ECHA webinars

EUROPEAN CHEMICALS AGENCY

Webinar: Know your obligations when exporting hazardous chemicals outside the EU

Questions and answers

ECHA organised a webinar on 24 September 2020 on knowing your obligations when exporting hazardous chemicals outside the EU. It explained the scope and main requirements of the PIC Regulation, how to notify your exports and the conditions that require explicit consent from importing countries.

This document compiles the questions and answers from the webinar. Minor editorial changes have been made to correct spelling mistakes and similar questions have been combined into one. The document will not be updated.

For the most up-to-date advice on PIC, contact us or refer to our support material.

Could you shortly describe the main changes in export of hazardous chemicals from EU to UK since 1st of January 2021 = after Brexit please?	Exporters from the EU-27 who are planning to export PIC substances to the UK from 1 January 2021 on will be able to notify their exports to the UK within the ePIC submission tool. It is tentatively scheduled to make the UK available as an importing country in the system by early November 2020. The precise date when this will be possible in ePIC will be communicated by ECHA within the next few weeks. Note that, pursuant to the IE/NI Protocol of the Withdrawal Agreement of the UK from the EU, exports from EU-27 to Northern Ireland do not require export notifications under the PIC Regulation. On the contrary, exports from Northern Ireland to third countries, including UK (Great Britain), will have to be notified. Such notifications by companies

	established in Northern Ireland, will be possible in ePIC as from November 2020 onwards. More information on the precise date and practical instructions will be communicated by ECHA in due course.
(1st SCENARIO) EXPORT IN UK WITHIN 2020: Please confirm that in case of export in UK within 2020 should we have to follow the instructions: "How to notify PIC exports to the UK after UK's withdrawal from the EU"?	The PIC Regulation still applies in the United Kingdom until the end of the transition period provided in the Agreement on the withdrawal of the United Kingdom from the EU (i.e. until 31.12.2020), as the UK remains until then in a single customs area with the EU. Therefore, no export notification is required for the export of a PIC chemical to the United Kingdom in 2020.
(2nd SCENARIO) EXPORT IN UK IN 2021: Please confirm that the RIN request is the standard applied for every Extra European countries. If so, when will you activate the compliant form on the web portal in order to ask for RIN authorization?	As from 01.01.2021, exports of PIC chemicals from the EU to UK will have to comply with the related obligations under the PIC Regulation, and in particular the requirement to submit an export notification prior to the first export of the chemical to that country indeed. Note that, in accordance with the Protocol on Ireland/Northern Ireland ("IE/NI Protocol") of the Withdrawal Agreement of the UK from the EU, the PIC Regulation will continue to apply in Northern Ireland after the end of the transition period. This means in practice that exports of PIC substances from the EU to Northern Ireland will not have to be notified, even for exports to take place in 2021; exports notifications will be required for exports to United Kingdom in respect to Great Britain ("UK (GB)") only. Exports of PIC substances in 2021 to UK (GB) will have to be notified in the ePIC tool which will be updated to enable such notifications by early November 2020.
(3rd SCENARIO) TRIANGULATION CASE: It is a situation that involves a sale of goods, where three different states. Example: EU producer-SUPPLIER - UK customer (trader) - End USER placed in an EXTRA EU country. There are two sales transactions but one transport transaction)"	We suggest you to refer to the definitions of "export" (Article 3(16)) and "exporter" (Article 3(18)) under the PIC Regulation, and to section "5.2 - Exporters and importers" (pages 22-23) of the "Guidance for implementation of Regulation (EU) No 649/2012 concerning the export and import of hazardous chemicals". With the more details you certainly have on the contractual agreements and practical arrangements between the partners involved, you should be better placed to decide on who should be seen as the exporter of the PIC chemical for the purpose of the PIC Regulation, and therefore subject to the PIC export notification requirement. When doing the assessment of your specific situation against the definition of an exporter under the PIC Regulation, you should not only bear in mind the contractual aspects related to the export, but also who

