

# REACH→LAW

COMPLIANCE. ADVOCACY. SUSTAINABILITY.



Wednesday, April 24

11:30am - 12:00pm

Venue: Hall 3, Seminar Room 1  
Bombay Exhibition Centre,  
Mumbai

## South Korea

# K-REACH

## The 2024 Registration Deadline

# K-REACH 2024 Registration Deadline

## Presenter



**GAGAN KUMAR**

Managing Director, REACHLaw India Private Limited

[gagan.kumar@reachlaw.fi](mailto:gagan.kumar@reachlaw.fi)

# K-REACH 2024 Registration Deadline

## Agenda

1. REACHLaw in Brief
2. Overview of K-REACH
3. K-REACH Pre-Registration
4. K-REACH Co-Registration and the 2024 Deadline
5. K-REACH Co-Registration Dossier Preparation and Submission
6. Costs & Timeline
7. Conclusions
8. Questions & Answers
9. Contact

**Duration: ca. 30 min**

# 1. REACHLAW IN BRIEF

## 2. OVERVIEW OF K-REACH

## 3. K-REACH PRE-REGISTRATION

## 4. K-REACH CO-REGISTRATION AND THE 2024 DEADLINE

## 5. CO-REGISTRATION DOSSIER PREPARATION AND SUBMISSION

## 6. COST & TIMELINE

## 7. CONCLUSIONS

## 8. QUESTIONS & ANSWERS

## 9. CONTACT



## MARKET ACCESS SERVICES FOR CHEMICAL PRODUCTS AND MORE

- **Support for Global Chemical Regulations**
- **Only Representation** (*EU, UK, Turkey, South Korea, India\**)
- **Registration (Lead & Co)** (*EU, UK, Turkey, South Korea, India\**)
- **Authorisation** (*EU, UK, Turkey\*\**)
- **Public Affairs and Advocacy** (*EU, UK*)
- **Outsourcing / Out-Tasking Regulatory Functions**
- **Global Inventory / Product Registry Notifications**
- **Classification and Labelling** (*CLP/GHS*)
- **SVHC Consultancy**
- **Circular Economy Services incl. SCIP**
- **Legal & Technical Services**
- **Compliance Audits**
- **Consulting & Training ...etc**

### *Regulations Supported:*

- *EU REACH & CLP*
- *UK REACH & GB CLP*
- *Korea REACH*
- *Turkey KKDİK & SEA & GBF*
- *India REACH\*, India BIS*
- *Swiss ChemO*
- *China "REACH" & GHS*

