumer goods,
- 2) July - Establishment of new comprehensive CBEC test zones,
- 3) November - The first China International Import Expo,
- 4) December - release of the “positive list” for imported CBEC commodities.

Throughout the year, continuous improvement of CBEC policies and increasingly clear industry regulations all contributed to the healthy development of CBEC. This, coupled with the continuous improvement of logistics speed, greatly shortened the shopping cycle for cross-border online shopping.

## 2) 进口消费品销售爆发式增长

根据阿里研究院数据，在过去四年多时间里，天猫国际已引进 75 个国家 3900 个品类近 19000 个海外品牌进入中国市场，其中八成以上是首次入华，并且 2017 年天猫国际的消费者人数是 2014 年的 10 倍。

2018 年 11 月 11 日（“双 11”），天猫国际平台多个跨境进口品牌实现销售过亿元，上百个国际品牌成交过千万元。澳大利亚 swisse、日本 moony、澳大利亚 chemist warehouse、德国爱他美等品牌跨境电商成交额过亿。

从数据来看，最受欢迎进口品类 TOP5：美妆、母婴、

保健（健康）、服装服饰和数码家电。日本、美国、韩国、澳大利亚、德国、英国、法国、西班牙、新西兰、瑞士为 2018 年双 11 最受欢迎的进口产品来源地。

## 3) 消费群体庞大

据电子商务研究中心监测数据显示，2018 年市场消费主力群体逐渐过渡到 80 和 90 后，80、90 后大多是学历高、工作收入稳定，有一定的经济基础，是跨境网购的“主力军”。同时 80 和 90 的女性大多已经结婚生子，更愿意在进口跨境电商平台购买高质量的海外母婴产品。此外，00 后和 10 后从小就面临来自世界各地的琳琅满目的商品，并且受父母消费习惯的影响，未来会成为海淘消费潜力军。



## 一般贸易市场持续发展

不可否认，企业通过跨境电商能够快速进入市场，像一些严管类产品（保健品，奶粉，化妆品等）想要通过一般贸易的模式进入中国市场可能需要 1-3 年时间，而通过跨境电商可能只需要几个月的时间。但同时跨境电商受到政策的影响很大，这些品类面临很大的不确定性，因此，这些品类的品牌商一定要及时关注政策的变化。由于一般贸易和跨境电商两种模式互相之间并不冲突，现在很多企业采取跨境电商和一般贸易并重的发展模式，通过跨境电商可以快速进入市场和降低成本发展，而完善的一般贸易又可以使企业在中国市场的风险可控。

此外，需要关注的是“正面清单”之外的商品，从 2019 年 1 月 1 日起，将不再能以跨境电商零售进口的方式进入国内市场。

在一般贸易下，中国市场的进口手续相对复杂一些，对于某些化妆品和食品来说，只有完成了注册备案等监管要求的消费品才能进入中国市场，其他消费品也需要符合相应的国家标准才能进入中国市场。

近年来，为保障消费者的健康安全，不仅中国，其他国家的消费品相关法规标准也越来越多，而且日趋严格。比如电子电器产品，如果通过一般的贸易进入中国市场，需要满足中国 RoHS 的限量要求和标签要求，也可能涉及到中国强制性产品认证。对于纺织产品及服装来说，需要符合限量物质的要求和标签的要求等。如果不符合中国的相关标准，可能会面临被禁止入境以及被通报的风险。

## 2) Explosive growth in sales of imported consumer goods

According to the data of the Ali Research Institute, in the past four years, Tmall International introduced nearly 19,000 overseas brands from 3,900 categories coming from 75 countries, and more than 80% of them are entering China for the first time. The consumer number of Tmall International is 10 times that of 2014.

On November 11th (“Double 11”), 2018, many cross-border imported brands on Tmall International Platform achieved sales of over 100 million RMB, while hundreds of international brands recorded sales of over 10 million RMB. The turnover of some Cross-border brands such as Australia's Swisse, Japan's Moony, Australia's Chemist Warehouse and Germany's Aihemei reached over 1 billion RMB.

Data shows the top 5 most popular imports by category are beauty, maternal and child, healthcare, clothing and digital home appliances. In 2018, Japan,

the United States, South Korea, Australia, Germany, the United Kingdom, France, Spain, New Zealand, and Switzerland were the most popular countries of origin for imported products.

## 3) A large consumer base

According to the monitoring data of the E-Commerce Research Center, in 2018, the largest consumer groups shifted from those born in the 80s to those in the 90s. Most of those belonging to 80s and 90s are highly educated, with stable income, and a certain economic base. They are the main force driving cross-border online shopping. At the same time, most 80s and 90s women are married and have children, and thus pushing demand for high-quality overseas maternal and children products on CBEC platforms. In addition, the 00s and 10s also demand for a wide range of imported goods and are also influenced by their parents' consumption habits. In the near future, they are expected to become the main consumer force for "Haitao" or e-border commerce.

## Continuous development of General Trade

It is undeniable that enterprises can quickly enter the market through CBEC. Through general trade channels it takes some product categories, i.e. health foods, milk powder, cosmetics, 1-3 years to gain market entry approval, while CBEC channel may only take a few months. At the same time, the reliability of CBEC is less certain due to constant threat of new regulations imposing stricter access. Therefore, brands in the categories requiring pre-market registration for general trade channel must constantly pay attention to up-and-coming policies changes, or be left out of the market. Since general and CBEC are not in do not conflict, many companies now adopt a mix model consisting of both CBEC and general trade. Through CBEC, they can quickly enter the market at a reduced cost, while in general trade they can more efficiently mitigate risks of non-compliance.

In addition, it is necessary to pay attention to goods not included in the “positive list”. These goods will not be able to enter the domestic market via CBEC

as of January 1, 2019.

For general trade, the import procedures to enter the Chinese market are more complex. For some cosmetics and foods, only consumer products that have completed pre-market regulatory requirements, such as registration and filing, can enter the Chinese market. Other consumer products must also comply with corresponding national standards before entering.

In recent years, in order to protect the health and safety of consumers, China and other countries have tightened regulations for consumer products. For example, if an electronic product wants to enter the Chinese market via general trade, it needs to first meet the Chinese RoHS limit and labeling requirements. It may also be required to obtain China's compulsory product certification. For textile products and garments, it is necessary to meet the requirements for limited substances as well as labeling. If found non-compliant, the seller may face risk of suspension or market ban.



主要消费品相关法规汇总

产品类型	主要标准
电子电器	<ul style="list-style-type: none"><li>● 中国 RoHS</li><li>● CCC 认证</li><li>● GB/T 26572-2011 电子电气产品中限用物质的限量要求</li><li>● SJ/T 11364-2014 电子电气产品有害物质限制使用标识要求</li></ul>
纺织产品及服装	<ul style="list-style-type: none"><li>● GB 18401 国家纺织产品基本安全技术规范</li><li>● GB 31701 婴幼儿及儿童纺织产品安全技术规范</li><li>● GB 20400-2006 皮革和毛皮 有害物质限量</li><li>● GB 21550-2008 聚氯乙烯人造革有害物质限量</li><li>● GB 5296.4-2012 消费品使用说明 – 第 4 部分 纺织品和服装使用说明</li><li>● GB/T 18885-2009 生态纺织品技术要求</li></ul>
鞋类	<ul style="list-style-type: none"><li>● GB/T 2703-2017 鞋类 术语</li><li>● GB 30585-2014 儿童鞋安全技术规范</li><li>● QB/T 2673-2013 鞋类产品标识</li><li>● GB 25038-2010 胶鞋健康安全技术规范</li><li>● GB 25036-2010 布面童胶鞋</li></ul>
玩具	<ul style="list-style-type: none"><li>● GB 6675.1-2014 玩具安全 第 1 部分：基本规范</li><li>● GB 6675.2-2014 玩具安全 第 2 部分：机械与物理性能</li><li>● GB 6675.3-2014 玩具安全 第 3 部分：易燃性能</li><li>● GB 6675.4-2014 玩具安全 第 4 部分：特定元素的迁移</li></ul>
文具	<ul style="list-style-type: none"><li>● GB 21027 学生用品的安全通用要求</li><li>● HJ 572 环境标志产品技术要求 文具</li><li>● QB/T 2960 彩泥</li></ul>

注：中国标委会或标准发布的相关机构一般仅发布中文版标准，如需其他语言版本请联系华测瑞欧。

综上所述，中国消费者对进口消费品需求较强，对于希望进入中国市场的品牌企业来说，跨境电商无疑是目前一个高效、快速的选择。但完善的一般贸易模式又可以达到风险可控，并且可以拥有更广阔的市场。为了能够在中国市场持续发展，企业可以从以下 3 个方面去思考：

1. 了解跨境电商平台及相关政策要求，及时关注政策动态，并且深入了解中国市场的消费需求；
2. 通过一般贸易进入中国市场的产品，需熟悉相关产品的标准要求，实时关注标准更新情况；
3. 以消费者需求为中心，做好品牌的营销工作。

Table 3 Summary of relevant regulations for major consumer goods

Product Category	Relevant Standard
Electronic Appliances	<ul style="list-style-type: none"><li>● China RoHS</li><li>● CCC Certificate</li><li>● Requirements for restricted substances in electrical appliances</li><li>● Restriction of Hazardous substance use in electrical and electronic products</li></ul>
Textile products and clothing	<ul style="list-style-type: none"><li>● GB 18401 National Textile Products Basic Safety Technical Specifications</li><li>● GB 20400-2006 Limited Hazardous substances for Leather and Fur</li><li>● GB 21550-2008 Limited Harmful Substances for Polyvinyl Chloride Artificial Leather</li><li>● GB 5296.4-2012 Instructions for Consumer Goods – Part 4 Instructions for Textiles and Clothing</li><li>● GB/T 18885-2009 Technical Requirements for Ecological Textiles</li></ul>
Footwear	<ul style="list-style-type: none"><li>● GB/T 2703-2017 Term of Footwear</li><li>● GB 30585-2014 safety Technical Specifications for Children's shoes</li><li>● QB/T 2673-2013 Identification of Footwear product</li><li>● GB 25038-2010 Health and Safety Technical Specifications for Rubber shoes</li><li>● GB 25036-2010 Children rubber shoes with Cloth cover</li></ul>
Toys	<ul style="list-style-type: none"><li>● GB 6675.1-2014 Toy Safety - Part 1: Basic Specifications</li><li>● GB 6675.2-2014 Toy Safety - Part 2: Mechanical and Physical Properties</li><li>● GB 6675.3-2014 Safety of Toys - Part 3: Flammability</li><li>● GB 6675.4-2014 Toy Safety Part 4: Migration of specific Elements</li></ul>
Stationery	<ul style="list-style-type: none"><li>● GB 21027 General Requirements for the Safety of Student Supplies</li><li>● HJ 572 Technical Requirements for Environmental Labeling Products</li><li>● QB/T 2960 Color mud</li></ul>

Note: The Chinese Standards Committee or the relevant institutions issue standards in Chinese. For other language versions, please contact REACH24H.

In summary, Chinese consumers have a strong demand for imported consumer goods. For enterprises that want to enter the Chinese market, CBEC is an efficient and fast choice. However, the general trade model can better achieve risk control and market expansion.

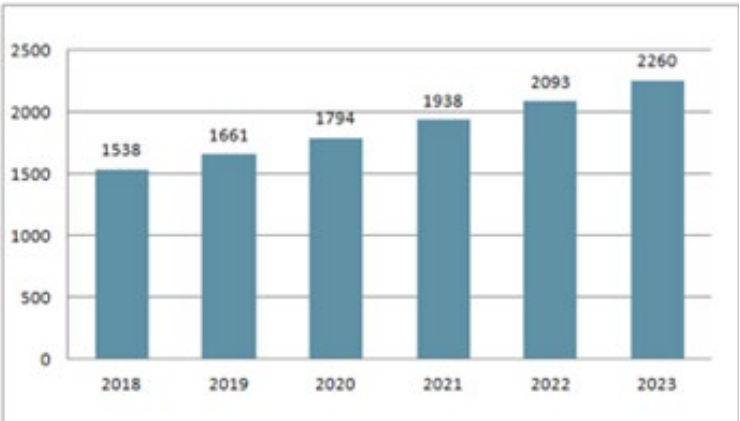
To ensure market development in China, companies should consider the following three aspects:

1. Understand CBEC platform and relevant policy requirements, pay attention to policy trends, and gain in-depth understanding of consumer demand in the Chinese market;
2. Products that enter the Chinese market through general trade need to be familiar with national standards and product requirements as well as pay close attention to any policy updates;
3. Focus on consumer demand and conduct brand marketing.



