

NEWSLETTER

SPECIAL ISSUE

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IMPORTANT UPDATES ABOUT REACH, K-REACH, K-BPR AND MEDICAL DEVICE REGULATION

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CHEMICALS / REACH

Time for industry action – ECHA plans scrutinising all REACH registrations by 2027

SCC has been regularly reporting about the development on the topic “REACH data compliance” and the actions that ECHA and the European Commission are taking in order to increase the quality of the submitted REACH dossiers. On 24 June 2019 ECHA published that the Commission is going to propose an amendment to REACH to raise the current minimum target for compliance checks from 5% to 20% of the registration dossiers in each tonnage band. This translates into checks for about 30% of all registered substances. The increased target is part of ECHA’s and the Commission’s joint action plan to address the lack of compliance in registration dossiers and to encourage industry to improve the safety data of chemicals.

ECHA's key priority for the coming years is improving compliance with the law¹. ECHA's aim is to screen by 2023 all registration dossiers for substances registered above 100 t/y and by 2027 all dossiers for substances below 100 t/y. The agency will also check the compliance of at least 30% of substances making sure that this check is done for all substances with a hazardous profile or for which more information is needed. Similar substances will be assessed in groups to gain efficiency and ensure that proposals for further regulatory action are consistent. For high tonnage substances, ECHA plans to conclude by the end of 2020 whether they are a priority for risk management, for data generation or currently of low priority for further action.

To support ECHA's intentions, in June 2019 the European chemicals manufacturers' association (Cefic) launched a multi-annual **Action Plan** to help REACH registrants review their chemical safety data. This Action Plan provides a framework for REACH registrants to evaluate the safety data in a stepwise manner. The plan outlines the timeline, roles and responsibilities, substance prioritisation criteria, critical issues, and explains how progress will be reported. The Action Plan will run between 2019-2026, allowing for one year of planning and setting-up and seven years of actual updates.

Cefic and ECHA have signed a cooperation agreement, which outlines a series of specific activities to support the implementation of this Action Plan and guide registrants to a better understanding of how to meet ECHA's expectations under Article 41 of REACH ('Compliance Check'). Individual companies are encouraged to sign a **Declaration of Intent**, with which they can express their intent to re-evaluate dossiers and to provide further information, where appropriate, in line with the Action Plan. Companies also commit to report to Cefic their progress using the already developed **reporting template**.

SCC can assist you in checking the REACH data quality of your dossier registrations, support you by improving the dossier quality and help defend your registration in eventual compliance check.

Recent Developments regarding the "Implementing Regulation on Dossier Updates" (draft)

After the final registration deadline for the transitional phase-in regime expired on 1 June 2018, it has become a priority for ECHA that registration dossiers are fully compliant with the applicable standard information requirements. As part of the Joint Action Plan, ECHA identified the need to establish specific timeframes for dossier updates in accordance with the individual cases listed in Article 22(1) of REACH. Article 22 describes the further duties of registrants once they have completed their registration pertaining to updates of their registration. These updates should be undertaken 'without undue delay'.

In the course of the recent 30th Meeting of Competent Authorities for REACH and CLP (CARACAL) on 1-2 July 2019, the draft Implementing Regulation (IR) was intensively discussed.²

We would like to outline the following most controversially discussed points:

- Where an update triggers the need to also update the Chemical Safety Assessment and the Chemical Safety Report, the timeframe for submitting that combined update shall be 6 months.

¹ ECHA, 24.06.2019, ECHA to scrutinise all REACH registrations by 2027, <https://echa.europa.eu/-/echa-to-scrutinise-all-reach-registrations-by-2027>

² The meeting documents are to be found on the CIRCABC website (<https://circabc.europa.eu>), publicly available data after registration in the Interest group to facilitate exchange of information between interested parties for the implementation of REACH and CLP

- Registrants shall have monitoring and tracking systems in place that enable them to identify if any of the cases itemised in Article 22(1) are triggered.
- Changes in a registrant's status or in his identity shall be updated within 1 month of that change taking effect legally.
- Changes in the annual or total quantities: within 1 month as of the moment that the registrant becomes aware that a lower threshold is reached.
- New identified uses: within 1 month from receiving all relevant information on them.
- The registrant shall be obliged to periodically review relevant information sources (e.g. conduct literature search). Updates related to such new knowledge shall be done within 6 months.
- Changes in the classification: within 1 month.
- Updates or amendments of the chemical safety report: within 6 months.
- Updates of joint submissions: the member registrant has 1 month to submit the update, counted from the date the updated lead submission was deemed complete.