*...and more*

*\* Upon Entry Into Force*

*\*\* When obligations enter into force*

# REACHLAW

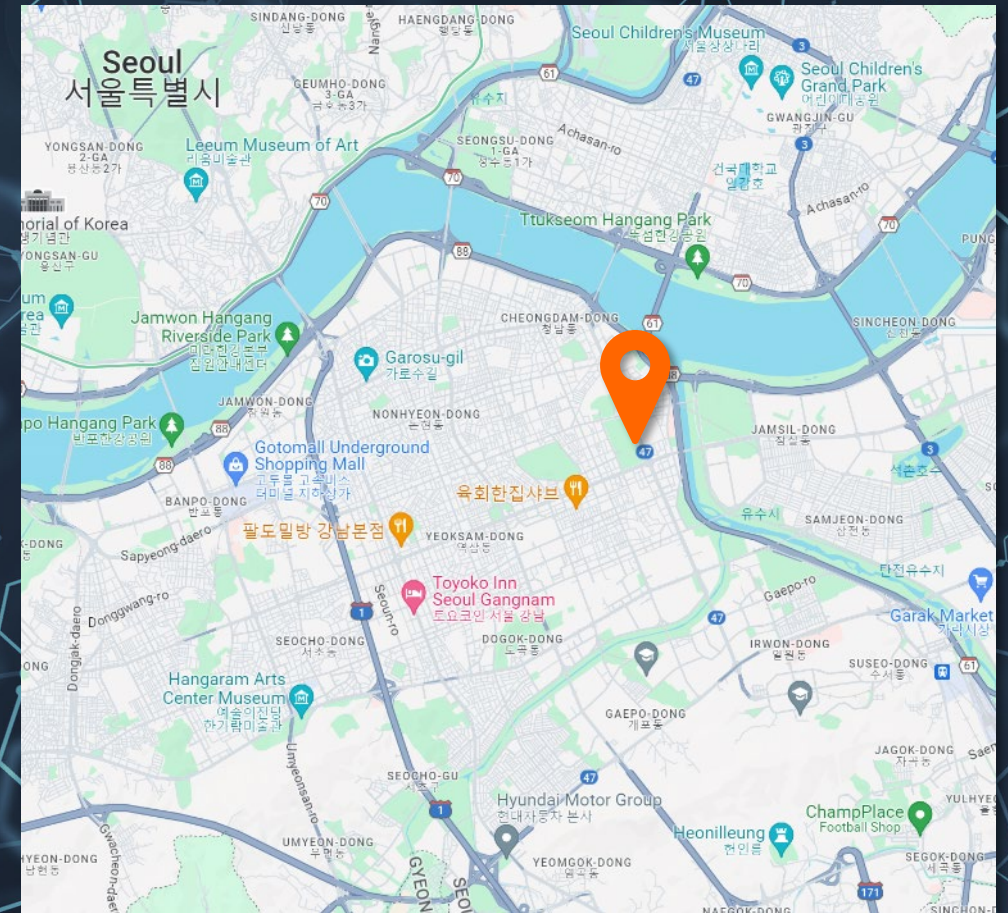
COMPLIANCE. ADVOCACY. SUSTAINABILITY.

**Company:** REACHLaw Korea Limited

**Address:** 30<sup>th</sup> Floor, 511, Yeongdong-daero, Gangnam-gu (Samseong-dong, Trade Tower), Seoul, Republic of Korea

**Corporate Registration No.:**  
110114-0316916

# REACHLAW KOREA LTD



Google Maps: <https://maps.app.goo.gl/F9q1GLi4Vs3i7q1B7>

# K-REACH SERVICES



1. Only Representation (*through REACHLaw Korea in Seoul*)
2. (Late) Pre-Registration
3. Co-Registration
4. Lead Registration
5. CICO Management & Lead Dossier Preparation (*as a Representative Consulting Company*)
6. CSR / Exposure Scenario Development
7. New Substance Notification
8. Confirmation of Exemptions (*Incl. Polymer of Low Concern Exemptions*)
9. CBI Protection and Extension
10. Impact Assessment / Due Diligence Assessment (*e.g. for business decision making*)
11. Consultancy (*Regulatory, Technical, Legal*)
12. Training *...etc.*



# K-OHSA SERVICES



1. Only Representation (for MSDS Scope) (*through REACHLaw Korea*)
2. MSDS Authoring and Updating
3. MSDS Electronic Submission to the MoEL
4. Electronic Distribution of the MSDS to Customers
5. MSDS Compliance Check
6. CBI Protection and Extension
7. Consultancy (*Regulatory, Technical, Legal*)
8. Training *...etc.*