# 中国婴幼儿奶粉行业分析

在政府扶持、行业整合以及二胎政策松绑等利好因素下，婴幼儿奶粉行业发展前景比较乐观。预计婴幼儿奶粉市场规模仍将继续扩张，在 2023 年将达到 2260 亿元。不过市场规模增速会逐渐放缓，预计未来几年内将保持在 8% 左右的增幅。



婴幼儿奶粉行业市场容量：亿元  
Infant milk powder industry market capacity: 100 Million RMB  
2018-2023 年中国婴幼儿奶粉行业市场容量预测（来源：前瞻产业研究院）  
Market Capacity Forecast of China's Infant Milk Powder Industry 2018-2023 (Source: Prospective Industry Research Institute)

2016 年 10 月 1 日，被称为“史上最严奶粉新政”的《婴幼儿配方乳粉产品配方注册管理办法》出台，规定婴幼儿配方奶粉的产品配方必须通过国家食品药品监督管理总局（现并入国家市场监督管理总局）的注册后才能生产销售，并且从 2018 年 1 月 1 日起未取得注册的品牌，将不得在我国境内销售婴幼儿配方乳粉产品。在此政策影响下，众多小品牌、小型乳企将逐步退出国内市场，预计未来五六线城市会出现进口奶粉市场空白情况，对于顺利通过注册的品牌是极大的市场机会。

截止 2018 年 12 月，已获得婴幼儿配方乳粉注册的奶粉配方 1195 个，其中国产配方 915 个来自于 106 家企业，进口配方 280 个来自于 47 家企业，尚有 52 家企业 460 多个配方处于审批环节。

总局对国内和进口企业审查的标准是一致的，但从目前注册情况来看，国内企业注册占配方总数 75%，进口企业配方注册仅占注册配方总数的 25%。造成这一现象的主要原因有以下几方面：

一、在注册管理办法发布之初，当如何注册的细节要求并不明朗时，国外企业普遍持观望态度，注册准备的启动时间明显迟于国内企业。

二、本身进口企业在准备资料时就会涉及更多的程序，比如中英文翻译、公证认证、针对国外工厂技术资料的往来沟通等，用时就会略长于国内企业。

三、今年机构改革之后，虽然法规并未发生变动，但实际上总局对于婴幼儿配方乳粉的注册审批从严处理，工厂必须要通过总局现场审核才能获得配方注册。总局受到出国经费和现场审核专家排期的限制，导致国外企业的现场审核进展缓慢，影响国外企业的注册审批进度。

自奶粉新政发布以来，多家企业委托华测瑞欧进行婴幼儿配方乳粉申报并获批通过。正在进行中的，已有一家通过技术评审，正在等待行政审批。华测瑞欧会始终提供快速专业的咨询服务帮助客户解决合规问题，为企业和行业的发展贡献力量。

# Analysis of Chinese Infant Milk Powder Industry

Given the favorable conditions afforded by government support, industry consolidation and the second-child policy, prospects for sustained development of the infant formula milk powder industry are optimistic. It is expected that the size of the market will continue to expand, reaching 226 billion yuan in 2023. However, the growth rate of the market is expected to gradually slow down with an expected 8% increase in the next few years.

On October 1, 2016, the “Regulations on the Registration Management of Formulas for Infant Formula Milk Powder Products”, which was called “the strictest milk powder policy in history”, was issued. Infant formula milk powder can only be produced and sold after being registered with the State Administration for Market Regulation (SAMR). For brands that have not obtained registration, they were no longer allowed to sell infant formula milk powder products in China as of Jan. 1, 2018. As a direct result of this policy, many small brands and small dairy enterprises gradually withdrew from the domestic market. Consequently there is expected room for growth for imported milk powder in fifth and sixth tier Chinese cities. This is a great market opportunity for brands already registered.

As of December 2018, 1,195 milk powder formulas have been registered. 915 of these are from 106 domestic enterprises, while the remaining 280 formulas are from 47 overseas companies. Currently, there are still 460 formulas from 52 enterprises going through the approval process.

SAMR standards for the review of domestic and imported enterprises are the same. However, due to the current registration situation, domestic enterprises account for 75% of the total number and the remainder from overseas. The main reasons are as follows:

1. At the beginning of implementing formula registration when the details were not clear, foreign

companies generally adopted a wait-and-see attitude. This gave domestic enterprises a head start.

2. Overseas companies have more materials and procedures to prepare for, such as Chinese-English translation, notarization certification, technical data communication with foreign factories, etc. This adds up to a longer registration procedure compared to that of domestic enterprises.

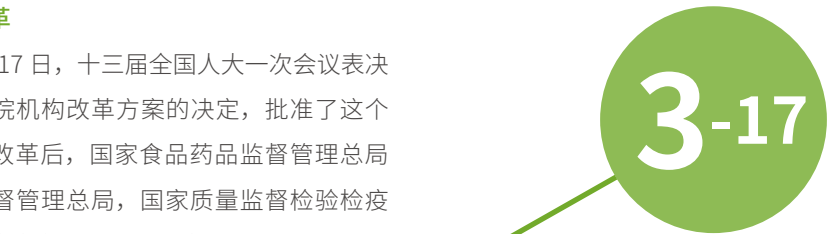
3. After institutional reforms this year, although the regulations for formula registration have not changed, the SAMR have added new requirements for the registration and approval of infant formula milk powder. Now producers must pass an on-site audit by CNCA to obtain the formula registration. Restricted by the funds for going abroad and conflicting schedules of auditors, progress in on-site audits of foreign manufacturers is slower, which affects the progress of registration and approval of foreign companies.

Since implementation of the infant formula registration policy, a number of companies have commissioned REACH24H to register their infant formula. Currently, we have helped 2 formulas pass the technical review and are now awaiting final administrative approval. It is REACH24H's regulatory expertise allowing for fast and professional consulting services to help customers solve compliance problems and contribute to the development of numerous enterprises and the overall industry in China.

# 2018 十大食品行业动态盘点

## 1. 国务院机构改革

2018 年 3 月 17 日，十三届全国人大一次会议表决通过了关于国务院机构改革方案的决定，批准了这个方案。本次机构改革后，国家食品药品监督管理总局并入国家市场监督管理总局，国家质量监督检验检疫总局的出入境检验检疫管理职责和队伍划入海关总署。



## 2. 全国人大常委会通过《中华人民共和国电子商务法》2019-01-01 起施行

电商法的实施可以保障电子商务各方主体的合法权益，规范电子商务行为，维护市场秩序，促进电子商务持续健康发展。根据电商法要求电商经营者办理营业执照，依法纳税。

## 3. 农业农村部公告 第 20 号 生效日期 2018-06-01

为进一步加强宠物饲料管理，规范宠物饲料市场，促进宠物饲料行业发展，农业农村部公布了《宠物饲料管理办法》、《宠物饲料生产企业许可条件》、《宠物饲料标签规定》、《宠物饲料卫生规定》、《宠物配合饲料生产许可申报材料要求》、《宠物添加剂预混合饲料生产许可申报材料要求》等规范性文件。



## 4. 税委会公告〔2018〕4 号 生效日期 2018-07-01

为进一步满足人民美好生活需要，推动供给侧结构性改革，主动扩大开放，自 2018 年 7 月 1 日起，降低部分进口日用消费品的最惠国税率，涉及 1449 个税目，平均税率由 15.7% 降为 6.9%，平均降幅 55.9%。

## 5. 国函〔2018〕93 号 生效日期 2018-07-24

同意在 22 个城市设立跨境电子商务综合试验区，名称分别为中国（城市名）跨境电子商务综合试验区，具体实施方案由城市所在地省级人民政府分别负责印发。2015 年以来国务院批准设立的杭州等 13 个跨境电商综合试验区成效显著，跨境电商成交额连续两年增长 1 倍以上，带动了创业创新和产业升级。此次入选的 22 个城市，主要向中西部和东北地区倾斜。



# Review: Top 10 Food Regulatory Updates 2018

## 1. State Council Institutional Reform

On March 17, 2018, a meeting of the 13th National People's Congress voted and approved the State Council's institutional reform. After the reform, the State Food and Drug Administration was merged into the State Administration of Market Regulation, and Entry and Exit Inspection of State Administration of Quality Supervision was merged into the General Administration of Customs.

## 2.The Standing Committee of the National People's Congress passed the "Electronic Commerce Law of the People's Republic of China" 01-01-2019

The implementation of the E-commerce law can guarantee the legitimate rights and interests of the main parties involved in e-commerce, standardize e-commerce behavior, maintain market order, and promote its sustainable and healthy development. E-commerce operators are required to apply for business licenses and pay taxes according to the law in force.

## 3.Announcement of the Ministry of Agriculture and Rural Affairs No. 20 came into effect on 01-06-2018

In order to further strengthen pet food management, regulate the pet feed market, and promote the development of the industry, the Ministry of Agriculture and Rural Affairs promulgated the "Pet Feed Management Measures", Pet Feed Production Enterprise License Conditions, "Pet Feed Label Regulations", and "Pet Feed Hygiene Regulations", "Pet Feed Production License Application Requirements", "Pet Additive Premix Feed Production License Application Requirements" as well as other related regulatory documents.

## 4. Taxation Committee Announcement [2018] No. 4 came into effect on 01-07-2018

In order to further meet the needs of the people for a higher standard of living, promote supply-side structural reforms, and actively expand economic openness, since July 1, 2018, the MFN tariff rate for selected imported consumer goods was reduced for 1,449 taxable items. The average tax rate was reduced from 15.7 to 6.9%, with an average drop of 55.9%.

## 5.State Letter [2018] No. 93 came into effect on 24-07-2018

The State Letter set up a CBEC comprehensive pilot zone in 22 cities in China. The specific implementation plan is to be issued by each provincial authority. Since 2015, the original 13 CBEC comprehensive pilot zones, such as Hangzhou, approved by the State Council have achieved remarkable results. The CBEC turnover has more than doubled for two consecutive years, which has led to entrepreneurial innovation and industrial upgrading. The 22 cities selected this time are located in the central, western and northeast region.

## 6. National Health and Health Committee Announcement 2018 No. 10 released on 12-09-2018

Two kinds of new food materials, black fruit gland ribs and globular candida (Gexianmi) were added.

6. 国家卫生健康委员会 公告 2018 年 第 10 号 发布时  
间 2018-09-12

新增黑果腺肋花楸果、球状念珠菌（葛仙米）2 种  
新食品原料。

9-12

7. 海关总署 市场监督管理总局公告 2018 年第 142 号 生  
效日期 2018-10-17

海关总署 国家卫生健康委员会公告 2018 年第 145 号  
生效日期 2018-10-29

在全国范围内实施《特殊医学用途配方食品注册证  
书》、《保健食品注册证书或保健食品备案凭证》、《婴  
幼儿配方乳粉产品配方注册证书》、《新食品原料许可证  
明》、《进口尚无食品安全国家标准的食品暂予适用的标  
准》电子数据与进出口货物报关单电子数据的联网核查。

10-17  
-29

8. 商财发〔2018〕486 号 生效日期 2018-11-28 过渡  
期后有关监管安排通知

为了衔接好跨境电商零售进口的监管过渡期政策，  
商务部、发展改革委、财政部、海关总署、税务总局、  
市场监管总局联合发布了关于完善跨境电子商务零售  
进口监管有关工作的通知。明确对跨境电商零售进口  
商品按个人自用进境物品监管，不执行有关商品首次  
进口许可批件、注册或备案要求。跨境电商企业和平  
台应当按通知要求履行责任。

11-28

9. 财关税〔2018〕49 号 生效日期 2019-01-01

将跨境电子商务零售进口商品的单次交易限值由人民  
币 2000 元提高至 5000 元，年度交易限值由人民币 20000  
元提高至 26000 元。已经购买的电商进口商品属于消费者  
个人使用的最终商品，不得进入国内市场再次销售。

2019  
1-1

10. 2018 年第 157 号 生效日期 2019-01-01 《跨境电  
子商务零售进口商品清单（2018 年版）》予以公布

清单扩大了跨境电商零售进口商品清单范围。此  
次增加了葡萄酒、麦芽酿造的啤酒、健身器材等 63  
个税目商品。

2019  
1-1

7. General Administration of Customs, General  
Administration of Market Supervision,  
Announcement No. 142 of 2018 came into effect on  
17-10-2018

General Administration of Customs National Health  
and Wellness Committee Announcement No. 145 of  
2018 came into effect on 29-10-2018

The national-level implementation of "Special  
Medical Use Formula Food Registration Certificate",  
"Health Food Registration Certificate or Health Food  
Recording Certificate", "Infant Formula Milk Powder  
Product Formula Registration Certificate", "New  
Food Raw Material License", now require networking  
verification of electronic data and electronic data  
of import and export goods declaration forms for  
foods that are not subject to national food safety  
standards.