	is taking care of the shipment in practical terms (e.g. being responsible for customs declarations, etc.).
A mixture that contains a PIC substance with concentration over the consideration limit for the classification of the mixture (its concentration is below its classification limit) but it contributes to the mixture classification only because its concentration is added to other substances with the same classification, is this mixture considered PIC?	Your question requires further consultation and cannot be answered during the webinar. Please send us your question using our contact form: echa.europa.eu/contact
When waiver validity overlaps 2 years (2020/2021 for instance), that makes the PIC process confusing/uncertain. Because many times the EU DNA does not sent consent request year n+1, and after waiver expiry a new consent request is needed before submitting a new waiver.	According to the PIC Regulation, waivers can be granted for a maximum period of 12 months (and this can be overlapping 2 years as you mentioned), after which time explicit consent is required. After the maximum period of 12 months has expired, if no response to the request for explicit consent has been received, the exporter will once again need to seek explicit consent through the exporter's DNA, which means that the waiver-proposal procedure starts again from the beginning.
Are there any special rules for export in European countries that are not EU member (something stated in national legislation of non-EU members on European market) - for example for Switzerland?	According to PIC Regulation there are no special rules applying to any non-EU member state. All exports to non-EU countries have to be notified the same way. For certain importing countries there are information available in the 'importing country info' visible in ePIC on the left side menu or when you are filling in the export notification for that importing country.
Are there official concentration limits for PIC substances below which PIC substances are no longer covered by the PIC regulation, e.g. 0,1% or 0,01%?	There are no standard and unique concentration limit above which an export notification is required for the export of a mixture containing a PIC substance. However, in accordance with Article 8(1) an export notification is required for the export of a mixture containing a substance listed in Part 1 of Annex I to the PIC Regulation in a concentration that triggers labelling obligations under the CLP Regulation.
Does the substance need to be present in concentration sufficient to trigger the labelling obligation on its own or it is sufficient that it is above cut-off values so together with other substances trigger the labelling obligation? thanks	Your question requires further consultation and cannot be answered during the webinar. Please send us your question using our contact form: echa.europa.eu/contact

At once explicit consent is confirmed, it remains valid for subsequent exports during a period of three calendar years or how?	The explicit consent response validity depends on the decision of the importing country. It can however be valid maximum three calendar years.
Bulk Special RIN request: When/Why we could apply for this request? Usually we ask several RIN requests to several countries for the same substance. Do we have to apply BULK Special RIN Request?	The special RIN request can be submitted when one chemical is exported to several countries, several chemicals are exported to one country and several chemicals are exported to different countries. This functionality is available to facilitate the submission of all those scenarios. For more information on special RIN requests, please refer to our SRIN In Brief.
Is it possible only for limited quantity - 10 kg or less? *(this question has been answered after the webinar)*	The Special RIN request can be applied to the following exports: - an Annex I or Annex V chemical exported for research or analysis purposes, in quantities of 10 kg or less, per year and per importing country; 10 kg refers to the total quantity of the PIC substance exported, as pure substance and in mixtures; - a chemical listed in Annex I part 3 for which a positive import decision is available in the latest PIC Circular; - if the importing country has waived its right to receive an export notification for this/all chemical(s).
Bulk Special RIN requests: Amendments to the Annexes of the PIC regulation should enter into force on Jan 1st of a certain year, since S-RINs are valid for one calendar year, and it's very hard to maintain company internal databases when there are different S-RINs for same country and same Annex.	Thank you for the feedback. We will share your views on the timing of the amendments to the PIC Regulation with the Commission.
What is an S-RIN?	An S-RIN stands for "Special RIN request", it is a so called 'mini-notification' with reduced data requirements. It can be applied in specific condition - more details also available in one of the presentations.
Case: Export of several products, differ in names, same PIC substance & concentration, same import country, same C&L of the mixture. Only one notification is necessary (Art. 8(1)) and the export certificate will be issued for one product name only. Is it possible to extend it to other product names?	Only one export notification per mixture, per importing country in the same calendar year should be submitted. However, if you wish to mention other products names in the export notification, it is possible unless the importing country specified otherwise.
Does this also apply to mixtures that differ in more than one component (other than the PIC relevant one) but have the same usage and C&L? Where can I indicate during my notification that more than one product name is mentioned in the export certificate?	A new notification is not required if the mixture has the same intended use, the same C&L, and only the other constituents than the PIC substance differ. Product names can be added e.g. in brackets after the mixture name when creating the mixture in ePIC.