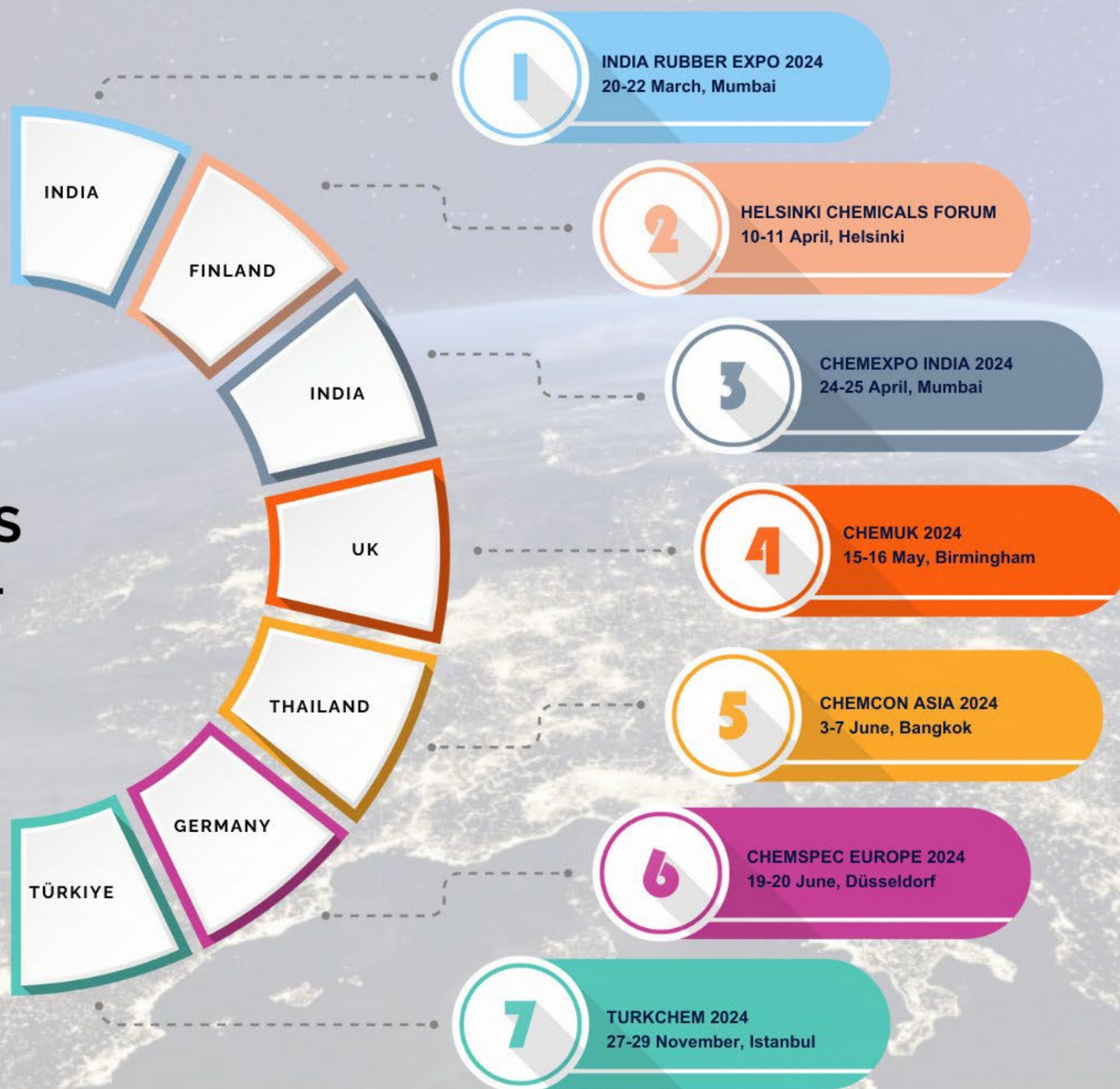
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# REACHLAW TALKS

Some of our content:



# MEET US IN 2024



**1. REACHLAW IN BRIEF**

**2. OVERVIEW OF K-REACH**

**3. K-REACH PRE-REGISTRATION**

**4. K-REACH CO-REGISTRATION AND THE 2024 DEADLINE**

**5. CO-REGISTRATION DOSSIER PREPARATION AND SUBMISSION**

**6. COST & TIMELINE**

**7. CONCLUSIONS**

**8. QUESTIONS & ANSWERS**

**9. CONTACT**

# Overview of K-REACH

## Basic Requirements

- Basic K-REACH market access requirements (*current legal text*):

**“Existing substances”** manufactured in or imported into South Korea at 1 t/a or more need to be **Pre-registered** and **Registered** by applicable transitional deadlines

**“New substances”** manufactured in or imported into South Korea at 100 kg or more\* need to be **Registered** before being placed on the South Korean market

