

2024 Global Outlook for chemicals and chemical products:



Mid-year review for the Americas

Your questions answered



Do the reporting requirements you covered in North America apply to importers of finished consumers product?

Yes, they do. In both the US and Canada, new PFAS reporting rules apply to both manufacturers and importers of PFAS chemicals and PFAS-containing articles.

Do you see that a lot of chemicals will need an update of their labels according to the new US Hazard Communication Standard (HCS)?

Substance labels and safety data sheets must be updated to the new standard by 19 January 2026. Mixtures have until 19 July 2027. All chemical labels will need to be reviewed for compliance under the new regulation and updated accordingly.

We cannot assume how many chemicals will need to be updated. However, we can say that the new regulation is intended to streamline and update the existing standard, rather than be a complete overhaul.

The due date for the reporting requirement of PFAS in Canada is close, do you know if the authority is considering an extension?

Although we have no knowledge yet of whether the government is considering a formal extension, it is entirely possible. <u>Industry has requested more time</u> to respond to the data call-in and also called on authorities to <u>deal with PFAS subgroups separately</u>, as our Chemical Watch News & Insight team has reported.

What we do know is that the government is accepting individual company extension requests, and we recommend submitting those requests, with substantiation, as soon as possible.

Is there a list of PFAS products for ban in Rhode Island in 2027? Or is it all products that contain PFAS?

The regulation addresses specific product categories referred to as "covered products." There are different compliance deadlines for different product types. It is not an all-encompassing PFAS ban at this point in time.

Do you expect the Brazil REACH-like regulation to move this year?

Predicting the finalization of Brazil's REACH-like regulation in 2024 remains challenging. Although we've anticipated its approval for the past three years, recent developments indicate progress towards final approval and publication.

On September 11, the bill advanced significantly when it was approved by the Environment Committee within the Federal Senate. It is now awaiting final consideration by the Social Affairs Committee.



Colombia has adopted GHS version 6. Within the implementation deadlines, the enforcement date for mixtures was scheduled for April 2024.

If you'd like to keep up with details and information on how GHS is being implemented in countries around the world, you can find this information in our <u>GHS Global Regulatory Comparison tool</u>, which is available as part of <u>Focused Compliance Solution</u>.

What does chemical registration in Colombia entail? Is it similar to EU-REACH requirements?

Decree 1630/2021 applies to industrial substances identified as hazardous under the GHS. It requires companies manufacturing hazardous chemicals in volumes exceeding 100kg per year, or importing them into the country, to submit basic information.

Starting in May 2022, companies should have begun populating the information of the hazardous industrial substances. The final deadline is 30 May 2025.

Registrants must be Colombian manufacturers or Colombian importers. The Ministry of Commerce and Trade – the authority overseeing this process – has created the figure of the 'exclusive representative'. This refers to a foreign company designated by a local user of the online platform (INSQUI) responsible for reporting confidential information associated with the chemical substances imported into the country.



Are foreign manufacturers required to report to Chile, Colombia and Peru soon?

Yes and no.

Chile: Foreign manufacturers have no obligation or right to register their substances. Registrants must be local or have a local representative to run this process. There is no 'only representative' structure as identified in REACH.

Colombia: As above, registrants must be local or have a local representative. However, the Ministry of Commerce and Trade has created the figure of the 'exclusive representative', which refers to a foreign company designated by a local user of the online platform.

Peru: According to the latest draft of the implementation, there is also the figure of the 'exclusive foreign representative', which will act as a local company to report on behalf of foreign companies importing into Peru.





If we make an online submission in Chile, do we have to resubmit in Excel format?

No, resubmission in Excel format is not necessary. The authorities decided to implement the Excel format submission just before the final initial deadline. Therefore, the reporting done once the system was open should be considered complete.

However, it is important to keep communication open and stay alert for any emails or communications sent to the contact information shared in the platform.

Could you confirm that the 30 September deadline in Chile is or pure substances only, and nothing contained in a multiconstituent product?

The first reporting deadline in Chile is for substances of industrial use imported or manufactured in Chile in a volume over 1 ton per year. The information to determine the initial reporting of substances in Chile should cover the years of 2022 and 2023.

There are four deadlines in the reporting window as follows:

Type of substance	Reporting deadline window
Industrial Use	Feb 9 - August 30, 2024
Non-Industrial Use substances	Feb 9 - August 30 2025
Substances in industrial-use mixtures	Feb 9 – August 30, 2027
Substances in non-industrial use mixtures	Feb 9 - August 30, 2029

If you are a Chemical Watch News & Insight member, you can find out more information here: **Chile extends deadline to register hazardous substances**



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