Could you also explain labelling and SDS requirements when exporting dangerous chemicals (art.17)?	If you are planning to export dangerous chemicals outside the EU, you must package and label the exported chemicals according to the CLP Regulation. You must indicate the expiry date and the production date on the label, and if necessary, give such expiry dates for different climate zones. You must also attach a safety data sheet in accordance with the REACH regulation to the shipment of the chemicals when exported, and the information both on the label and on the safety data sheet shall as far as practicable be given in the official languages, or in one or more of the principal languages, of the country of destination or of the area of intended use.
Could you please give more information about articles PIC obligations? For articles, SDS are not mandatory. I'm especially interested in textiles or footwear articles if they are also affected.	Pursuant to Article 15 of the PIC Regulation, only articles containing substances listed in Part 2 or 3 of Annex I (either as such or in mixtures in a concentration that triggers labelling obligations under the CLP Regulation) are subject to the export notification obligation. Note that, under the PIC Regulation, articles are defined as "finished products containing or including a chemical, the use of which has been banned or severely restricted by Union legislation in that particular product". You are therefore advised to carefully assess whether your product fulfils this definition, before submitting an export notification in the ePIC tool. In ePIC, you do not have to attach an SDS when notifying the export of an article, but you should aim at filling-in all the other fields, to the extent possible. Finally, note that articles listed in Annex V to the PIC Regulation, are subject to an export ban.
Do we have to show any information of PIC on SDS?	The SDS is not mandatory at the time of the notification but shall accompany the chemical when exported to the destination country. If attached to the export notification, the SDS can be used as an alternative to filling-in Sections 4 and 5 of the ePIC format. The SDS is to help employers, site managers and product safety managers to ensure the safe use of the chemical exported and has to refer to the PIC substance/mixture intended to be exported. Usually the SDS format attached to the notification is following the template according to REACH Regulation.

Does this PIC Regulation also counts for customs goods, shipped from a warehouse in an EU country to a country outside EU?	If "external union transit" (without customs clearance into EU), then it is not considered as export or import under PIC.
For example there is a limitation for Benzidine, its salts and benzidine derivatives. Which chemicals are included in "derivatives", only the identified group members or all benzidine derivatives?	ePIC cannot provide an exhaustive list of all the possible substances falling within the scope of PIC Annex I entries for group of substances (e.g. "Benzidine, its salts and benzidine derivatives"). If you cannot find the substance you are planning to export in the list of PIC chemicals in ePIC or from the ECHA website, but believe that it falls under the scope of the PIC Regulation, please contact the ECHA helpdesk. ECHA experts will check the regulatory status of your substance under PIC and provide you with any necessary clarifications in due course.
For export of industrial uses to countries where there is no "REACH-like" registration system we cannot provide a "registration certificate". What kind of waiver is enabling this import approval?	Waivers will be discussed in the upcoming presentations. You can also find detailed information in Waiver information sheet available on the ECHA website https://echa.europa.eu/regulations/prior-informed-consent/explicit-consent-requirement/waivers-information. The waiver proposal should include one of the following: 1. Documentary evidence from an official source in the importing country, that your chemical is licensed, registered or authorised in that country, or; 2. in case the intended use in the importing country as mentioned in the export notification is not in a category of use for which the chemical is listed in Part 2 or 3 of Annex I to the PIC Regulation: - a written confirmation of that intended use by the importer and; - a documentary evidence from an official source that the chemical has been used or imported in the importing country in the last 5 years.
For PIC annual returns - for chemicals added from September, is annual notification required for the full year quantities or only for quantities exported from 1 Sep to end year?	The estimated quantities notified and also the real quantities exported that will be reported in the Article 10 annual report, will refer to the exporting period from the date when the Amendment became applicable, therefore from 1 September to end of the year in the case of the latest amendment.
For Special RIN requests there are 3 scenarios. Where can I check if the importing country waived its right to receive an export notification? Special RIN request in this case is not limited to quantities below 10 kg, correct? For UK will be possible to ask for a special RIN according to this?	The information that an importing country waived its right to receive an export notification can be found under the Importing country information in ePIC. In case a country waived its right to receive an export notification, SRINs for PIC substances in any quantities can be submitted. As of 01/01/2021,