Comments on the draft Implementing Regulation were submitted by the competent authorities (CA) of Ireland and Finland and from the industry associations Eurometaux, Concawe, SMEUnited, Cefic. In summary industry stressed that the deadlines, especially in cases where 1 month is foreseen, would be too stringent. Taking complex supply chains and communication within these into account, industry associations expressed that it would be unrealistic to meet the proposed update deadlines.

The industry associations stressed that the meaning of a monitoring and tracking systems is not clear and that it creates new administrative burdens for registrants.

This Implementing Regulation has the potential to increase the administrative efforts for the registrants to be REACH compliant. SCC will closely monitor the on-going discussions and the development regarding this implementing regulation as it will have a huge impact on registrants. Stay tuned and follow our newsletter.

Implementing Regulation on the end of the 'phase-in' status

Article 23 of REACH regulation established a transitional regime for phase-in substances. In order to ensure equality between market operators of phase-in and non-phase-in substances after the expiry of the transitional regime, it was necessary to specify the applicability of special provisions for phase-in substances after the transition period ended. Thus, **the Commission has prepared an Implementing regulation to specify these conditions.**³ The regulation was submitted to a vote to the REACH committee. On its recent meeting on 1-2 July 2019, the committee gave a favorable vote on the draft implementing regulation and the regulation will soon be published in the official journal.

The following points will be changed from 1 January 2020 onwards:

- The specific method for calculating quantities per year of phase-in substances (based on a 3 year average) shall only continue to apply until 31 December 2019. Once a registrant has completed the registration, the registrant shall subsequently calculate his quantity of that substance per calendar year.

³ The meeting documents are to be found on the CIRCABC website (<https://circabc.europa.eu>), publically available data after registration in the Interest group to facilitate exchange of information between interested parties for the implementation of REACH and CLP

- The expiry of the transitional regime for phase-in substances shall not affect the applicability of Article 12(1)(b).
- Registrants shall continue to fulfill their data-sharing obligations in a fair, transparent and non-discriminatory way.
- After 31 December 2019 pre-registrations shall no longer be valid and Articles 26 and 27 shall apply to all phase-in substances.

We recommend checking whether, based on the new calculation rules, the tonnage band will change from 2020 onwards. It may be the case that, based on the calculation per calendar year, a higher tonnage band in 2020 will be triggered.

Furthermore, as pre-registrations will become in-valid from 2020 onwards, any pending registrations (member or lead) should be completed by the end of the year. Otherwise an inquiry needs to be prepared and submitted to ECHA. This will result in additional time and efforts and needs to be considered for the registration plan and the market-access timelines.

Nanomaterials under REACH: an important update

Nanomaterials are used in various fields ranking from everyday goods to electronics and medicine. Their characteristics like particle size, shape and different coating material allow innovation and new uses. However, with sizes between 1 and 100 nm new properties arise, which are different from their bulk material and which lead to a need for regulatory scrutiny. Therefore, REACH Annexes I, III and VI-XII have been modified introducing nano-specific clarifications and new provisions (COMMISSION REGULATION (EU) 2018/1881). These amendments will enter into force on **1st January 2020** for both new and existing registrations that also cover nanoforms of substances. So registrants **need to update existing dossiers** with the nanoform-specific information.

A recommendation of the EU Commission for defining nanomaterials has been integrated in this new nano-specific amendment of the REACH regulation. According to this definition, a nanomaterial *“is a form of a natural or manufactured substance containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for 50 % or more of the particles in the number size distribution, one or more external dimensions is in the size range 1 nm-100 nm, including also by derogation fullerenes, graphene flakes and single wall carbon nanotubes with one or more external dimensions below 1 nm.”*

According to Annex VI (Identification of nanomaterial) of the new amendment, information on the following points is required in the dossier:

- Number based particle size distribution
- Description of surface functionalization
- Shape, aspect ratio and other morphological characterisation
- Surface area (specific surface area by volume, specific surface area by mass or both)
- Description of the analytical methods

In general, a proper characterisation of the nanomaterial prior to performing studies is mandatory. Furthermore, grouping of a set of similar nanoforms for Read-Across purposes is introduced.