\* Will be changed to 1 t/a or more from 1.1.2025

# Overview of K-REACH

**Legal Texts** <https://www.law.go.kr/>

- The South Korea K-REACH regulation constitutes a few legal texts that together creates the “complete” legal text, as follows:
  1. **Act on Registration and Evaluation of Chemicals**  
(Latest updated with: Act No.19172, 03 January 2023, partially revised)
    - Contains the *main text* of K-REACH
  2. **Enforcement Decree of the Act On Registration and Evaluation of Chemical Substances** (Latest updated with: Presidential Decree No. 33952, December 12, 2023, partially revised)
    - Contains **definitions** supporting the Act & *Annexes* and *Forms*
  3. **Enforcement Rules of the Act on Registration and Evaluation of Chemical Substances** (Latest updated with: Ministry of Environment Ordinance No. 1064, December 18, 2023, partially revised)
    - Defines *further definition*

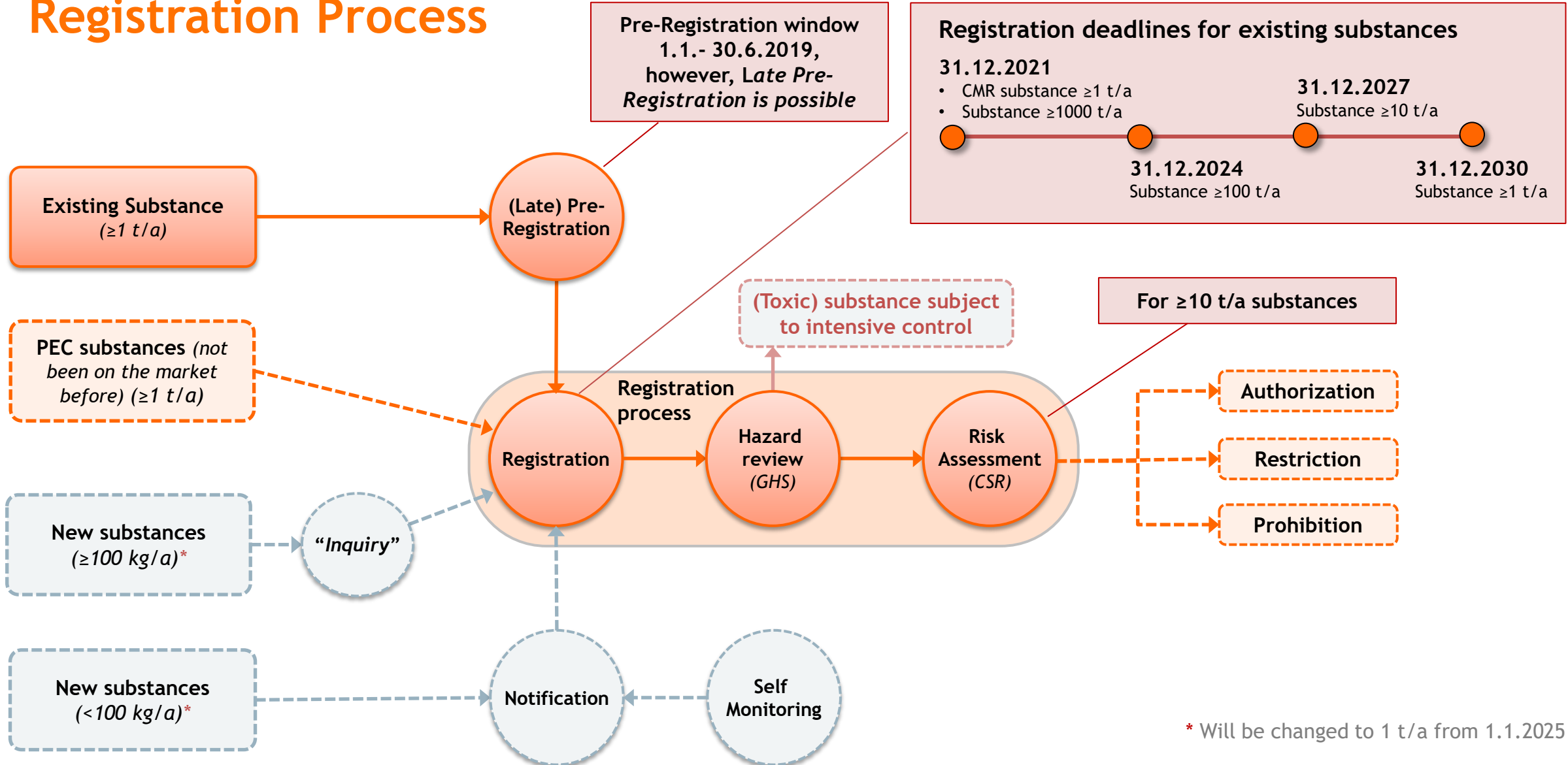


# Overview of K-REACH

## Some Definitions (*relevant for this presentation*)

- **Existing substances** (“*Phase-in substances*”) are all substances that have been on the South Korean market before the entry into force of K-REACH and typically are identified with a KE number. PEC substances are **Priority Existing Substances (PEC)** are a subset of the **first 510 existing substances** that were required to be registered to the MoE by **30 June 2018** for all tonnage bands (*1 - 10, 10 - 100, 100 - 1000 and > 1000 t/a*)
- **New Substances** (“*Non-Phase-in substances*”): Any other substance that is **not an existing substance** (including PEC substances) is a new substance.
- **KE-number:** KE-number is given to **existing substances** and are available for search on the *Chemical Information IT System* website.
- **NIER:** *National Institute of Environment* and is charged with environmental research, education, international cooperation, and setting criterion levels for various pollutants.
- **CICO:** Means **chemical substance information communicative organization**, is similar to a SIEF under EU REACH. For companies wishing to register the same substance jointly, they must first join the CICO of the substance and then cooperate in preparation for a joint registration.

# Overview of K-REACH Registration Process



\* Will be changed to 1 t/a from 1.1.2025



## Substances Completely Out of Scope of the K-REACH Regulation *(Act Article 3)*

- Radioactive materials
- Drugs and Narcotics
- Cosmetics and raw materials used for cosmetics
