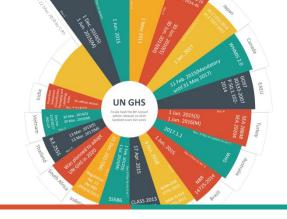


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Japan GHS features and local regulations (July 29, 2020)

Q1: Does the SDS and label has to be in Japanese or English or both?

A1: SDS and Label must be in Japanese. Only in English is not allowed. Both in Japanese and English are applicable since including Japanese.

Q2: There is any database (like ECHA) where an importer can check the regulatory state for the substances?

A2: Please visit the CHRIP database to confirm the regulatory state for the substances. https://www.nite.go.jp/en/chem/chrip/chrip search/srhInput

Q3: Where can I get an English translation of JIS Z7253?

A3: Unfortunately, English translation of JIS Z7253:2019 is not available on the Japan Standard Association' s Website. Only fee-based Japanese version is available currently. https://webdesk.jsa.or.jp/books/W11M0090/index/?bunsyo_id=JIS+Z+7253:2019

Q4: Where can I get copies of the IHSL Tables 3 and 9?

A4: 1) Please visit the CHRIP database to get the list of ' Japan ISHA: Chemical Substances Requiring Labeling and Delivery of Documents, etc.

https://www.nite.go.jp/en/chem/chrip/chrip search/intSrhSpcLst? e trans=&slScNm=RJ 04 021

2) Or refer to the documents shows below.

https://www.mhlw.go.jp/new-info/kobetu/roudou/gyousei/anzen/dl/180815-01.pdf

Q5: Where can I get English translation of JIS ZZ7252?

A5: Unfortunately, English translation of JIS Z7252:2019 is not available on the Japan Standard Association's Website. Only fee-based Japanese version is available currently. Please visit the Japan Standard Association's website for JIS standard.

https://webdesk.jsa.or.jp/

Q6: Is there a link to get the JA GHS guidance document for SDS section 15 shown on the slide?

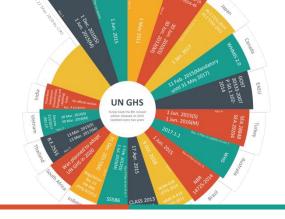
A6: Fee-based Japanese version of GHS compliance guidelines is available on the Japan Standard Association' s Website. Unfortunately, English version is not available.

https://webdesk.jsa.or.jp/books/W11M0100/index/?syohin cd=503010



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Q7: For section 15, if no substances listed on regulations such as PRTR, PDSCL, etc., should these regulations still indicated in section 15?

A7: It is not necessary indicted the relevant regulation on Section15 if there are no regulated substances under these regulations. However, to show that the product does not including any regulated substance, recommend to indicate like as' PRTR: Not applicable'.

Q8: Is it possible to have the list of required test data for new chemical? Could you please indicate if Foreign data are accepted (glp) or only japan laboratories are accepted?

A8: 1) Please refer to documents (P15) shows below for required data under CSCL.

https://www.meti.go.jp/policy/chemical management/english/cscl/files/about/03CSCLnewchem.pdf

2) In general, it is acceptable if the data in compliance with GLP and according to the OECD testing guidelines. However, for biodegradation testing, any information about the degradation product is needed. Analytical data of degradation product is essential since CSCL requires assessments on bioaccumulation potential, human toxicity, and eco-toxicity for both the notified substance and the degradation products. We recommend conduct testing in Japan's lab since they have more experience to comply with CSCL.

Q9: Regulated substances under PRTR, ISHL, PDSCL, CSCL should be listed in Japan SDS section 15, whether there is any cut-off limit to provide substance information? Where to find the cut-off limit? A9: 1) Regarding PRTR, please refer to the slide 6 of presentation to confirm the substance category and their requirements.

2) Regarding ISHL, please refer to the document shows below and confirm the cut-off limit. https://www.mhlw.go.jp/new-info/kobetu/roudou/gyousei/anzen/dl/180815-01.pdf

3) Regarding PDSCL, please refer to the slide 14 & 15 of presentation to confirm the requirements for providing SDS/Labeling.

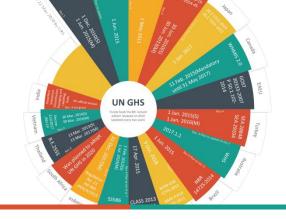
Q10: Can I send a SDS as per REACH/CLP with Japan regulations update in respective sections in SDS? A10: The product should be classified according to JIS Z 7252 and SDS should be authoring according to JIS Z 7253.

Q11: Is there provision to hide Component identity and composition info if the Chemicals are patented? A11: There is no provision for CBI purposes if the chemicals are patented. However, if this chemical is a hazardous chemical, not the subject substance under PRTR, ISHL, and PDSCL, the generic name is allowed on SDS for CBI purposes. On the other hand, if this chemical is a not hazardous chemical, it is not necessary to indicate it on SDS.



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Brief introduction of this series course

Due to the the outbreak of COVID-19 we have been unable to provide this training in the usual face to face manner. CIRS is proud to announce a series of training webinars on Global GHS regulations for our clients who may be:

- Product Safety and Regulatory Affairs Professionals
- Purchasing or Sourcing Manager Chemicals
- EHS Professionals and Consultants
- MSDS Author and Hazard Communication Officer
- Product Registration Specialist
- Import/Export Manager Chemicals

This series of training course is initiated and planned by David Wan, the Managing Director of CIRS Ireland. Information correctness and completeness is guided by Cloris Pan, the Leader of CIRS GHS service center. Webinars are provided by CIRS in conjunction with our partners in Japan (JEMAI) and Russia (ECOMOLE & Ecovostok).

This course includes webinars activities and advanced articles.

Webinars Content:

- 1. Series Introduction and Global GHS (July 1, 2020)
- 2. EAEU GHS features and EAEU-REACH (July 8, 2020)
- 3. Korea GHS features and local regulations (July 15, 2020)
- 4. China GHS features and local regulations (July 22, 2020)
- 5. Japan GHS features and local regulations (July 29, 2020)
- 6. CLP and SCIP Database Dean Winder (August 5, 2020)
- 7. Does article need to comply with GHS (August 12, 2020)
- 8. How to keep your CBI in secret during hazard communication (August 19, 2020)
- 9. The emergency contact number required in Global GHS SDS (August 26, 2020)
- 10. What makes the classification difference (September 2, 2020)
- 11. GHS labelling for small and awkward packages (September 9, 2020)
- 12. Global GHS advanced and series closure (September 16, 2020)

Advanced Articles(click here)

Time: Every Wednesday from 1 July to 16 September 2020, 15:00pm (GMT+1)/10:00am (PST), except the one in 8 Jul., which will be held on 16:00pm (GMT+1).(click here to register)