

# **K-BPR FAQ – common questions or issues companies will face during the K-BPR compliance**

## **Q. How is the approval for existing Active Substance and New Active Substance different?**

- Companies who submitted and been approved for Existing Active Substance requires to submit ‘active substance approval plan’ by 21<sup>st</sup> December 2020, and approval by given deadline.
- For new Active Substances require Approval before manufacture and import

## **Q. I have not submitted pre-notification for an Existing Active Substance. What do I need to do?**

- Existing Active Substance which were not given with a deadline requires to be approved before Manufacture and Import
- Amendment of K-BPR under legislation allows Existing Active Substance to be pre-notified and acquire deadline for Approval

## **Q. How long the Approval process take?**

- The duration of the processes defined under regulation add up to 1year and 180days. Approval must be submitted considering the time taken to be approved by the deadline.

## **Q. I have pre-notified multiple Biocidal products for one Active Substance. Do I have to submit Approval for each Product types?**

- Approval is required to be submitted for each Product Type per Active Substance.
- Deadline and data requirement may be different between Product Types; therefore Approval application will need to be prepared separately.

**Q. If the active substance approval is completed earlier than the grace period of approval, does the grace period for the biocidal product approval apply from the date of the active substance approval? For example, the grace period of approval for an active substance contained in a disinfectant is legally by Dec. 31st, 2022. If the active substance approval is completed on July 25th, 2022, before the legal end date of the grace period, then is the grace period of active substance approval on July 25th, 2024 or Dec. 31st, 2024?**

- Only applies from the legal end date of the grace period of active substance approval (additional clause Art 3). Even though the approval is completed earlier than the given grace period, the biocidal product approval is enacted within 2 years from the end date of grace period. So, from the above example, it is Dec. 31st, 2024.

**Q: How does a company deal with the case that a biocidal product used in an imported treated article has not been approved?**

- In spite of the importer of a treated article, they shall complete the active substance approval and biocidal product approval to comply with K-BPR.

**Q: What is the coverage of the treated article?**

- The treated article is defined as the final product. Raw materials or subsidiary materials are not considered as the treated article. According to this, the relevant guidelines are expected to be provided.

**Q: Will the products that only used in a designated place (Laundry room in a hotel, Kitchen for school meals) also be considered as Household chemical products subject to Safety confirmation?**

- Considering that “workplace” where it is not occupied by unspecified people other than workers is not a daily living space, so the product is not a subject of Household chemical products subject to Safety confirmation. (Article 2, paragraph 4 of the designation of Household chemical products subject to safety confirmation and safety · labelling standard).