- Pesticides
- Fertilizers
- Foods, Health functional foods, Organic food
- Feed
- Explosives
- Munitions
- Medical devices
- Hygiene products
- Biocidal substances and products

## Substances Out of Scope of K-REACH Pre-Registration / Registration / Notification *(Act Article 11)*

### Self-Declaration:

- Imported as imbedded into machines
- Imported together with machines or equipment used for test operation
- Contained in a product that performs a certain function
- Very low risk substances declared and publicly announced by the MoE
- Impurities, by-products etc.
- Substances existing in nature
- Amino acids and its salts

### Confirmation of exemption submission to and Confirmation from the Authority *(within 30 days)*:

- Wholly exported overseas
- Imported to manufacturer another chemical to be wholly exported overseas
- Used for scientific experiment, analysis or research
- chemical for research and development
- Some polymer compounds
- Surface treated substances
- Non-isolated intermediate
- Isolated intermediate

## Other Special K-REACH Provisions

- Substances with lesser Registration data requirements *(Decree Article 13)*
  - On-site isolated intermediates
  - Transported isolated intermediates

# Overview of K-REACH

## Korean Authorities and Roles

1. MOE (Ministry of Environment): *The Competent Authority*
2. NIER (National Institute of Environmental Research): *Registration Management*
3. KECO (Korea Environment Corp): *Pre-registration management*
4. MoEL (Ministry of Employment and Labour): *Hazardous Substances Supervision*
5. Local Environmental Office(s): *Reporting*
6. KCMA (Korea Chemicals Management Association): *Certification*
7. Korea Customs: *Import/Export Supervision and Inspections at the Border*



MINISTRY OF  
ENVIRONMENT



Korea Environment  
Corporation



KOREA CHEMICALS MANAGEMENT ASSOCIATION



Ministry of  
Employment and Labor



National Institute of  
Environmental Research



KOREA CUSTOMS  
SERVICE

# Overview of K-REACH

## K-REACH IT System

- K-REACH regulatory dossiers (*pre-registrations, registrations, etc.*) are prepared and submitted using the online **K-REACH IT system in the Korean language**
  - Everything is in *Korean language*
  - Homepage:  
<https://kreach.me.go.kr/repwrt/index.do>
- The IT system also contains information on chemicals
  - Chemical search (English language):  
<https://kreach.me.go.kr/repwrt/mttr/en/mttrList.do>
- Login requires registration on the system and can only be done by Korean companies.