	exports to the UK should be notified as to any other non-EU country, as currently no such information was recorded for the UK.
For the purposes of export notification, mixtures fall within the scope of PIC where one or more Annex I chemical(s) triggers labelling under CLP. Please could you confirm that labelling under CLP includes the statements set out in Part 2 of Annex II of CLP e.g. EUH210?	Your question requires further consultation and cannot be answered during the webinar. Please send us your question using our contact form: echa.europa.eu/contact
Exclusion of Chemical Weapons is clear. What about Dual Use materials (listed in the EU Reg. 2019/2199 amending Council Regulation (EC) No 428/2009)	Your question requires further consultation and cannot be answered during the webinar. Please send us your question using our contact form: echa.europa.eu/contact
How often is the accuracy of the DNA contacts displayed on the ECHA website reviewed and updated?	The DNA contacts are reviewed and updated twice a year following the PIC circular publication on the Rotterdam Convention website. Furthermore, ECHA is updating the contact details whenever an update from an official source is received.
How to apply for Bulk RIN? Is it a special option in the ePIC?	Yes, there is an option in ePIC and to begin you need to click on the "Bulk request" link in the "Special RIN Request" section of the main menu. More details on this are available in chapter 9.2 of the industry user manual.
I have rather a remark: the implementation time between PIC publication and the effective restriction in export should be in line with the needed times for receiving the Explicit consent. The last update of July 22, is implemented on Sept 1th. This does give additional pressure on the companies.	Thank you for the feedback. We will share it with the Commission.
I'm exporting home insecticide sprays (containing Permethrin in the mixture). All work fine when I export directly, but when my non-EU customer uses a European company to buy the mentioned EU company is the exporter and they have big difficulties to obtain a RIN from ePIC.	Only EU based companies can have an account in ePIC. In order for us to be able to help the exporter in the EU in their ePIC related matters, they should contact the ECHA Helpdesk.
If I export a substance attaching the label requested by the country how can I manage the SDS? Could the SDS be prepared according to CLP classification? In this case the labelling information may	You can also provide additional/different hazard classifications in your SDS as soon as you are clear which "system" you are referring to.

differ from the SDS but on the other hand the SDS format do not include other classification systems.	
If the PIC substance is imported in EU for the re-work and re-export out of EU, does its import need to be reported?	In case the PIC substance is "customs cleared" into EU, the import needs to be reported under article 10. Similarly, the re-export out of EU needs to be notified by means of export notification. External union transits are excluded from the definition of "export" and "import".
If you want the approval for Explicit consent for a combined Pesticide and industrial use, is 1 DNA import (PPP or chemical) sufficient to approve? Or does all DNA's import (PPP and chemical) need to approve?	First, the explicit consent procedure is handled solely between the authorities. There are so called dual use chemicals, for which the use (e.g. sterilization of medical devises) can be considered whether industrial or biocidal (subcategory to pesticides in PIC) and therefore can belong to the competence of one or the other authority in the importing country. In other cases, the consent usually needs to be sought from a certain DNA, depending on the intended use in the importing country.
In case a PIC substance is imported in EU only for being re-exported out of EU: In order for this export (out of the EU) to take place, does an export notification need to be submitted?	In case the goods are not placed under customs procedure other than transit procedure in the EU customs territory then no export notification is required.
If they are placed under customs procedure? In case they are imported, under the condition that the whole quantity will be (and is) re-exported? *(this question has been answered after the webinar)*	Refer to the PIC Guidance document. Information on the import and export of chemicals subject to PIC from the customs perspective can be found on page 24. If you need further support on this issue, contact us.
Should, the total quantity imported and re-exported, be included in article 10 annual reports on PIC exports and imports? *(this question has been answered after the webinar)*	Yes, the total quantity of the PIC chemical imported in EU should be reported in the annual report on imports and the total quantity of PIC chemical exported should be reported in the annual report on exports. Note that by import to EU it is understood that goods entered in EU from a third non-EU country and customs clearance took place on the EU territory before it has been re-exported outside the EU territory.
In case of no answer from the importing country DNA, is it possible for companies to get in touch with the DNA directly to ask for RIN status?	Companies should not directly contact the importing country DNA but are advised to check with their own DNA if they have any question related to their RIN.
In case we have new business for a new importer located in a country for which a RIN already has been granted for category	Yes, you are requested to submit another export notification, for the purpose of ensuring that the authorities of the importing country are

