

## Compare REACH and similar chemical management programs

EU/EAA: REACH		TAIWAN: TCSCA	SOUTH KOREA: AREC	TURKEY: KKDIK*
Registration, Evaluation, Authorization of Chemicals		Toxic Chemical Substance Control Act	Act on the Registration and Evaluation of Chemicals	Kimyasalların Kaydı, Değerlendirmesi, İzni ve Kısıtlanması**
<b>NOTIFICATION</b> (Basic information required)				
New substance notification	No notification, only registration.	<ul style="list-style-type: none"> <li>Required for all substances, i.e., those that are not listed on the Taiwan Chemical Substance Inventory (TCSI);</li> <li>Standard notification: manufacture/import higher than 1 ton, or 10 tons for research purpose;</li> <li>Simplified notification: manufacture/import between 100kg to 1 ton, or 1 ton to 10 ton for research purpose;</li> <li>Small amount notification: manufacture/import less than 100kg, or less than 1 ton for research purpose.</li> </ul>	<ul style="list-style-type: none"> <li>Required for products containing hazardous substances, that are not on the Korean Existing Chemicals Inventory (KECI) list;</li> <li>Also for product containing hazardous substances, i.e. PEC substances &gt;1 ton/yr.</li> </ul>	SAME AS EU REACH: No notification, only registration.
Who must notify	EU/EEA manufacturer/importer	Taiwan manufacturer/importer	South Korean manufacturer/importer	Turkish manufacturer/importer
<b>REGISTRATION</b> (More complex data required, subject to approval)				
Name of national inventory when applicable	Not applicable.	Taiwan Chemical Substance Inventory (TCSI)	Korea Existing Chemicals List (KECI)	Inventory and Control of Chemicals (CICR) is currently in place (pre-KKDIK) but expected to be replaced in the final legislation.
Substance registration	Required for all substances, i.e., those, in quantities > 1 ton/year, that any legal entity has never imported before, regardless of what other legal entities have done.	<ul style="list-style-type: none"> <li>For all substances on a PEC list that is not yet published.</li> </ul>	<ul style="list-style-type: none"> <li>New substances (i.e., not in KECI) regardless of volumes;</li> <li>Priority Existing Chemicals (PEC) ≥ 1 ton / year / legal entity. Only those require full registration.</li> </ul>	<ul style="list-style-type: none"> <li>Required for all substances, i.e., those, in quantities &gt; 1 ton/year, that any legal entity has never imported before, regardless of what other legal entities have done.</li> </ul>
Volume-based registration	Yes	Yes	Yes	Yes
Pre-registration	<ul style="list-style-type: none"> <li>Pre-registered substances will exist until June 2018;</li> <li>Late pre-registration is open until June 2017 for volumes &lt; 100 ton/year.</li> </ul>	Phase 1 registration: <ul style="list-style-type: none"> <li>Required, to be done after Apr 1, 2016 for substances listed on TCSI when ≥ 100 kg / year / legal entity (LE);</li> <li>Required, to be done before Apr 1, 2016 for substances listed on TCSI when ≥ 100kg/year in the past 3 years (2013-2015);</li> <li>Some exemption applied.</li> </ul>	No	Yes
Existing substance registration scope	All existing substances ≥ 1 ton / year should have been (pre-) registered.	Phase 2 registration: for all substances on a Priority Existing Chemicals (PEC) list that is not yet published.	<ul style="list-style-type: none"> <li>New substances (i.e., not in KECI) regardless of volumes;</li> <li>Priority existing chemicals (PEC) ≥ 1 ton / year / legal entity. Only those require full registration.</li> </ul>	All existing substances ≥ 1 ton/year.