8. Shangcai Fa [2018] No. 486 came into effect on 28-  
11-2018

Notice of relevant regulatory arrangements after the  
transition period  
In order to link the regulatory transition period policy  
for CBEC retail imports, the Ministry of Commerce,  
the Development and Reform Commission, the  
Ministry of Finance, the General Administration of  
Customs, the State Administration of Taxation, and  
the General Administration of Market Supervision  
jointly issued a notice to improve the supervision  
of CBEC retail imports. The notice regulates CBEC  
retail imports under the same supervisory framework  
of personal imported goods. Such goods are not  
the same requirements as first-time import license  
approval, registration or filing. CBEC enterprises and  
platforms shall perform their duties as required by  
the notice.

9. Financial Customs [2018] No. 49 came into effect  
on 01-01-2019

The single transaction limit for CBEC retail imports  
was raised from RMB 2,000 to RMB 5,000, and the  
annual transaction limit was raised from RMB 20,000  
to RMB 26,000. E-commerce imported goods that  
have been purchased belong to the final products  
used by consumers and may not be re-sold in the  
domestic market.

10. No. 157 of 2018 "List of cross-border e-commerce  
retail imports" (2018 edition) came into effect on  
01-01-2019

The list expands the range of CBEC retail imports.  
This time, 63 taxable items such as sparkling wine,  
malt-brewed beer and fitness equipment were  
added.





# 2018 年中国化妆品法规动态盘点

## 1. 国家药品监督管理局办公室公开征求化妆品安全技术规范拟修订内容等意见

为进一步做好化妆品注册备案管理工作，国家药监局组织起草了《化妆品安全技术规范》拟修订相关内容（附件 1、附件 2），并对美国个人护理产品协会（Personal Care Products Council，PCPC）出版的《国际化妆品原料字典和手册（第 16 版）》（International Cosmetic Ingredient Dictionary and Handbook（2016 Sixteenth Edition））进行翻译，形成了《国际化妆品标准中文名称目录（2018 版）（征求意见稿）》。

## 2. 关于《化妆品监督管理条例（草案）（第二次书面征求意见稿）》征求意见的通知 全联美组 [ 函 ]

化妆品分类管理，新原料分类管理等变动较大。药监部门将按照化妆品的功效宣称、作用部位、产品剂型、使用人群等因素，制定并公布化妆品分类规则和分类目录；特殊化妆品由 9 类减至 4 类；化妆品原料实行分类管理，新原料应当进行注册或备案。

## 3. 国务院关于在全国推开“证照分离”改革的通知 国发〔2018〕35 号

在全国范围内对第一批 106 项涉企行政审批事项分别按照直接取消审批、审批改为备案、实行告知承诺、优化准入服务等四种方式实施“证照分离”改革。对所有涉及市场准入的行政审批事项按照“证照分离”改革模式进行分类管理，实现全覆盖，为企业进入市场提供便利。加强事中事后监管，建立部门间信息共享、协同监管和联合奖惩机制，形成全过程监管体系。

## 4. 关于在全国范围实施进口非特殊用途化妆品备案管理有关事宜的公告（2018 年第 88 号）

自 2018 年 11 月 10 日起，首次进口非特殊用途化妆品由现行审批管理和自贸试验区试点实施备案管理，调整为全国统一备案管理，国家药品监督管理部门不再受理进口非特殊用途化妆品行政许可申请。境内责任人注册地在天津、辽宁、上海、浙江、福建、河南、湖北、广东、重庆、四川、陕西等前期已经开展自贸试验区试点实施进口非特殊用途化妆品备案管理的省（市）行政区域范围内的，在备案系统填报上传完成电子版资料后，向所在地省级食品药品监督管理部门办理备案。有关省级食品药品监管部门应当及时制定本行政区域内备案管理相关办事指南，并向社会公开。境内责任人注册地在其他省（区、市）行政区域范围内的，在网上备案系统填报上传完成电子版资料后，向国家药品监督管理部门办理备案。已经备案产品拟在境内责任人所在地省（区、市）行政区域以外的口岸进口的，应当通过备案系统补充填报进口口岸和收货人等相关信息后方可进口。在许可有效期结束后仍需继续进口，或者有效期结束前原行政许可事项发生变更的，应当按照本公告要求重新办理备案手续后方可进口。

## 5. 关于调整特殊用途化妆品行政许可延续程序有关事宜的规定（征求意见稿）

已获批准的国产特殊用途化妆品、进口特殊用途化妆品行政许可批准证件（以下简称批件）有效期届满需要延续的，申请人应认真开展产品自查，并在批件有效期届满前 4-6 个月向国家药品监督管理局提交批件延续申请，相关延续申报材料同时报送申请人（在华申报责任单位）所在地省级药品监督管理部门。

# 2018 Compliance Review of China’s Cosmetic Industry

## 1. National Medical Products Administration Publicly Solicited Opinions on the Proposed Revision of China’s Safety and Technical Standards for Cosmetics

In order to further improve the registration management of cosmetics, the National Medical Products Administration (NMPA) organized the drafting of the relevant provisions for the Safety and Technical Standards for Cosmetics. Meanwhile, the 2016 International Cosmetic Ingredient Dictionary & Handbook by Personal Care Products Council (PCPC) was translated to form the Chinese version of International Nomenclature Cosmetic Ingredient (2018 version) (draft for comments).

## 2. Notice on the "Regulation concerning Supervision and Administration over Cosmetics (Second Draft for Comments)", Chamber of Beauty Culture and Cosmetics of All-China Federation of Industry and Commerce (CBC).

In the last few years the cosmetics and new raw material classification management have gone through extensive changes. NMPA is responsible for formulating and publishing cosmetic classification rules and updating the classification catalogue according to cosmetics’ efficacy claims, action site, product dosage form, usage amount, etc.; categories of special-use cosmetics will be reduced from 9 to 4. Cosmetic raw materials must be classified and regularly managed, and new raw materials must be registered or properly filed.

## 3. State Council Notice on the Reform of "Separation of Operation Permits and Business Licenses" [2018] No. 35

The first batch of 106 administrative examination and approval items concerning enterprises nationwide has been subject to the reform of "Separation of Operation Permits and Business Licenses" which provides four possible paths: direct cancellation on administrative approval, exchange of examination and approval for record-filing, implementation of an informed commitment, and optimization of market access services. All administrative examination and approval matters concerning market access must be classified and managed in accordance with the reform of the "Separation of Operation Permits and Business Licenses" to achieve full coverage and

simplify enterprises’ market entry process. A specific focus for REACH24H is strengthening post-market supervision and establishing inter-departmental data sharing, joint supervision and reward and punishment mechanisms.

## 4. Announcement on the Implementation of the Filing Management System for Imported Non-Special Use Cosmetics (No. 88 of 2018)

Since November 10, 2018, the management of first-imported non-special use cosmetics shifted from the current registration and the pilot filing system of the Pilot Free Trade Zone to national unified filing management system. The National Medical Products Administration no longer accepts License applications for the import of non-special use cosmetics. It is necessary to designate a Domestic Responsible person from China located in the pilot zones capable of filing management (including Tianjin, Liaoning, Shanghai, Zhejiang, Fujian, Henan, Hubei, Guangdong, Chongqing, Sichuan and Shanxi) who will complete the filing process with provincial Medical Products Administration (previous provincial FDA) after filing the online application and submitting the dossiers. In the pilot areas of Tianjin, Liaoning, Shanghai, Zhejiang, Fujian, Henan, Hubei, Guangdong, Chongqing, Sichuan, Shanxi, after the filing has been completed –including uploading and completing the electronic version– technical review of the documents will be conducted by the local or provincial Medical Products Administration. Domestic responsible persons located outside pilot zones in China have to complete filing to NMPA after online dossiers submission. The relevant body then promptly formulates the relevant guidelines for the administration of filing management within their respective administrative regions and issues a public notice. Once the online filing process is completed and the electronic version is issued, this information is filed with National Medical Products Administration. The products that have been filed are allowed to be imported through any ports outside the administrative regions where the domestic responsible persons are located (province, city, etc.) –yet it is necessary to supplement the relevant information such as the import port and the consignee through the filing system before importing.

# 2018 年海关总署 “变形记”

## 1. “新海关” 亮相

根据十三届人大一次会议批准的国务院机构改革方案，原国家质量监督检验检疫总局的出入境检验检疫管理职责和队伍划入海关总署。4 月 20 日起，这一改革正式实施，“新海关” 亮相。中国特色社会主义新海关将承担新职责，明确新目标，展现新风貌，实现新作为，加快关检业务深度融合，实现 1+1 > 2。

## 2. 口岸通关迎来新变化

**旅检监管方面**，将旅客进出境原有的 8 个环节整合优化为卫生检疫、申报、现场调研、查验、处置 5 个环节。**通关作业“三个一” 方面**，统一通关“单一窗口” 实现报关报检，对进出口货物全面实施一次查验，凭海关放行指令提离货物，实现一次放行。**运输工具登临检查方面**，将原有的关检 3 个监管环节优化整合为检疫处置、登临检查 2 个环节。**辐射探测方面**，统一使用一套辐射探测设备，进行一次探测。**在邮件监管方面**，将原有的关检 17 个监管环节优化整合为邮袋消毒并放射性检查、查验、分流处理等 6 个环节。**在快件监管方面**，将原有的关检 9 个监管环节优化整合为申报、动植物检疫、查验、放行 4 个环节。**报关报检企业资质注册以及对外“一个窗口” 办理方面**，企业在海关注册登记或备案后，同时取得报关报检资质，对外窗口在同一行政大厅的整合为一个窗口统一对外办理相关业务。

## 3. 海关 “三定” 确定

《海关总署职能配置、内设机构和人员编制规定》正式于 2018 年 9 月 10 日在中华人民共和国中央人民政府网站公布，“三定” 自 2018 年 7 月 30 日起施行。海关总署内设办公厅、政策法规司、综合业务司、自贸区和特殊区域发展司、风险管理司、关税管理司、卫生检疫司、动植物检疫司、进出口食品安全局、商品检验司、口岸监管司、统计分析司、企业管理和稽查司、缉私局、国际合作司、财务司、科技发展司、稽查内审司、人事教育司、政治部、机关党委、离退休干部局共 22 个机构。“三定” 并明确了与农业农村部、国家卫生健康委员会、国家市场监督管理总局的有关职责分工。

## 4. “新海关” 在进口食品监管方面变化

出入境检验检疫划入海关总署后，在进口食品监督管理方面变化主要有以下两方面：（一）海关新增出入境卫生检疫、出境动植物检疫、出入境商品检验、出入境食品安全职责，关检融合，全面取消通关单，提高了通关速度，实现了更高效地监督管理进口食品安全问题。（二）原先由中国国家认证认可监督管理委员会负责的进口食品企业注册工作划入海关总署进出口食品安全局。

## 5. 海关在跨境电商零售进口监管职责

2018 年 11 月 30 日商务部、发展改革委、财政部、海关总署、税务总署六部委联合发布了《关于完善跨境电子商务零售进口监管有关工作的通知》，明确规定了中国境内消费者通过跨境电商第三方平台经营者自境外购买的商品，按个人自用进境物品监管，不执行有关商品首次进口许可批件、注册或备案要求。但对相关部门明令暂停进口的疫区商品，和对出现重大质量安全风险的商品启动风险应急处置时除外。海关对跨境电商零售进口商品实施质量安全风险监测，在商品销售前按照法律法规实施必要的检疫，并视情发布风险警示。海关责令相关企业对不合格或

If the import is still required after the expiration of the license period, or if the original administrative license changes within the validity period, it is necessary to re-apply for filing in line with these provisions before their import.

## 5. Provisions on the Continuation for Special-Use Cosmetic Production Licenses (Draft for Comment)

In the case of approved domestic and imported

special-use cosmetic licenses which must be extended after the expiration of the validity period, the applicant must consciously carry out the self-inspection of the products and submit the corresponding application to National Medical Products Administration 4-6 months before the expiration as well as the Provincial People's Government Drug Administration Department.

