



*CHEMTREC provides a truly global emergency response service that is compliant in China through our partnership with the National Registration Center for Chemicals (NRCC).*

This document aims to provide international companies managing chemicals in China with an overview of the emergency response requirements on them as companies importing chemicals into China, or companies manufacturing within China.

These questions are aimed specifically at NRCC's Emergency Response Service and its requirements, not NRCC's product registration department and requirements.

## Frequently asked questions and confirmation of the answers from NRCC

### **Q1: What is the official regulatory body managing/regulating emergency response in China and what are the specific emergency response (ER) regulations called?**

Following the institutional reform of the State Council (2018), the State Administration of Work Safety (SAWS) was abolished and its responsibilities transferred to the Ministry of Emergency Management (MEM).

The specific regulation requiring companies to register hazardous products with NRCC for Emergency Response purposes is set out by SAWS "Article 5-6, Chapter 2 and Article 22, Chapter 4, Order 53" and this continues to be regulated by MEM.

### **Q2: Am I a local Chinese company or foreign company when I register my products with NRCC's ER center?**

Producers or importers based/registered in China are deemed local. Any foreign company importing products into China are classified as a foreign company.

**Q3: Which of my hazardous products require emergency response phone number registration with NRCC?**

Any products registered in the Chinese “*Catalogue of Hazardous Chemicals, 2015 (including highly toxic chemicals)*” require registration with NRCC. This catalogue is only available in Chinese.

Also, any hazardous chemicals classified under GHS (Rev. 4; 2011) require registration with NRCC.

**Q4: Do my hazardous research and development (R&D) products need to be registered with NRCC for ER purposes? For example, flavor and fragrance R&D products or fuel additives for blending.**

Yes – R&D products do require registration with NRCC for ER number purposes.

**Q5: Is there a volume/quantity that requires registration?**

No – if the product is hazardous and being sold in China then it requires registration irrespective of the volume.

**Q6: Do chemicals stored/used inside products/machinery require registration?**

No e.g. fuels and oils inside a vehicle (for the vehicle to run) are hazardous but don't require registration.

**Q7: If I manufacture products overseas and another company imports the products into China am I liable for registration of the products or is the importer?**

The importer is liable for registration with NRCC. From a legal standpoint the importer should also re-label and re-author the SDS in their name.

However, it's worth considering whether the costs to register with NRCC mean you mitigate any risks on your company. It also means if you change importer you don't have to renegotiate the registrations with that importer.

**Q8: If a company manufactures a chemical inside China, which is registered with NRCC and then for some reason the company needs to import that same chemical (there may be low stock in China), do they have to then register the product as an import (which means they pay twice for the same product registration)?**

No – once a product is registered once by a company they do not have to register it again, even if importing the product.

### **Q9: Do Lithium batteries need to be registered with NRCC and to display the ER number?**

Lithium batteries are categorized as dangerous goods in China, not dangerous chemicals. Therefore the regulations stipulate that they do not need to be registered, however if a company would prefer to display the NRCC number an SDS will need to be registered. Alternatively companies can display CHEMTREC's Chinese or international numbers in section 1.4 of the SDS.

### **Q10: Are products which are unclassified under GHS, or not classed as dangerous goods, required to be registered with NRCC for Emergency Response purposes and to display the NRCC ER number?**

If a product is classified under GHS, they need to be registered with our NRCC Emergency Telephone Number Service. However, if a product is unclassified under GHS, companies can display NRCC's telephone number in section 1.4 of the SDS provided the SDS is registered with NRCC or alternatively CHEMTREC's international telephone number can be used. If there is uncertainty as to whether the product is unclassified then it is recommended to register the SDS with NRCC.

### **Q11: Can CHEMTREC provide wider chemical compliance solutions e.g. chemical product registration, SDS/label authoring, testing etc.?**

Yes – please complete a [request a quote form](#) and we can provide more details on how we can support you.

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## **DISCLAIMER**

*CHEMTREC, in conjunction with NRCC, provides this Frequently Asked Questions (FAQ) overview as a service to its customers and potential customers. This information was compiled as of May 1, 2021 and CHEMTREC believes it to be current and correct as of January 24, 2024. Be aware that regulations often change or are revised over time. Please check the regulatory source to ensure you have the most up-to-date information available. Neither the American Chemistry Council, CHEMTREC nor NRCC warrants or guarantee the accuracy of the information provided herein and accept no liability for any inaccuracies or improper reliance. Each user should independently verify the regulatory requirements of each relevant jurisdiction. This document does not constitute legal advice and each user should retain counsel of its own choosing before relying on any information contained herein.*