In Annexes VII-X (Information requirements) nanospecific requirements are introduced for various endpoints:

- Water solubility: For nanoforms, the testing of dissolution rate in water as well as in relevant biological and environmental media shall be considered as additional methods.
- Partition coefficient n-octanol/water: For nanoforms, whether of inorganic or organic substances, for which the partition coefficient n-octanol/water is not applicable the study of dispersion stability shall be considered instead.
- Dustiness testing for nanoforms
- *In vitro* gene mutation study in bacteria does not need to be conducted for nanoforms.
- Acute oral toxicity: The study doesn't need to be conducted if a study on acute toxicity by the inhalation route is available.
- Repeated dose inhalation toxicity studies: For nanoforms toxicokinetics shall be considered including recovery period and, where relevant, lung clearance.
- Hydrolysis: For nanoforms, the study may not be waived on the basis of high insolubility in water alone.
- Adsorption/desorption screening: For nanoforms, use of any physicochemical property (e.g. octanol-water partition coefficient) as a reason for waiving the study shall include adequate justification of its relevance to low potential for adsorption.

For a successful implementation of the nanospecific REACH amendment robust and reliable hazard data are needed. Therefore, authorities work together and started updating current OECD guidelines so that reliable hazard data on nanomaterials can be generated. However, where no current OECD test guidelines are available, other test guidelines (IS/CEN/WHO) or test methods, which are proposed by national authorities, are recommended by ECHA.

ECHA has also updated guidance documents to help registrants to fulfil the new requirements under REACH^{4, 5}.

ECHA's assessment of the need to amend the Annexes VI to XI of REACH

On the 30th Meeting of Competent Authorities for REACH and CLP (CARACAL) on 1-2 July 2019, ECHA presented a document for discussion outlining the need to amend the Annexes VI to XI of REACH. As a result of its dossier evaluation activities, the agency came to the conclusion that the REACH Annexes on information requirements are to a certain extent not consistent, not clear or specific enough and leave room for interpretation.

ECHA stated that, in line with the REACH Evaluation Joint Action Plan, the EU Commission will assess the need, and if necessary make a proposal, to amend the Annexes VI to X of REACH by the end of 2019. Furthermore the Commission will also evaluate the need to amend Annex XI.

ECHA identified the following important improvement needs across the REACH Annexes:

- Clarify the wording in column 2 of annex VII, VIII and IX: ***“further testing shall be considered/proposed by the registrant or, within the information requirements in those annexes, may be requested by the Agency”***.

⁴ ECHA Guidance: Appendix R7-1 for nanomaterials applicable to Chapter R7a Endpoint specific guidance Version 2.0 May 2017

⁵ ECHA Guidance on information requirements and chemical safety assessment Appendix R.6-1 for nanomaterials applicable to the Guidance on QSARs and Grouping of Chemicals Version 1.0 May 2017

- Clarify the difference between information requirements for degradability under Annexes VIII, IX and X.
- Ensure consistency between column 1 and column 2.
- Ensure consistency in naming test methods for a certain endpoint (OECD number not always given). Some references to test methods mentioned are outdated.

ECHA prepared a non-exhaustive list of concrete issues that should be rectified, clarified and/or further specified in the Annexes to REACH. Those issues are subject to further discussion and may be adapted by the Commission as appropriate.

We would like to focus on some issues, which would have a major impact on REACH dossier and registration strategy.

Issue	SCC's assessment
Annex VII and VIII: Clarify mutagenicity testing strategy for all registrants regardless of their tonnage. Specify whether/what further studies must be done in case <i>in vitro</i> test is not negative, to resolve the mutagenicity concern.	This change may introduce new standard data requirements for Annex VII and VIII dossiers. Submitted dossiers may need to be updated with new tests.
Annex VIII Section 8.7.1: Delete the adaptation based on availability of a Prenatal Developmental Toxicity Study (OECD 414).	This could have an impact on the registration strategy chosen in existing Annex VIII and Annex IX dossiers. For Registration dossiers, in which this adaptation was used, the testing for an OECD 422 study may be triggered.
Annex IX and X Section 8.4: Clarify the conditions when to perform an <i>in vivo</i> somatic cell genotoxicity study and a germ cell study as well.	This change may introduce new standard data requirements and further tests may be required for registered substances.
Annex IX and X Section 8.7.2: Reconsider number of species in the PNDD requested in Annex IX.	This change may introduce the second species OECD 414 as new standard requirement.
Annex XI: Clarify requirements for read-across adaptations and clarify weight of evidence (WoE) requirements.	This may introduce more stringent rules for read across and WoE adaptations and to which extent read across and WoE will be accepted by ECHA.