# 2018 Changes in General Administration of Customs

## 1. “New Customs”

According to the State Council Institutional Reform Plan passed on the 13th National People's Congress, the duties of entry-exit inspection and quarantine of the General Administration of Quality Supervision, Inspection and Quarantine (AQSIQ) were assigned to the General Administration of Customs. The reform was officially implemented on April 20th 2018, making room for a “new customs” body. The new customs authority with Chinese characteristics is set to take over new responsibilities, specify new objectives, operate with a new overall style, and further a greater integration of customs inspection and declaration services to achieve 1+1>2.

## 2. Changes in Port Customs Clearance

In terms of travel inspection supervision, the original 8 mandatory steps for passengers entering and leaving the country were integrated and optimized into five links: health quarantine, declaration, on-site investigation, inspection and disposal. The “three ones” system applied for customs clearance unified the process by setting up One Window for customs declaration and inspection, and a comprehensive One-Time Inspection of import and export goods, and removal of goods with customs clearance instructions to achieve a release. In terms of transport inspection, the three links of the original inspection procedure were optimized and split into two parts: quarantine disposal and boarding inspection. A set of radiation detection equipment is used in a unified manner to ensure detection. In terms of mail supervision, the original 17 inspection links were optimized and integrated into six links, among these: pouch disinfection and radiological inspection, inspection and diversion, etc. In terms of express mail supervision, the original 9 inspection links were optimized and integrated into declaration, animal and plant quarantine, inspection and release. In terms of customs registration and

inspection of enterprise qualifications and the handling of the One Window, the enterprise obtains the customs qualification for customs declaration after registration or filing, and the external window is integrated into the same administrative hall as a window to handle related businesses.

## 3.Three Stipulations Scheme: China Customs

The Regulations on the Allocation of Functions, Internal Bodies and Staffing of the General Administration of Customs was officially announced on the website of the Central People's Government of the People's Republic of China on September 10, 2018. The “Three Stipulations” came into force on July 30, 2018. The General Administration of Customs consists of a General Office, Policy and Regulation Department, Comprehensive Business Department, Free Trade Zone and Special Regional Development Department, Risk Management Department, Customs Management Department, Health and Quarantine Department, Animal and Plant Quarantine Department, Import and Export Food Safety Department, Commodity Inspection Department, Port Supervision Department, Statistics Analysis Department, Enterprise Management and Inspection Department, Anti-Smuggling Department, International Cooperation Department, Finance Department, Science and Technology Department, Internal Audit Department, Staff Education Department, Political Department, among other main bodies. “Three Stipulations” also clarified the division of responsibilities among the Ministry of Agriculture and Rural Affairs, the National Health and Health Commission, and the State Administration of Market Supervision.

## 4. “New Customs” Changes in the Regulation of Imported Food

After the entry-exit inspection and quarantine is transferred to the General Administration of



存在质量安全问题的商品采取风险消减措施，对尚未销售的按货物实施监管，并依法追究相关经营主体责任。对食品类跨境电商零售进口商品优化完善监管措施，做好质量安全风险防控。将跨境电商零售进口相关企业纳入海关信用管理，根据信用等级不同，实施差异化的通关管理措施。海关对违反本通知规定参与制造或传输虚假“三单”信息、为二次销售提供便利、未尽责审核订购人身份信息真实性等，导致出现个人身份信息或年度购买额度被盗用、进行二次销售及其他违反海关监管规定情况的企业依法进行处罚。

## 6. 海关企业信用管理

2018年3月3日海关总署令第237号公布《中华人民共和国海关企业信用管理办法》，2018年11月28日海关总署2018年第178号公告关于实施《中华人民共和国海关企业信用管理办法》有关事项。海关可以采集反映企业信用状况的下列信息：（一）企业注册登记或者备案信息以及企业相关人员基本信息；（二）企业进出口以及与进出口相关的经营信息；（三）企业行政许可信息；（四）企业及其相关人员行政处罚和刑事处罚信息；（五）海关与国家有关部门实施联合激励和联合惩戒信息；（六）AEO互认信息；（七）其他能够反映企业信用状况的相关信息。（八）企业产品检验检疫合格率、国外通报、退运、召回、索赔等情况；（九）因虚假申报导致进口方原产地证书核查，骗取、伪造、变造、买卖或者盗窃出口货物原产地证书等情况。对于被认定为失信的企业海关将采取相应的管理措施，比如进出口货物平均查验率在80%以上，不予免除查验没有问题企业的吊装、移位、仓储等费用等。



Customs, there are two main changes in the supervision and management of imported food: (1) Customs has taken over new responsibilities related to the entry and exit sanitary quarantine, entry and exit animal and plant quarantine, entry and exit commodity inspection, and entry and exit food safety. The integration of customs inspection and declaration services and comprehensive cancellation of customs clearance forms have improved customs clearance speed. All of these changes have allowed for the more effective supervision and management of imported food; (2) the registration of imported food enterprises originally undertaken by the China National Certification and Accreditation Administration Committee is included in the Bureau of Import and Export Food Safety of the General Administration of Customs.

## 5. Customs Duties in Import Supervision of Cross-border E-commerce Retail

On November 30, 2018, the Ministry of Commerce, the National Development and Reform Commission, the Ministry of Finance, the General Administration of Customs, and State Taxation Administration jointly issued a Notice on Improving the Supervision of Cross-Border E-Commerce Retail Imports, which clearly stipulates goods purchased by Chinese domestic consumers from overseas through third-party platforms of cross-border e-commerce are subject to supervision and control as imported articles for personal use, and the requirements for approval, registration or filing for the first import license of relevant commodities for domestic consumption in China does not apply. There is an exception when the relevant departments explicitly suspend the import of infected goods and initiate the emergency risk disposal of goods posing significant quality and safety risks. The Customs authority implements quality and safety risk monitoring for cross-border e-commerce retail imports, implementing necessary quarantine in accordance with laws and regulations before the sale of goods, and issues risk warnings when necessary. Customs is authorized to order enterprises to adopt risk reduction measures for unqualified products or those with specific quality and safety descriptions, and to supervise those goods that have not been sold yet. Legal Responsibility of the relevant business entity will be investigated according to law. This body is also responsible for optimizing and improving the regulatory measures for cross-border e-commerce retail imports of food, and preventing as well as controlling quality and safety risks. It incorporates cross-border e-commerce retail import related enterprises into the customs credit management system, and implement differentiated customs

clearance management measures according to different credit ratings. Enterprises operating through cross-border e-commerce retail imports are included in the customs credit management, and differentiated customs clearance management measures are implemented according to different credit levels. Customs is entitled to punish enterprises which participate in the manufacturing or transmission of false "three orders" information, facilitate secondary sales, and/or fail to follow due diligence, verifying the authenticity of the subscriber's identity, as this could result in the theft of personal information or the duplication of the annual purchase amount, among other illegal actions.

## 6. Customs Enterprise Credit Management System

On March 3, 2018, the General Administration of Customs Order No. 237 released the Decree on the Promulgation of the Measures of the People's Republic of China on Customs Enterprise Credit Management. On November 28, 2018, the General Administration of Customs, Announcement No. 178 of 2018 was released regarding Measures associated with the Implementation of the Credit Management System. China Customs decided to introduce a classification scheme for enterprises based on compliance records, recognizing them either as Certified, General Credit or Dishonest/Discredited Enterprises. Certified Enterprises may be further on classified either as Advanced or General Certified Companies.

Customs may collect the following information to determine the credit status of an enterprise: (1) enterprise registration or filing information and basic information of relevant personnel of the enterprise; (2) import and export of the enterprise and related information; (3) information on the administrative license; (4) Information on administrative and criminal punishment of enterprises and their related personnel; (5) Implementation of joint incentives and punishment by the customs authority and relevant state departments; (6) AEO mutual recognition information; (7) Other correlations that reflect the credit status of the enterprise. (8) Qualification rate of inspection and quarantine of enterprise products, foreign notification, return shipment, recall, claim, etc.; (9) Verification of the Certificate of Origin of the importer following a false, fraudulent, forged, altered declaration, or sale or theft of the original exported goods certificates, etc. For enterprises deemed to be untrustworthy, appropriate management measures will be adopted. For example, the average inspection rate of import and export goods is above 80%, and the cost of lifts, shifts, warehouse, etc. for enterprises without registered issues may not be exempted.



# ChemLinked

ChemLinked 创建于 2012 年，是华测瑞欧旗下集热点资讯、专业咨询、研究报告、定制化培训等服务于一体的综合性法规平台。平台专注于为国内外生产商、贸易物流、原料企业等相关化工、食品、化妆品、农化相关行业会员，以及政府部门、行业协会和研究机构等合作伙伴提供一站式法规信息服务。

当前服务内容覆盖国家包括中国，日本，韩国，泰国，越南，印尼等。网站根据国际化需求开设了各种频道，包括新闻，文章，百科，通告，网络研讨会，数据库，翻译件等，支持英文和日文两种语言，为全球化学品、食品、化妆品、农药行业从业人员和企业提供全方位的信息和商务服务。经过六年的发展，ChemLinked 受到了来自 100 多个国家 37,045 名注册会员的高度认可和访问热度，其中月度访问人数在 5 万人以上，月度浏览量在 20 万次以上。

2018 年对于中国企业以及出口商品到中国的海外企业来讲，是法规变动巨大的一年。从监管机构改革，中美

贸易摩擦，到一系列法规政策如《危险货物道路运输规则》、新《农药管理条例》、《中华人民共和国电子商务法》、在全国范围实施进口非特殊用途化妆品备案管理、跨境电商系列利好通知的发布，ChemLinked 通过线上实时跟进报道、见解与经验分享，架起了中国法规与全球企业的桥梁，进一步向全球会员展示了我们存在的价值—扫除贸易障碍，促进市场准入。

随着用户在商业、工业、教育和政府各个领域的不断扩展，为了提供更优质、对口的服务，ChemLinked 在 2018 年整合并推出了多个新栏目，开设了微信公众号和 Youtube 频道，举办了线下主题会议，在很大程度上使得 ChemLinked 的产品与服务更加有效地帮助全球会员解决贸易与合规困难。在 2019 年，ChemLinked 还将继续以用户至上的原则进行服务的拓展，进一步提高信息传递的及时性和专业性，增加各行业市场洞察栏目，提供更多信息化工具，持续为我们尊贵的全球会员提供增值服务。



# CHEM LINKED

Founded in 2012, ChemLinked is a comprehensive regulatory platform created by REACH24H which integrates the most recent and globally relevant news, professional consulting, research reports, and customized training resources. The news platform focuses on providing one-stop regulatory information services for domestic and foreign producers, trade logistics, raw material enterprises and other related chemical, food, cosmetics, agrochemical related industry members, as well as government departments, industry associations and research institutions.

ChemLinked currently covers regulatory and market entry-related topics on countries which include China, Japan, Korea, Thailand, Vietnam, and Indonesia, among others. The website has opened various channels to stay up to date with the needs of its international members, offering news, articles, encyclopedia-styled regulatory database, the latest announcements, webinars, databases, translations, supporting English and Japanese languages, to provide a full range of information and business services to practitioners and stakeholders in the global chemical, food, cosmetics and pesticide industries. With six years of constantly growing, ChemLinked has received high praise and counts on 37,045 registered members from more than 100 countries, including more than 50,000 monthly visitors and more than 200,000 monthly views.

The year 2018 was a year of huge changes in terms

of regulations, both for Chinese domestic enterprises and overseas companies exporting goods to China. From regulatory reforms, Sino-US trade frictions, to a series of regulatory policies such as the "Dangerous Goods Road Transport Rules", the new "Pesticide Management Regulations", "The People's Republic of China Electronic Commerce Law", and the implementation of imported non-special-use cosmetics rules at a national level, announcements of favorable policies on cross-border e-commerce, ChemLinked has set up a bridge between Chinese regulations and global enterprises and further demonstrates REACH24H's value to global members - sweeping trade obstacles to promote market access through online real-time follow-up reports, insights and experience sharing.

With the continuous expansion of users in various fields of commerce, industry, education and government, ChemLinked has integrated and launched a number of new columns in 2018, and opened the WeChat public number and Youtube channel to offer better service. Offline thematic meetings have largely enabled ChemLinked's products and services to help global members solve trade and compliance difficulties more effectively. In 2019, ChemLinked will continue to expand its services with the principle of customer first, further improve the timeliness and professionalism of information transmission, increase market insights in various industries, provide more information tools, and continue to provide value-added services to its global members.