pesticide but new importer is using at as an industrial chemical do we then need to apply an additional RIN? If not, how can we separate the volumes in the article 10 reporting?	informed about this new category and type of uses to take place on their territory, and where relevant can provide their explicit consent to that import. In some cases, the authorities responsible for the different (categories of) uses are also different, hence another reason to submit and forward another export notification. You will find in your draft Article 10 report in ePIC only one entry, referring to the two RINs. ~~The fact that you have two different export notifications/RINs will lead you to have also two separate entries in your draft Article 10 report in ePIC; p~~ Note that information on the uses in the importing country is not required as part of Article 10 annual reporting. Therefore, you do not need to make a distinction in your reporting between the quantities dedicated to each of the uses *(The answer to this question has been reviewed and clarified during the webinar)*.
Is there a minimum quantity of chemical applicable for export notifications and annual declarations except from the Research and development activities?	No, there is no other exemption on a minimum quantity of PIC chemical under which there would be no export notification and/or Article 10 reporting obligations.
Is there any EU PIC training activity planned for non-EU countries? DNAs at importing countries are often not familiar with the EU PIC procedure and they have difficulties to distinguish between PIC (Rotterdam Convention) and the EU PIC Regulation	Contribution of the EU to international activities, including support to and training of non-EU countries, is within the remits of the European Commission, in particular in the context of the activities organised by the Secretariat of the Rotterdam Convention. ECHA and the Designated National Authorities of the EU Member States are nevertheless often contributing to these activities, in support and coordination with the European Commission. As an example, ECHA has actively contributed to side-events organised in the margins of the last meetings of the Conference of the Parties to the Rotterdam Convention. ECHA is also in regular contacts (via email) with non-EU country DNAs to clarify any questions or issues with the procedures under the PIC Regulation. All the supporting information and documents published by ECHA on its website, including this webinar, can also be freely used by non-EU countries.