Furthermore, ECHA proposed some changes providing in general more clarity regarding Environmental Safety (e.g. definition of a poorly water-soluble substance, use of logPow and Koc as trigger for columns 2 adaptations).

Proposals for these topics will be prepared by the Commission by the end of 2019 and will be discussed in the CARACAL group from 2020 onwards.

Are you prepared to offer your eSDSs in all European Languages?

The REACH legislation requires registrants to provide the eSDS including its Annex in the national language of the market, where the chemical is sold. In the past, most of the national competent Authorities (MSCAs) accepted the Annex to the eSDS in English language. This has changed over the last years and

many customers and MSCAs are now requesting the translated versions. Many big chemical companies have developed their own system, which is in most cases linked to their in house EHS software.

Basis for the majority of such IT solutions is a risk assessment performed in CHESAR, the official tool by ECHA. Prerequisite for using a CHESAR export is that the risk assessment is done using standardized phases. The established standard is to use the ECom phrases, which are available in all EU languages. Thus, we encourage all registrants to update their risk assessments using ECom phrases. This also helps developing harmonized risk assessments, which can easily be exchanged between lead and member registrants.

SCC has developed a system to be able to generate Annexes for eSDSs for all European languages from a CHESAR risk assessment using ECOM phrases. Please get in contact with your SCC partner to learn how easily you may get ready with your eSDS translations.

Brexit and its impact on chemicals

On 11 April 2019, the European Council decided, in agreement with the United Kingdom, to further extend the foreseen 2-year period prior to the UK withdrawal until 31 October 2019. Following this decision, and until further notice, the withdrawal date **of the United Kingdom from the European Union, must be read as referring to 1 November 2019** at 00.00 (CET).

There continues to be as much uncertainty in the air about Brexit and its scenarios as throughout the entire process. It is completely open whether the UK and the EU will agree on a withdrawal agreement, which would allow for a Brexit with provisions about a transition phase, or not, since a transition phase will only be accepted if a comprehensive withdrawal agreement is in place.

Both ECHA and the HSE (Health and Safety Executive) in the UK have published extensive guidance for stakeholders, including no-deal guidance i.e. if the UK leaves the EU with no deal in place (and thus with no implementation period). Defra (Department for Environment Food & Rural Affairs) issued an updated detailed [guidance document](#) covering various stakeholder roles and they also issued a concise overview of the key requirements in regard of the future IT system for UK REACH.

Who/what is concerned?

EU REACH registrations:

- The solution for substances that were REACH registered by UK-based Only Representatives (OR) could be the transfer of the OR role to SCC.
- The solution for UK importer or manufacturer registrations could be the registration either by SCC as OR or by an EU importer / downstream user supported by SCC.

Substances marketed in the UK:

- The solution for all the substances that need to be registered according to the new chemicals regulation in the UK for continued supply could be the UK registration via SCC in collaboration with its experienced UK-based partner consultant.

What is your degree of preparedness for the Brexit? Do not hesitate to contact us if you want to ensure the continuity of your supply chains in Europe.

INTERNATIONAL REGISTRATIONS

K-REACH: What are the most important obligations after the pre-registration deadline expired?

A big milestone for K-REACH has just passed: the deadline for pre-registration of existing substances expired on 30 June 2019. SCC succeeded in securing the foreseen grace periods for continued importation for its clients through pre-registration of a fairly large number of substances.

Just to re-cap, the grace periods per tonnage band for pre-registered substances are as follows:

- By 31 Dec 2021: ≥ 1000 t/a and CMRs ≥ 1 t/a
- By 31 Dec 2024: 100 - 1000 t/a
- By 31 Dec 2027: 10 - 100 t/a
- By 31 Dec 2030: 1 - 10 t/a

As both stressful but finally rewarding as the last weeks in June were for the international team, the pre-registration is just a first step on the journey towards registration and many obligations need to be kept in mind and addressed in parallel.

For **approved pre-registrations**, it is important to note that K-REACH stipulates the need for formal updates in case of certain triggers. Pre-registrations need to be updated within 1 month in case of changes like e.g. change in tonnage band, change of company name or contact details, but also within 1 month after recognition of change in cases like e.g. change in classification and labelling of a substance, whenever a new use has been identified.