*"We realized the difficulties members have in navigating the legal and regulatory requirements, especially in the China market. ChemLinked contains more than thousands of pieces of comprehensive intelligence to help businesses get started and alleviate these challenges."*

Along the year 2018, China's regulatory landscape experienced ongoing changes that shook up the country's consumer-end market. Political conflicts between major powers and new trade barriers are unsettling our global members, providing a chance to present our values to the global audience.

With 6 years development, as a well-known regulatory platform, ChemLinked now has **36,000 registered members** from more than **100 countries**, with **50,000 site visitors** and more than **150,000**

**pages** views every month. In 2018, ChemLinked integrated and launched **several new columns (information, knowledge, database, training, and solutions)** to underpin and increase the value of membership. Meanwhile, in September, it opened its **official Wechat account** to deliver free and practical marketing access information on China social platform. It is pleased to report that membership numbers remained stable in 2018 (37,045) comparing with 2017 (32,138), serving over 500 global companies regarding premium services.



## Key Reports

As a leading regulatory platform, ChemLinked provides latest news on Chemicals, Cosmetic, Food, Agrochem and Consumer products.

### China Releases JT/T 617 Series Regulations

On Nov 21st, China MOT releases JT/T 617 series on official website. JT/T 617, Regulations concerning road transportation of dangerous goods (危险货物道路运输规则), is the first integrated regulations for Road TDG in

China. It will soon come into effect from Dec 1st, 2018.

As can be referred to ChemLinked previous news, JT/T 617 has 7 parts and uses ADR (the European Agreement concerning the International Carriage of Dangerous Goods by Road) as a reference to understand the international management on Road TDG.



### Deep Structural Changes Planned for China's Food Administration

China decided to reform the structure of its State Council and ministerial level departments, abolishing CFDA, AQSIQ, SAIC, NHFPC and MOA and creating new bodies.

The newly planned structural changes within China's administrative framework will take years to be developed and fully realized. In the short term we do not expect any significant changes in terms of market access requirements. Nevertheless, in the long term we can expect a more efficient and streamlined administration of trade. Centralization of regulatory authority will for the food sector mean clearer customs protocols and associated regulatory requirements throughout product lifecycle and the supply chain.



### Preparatory Work for Special Food Registration/Filing in China

Special Food refers to infant formula, health food and food for special medical purposes that are subject to more stringent supervision than average foods in China. As of March 2018, a newly established Special Food Safety Supervision Department under SAMR is now in charge of the drafting and enforcement of regulations on special food.

This article talks about Relevant Regulations and Measures for Registration/Filing, Application Dossier Requirements and Review Protocols, Documentation Requirements and Status quo of special food in China, offering practical guidelines for relevant enterprises.



## China Officially Releases Enforcement Rules for Replacing Imported Cosmetic Registration with Filing Management Nationwide

On Nov. 9, 2018, China National Medical Products Administration (NMPA-Subordinate to SAMR) officially announced that the registration of first-imported non-special cosmetics would be entirely replaced by a filing management system nationwide, effective as from Nov. 10th in accordance with the State Council's notice of Advancing the Reform of "Separating Certificates from Business License", a move that confirmed what ChemLinked had exclusively been reporting and anticipating on its reports earlier. The announcement served as preliminary enforcement guideline and also offered instructions for cosmetic stakeholders on post-reform regulatory requirements.





## Tips for stakeholders

- All first-imported non-special use cosmetics are subject to filing system; special use cosmetics and new ingredients are still subject to registration management.
- **Animal testing** is still necessarily required for filing system.
- NMPA is no longer capable of registration of first imported non-specials cosmetics and three affairs will be definitely rejected, i.e. **new registration application, renewal and change of certification**.
- Enterprises who have registered with NMPA shall entrust a reliable domestic responsible person as soon as possible. For strong companies, establish branches in China as RP is the safest way to conduct business.

## Korea Officially Releases New Amendments to Cosmetics Act

On Mar 13, 2018, amendments to Cosmetics Act were officially released. Except for the provisions related to customized cosmetics, which will take effect on Mar 14, 2020, the new Cosmetics Act will fully enter into force on Mar 14, 2019. The amendments mainly include the following points:

1. Addition of the definition of natural and customized cosmetics;
2. Re-classification of cosmetics business;
3. Extension of the scope of cosmetic business operation and functional cosmetics review applicants;
4. Implementation of natural cosmetics and organic cosmetics certification system (Not mandatory);
5. Set cosmetic safety management supervisors; and
6. Improved procedural rules.



## Taiwan Releases Amendments to Statute for Control of Cosmetic Hygiene

Taiwan Legislative Yuan previously approved the amendments to "Statute for Control of Cosmetic Hygiene" which is now renamed as "Cosmetic Hygiene Safety Administration Act" (See CL news). On May 2, 2018 Taiwan FDA released the new Act. Except for Item 4 to Item 6, Article 6 and Paragraph 6, Item 1, Article 23 will be effective on Nov 9, 2019, the implementation date of this new Act shall be stipulated by Taiwan Executive Yuan.



With China's recent institutional reform becoming effective in March 2018, many overseas businesses are struggling to understand China's food market. To deliver the latest regulatory information and solutions on China Food Industry, ChemLinked hold its first overseas conference - **ChemLinked Food Regulatory Conference – Oceania 2018 (CLFRC 2018)** on Nov, 20th, 2018, Melbourne, Australia in association with the Australia China Business Council, Australia Institute of Food and Science Technology, and Complementary Medicines Australia.



More than 100 professionals and experts discussed the latest changes in China Food Regulations. The highly interactive one-day conference was designed to serve food and nutraceutical producers, exporters and investors with latest regulatory information related to China's food industry to ensure their successful entry into this ever-expanding market. Members have also identified the desire to hear from government officials, as we build on the great outcomes of 2018, a key focus in 2019 CLFRC will be developing a better program with speakers from government authorities, providing a more targeted engagement.

## Forecast 2019

With clients span in business, industrial, education and government, the range of service needs continually improve and expand in line with client's demand and expectations. Not only as a source for regulatory news and alerts, ChemLinked is generating more articles featuring timely content and market insights than ever before, with an emphasis on covering pertinent topics for users at every level.



2019 will focus ChemLinked's work around 5 priority areas including:

- Platform Optimization
- Marketing & Communications
- Industry Development
- Membership and Value-added Services
- Skill and Capability Building

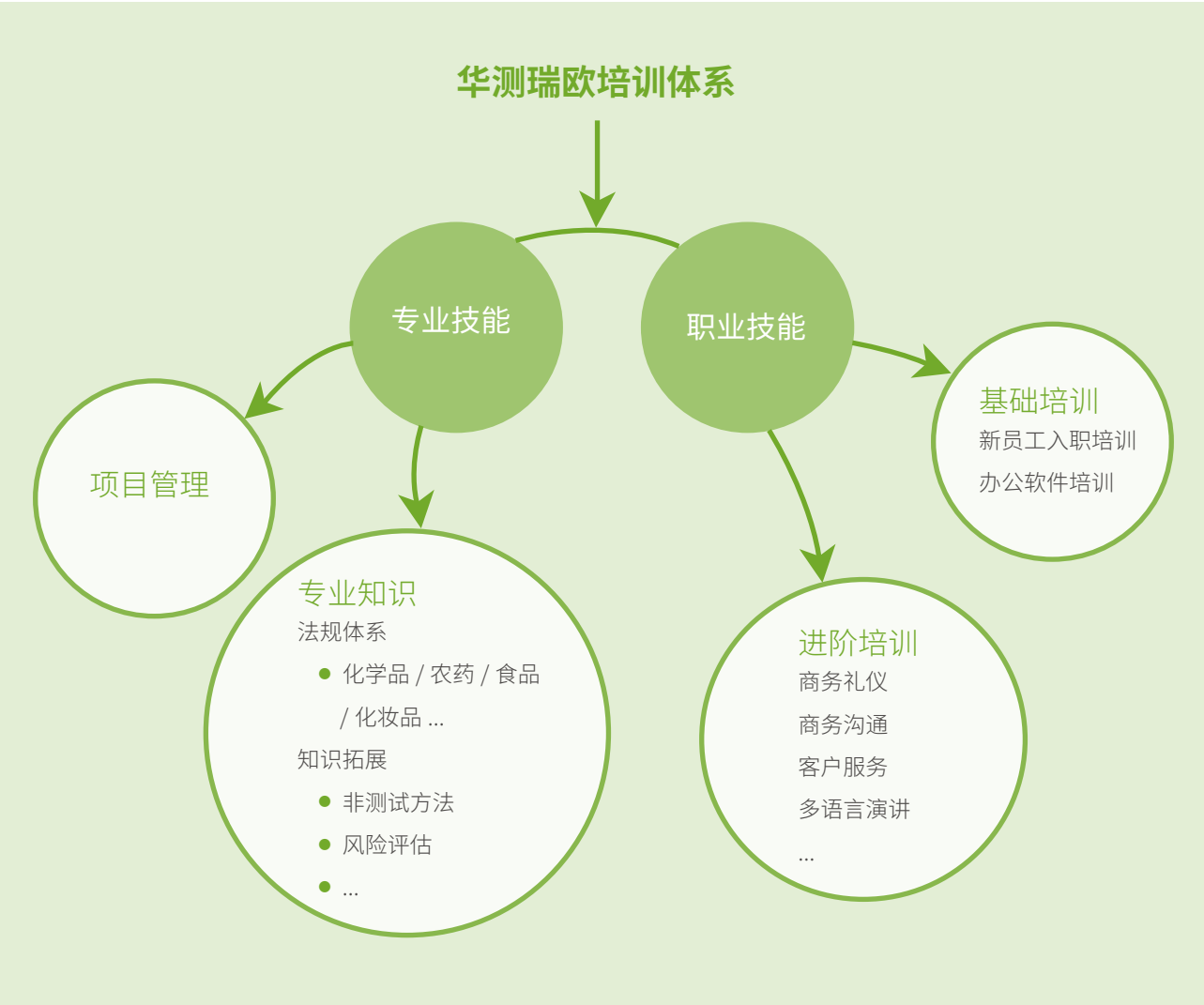




# 员工成长 Employee Growth

# 学无止境 ——成为更好的自己

咨询机构是人才密集和知识密集型企业，其中人才是企业最核心的竞争力，也是企业长足发展的根基。多年来华测瑞欧不断加强人力资本投入，建立完善的培训体系，提供职业技能、专业技能多个维度的培训通道，全面提高员工的综合能力。



# Endless Learning: We Learn - We Grow

REACH24H, as a technical consulting company is an intensive enterprise of talent and knowledge, in which talent is at the core of our competitive edge and the long-term growth strategy. Over the years, REACH24H has continuously supported its team's professional development, establishing a sound training system, and providing training channels with multiple dimensions of vocational skills and professional skills to improve the comprehensive capabilities of employees.





## 新员工入职培训

通过入职培训帮助员工系统地了解公司发展情况和工作流程，帮助新员工建立良好的人际关系，增强团队意识与合作精神。

### New Employee Induction Training

The induction training helps employee develop a systematically understanding the company's development and work processes, to establish good interpersonal relationships, and to enhance team awareness and cooperation.

## 演讲能力提升—Toastmaster Club

Toastmaster Club 是一个教育性质非营利组织，于全球各地推行演讲会，协助会员提升其沟通、演讲及领导技巧。2018 年 Toastmaster Club 梦想小镇第 56 次英文活动在华测瑞欧举办。

### Holding the Key to Public Speaking —Toastmaster Club

The Toastmaster Club is an educational non-profit organization that conducts lectures around the world to help members improve their communication, presentation and leadership skills. In the 2018, the 56th Toastmaster event of Dream Town was held in REACH24H.

## 商务沟通—MOT (Moment of Truth) 培训

在产品高度同质化及快速迭代更新的时代，服务成为了每个行业得以体现差异化、个性化的核心竞争力。2018 年，华测瑞欧多次组织关键时刻 -MOT 培训，深究客户服务之道，全面提升员工在商务环境中的“情商”，提升客户服务意识和服务质量。

### Business Communication—MOT (Moment of Truth) Training

In an era of highly homogenized products and rapid iterative updates, services have become the core competitiveness of each industry to differentiate and individualize their brand. In 2018, REACH24H organized many key moments such as its MOT training, which goal was to provide a more thorough understanding of customer service, enhancing

employees' emotional intelligence, customer service awareness and service quality.