Is there any low volume exemption for analytical standards (<1mL solution with a few ppm of substances) when exporting hazardous chemicals outside the EU?	Yes, a so-called special RIN request procedure applies when the export is for research or analysis purposes and does not exceed 10 kg per importing country/calendar year.
You just said that Medicinal products are outside scope of PIC regulation. What about veterinary products?	Pursuant to Art. 2(2)(h), the PIC Regulation does not apply to proprietary medicinal products and veterinary medicinal products covered by Directive 2001/83/EC on the Community code relating to medicinal products for human use and Directive 2001/82/EC on the Community code relating to veterinary medicinal products respectively. However, please note that the export PIC chemicals that are exported as such or in an industrial mixture, for their further processing into such medicines in the importing country, are not covered by this exemption. In addition, note that, in accordance with Article 3(5)(b)(ii) on the definition of "other pesticides", disinfectants, insecticides and parasiticides covered by Directives 2001/82/EC and 2001/83/EC are subject to the provisions of the PIC Regulation.
Obligation to provide SDS under REACH applies to recipients in EU (art 3). PIC (art 17) requires to send REACH compliant SDS out of EU. Does it mean providing translation of SDS for EU country in language of non-EU country? E.g. Belgium SDS (with Belgian poison centre, OEL...) translated in Korean?	The information both on the label and on the safety data sheet shall as far as practicable be given in the official languages or in one or more of the principal languages of the country of destination or of the area of intended use. The list of official and principal languages for SDSs and labelling of exports to certain countries is available in the Appendix 4 of the PIC Guidance.
What about national specificities required in a REACH compliant SDS (e.g. poison centre, OEL...)? Under REACH SDS recipients are established in EU so OEL etc. used are those of the EU recipient country. For export there is a contradiction between PIC vs REACH. Hence my question.	EU-only specific details such as poison centres contact details do not have to be updated.
Art 17 of PIC clearly states SDS "in accordance with REACH". And a SDS "in accordance with REACH" shall include national details such as OEL. If not, the SDS will have absent or empty (sub-)sections and will not be REACH compliant and infringe PIC art 17 requirement. "EU-only specific details such as poison centres contact details do not have to be updated" --> Does this also apply to e.g. REACH registration numbers, exposure scenarios as they are EU-only specific? Is there a guidance listing which details are to be included in a SDS for export and which are not?	The SDS must be REACH compliant in accordance with Art 17 of PIC. Those specific details do not have to be updated however they should not be removed.

That must be the details of which country? The country of the exporter? For example chemical exported from Belgium to Korea: Belgian poison centre, Belgian OEL etc. with the phrases translated in Korean?	The country of the EU exporter if possible, otherwise any other EU country. The phrases do not need to be translated in Korean and can remain in English.
PIC applies to mixture containing one (or several) substances listed in Annex I, in a concentration that triggers labelling obligations for the mixture under CLP. What means "trigger labelling" and in practice what calculation should be done when we have other dangerous substances in the composition of the mixture?	An export notification for a mixture containing a substance listed in Annex I to the PIC Regulation is only required if this substance contributes to the labelling obligations under CLP, irrespective of the presence of other substances in the mixture. For any potential follow up questions, contact us.
Regarding mixtures export notifications, do we have to notify: every mixture containing chemical subject to notification OR every hazardous mixture containing chemical subject to notification OR every mixture presenting at least the same hazards of the chemical subject to notification?	In principle, every mixture containing one or more chemicals which are subject to the PIC Regulation should be notified whenever the concentration of the mixture changes so that the labelling of the mixture is altered. A single notification covering several mixtures containing the same Annex I chemical(s) would however be acceptable if the only difference between the mixtures is, for example, colour and that there are no differences in the classification and labelling of the mixture and the uses remain the same. Whenever changes in the concentration of Annex I chemical(s) in a mixture trigger new labelling requirements, a new notification is needed.
Do you mean only if the labelling of the mixture changes after the addition of the PIC substance to the mixture or if the conc. of the substance itself is sufficient to trigger labelling classification?	Mixtures containing substances listed in Annex I in a concentration that triggers labelling under CLP should be notified, irrespective of the presence of any other substances.
The PIC is focussing on the production of substances in EU to 3rd countries (e.g. India). But what with production of the same substance outside EU (e.g. China) to that 3rd country (e.g. India)?	Please let me first clarify that the PIC Regulation regulates the export and import of certain hazardous substances from/to the EU, and not their production within the EU. Then, the trade of these same substances between non-EU countries are not regulated by the PIC Regulation, but may be subject to regulatory obligations from the national regulations in those non-EU countries. These obligations may be stemming from the provisions of the Rotterdam Convention if the non-EU countries are Party to that convention.