The possibility of **late pre-registration** exists. It is permitted (without deadline) in these cases:

- Whenever an existing chemical is to be newly manufactured or imported into South Korea and its annual tonnage is expected to exceed the 1 t/a threshold
- Whenever a chemical's annual tonnage hadn't reached the 1 t/a threshold by June 2019 but is expected to exceed it still in 2019 or in subsequent years.

Pre-registrants are now strongly advised to start determining their **registration strategy** for the portfolio of concerned substances. The CICO ('SIEF') IT platform will open in September and will automatically bring the parties together for joint registration. Several consortia have formed and are ready to register groups of substances. CICO distinguishes between three different roles: Lead Registrant (LR), Active and Passive member. It is important that companies compare the advantages and disadvantages of the roles and determine the best fitting position case by case. EU REACH data owners may probably want to utilize the existing data and should perhaps consider taking an Active member role for such substances.

The **registration deadline for high volume chemicals** of $>1,000$ t/a (but also for CMRs of >1 t/a) is on **31 December 2021** and thus only leaves approximately 2 years for completion of the registration, so that a fast start into the CICO activities and planning for successful joint registration is desirable.

A distinct feature of K-REACH is the **obligation to register polymers**, unless they fulfil certain exemption criteria. Conclusive GPC data will be the key pre-requisite for notification of application for exemption. The MoE just published "Guidance for polymer registration" on 9 July 2019.

In cooperation with our experienced and trusted partner in South Korea, SCC looks forward to assisting you with regulatory advice, monitoring of any required studies, compilation and submission of the registration dossiers for pre-registered substances and new substances alike.



In case you have any questions or need support, please contact
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K-BPR and beyond: Regulatory requirements for the import of Biocides into South Korea

Does your company export biocidal products, active substances or treated articles (e.g. paints containing in-can preservatives) to South Korea - or are you planning to do so? Then you might already be familiar with the requirements of Korea's new biocidal products regulation: the "Consumer chemical products and biocides safety management Act", better known as "K-BPR".

Depending on the formulation of your product(s), however, there may be other regulatory requirements in addition to K-BPR that you may also need to comply with.

Biocidal products and treated articles are usually complex mixtures that contain - beside active substances and/or preservatives - a large number of co-formulants such as thickeners, pigments, solvents, etc. Among the most important regulations under which these substances may fall are the following:

- Act on the registration, Evaluation etc. of Chemicals (ARECS, "K-REACH"): regulates the registration and evaluation of industrial chemicals
- Chemical Control Act (CCA): concerns the management of chemicals (reporting by importers and manufacturers) and accident prevention
- Occupational Safety and Health Act (K-OSHA): affects occupational safety

In accordance with article 9 of the CCA, importers have to submit a so called "Letter of Confirmation" to the Korean Chemicals Management Association (KCMA) which details the composition of a respective chemical product and confirms the inventory status of each component.

The industry is recommended to check biocidal active substances, biocidal products and treated articles exported to South Korea and identify the regulatory status of contained chemical components in order to avoid interruptions in the supply chain.

Should you have any doubts whether you have indeed considered all relevant aspects of South Korea's complex biocides and chemicals legislation, please do not hesitate to talk to us. We analyse for you whether the regulatory steps you have taken or are about to take are compliant with your business goals.



In case you have any questions or need support, please contact
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MEDICAL DEVICES

The implementation of the new European medical device regulation is going forward

The European Commission (EC) has recently issued some announcements opening the way for the implementation of the medical device regulation (MDR).

One of the most prominent bottlenecks, however, is the designation of the notified bodies. After the BSI nomination in January this year, the TÜV Süd Product Service became the second institution authorised to provide certification services under the new regulation this May. With further 37 notified bodies still awaiting MDR designation, this step cannot count as a big breakthrough, yet. However, this designation is not just a formal sign to show that the MDR implementation is moving forward, taking into account the fact that TÜV SÜD is a strong player in Germany with a powerful international presence and openness for new customers.

In June 2019, the EC also designated the issuing entities entitled to generate Unique Device Identifiers (UDIs) for medical products. Accordingly, medical device manufacturers can select among four organisations: the GS1 AISBL, the Health Industry Business Communications Council (HIBCC), the ICCBBA, and the German Informationsstelle für Arzneispezialitäten (IFA GmbH).