## 客户服务技巧培训

2018 年 5 月，外聘专业培训老师开展客户服务培训，从“价值”“信任”“情绪”“能力”“情绪”“需求”五个维度探索客户心理，洞悉客户的真实需求，将产品价值发挥极致。

### Customer Service Skills Training

In May 2018, external training professionals conducted customer service training, exploring customer psychology from the five dimensions i.e., "value", "trust", "emotion", "ability", and "demand", to explore the real needs of customers and give them full play of products value.

## 专业知识拓展—QSAR 培训

2018 年，华测瑞欧聘请外部专家开设 QSAR 培训系列课程，提高技术人员的专业技能提升对 QSAR 的认识和了解，促进非测试方法在合规工作中的应用。

### Professional Knowledge Development – QSAR Training

In 2018, REACH24H hired external experts to deliver QSAR training series courses, improving the skill of QSAR and promoting the application of non-test methods in compliance work.

## 外部专业培训

2018 年，华测瑞欧委派员工外出参加环境保护部、国家食品药品监督管理总局、农村农业部、农业科学院等国家单位组织的学习培训五十多人次，以提升公司的综合服务水平。

### External Professional Training

In 2018, REACH24H appointed a number of its employees to participate in more than 50 studies and training sessions organized by the Ministry of Environmental Protection, the State Food and Drug Administration, the Ministry of Agriculture, the Agricultural Academy and other national units to enhance the company's comprehensive service level.



# 进阶之路 ——我在瑞欧这几年



**陈勇豪** 技术主管  
食品事业部

在加入瑞欧之前，我一直从事食品研发工作，得益于之前的研发经验积累，我对食品行业的生产、工艺、质检、法规等方面都有一些了解，对于很多类别的食品法规均有研读学习，这些积累让我快速地融入到新的工作中。加入华测瑞欧后，通过更深层次的研究和技术能力扩充，能够更准确的了解客户需求，提供解决方案。

2018 年，很荣幸成为食品部技术主管，带领小伙伴们一起为食品行业合规安全努力。工作中，我是一名食品合规咨询师，生活中，我是两个孩子的爸爸。作为家长，食品安全一直是我們最关心的问题。我们的工作能够提高企业食品安全合规意识，解决合规问题，保障老百姓舌尖上的安全，我想这是瑞欧赋予我的更大的价值和意义。



**朱璐** 高级法规咨询师  
REACH 法规事务部

从 2011 年底加入华测瑞欧，这是我在业务岗位的第七年，每天都有新的机遇和挑战。

工作让我不断学习。每天都会接收到第一手的合规资讯和法规政策新动态，有机会向技术团队学习不同国家不同类型法规下的问题解决思路，保持时刻学习的心态和状态。

每天在服务中成长。我的工作需要每天和不同企业不同类型的人员打交道，帮助他们解决或工作上的或贸易上的各类问题，总是能够给我带来满满的新鲜感、成就感和满足感。在服务客户时，我总是尽可能地站在客户的角度去考虑问题，先客户之忧而忧，结合企业实际情况给出最佳解决方案；在遇到复杂疑难的 case 时，我们通过团队协作深入研究法规和执法要求，共同解决问题。

在华测瑞欧七年的历练和沉淀，让我处事更加成熟和自信，各方面的能力都得到了显著的提升和锻炼，面对生活或工作中的任何压力和磨练能够坦然地微笑面对。



**吕森** 法规技术咨询师  
EHS 咨询部

2014 年，我从纽约市立大学毕业，为了能真正学有所获，我作为 ChemLinked 化学站编辑加入瑞欧。虽然学习了十来年的化学，但这是第一次系统学习各个国家的化学品法规，欧盟 REACH、GHS、新物质注册等陌生的名词和复杂的法规体系一度让我非常头大。随着研究的深入，我深刻地了解到化学品管理的必要性和企业合规工作的重要性，我们作为这些重要法规资讯的传播者，在一定程度上推动着化学品的安全管理工作向前推进，让我的心里产生了一点使命感与责任感。

2018 年，通过内部晋升通道我转入 EHS 咨询部专注研究环保法规体系。环保是一个非常大的命题，关乎企业长远发展，更关乎人类和社会可持续发展。我很幸运有机会在同一个公司尝试不同但都非常有意义的工作。

白驹过隙，在公司 4 年多仍然不断在各个同事身上看到值得我学习的优点，我被团队年轻积极的氛围和认真专业的态度所打动。我想除了专业的法规知识，这些经历和积累就是最大的财富，期待更多优秀的人才加入，和我们一起发扬这些财富。

# The Road to Progress – My Time in REACH24H

**Mr. Lynn Chan** Technical Director – Food Division

Before joining REACH24H team, I had been engaged in R&D for the food industry. Thanks to my previous work experience, I have now a more round understanding of the food industry's production, process, quality control, relevant regulations and other aspects, which has positively helped me to quickly adapt to my position at REACH24H. After joining, through deeper research and further development of my technical capabilities, I am now more able to accurately understand customer needs and provide targeted solutions. In 2018, I was honored to become the Technical Director of the Food Department, motivating our colleagues to work together on the topic of food industry compliance safety. At work, I serve as a Food Compliance Consultant. As a parent with two children, food safety has always been my biggest priority. Our work at REACH24H can improve the company's food safety compliance awareness, solve compliance problems, and protect the safety of the people's food. I think this is the greater value and significance that REACH24H has given me.

**Mrs. Lucia Zhu** Senior Regulatory Consultant – REACH Regulatory Affairs Department

Joining at the end of 2011, 2019 will make it my seventh year working for business, where I am proud to find new opportunities and challenges on a daily basis.

This job keeps me interested. Every day we receive first-hand information on compliance, new regulations and policies. For this reason, I have been fortunate to have access to every opportunity to learn from the technical team about problem-solving ideas under different types of regulations in different countries.

I grow up in the service every day. My job needs to deal with different types of people in different companies every day, helping them solve difficulties in trade, which always bring me a sense of freshness, accomplishment and satisfaction. When serving customers, I always try to think about the problem from the customer's point of view, by figuring out their concerns, which has always proved to lead to the best tailored solution for the client company. When dealing with complex cases, we work together as a team to fully study the regulations and enforcement requirements. With seven years in REACH24H, I have become more mature and confident. With the increase of abilities, I am able to face any pressure with a smile.

**Mr. Matt Lv** Regulatory Technical Consultant – EHS Advisory Department

After graduating from the City University of New York in 2014, I joined REACH24H as an editor for ChemLinked's Chemical Station. Although I had studied chemistry for ten years, it was my first time systematically analyzing the chemical regulations of various countries. In the past, legal systems and chemical regulations were all foreign to me, yet the diligence and daily research my role at ChemLinked allowed me to see the relevance of chemical management and get a thorough understanding of corporate compliance work. As a communicator, I promote the safety management of chemicals, which brings me a sense of mission and responsibility.

In 2018, I transferred to the EHS Consulting Department to study the environmental protection system.

Environmental protection is a very big proposition, relating to the long-term development of enterprises, human beings and the society. I am fortunate to have the opportunity to try different but very meaningful roles in REACH24H.

After 4 years in REACH24H, I still see the merits from my colleagues which challenge me to improve. I am impressed by the team's young and positive atmosphere and serious and professional attitude. Looking forward to more excellent talents joining us.



# 员工活动

## ——欢乐和温暖随行

1

一路同行，  
华测瑞欧9岁啦！

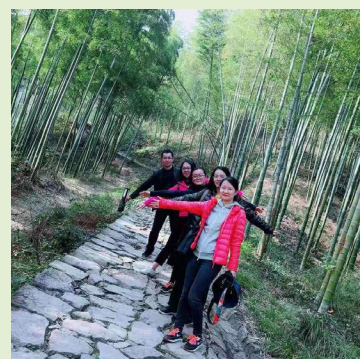
Thanks to  
Support  
like Yours,  
REACH24H is  
now Turning 9  
Years Old!



2



世界那么大，陪你去看看——沙巴，我们来啦！  
To see the world – Sabah!



3

2018 毅行计划——径山行，这里风景独好  
2018 Trail walking - Jinshan

# Employee Activities

## – Enjoying Together

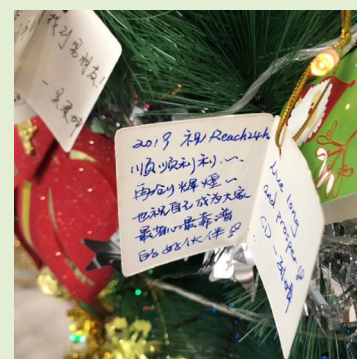
生日快乐，亲爱的家人！  
Birthday time!

4



5

Merry Christmas !





# 伙伴共赢和社会责任 Win-win Partnership & Social Responsibility

# 合作伙伴

## 行业协会

- 中国石油和化学工业联合会
- 中国化学品安全协会
- 中国香精香料化妆品工业协会
- 中国橡胶工业协会
- 中国食品土畜进出口商会
- 中国毒理学会
- 浙江省日用化工行业协会
- 广东省日化商会
- 美国化学工业协会
- 美国个人护理品协会
- 欧洲化学工业联合会
- 欧洲石油炼油协会
- 法国化妆品协会
- 新加坡化工协会
- 马来西亚化工协会
- 日本一般社团法人色材协会
- 日本化学工业日报
- 台湾电子连接器产业协会
- 化成品工业
- 波兰投资贸易局
- 西班牙化妆品协会
- 新西兰贸易发展局
- 意大利 VEGA
- 广东省微生物分析检测中心
- 浙江省产品质量安全检测研究院

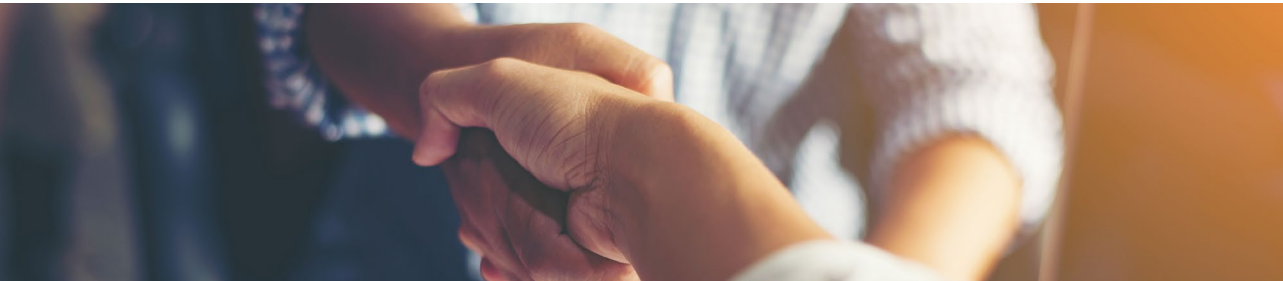
2018 年，华测瑞欧与国内外政府机构、行业协会和技术支撑单位等多个组织单位开展了深度合作，互惠共赢达到 1+1 > 2 的效果，助力中国企业“走出去”，海外企业“走进来”，同时发挥自身在合规领域的专业优势，在推动行业安全可持续发展方面持续努力。

## 贸易协会

- 中澳商会
- 中国欧盟商会
- 英中贸易协会
- 爱尔兰出口商协会
- 中国英商协会
- 比中经贸协会

## 测试机构

- 浙江省化工研究院
- 上海化工研究院
- 苏州华测安评化学品技术服务有限公司
- 浙大药物评价中心
- 浙江省医学科学院
- 苏州西山中科
- 北京汇智泰康医药技术有限公司
- 上海市检测中心
- 江苏雅信昆成检测科技有限公司



# Partners

In 2018, REACH24H carried out in-depth cooperation with domestic and foreign governmental agencies, industry associations and technical support units, and achieved mutual benefits and win-win results of 1+1>2, helping Chinese enterprises “go global” and overseas enterprises to “walk in”. Always creating true value, REACH24H’s mission will keep in line with the promotion of the safe and sustainable development of the industry.