According to the information on slide 16 "Specific implementation approaches", I assume that impurities in non-PIC substances do not have to be considered in any case. Is this correct?	The question of whether or not the export of substances containing a PIC substance as an impurity should be subject to export notifications under the PIC Regulation, was discussed with the European Commission and the Designated National Authorities (DNAs) at the meeting of the DNAs in July 2020. It was agreed that, as a temporary approach, an export notification should not be required for the export of a PIC substance which is present as an impurity in a substance that it is not itself listed in Annex I to the PIC Regulation. Our understanding is that the European Commission is planning to bring again this topic for the discussion of the DNAs in the future, with a proposal for reaching an agreement on a long-term approach.
We produce a PIC regulated substance, but our distributors are applying this substance on seeds. We presume that the treated seeds also need to be notified before export. Is this correct? And if so, who needs to notify? The producer or the seed treater?	Your question requires further consultation and cannot be answered during the webinar. Send us your question using our contact form.
What if I have to export a mixture containing more than 1% of a substance listed of part 2 of Annex I of PIC regulation, do I have to fill a PIC notification for the whole mixture? Or just for the substance listed of part 2 of annex I?	You have to create a 'mixture' in ePIC containing the PIC substance and then create an export notification for your mixture using the mixture template in ePIC.
What should we do if the expected first date of Export of a mixture containing a PIC regulated substance requiring Export notification to a particular destination is not known? Is it allowed to submit notifications in an attempt to mitigate the 35 day lead period before a RIN becomes Active?	The first intended date of export of the year can be an estimation. However, you should not submit "fake notifications" which do not reflect the real situation. Redundant notifications may result in the importing country blocking the import.
What to choose when the chemical is neither used in Industrial Processes nor as a biocide? E.g. nicotine in e-liquids which is for consumer use	We understand that you refer to the selection of the use category, "Industrial" or "Pesticide", in section 3.3 of the notification form. Your description would appear to fall under "Industrial" category. The description of the use should be provided in the free text field "Industrial use foreseen in importing country".
What's the timeline for RIN activation once the importing country has sent an explicit consent to the EU DNA (process within EU DNA and ECHA)?	As soon as the EU DNA has registered the explicit consent response in the system, ECHA proceeds with activation of the notification.
Does the EU DNA have any timeline to register the explicit consent response in the system, once they have received a positive consent response (i.e. via email) from the importing DNA?	There is no timeline specified in the Regulation. We advise you to contact your DNA directly to enquiry whether they have internal deadlines for processing explicit consent responses.

When an updated version of the SDS is available for a mixture, I upload it in the section "manage mixture". But: what about the Export notifications already required (before SDS updating) and linked to that mixture? It seems that it doesn't update automatically. Do I have to require a new RIN?	A validated export notification can no longer be edited and therefore the SDS will not get updated either. However, when you have a validated export notification in the system, you have fulfilled your obligation to notify your export and a subsequent export notification is not needed.
When may PIC notification submissions for 2021 be submitted to e-PIC?	The submission of export notifications for 2021 are already possible in ePIC however, before notifying for 2021, you should also consider when in 2021 your exports are actually taking place. If, for example, you export in July 2021, we advise to prepare your notification ca. two months ahead.
When we know that we will have similar exports from same chemical to same country in 2021; from which date can we request RIN numbers in ePIC, as we might have an export to occur early January. If we only can request RIN as of Jan 2021, it would not be possible to respect 35 days period!	You can submit your notification for the next year, with the export date marked for 2021, already in the end of this year, at the latest 35 days before the first intended date of export. ECHA ensures that the notifications are processed respecting the timelines set in the Regulation.
Who is in charge to apply the RIN authorization to the final end user in the Extra European country? I suppose that in this case is the UK company which sells the product to the end user in extra EU country.	Exporters from the EU-27 who are planning to export PIC substances to the UK from 1 January 2021 on, will be able to notify their exports to the UK (and obtain a RIN) within the ePIC submission tool. From 1 January 2021 onwards, UK will no longer have to notify exports to non-EU importing countries as the EU PIC Regulation places obligations only on companies based in the EU who wish to export chemicals listed in Annex I to non-EU countries. Note that, pursuant to the IE/NI Protocol of the Withdrawal Agreement of the UK from the EU, exports from EU-27 to Northern Ireland do not require export notifications under the PIC Regulation. On the contrary, exports from Northern Ireland to third countries, including UK (Great Britain), will have to be notified. Such notifications by companies established in Northern Ireland, will be possible in ePIC by November 2020. More information on the precise date and practical instructions will be communicated by ECHA in due course *(note added after the webinar).*
Why do we have to complete section 6.2 in the RIN application when the prohibited and allowed uses can be found in section 6.1?	Section 6.2 is meant to provide the authorities of the importing country with information on the uses of the PIC chemical in the EU, and in particular which uses are allowed and/or restricted or banned within the EU. The information should be relevant in the context of the PIC Regulation i.e. the uses mentioned there should fall within use categories regulated by PIC (pesticides and industrial chemicals).