Another open task that has been taken on is the EUDAMED database. The functional specifications for EUDAMED were published in a draft this March. Alongside the new manufacturer incident report templates, issued in January 2019, the EC also published the XSD files for implementation in manufacturers' databases before January 2020. The actual rolling plan indicates, however, that clinical investigation and market surveillance modules will not be available before the MDR implementation deadline due to several processing difficulties. Nevertheless, progress is becoming visible. With the vigilance module of EUDAMED being now ready, the EUDAMED's relaunch is inevitably getting closer.

In general, major implementation steps are in time and there is no doubt that the old directive will be replaced by the new regulation as planned by 26 May 2020. For manufacturers and other economic operators, the transition means additional work and costs in order to be compliant. The clock is ticking – and as usual, stress level and costs will rise heavily when time comes close to the final deadline.

If you have not fully planned your transition steps yet or you need additional personnel resources to implement the MDR, you have to get active now. SCC offers a broad range of services for everybody who wants to stay or start at the European medical device market.



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CALENDAR



SETAC GLB Meeting 2019 in Landau, Germany 4 - 6 September 2019

SCC is joining the annual SETAC GLB meeting, taking place at the campus Landau of the University Koblenz-Landau on 4-6 September 2019.

Visit us at **SCC's booth in the exhibition area**. Our environmental expert, **Erik Geibel**, Senior Manager Regulatory Science, looks forward to sharing with you his expertise on regulatory and scientific issues.

Request a meeting with Erik at the upcoming SETAC GLB meeting in September.

Supported by the German Chemical Society (GDCh), this year event will focus on the biodiversity in water and on land, examining the role of chemical stressors in particular. For more information on the SETAC GLB meeting, please view [the event website](#).

CIR Crop Innovations and Regulations in Barcelona, Spain 10 - 12 September 2019

Join SCC at the annual CIR conference, taking place in Barcelona on 10 – 12 September 2019. At the event, you will meet the agrochemicals and biocontrol crop protection community and gain insight into the latest regulatory policy and R&D advancements for effective plant protection products, biopesticides, and biostimulants. To learn more about the upcoming event, please go to the official [CIR website](#).

SCC will be speaking at the CIR 2019. If you are interested in an update on **current and future challenges with Efficacy evaluation**, don't miss out on Dr Norbert Weissmann's speech in the AgChem Forum: Regulatory Frameworks scheduled on Day 1 at 11:10.

Dr Weissmann is Senior Manager Regulatory Affairs, Head of SCC's Efficacy Group.

If you are active in the field of biorationals regulatory affairs, join SCC to get **an update on Low Risk substances** presented by our Senior Manager Dr Bernd Brielbeck in the Biocontrol Forum on Day 2 at 11:35.

Our senior experts look forward to meeting you at our **Booth 13**.

Request a meeting with our experts to discuss your specific regulatory needs at CIR in September.

See you at the CIR 2019 in Barcelona!

Chemical Material Japan 2019 in Yokohama 18 - 19 September 2019

SCC is attending the Chemical Material Japan 2019, taking place for the second time in Yokohama on 18-19 September 2019. This year's event comprises an exhibition, an industrial meeting and a forum, being recognized as a valuable platform for Japan's chemical industry that brings together business decision makers, researchers and innovators in the fields of environmental technology, automotive electronic materials, life sciences and social infrastructure. For more information on the event, please view its [official website](#).

As part of the Chemical Substance Management Meeting, our Japanese regulatory experts will hold presentations, providing an overview on most recent regulatory developments in the chemical industry in the EU and selected Asian countries.

Don't miss the chance to visit our **booth M-14** and discuss with our Chemicals regulatory experts your registration needs for Chemicals on the Japanese, European and international markets. Request a meeting with SCC at the Chemical Regulation Meeting in Yokohama.

Request a meeting with our experts on site to discuss any issue of your concern.

Looking forward to meeting you in Yokohama!

Risk Assessment Training Course for Biocides – Mainz, Germany 22 - 23 October 2019

In partnership with Chemical Watch, SCC will provide two days of intensive training on biocides with a comprehensive overview of environmental (ERA) and human health risk assessments (HHRA). The course will be held in Mainz on 22 - 23 October 2019.

The training is based on theoretical and practical sessions, explaining the essential principals of ERA and HHRA and demonstrating how to use software tools and models.

This two-day course is designed for environmental and human risk assessors and regulators from industry, authorities and consultancies.

For further information, please [download the programme](#). To register for the training courses, visit [the event website](#).

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Do you have any comments, questions or suggestions?
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