## Industrial Associations

- China Petroleum and Chemical Industry Federation
- China Chemical Safety Association
- China Flavor & Fragrance Industry Association
- China Rubber Industry Association
- China Chamber of Commerce of Foodstuffs and Native Produce
- Chinese Society of Toxicology
- Zhejiang Daily Chemical Industry Association
- Guangdong Province Chemical Chamber of Commerce
- American Chemical Industry Association
- European Petroleum Refiners Association
- French Cosmetics Association
- Singapore Chemical Industry Council
- Chemical Industries Council of Malaysia
- Japan - Color Science Association of Japan
- Japan Dyestuff and Industrial Chemicals Association
- Polish Bureau of Investment & Trade
- Spanish Cosmetic Association
- New Zealand trade development board
- VEGA: Italy VEGA
- Guangdong Microbiological Analysis & Testing Center
- Zhejiang Institute of Product Quality & Safety Inspection

## Trade Associations

- Australian Chamber of Commerce in China
- European Union Chamber of Commerce in China
- China-Britain Business Council
- Irish Exporters Association
- British Chamber of Commerce in China
- Belgian-Chinese Chamber of Commerce (BCECC)

## Test Agency

- Zhejiang Research Institute of Chemical Industry
- Shanghai Research Institute of Chemical Industry
- Suzhou Centre Testing Technology Co., Ltd.
- Zhejiang University Center for Drug Safety Evaluation and Research
- Zhejiang Academy of Medical Sciences
- Suzhou Xishan Zhongke
- IPHASE
- Shanghai Academy of Public Measurement
- Jiangsu Yaxin Tech. Co. Ltd.



### ● 以开放姿态拥抱世界，帮助更多优质企业走进中国

近年来，中国全面提升对外开放水平推动高质量大发展，为世界各国通过扩大对华贸易投资合作、分享中国发展红利创造更多机遇，让更多优质的海外企业、产品走进中国。2018 年，华测瑞欧与波兰投资贸易局（PAiH）、西班牙化妆品协会（STANPA）、新西兰贸易发展局（NZTE）合作举办一系列合规论坛，帮助食品、化妆品企业深入了解中国市场发展现状和法规要求和变化。此外，华测瑞欧还与英国驻上海总领事馆达成多方面的合作，为促进中英贸易发展提供各项支持，为企业产品顺利合规进入中国市场提供技术助力。



### Embrace the World with an Open Attitude to Help More Quality Companies Enter China

In recent years, China has comprehensively upgraded its level of expansion to promote high-quality development, and created more opportunities for countries around the world to grow their trade and investment cooperation projects with China, sharing China's development dividends to ensure more high-quality overseas enterprises and products can enter China. In 2018, REACH24H cooperated with the Polish Investment and Trade Bureau (PAiH), the Spanish Cosmetics Association (STANPA) and the New Zealand Trade Development Council (NZTE) to organize a series of compliance forums to help food and cosmetics companies understand the Chinese market, regulatory requirements and changes. In addition, REACH24H also reached various cooperation with the British Consulate General in Shanghai to provide various support for the development of Sino-British trade and provide technical assistance for the smooth and compliant access of British corporate products into the Chinese market.



### ● 与意大利 VEGA 建立合作，推动 QSAR 在中国的普及和应用

2018 年，华测瑞欧与意大利 VEGA 合作共同举办 QSAR 模型培训班，给企业提供免费培训机会，特别邀请资深专家 Emilio Benfenati 博士、Giuseppina GINI 教授来中国授课，吸引了国内外知名企业、监管部门、实验室、科研院所等机构积极参与。未来双方还将进一步开展深入合作，推动非测试方法在化学品管理、风险评估和毒性预测等方面的应用。

### Cooperation with VEGA of Italy to Promote the Application of QSAR in China

In 2018, REACH24H cooperated with VEGA from Italy to hold a QSAR model training class to provide free training opportunities for enterprises. The training invited two senior experts Emilio Benfenati and Professor Giuseppina GINI to take the lectures, attracted the participation of well-known enterprises and regulatory authorities at home and abroad Institutions such as laboratories and research institutes. In the future, REACH24H and VEGA will further carry out in-depth cooperation to promote the application of non-test methods in chemical management, risk assessment and toxicity prediction.

### ● 持续深化技术合作，夯实服务基础

2018 年，华测瑞欧与广东省微生物分析检测中心、浙江省产品质量安全检测研究院在实验测试、产品安全等方面开展进一步合作，共同推进产品质量监督安全事业，夯实合规工作基础。



### Focusing on Technical Cooperation and Consolidating Service- Oriented Services

In 2018, REACH24H cooperated with Guangdong Microbial Analysis and Testing Center, Zhejiang Product Quality and Safety Testing Institute in experimental testing and product safety to jointly promote product quality and safety supervision as a foundation of our compliance work.



# CRAC2018

2018年9月9-12日，第十届全球化学品法规年度峰会（CRAC2018）在成都香格里拉大酒店圆满召开，来自全球各国各地区包括化学品、农药、危货运输、消费品、食品接触材料等多个行业的近500位官方代表、技术专家、企业代表和社会媒体共聚成都，共商行业发展方向，共享前沿合规资讯，共建绿色产业生态圈。

部分参会嘉宾合影

Part of Guest Photo



全球化学品环境安全管理分会场

Global Chemical Environmental Safety Management Session



全球农药登记分会场

Global Pesticide Registration Session



中欧美危险货物运输管理分会场

China, Europe and America Dangerous Goods Transportation Management Session



食品接触材料分会场

Green Materials and Consumer Products Safety Compliance Session



On September 9-12, 2018, the 10th Annual Global Chemical Regulations Annual Conference (CRAC2018) was successfully held at Shangri-La Hotel, Chengdu. Nearly 500 official representatives including chemicals, pesticides, dangerous goods transportation, consumer goods, food contact materials, etc., technical experts, business representatives and social media from various industries gathered in Chengdu to discuss the direction of global and regional regulatory affairs affecting trade, share the latest compliance information, and jointly find ways to ensure the green development of the industry.

绿色材料及消费品安全合规分会场

Green Materials and Consumer Products Safety Compliance Session





# 社会责任

华测瑞欧始终坚持以合规促发展，合规是可持续发展的基础。2018 年，华测瑞欧持续在全球各地普及合规意识，同时关注中小企业成长发展，通过免费提供资讯、技术和培训等服务帮助企业增强市场竞争力。

● **信息安全责任重于泰山——四大数据保护和风险控制措施确保客户信息安全**

自华测瑞欧承接第一件 EU-REACH 注册服务开始，就采取多重措施以加强对客户信息安全管理，并在近几年中持续加强，以保障客户信息安全，规避法律风险，确保自身作为众多客户的境内外代理人的平稳安全运行。

**成立风险审计部**

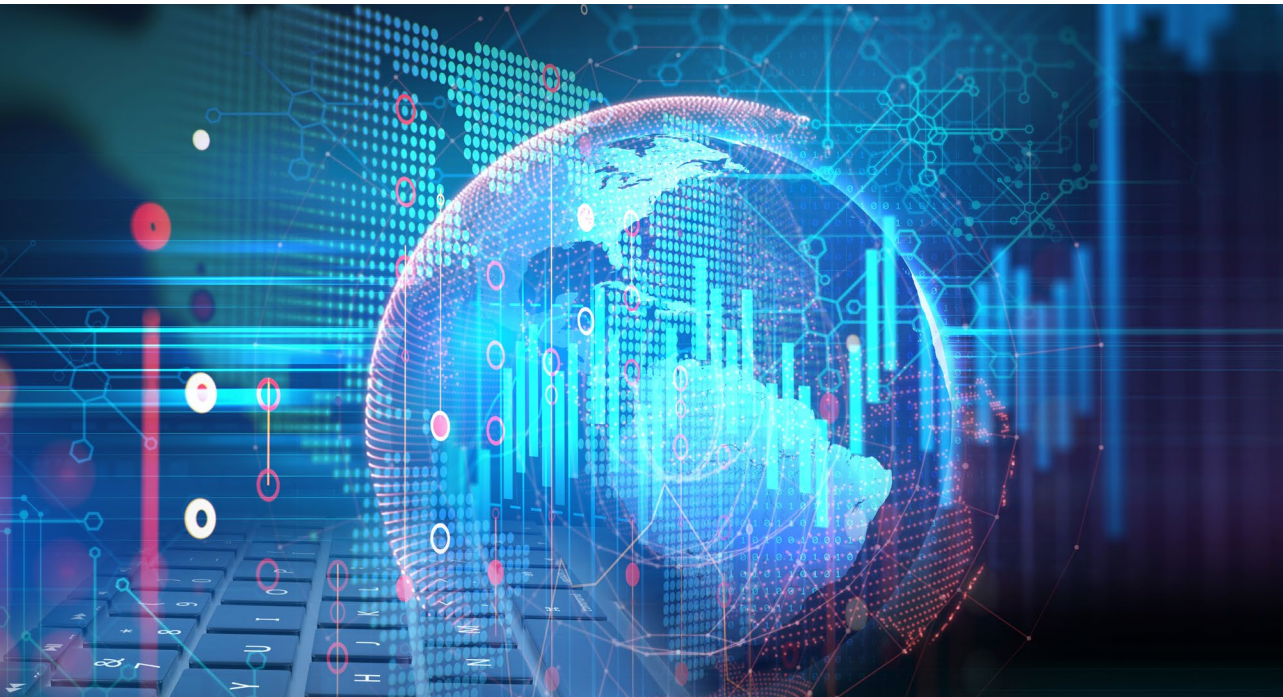
该部门是为了保护委托我司及境外子公司作为代理人的所有客户而专门设置的。风险审计部门打通了境内外进出口商问询回复、受客户委托情况下进行供应链上下游沟通的渠道，并且承担起欧洲化学品管理局、欧盟成员国执行当局、各国海关的查询、执法检查以及公司内部合规质量体系控制等职责。风险审计部旨在帮助企业一站式完成整条供应链上下游的贸易合规，为贸易链各角色（生产商，出口商，进口商）提供风控建议和帮助，规避潜在的法律风险。

**信息系统全面支撑**

华测瑞欧为欧盟 REACH 法规下的注册委托者自主研发了合规供应链系统 NewRSCC，为供应链中的每个角色提供点对点的产品线合规信息传递。系统中各个角色账户保持独立。每个用户仅能查看自己账户中的信息和直接关联的上游或下游传递而来的信息，避免客户信息或供应商信息泄露给其他贸易伙伴。针对下游关于供应商合规信息的确认，风险审计部有严格的机制流程，首先确定问询者（潜在）下游用户的身份后，才会在客户授权下发送或提供相关信息，杜绝信息的恶意套用。合规文件或信息通过系统传递、风险审计部门窗口把关，可以防范客户合规信息被同行滥用或盗用。

**法务团队深入内审**

信息保密方面，华测瑞欧除了与客户签订保密协议，还要求所有员工入职时就签订单独的保密协议，以此确保客户的商业信息得到有效的保护。在内部管控方面，华测



# Social Responsibility

REACH24H has always adhered to the principle of creating value in compliance and prioritizing the green development of the industry. In 2018, REACH24H continued to promote compliance awareness around the world, focusing on the growth and development of SMEs, and helping companies enhance their market competitiveness by providing free information, technology and training services

Since the time of the first EU-REACH registration service, REACH24H has taken multiple measures to strengthen the security management of our customer's data, and it has continued to strengthen its work in the recent years to protect customer information security, avoid legal risks and to ensure its own role as a global agent for our clients to operate smoothly and safely.

● **Establishing the Risk Audit Department**

This department was set up to protect clients. It has opened up channels for domestic and foreign importers to respond to inquiries, conduct upstream and downstream communication in the supply chain when they are entrusted by clients, and to undertake inquiries from the European Chemicals Agency, EU member states, customs of various countries, law enforcement inspectors, and the company's internal compliance quality system control and other duties. It aims to help companies to complete trade compliance by providing risk control advice and assistance to stakeholder up and down the supply chain (producers, exporters, importers) to avoid potential legal risks.

**Full Support from our Information System**

REACH24H has independently developed the compliance supply chain system NewRSCC for the registration of the EU REACH. Each account in the system remains independent. Each user can only view information in their own account and information directly from upstream and downstream to prevent information leakage. For the compliance confirmation of downstream suppliers, the risk audit

department has a strict mechanism process. First, the information can only be provided once authorized by the customer after the requesting party/ (potential) downstream user is identified to prevent malicious use of information. Compliance documents or information will be checked through the system delivery and risk audit department windows to prevent customer compliance information from being abused or stolen by peers.