But it is already specifically provided in the section 6.1.	Guidelines are available in the factsheet on "How to provide information on prohibited and allowed uses in PIC export notifications". Section 6.2 allows to provide more specific and additional information in addition to section 6.1. As mentioned earlier, you can give more specific detailed information in 6.2. And mention other information, which is not provided there, i.e. on the allowed uses.
Why don't we see the importing country's negative response in our RIN application? It would help the importer in the non-EU country clarifying the matter with the respective authority/person.	Explicit consent requests and responses contain confidential business information (e.g. references to RINs, importers' details, etc.) and hence are handled by the designated national authorities of the importing and exporting countries only. They are therefore not made available to companies in ePIC.
That's the data *my* company has entered into the RIN application form in the first place. I don't understand why we are not allowed to see that data in the negative response from the importing country.	Note that an explicit consent response received from an importing country do not 'belong' to any exporter specifically and may also be applicable to other exports than those of your company.
Why is there always a delay of 35 days, even if the RIN has been activated a few days after application?	The timelines are set in the PIC Regulation. Refer to Article 8 (2).
Nevertheless this fixed delay doesn't make sense. Maybe the regulation should be amended. The same goes for the delay for waivers, I see no reason to have to wait 60 days before even trying to get a waiver.	The standard waiver procedure is applicable only when no explicit consent response has been received. An OECD waiver can be proposed immediately after the notifications has been submitted. The timelines set in the Regulation should allow enough time for processing for the authorities both in exporting and in importing countries.
However it heavily affects the business continuity!	Note, that you need to notify one substance or one mixture to the same country only once a year, with the first intended date of export. The subsequent exports of the same substance / mixture during that calendar year are covered by one notification.
Why is there no direct E-Mail address to contact ECHA? It's very hard to try to reach ECHA via helpdesk.	The official way to contact our helpdesk. That way it is ensured that all enquires are duly answered, recorded and followed-up.

Why the mixtures with the same PIC substance content, but with different Trade names (therefore different SDS) must be submitted separately even if they are exported in the same country?	An export notification can cover more trade names, and these can be mentioned also in the SDS attached - this is possible unless the importing country requests specifically to receive all these in separate notifications. However, please note that in case one of the mixtures to be exported triggers new classification and labelling obligations (depending on the composition), exporters need to submit a new export notification in order to cover the export of that mixture to the same importing country.
You mentioned that exports of a PIC chemical is still possible when not notified. (And that manual entry is then needed for reporting the exports.) Does this then mean that we can export without explicit consent? And what are the consequences on that? E.g. fines, ...	During the webinar this was mentioned in the part for the Article 10 report and it was referring only to the fact that the exports which were not notified the previous year (therefore those RINs are not automatically generated in the report) can be inserted manually in the annual report that has to be prepared the next year for the exports from the previous year. Not notifying the intended exports can however happen from different reasons and the consequences (e.g. fines, penalties) are established at national level and this you may want to check with your DNA. By allowing the companies to insert them manually in the annual report, ECHA only gives the possibility that those exports are reported according to the Article 10 of the PIC Regulation. We would like to stress that during the webinar we did not refer at any point that exports can take place without having notified and moreover, without having an active RIN.
No, indeed I understand that clearly. However the updated PIC publication July 22 and implementation Sept 1st makes is really hard for business to await the 60 days. Therefore this could be a well thought option. I just wanted to double check this.	Thank you for the feedback. We understand and we will share your views with the Commission.