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<b>REGISTRATION</b> (More complex data required, subject to approval)				
Reduced data requirements	<ul style="list-style-type: none"> <li>All isolated intermediates can be registered with reduced data requirements provided certain requirements, but have to be handled under strictly controlled conditions (SCC);</li> <li>PPORD notification or registration (for substances subject to Product and Process Orientated R&amp;D) allowed under certain conditions.</li> </ul>	Not clarified yet.	No	SAME AS EU REACH: <ul style="list-style-type: none"> <li>All isolated intermediates can be registered with reduced data requirements provided certain requirements, but have to be handled under strictly controlled conditions (SCC);</li> <li>PPORD notification or registration (for substances subject to Product and Process Orientated R&amp;D) allowed under certain conditions.</li> </ul>
Exclusion from registration	Non-isolated intermediates, waste, naturally occurring substances, etc.	Natural substances, waste, articles, mixtures, substances managed by other regulations, etc.	Articles and impurities	SAME AS EU REACH: Non-isolated intermediates, waste, naturally occurring substances, etc.
Product identifier	EC#	CAS# or series number (for confidential listing)	CAS#	SAME AS EU REACH: EC#
Joint registration via consortium	Yes	Not mandatory	Required for PEC substances, but not via consortium	Yes
Exposure/use scenarios part of Safety data sheet	Yes	No	No	Yes
CSA: Chemical Substance Assessment	Required for all substances in volumes >10 ton/year	Will be clarified by regulators in phase 2	Required when volume exceeds certain quantities, following a defined timeline: 2017: ≥ 70 tons / year 2018: ≥ 50 tons / year 2019: ≥ 20 tons / year 2020: ≥ 10 tons / year or depending on hazard examination	SAME AS EU REACH: Required for all substances in volumes >10 ton/year
Registration language	English	Chinese	Korean	Turkish
<b>REGISTRATION OBLIGATION</b>				
Who should register	The obligation to register lies on manufacturers and importers into the EU/EEA. Exporters to the EU/EEA can support a local importer on a voluntary basis	The obligation to register lies on manufacturers and importers into Taiwan	The obligation to register lies on manufacturers and importers into Korea. Exporters to Korea can support a local importer on a voluntary basis	The obligation to register lies on manufacturers and importers into Turkey. Exporters to Turkey can support a local importer on a voluntary basis
Only Representative (OR) concept for foreign companies' registration	Yes	No	Yes	Yes
Who can appoint an OR	Non-EU/EEA manufacturer or formulator	Not applicable.	Non-residential manufacturer or exporter to Korea, regardless whether it's the original manufacturer or not	Non-Turkish manufacturers or formulators
OR qualification requirements	EU/EEA entity with sufficient background in registration of substances	Not applicable.	Any Korean entity	Turkish entity with sufficient background in registration of substances

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<b>ANNUAL REPORTING</b>				
Annual reporting to agency	Only when/if there is a change of volume band	No	Yes	SAME AS EU REACH: Only when/if there is a change of volume band
Annual reporting of imports to OR	Yes	No	Yes	Yes
<b>DATA SHARING</b>				
How registrants identify each other and share data	In Substance Information Exchange Forum (SIEF)	To be defined in Phase 2	Via free IT platform at MoE's "K-REACH Support Center"	SAME AS EU REACH: In Substance Information Exchange Forum (SIEF)
Registration tool	EU IUCLID tool	<ul style="list-style-type: none"> <li>The tool used requires a different computer connection than with EU IUCLID.</li> <li>An online registration platform called Chemist 2 is used for new chemical notification.</li> </ul>	Electronically, via government data process system.	Registration data to be sent electronically to the Ministry of Environment and Urbanization. The tool used is similar to EU IUCLID, but uses a different computer connection.
<b>DEADLINES</b>				
Next key compliance deadline	1 June 2018 : tier 3 (1t/yr - 100t/yr) REACH registration.	<ul style="list-style-type: none"> <li>Within 90 days: phase 1 registration to be done within 90 days when <math>\geq 100</math> kg / year / legal entity (LE);</li> <li>End 2017: phase 2 registration: first PEC list will be issued end of 2017.</li> </ul>	<ul style="list-style-type: none"> <li>Apr 30, 2016: for Product notification of product containing hazardous substances;</li> <li>30 June 2015 - 30 June 2018: registration window for substances on the 1st PEC list (published on 1st July 2015);</li> <li>30 June 2016: first annual reporting due date;</li> <li>2018: second Priority Existing Chemicals (PEC) list expected to be issued;</li> <li>2021: third/final PEC list expected to be published.</li> </ul>	KKDIK is expected to be finalized and available sometime during 2016 and (pre-) registration periods are yet to be confirmed: <ul style="list-style-type: none"> <li>2017-2018: a 2-year pre-registration period is expected;</li> <li>2019-2020: 2-year registration period expected for pre-registered products;</li> <li>1 January 2019: start of the full registration of substances not pre-registered.</li> </ul>
<b>UNIQUE FEATURES</b>				
Substances of Very High Concern (SVHC)	<ul style="list-style-type: none"> <li>Substances of Very High Concern, SVHC - candidate list and Annex XIV authorization;</li> <li>Annex XVII restriction.</li> </ul>	Not applicable.	Not applicable.	SAME AS EU REACH: <ul style="list-style-type: none"> <li>Substances of Very High Concern, SVHC - candidate list and Annex XIV authorization;</li> <li>Annex XVII restriction.</li> </ul>
<b>LINKS</b>				
External links for more information	<a href="#">ECHA</a>	<a href="#">TCSCA</a>	<a href="#">Ministry of Government Legislation (MOLEG)</a>	<a href="#">KKDIK</a>
Links into the Product Safety Guide	<a href="#">PSG - REACH page</a>  <a href="#">PSG-REACH for non-EU manufacturers</a>	<a href="#">PSG-TCSCA and REACH in Taiwan</a>	<a href="#">PSG-The Act on Registration and Evaluation of Chemicals in Korea</a>	<a href="#">PSG-Turkey KKDIK</a>

\* KKDIK is still a draft

\*\* Chemicals Registration, Evaluation, Authorization and Restriction in Turkish.



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