**Embed in Internal Audit**

In terms of the confidentiality of information, except the confidential agreement with customer, REACH24H also requires all employees to sign a separate confidential agreement when they join the company. In terms of internal control, REACH24H strengthens confidential education, implements responsibility system, enhances employee professional ethics education, and guides employees to abide by work discipline. In addition, REACH24H formed an internal legal audit team. The information security status is checked from time to time. Once found, the loopholes will be corrected immediately to perfect customer information management.



瑞欧对内加强保密教育，落实责任制，强化员工职业道德教育，引导员工遵守工作纪律；此外，华测瑞欧在工作流程中把握各项业务处理和操作环节风险点，组建了法务内审团队。不定期对信息安全状况进行检查，及时发现、立刻纠正，避免客户信息管理工作中的隐患和漏洞。

职业责任险参保

华测瑞欧参保了华泰保险价值 100 万美元的职业责任保险，构筑起职责责任最后一道的风险屏障，为客户的利益保驾护航。

只有注重风险管理，重视客户的数据和隐私保护，才能保证和提升客户的价值，并在遭遇危机时依然确保企业经营的稳定性。华测瑞欧通过自身建立信息保密和风险监控为服务准则，并将这一理念通过专业技术服务传递给客户。

● 成为国家中小企业公共服务示范平台，助力企业增强市场竞争力

2018 年，华测瑞欧成为“国家中小企业公共服务示范平台”，为中小企业提供资讯、技术、培训等服务，主动开展公益性服务，积极承担政府部门委托的各项任务，在解决化工行业中小企业共性需求，畅通信息渠道，提高发展质量，增强市场竞争力，实现创新发展等方面发挥支撑和示范带动作用。

● 省商务厅律师服务月，助力中国企业“走出去”

当前全球贸易保护主义升级、贸易摩擦形势日趋严峻复杂，在湖州市商务局的支持下，由省商务厅贸易救济局率队，省商务厅律师团先后赴湖州市三县两区，实地开展外经贸法律服务活动。华测瑞欧作为唯一的技术性贸易壁垒支持者已经参与该项目多年，为基层企业提供技术性贸易壁垒的培训及咨询，五站活动共计培训全市外贸预警点重点联系人员和外贸企业相关人员 300 余人。

● 普及依法合规意识，促进资讯传递共享

2018 年，华测瑞欧持续发挥自身优势，积极搭建多方交流平台，在全球各地举办线下会议培训 17 场，在线培训 33 场，培训人数超过 10000 人次。同时积极参与行业会议进行交流探讨，出席专业会议 76 场，在 25 场会议上受邀演讲，传递最新法规动态，提高产品合规意识，我们一直在路上。

● 深化校企合作，共育卓越人才——为浙江大学提供实践教学基地

华测瑞欧一直以来坚持以人为本，重视优秀人才培养。2018 年，华测瑞欧与浙江大学就实践教学基地共建达成合作，为培养适应市场需求的运用型人才提供良好的平台。

Professional Liability Insurance

REACH24H purchased Huatai Insurance's professional liability insurance for a value of 1 million US dollars to construct the last risk barrier of responsibility to protect the interests of customers. Only by focusing on risk management, customer data and privacy protection can we ensure and enhance the value of our customers, as well as ensure the stability of our business operations in times of crisis. REACH24H establishes information confidentiality and risk control management as its service standard, and shares it with its clients through professional technical services.

● Being the National SMEs Public Service Demonstration Platform, REACH24H Assists Enterprises Enhance Market Competitiveness

In 2018, being the “National SMEs Public Service Demonstration Platform”, REACH24H provides information, technology, training and other services for SMEs, actively carrying out social welfare projects. It has supported these enterprises by addressing common needs, smoothing communication channels, improving the development overall quality, enhancing market competitiveness, and achieving innovation and development.

● Legal Counseling Month Provided by the Provincial Commerce Department to help Chinese Enterprises “Go Global”

At present, the escalating levels of protectionism and trade friction, led the Huzhou Municipal Bureau of Commerce, the Lawyers of Provincial Commerce

Department to join resources went to the three counties and districts of Huzhou city to offer economic and legal services. REACH24H, as the only technical trade barrier supporter, has participated in the project for many years to provide training and consultation on technical barriers to grassroots enterprises. The five-station activities have been used to train more than 300 key personnel on foreign trade early warning points and related personnel of foreign trade enterprises.

● Popularize legal compliance awareness to promote information sharing

In 2018, REACH24H continued to exert its own advantages and actively built a multi-party exchange platform. We held 17 offline conference trainings and 33 online trainings, with more than 10,000 trainees. At the same time, we actively participated in industry conferences, attended 76 professional conferences, and were invited to give speeches at 25 conferences. We constantly follow on the latest regulations passed to improve our product compliance awareness services.

● Deepen the Cooperation between Schools and Enterprises and Jointly Cultivate Outstanding Talents - Providing a Practical Teaching Base for Zhejiang University

REACH24H has always adhered to a people-oriented customer service and has paid attention to talent cultivation. In 2018, REACH24H and Zhejiang University established cooperation on the practice teaching base to provide a good platform for cultivating talents to meet market demand.



# 展望 2019

## 2019 Outlook

# 2019 年上半年办会计划

时间	活动名称	地点
3 月	化学品管理综合性会议	苏州
3 月	化学品管理综合性会议	上海
4 月	化学品管理综合性会议	宁波
4 月 25-26 日	化学品全过程安全管理培训系列—化学品安全环保管理课程	杭州 / 上海
5 月	农药登记基础培训班	上海 / 杭州
5 月	化学品合规研讨会	美国
5 月	化学品合规研讨会	欧洲
6 月 13-14 日	化学品全过程安全管理培训系列—危险货物运输管理课程	杭州

# 2019 年上半年参会计划

时间	活动名称	地点
1 月 30-2 月 1 日	COSME TOKYO	日本东京
2 月 24-27 日	Personal Care Products Council (PCPC) Annual Meeting	美国棕榈滩
4 月 25-26 日	GlobalChem 2019	美国华盛顿
3 月 14-17 日	Cosmoprof Worldwide Bologna	意大利博洛尼亚
3 月 18-20 日	第二十二届中国国际食品添加剂和配料展览会（FIC）	上海国家会展中心
3 月 5-7 日	CAC2019 第二届中国国际农用化学品及植保展览会	上海新国际博览中心
3 月 26-28 日	Grocery Manufacturers Association (GMA) Science Forum	美国华盛顿
4 月 1-3 日	11th International Conference of Global Chemical Safety Regulation in Russia and CIS Corporations	意大利米兰

# Event Calendar for First Half of 2019

Time	Name	Location
March	Comprehensive Chemical Management Conference	Suzhou
March	Comprehensive Chemical Management Conference	Shanghai
April,	Comprehensive Chemical Management Conference	Ningbo
April 25-26	Chemical Process Safety Management Training Series - Chemical Safety and Environmental Management Course	Hangzhou/Shanghai
May	Pesticide Registration Training Course –Entry Level	Hangzhou/Shanghai
May	Chemical Compliance Workshop	USA
May	Chemical Compliance Workshop	Europe (TBD)
June 13-14	Chemical Process Safety Management Training Series - Dangerous Goods Transportation Management Course	Hangzhou

# Event Calendar for First Half of 2019

Time	Name	Location
Jan.30 –Feb. 1	COSME TOKYO	Tokyo, Japan
Feb. 24-27	Personal Care Products Council (PCPC) Annual Meeting	Palm Beach, United States
March 6-8	GlobalChem 2019	Washington, USA
March 14-17	Cosmoprof Worldwide Bologna	Bologna, Italy
March 18-20	The 22nd China International Food Additives and Ingredients Exhibition (FIC)	Shanghai National Convention and Exhibition Center
March 5-7	CAC2019 20th China International Agricultural Chemicals and Plant Protection Exhibition	Shanghai New International Expo Centre
March 26-28	Grocery Manufacturers Association (GMA) Science Forum	Washington, USA
April 1-3	11th International Conference of Global Chemical Safety Regulation in Russia and CIS Corporations	Milan, Italy



4 月 2-4 日	In-cosmetics Global	法国巴黎
4 月 4-5 日	CropLife America (CLA) & RISE 2018 Regulatory Conference	美国水晶城
4 月 7-11 日	COSTHA 2019 Annual Forum & Expo	美国长滩
4 月 10-12 日	中国国际染料工业展 展位号 C516	海世博展览馆
4 月 11-12 日	CBIFS 2019 第十二届中国国际食品安全技术论坛	中国重庆
5 月 1-3 日	Personal Care Products Council (PCPC) Legal & Regulatory Conference + PCPC International Committee Meeting	美国圣安东尼奥
5 月 14-16 日	上海中食展 SIAL	中国上海
5 月 29-31 日	2019 中国国际食品、肉类及水产品展览会暨进出口食品政策与法律法规交流会	上海国家会展中心
6 月 11-13 日	2019 第十三届上海国际进出口食品及饮料展会	上海国家会展中心
6 月 17-21 日	Chemcon Asia 2019	韩国首尔
6 月 19-21 日	第十届中国国际健康产品展览会 2019 亚洲天然及营养保健品展 (NPC)	中国上海
6 月 26-28 日	马来西亚吉隆坡国际饮食品展览会 (MIFB)	马来西亚吉隆坡
6 月 11-13 日	2019 Spring Food Packaging Summit	美国巴尔的摩
6 月 26-28 日	In-Cosmetic Korea	韩国首尔
6 月 18-20 日	第十八届世界制药原料中国展 CPHI 展位号: E6G57	上海新国际博览中心
待定	第五届化学物质管理展会	日本横滨
待定	China Beauty Expo	中国上海
待定	PLASTICS 2019 International Food Packaging Symposium	美国巴尔的摩
待定	第五届全球乳制品聚焦峰会	新加坡
待定	新西兰奥克兰国际食品展览会 Fine Food New Zealand	新西兰奥克兰
待定	ICMAD 2019 Cosmetic Technical Regulatory Forum	待定
待定	Society of Chemical Hazard Communication (SCHC) Spring 2019 Meeting	待定
待定	IFRA North America Regulatory Workshop & Spring Meeting	待定
待定	Household & Commercial Products Association (HCPA) Mid-Year Meeting	待定

April 2-4	In-cosmetics Global	Paris, France
April 4-5	CropLife America (CLA) & RISE 2018 Regulatory Conference	Crystal City, USA
April 7-11	COSTHA 2019 Annual Forum & Expo	Long Beach, USA
April 10-12	China International Dyestuff Industry Exhibition Booth No. C516	Shanghai World Expo Exhibition Hall
April 11-12	CBIFS 2019 The 12th China International Food Safety Technology Forum	Chongqin, China
May 1-3	Personal Care Products Council (PCPC) Legal & Regulatory Conference + PCPC International Committee Meeting	San Antonio, USA
May 14-16	SIAL	Shanghai, China
May 29-31	2019 China International Food, Meat and Aquatic Products Exhibition and Import and Export Food Policy and Laws and Regulations Exchange Meeting	Shanghai National Convention and Exhibition Center
June 11-13	2019 The 13th Shanghai International Import and Export Food and Beverage Exhibition	Shanghai National Exhibition Center
June 17-21	Chemcon Asia 2019	Seoul, Korea
June 19-21	The 10th China International Health Products Exhibition 2019 Asian Natural and Nutritional Health Products Exhibition (NPC)	Shanghai, China
June 26-28	Kuala Lumpur International Food and Beverage Fair (MIFB)	Kuala Lumpur, Malaysia
June 11-13	2019 Spring Food Packaging Summit	Baltimore, USA
June 26-28	In-Cosmetic Korea	Seoul, Korea
June 18-20	The 18th World Pharmaceutical Raw Materials China Exhibition CPHI Booth No: E6G57	Shanghai New International Expo Centre
TBD	The 5th Chemical Substance Management Exhibition	Yokohama, Japan
TBD	China Beauty Expo	Shanghai, China
TBD	PLASTICS 2019 International Food Packaging Symposium	Baltimore, USA
TBD	The 5th Global Dairy Focus Summit	Singapore
TBD	Fine Food New Zealand	Auckland, New Zealand
TBD	ICMAD 2019 Cosmetic Technical Regulatory Forum	TBD
TBD	Society of Chemical Hazard Communication (SCHC) Spring 2019 Meeting	TBD
TBD	IFRA North America Regulatory Workshop & Spring Meeting	TBD
TBD	Household & Commercial Products Association (HCPA) Mid-Year Meeting	TBD



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*CRAC2019,  
More to Come!*

September 9  
See you in Xi'an!





杭州华测瑞欧科技有限公司  
REACH24H Consulting Group China

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