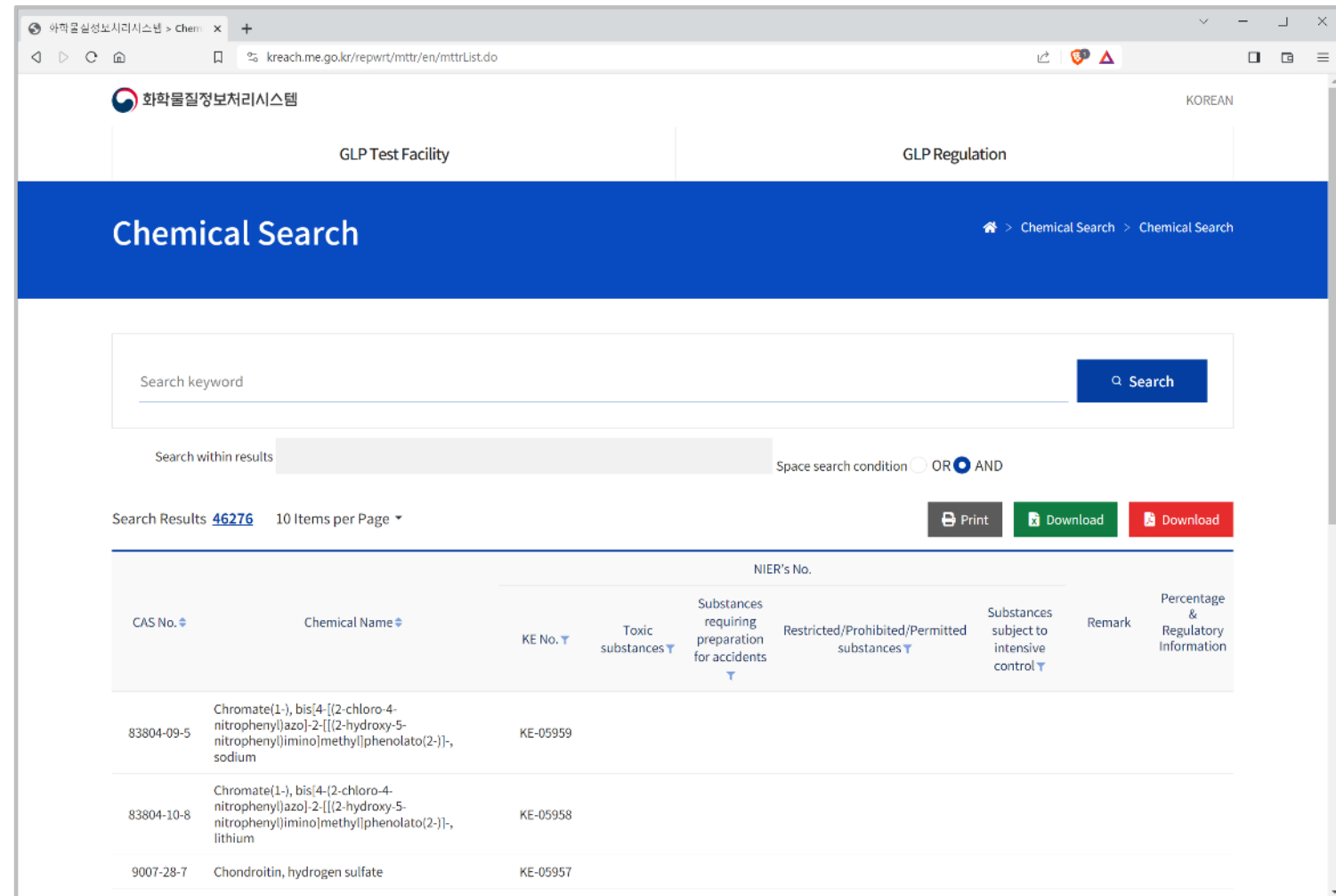
The screenshot shows the homepage of the K-REACH IT system (kreach.me.go.kr/repwrt/index.do). The interface is in Korean. Callout boxes point to various features:

- K-REACH implementation panel**: Points to the main navigation area.
- Exemptions from registration**: Points to the '유독물질' (Toxic Substances) category.
- Chemicals notification**: Points to the '화학물질신고' (Chemical Notification) icon.
- Joint registration**: Points to the '공동등록 협의제' (Joint Registration Consultation System) icon.
- OR Appointment**: Points to the '선임/해임' (Appointment/Dismissal) icon.
- Substance Registration**: Points to the '화학물질등록' (Chemical Registration) icon.
- PCS declaration**: Points to the '화학물질등록평가법 이행' (Compliance with the Chemical Registration Evaluation Act) section.

# Overview of K-REACH

## How to Check for Existing / New Substance Status

- **Chemical Information IT System** (Formerly on the NIER website) provides information, amongst others, of the “*new substance*” / “*existing substance*” status
  - You will need a **CAS number** to run the check
- Links to the system:
  - <https://kreach.me.go.kr/repwrt/index.do> (Korean)
  - <https://kreach.me.go.kr/repwrt/mtr/en/mtrList.do> (English language)



The screenshot displays the K-REACH Chemical Search interface. The page title is "화학물질정보처리시스템" (Chemical Substance Information Management System) with a "KOREAN" language selector. The main navigation bar includes "GLP Test Facility" and "GLP Regulation". The "Chemical Search" section features a search input field with the placeholder "Search keyword" and a "Search" button. Below the search bar, there are options for "Search within results" and "Space search condition" (OR and AND). The search results are displayed in a table with the following columns: CAS No., Chemical Name, KE No., Toxic substances, Substances requiring preparation for accidents, Restricted/Prohibited/Permitted substances, Substances subject to intensive control, Remark, and Percentage & Regulatory Information. The table shows three results:

CAS No.	Chemical Name	KE No.	Toxic substances	Substances requiring preparation for accidents	Restricted/Prohibited/Permitted substances	Substances subject to intensive control	Remark	Percentage & Regulatory Information
83804-09-5	Chromate(1-), bis[4-[(2-chloro-4-nitrophenyl)azo]-2-[[[2-hydroxy-5-nitrophenyl]imino)methyl]phenolato(2-)], sodium	KE-05959						
83804-10-8	Chromate(1-), bis[4-[(2-chloro-4-nitrophenyl)azo]-2-[[[2-hydroxy-5-nitrophenyl]imino)methyl]phenolato(2-)], lithium	KE-05958						
9007-28-7	Chondroitin, hydrogen sulfate	KE-05957						

# Overview of K-REACH

## Search Example 1: “Propene”

The screenshot shows the K-REACH search interface. At the top, there are navigation links for 'GLP Test Facility' and 'GLP Regulation'. A blue banner reads 'Chemical Search'. Below this is a search input field containing '115-07-1' and a 'Search' button. Underneath the input field, there are options for 'Search within results' and 'Space search condition' (OR/AND). The search results are displayed in a table with columns: CAS No., Chemical Name, KE No., Toxic substances, Substances requiring preparation for accidents, Restricted/Prohibited/Permitted substances, Substances subject to intensive control, Remark, and Percentage & Regulatory Information. The first result is '1-Propene; Propylene' with 'KE-29388' circled in red. A red arrow points from the 'Input' label to the search field, and another red arrow points from the 'Result' label to the first row of the table.

CAS No.	Chemical Name	KE No.	Toxic substances	Substances requiring preparation for accidents	Restricted/Prohibited/Permitted substances	Substances subject to intensive control	Remark	Percentage & Regulatory Information
115-07-1	1-Propene; Propylene	KE-29388						

Existing substance, as it has a KE number.

# Overview of K-REACH

## Search Example 2: “Sodium Hydroxide” (PEC substance)

The screenshot shows the K-REACH search interface. At the top, there is a search bar with the input '1310-73-2' and a 'Search' button. Below the search bar, there are options for 'Search within results' and 'Space search condition' (OR/AND). The search results show 10 items per page. The first result is Sodium hydroxide (CAS No. 1310-73-2). The registration details for this substance are shown in a table below the search results.

순번	화학물질 명칭*	고유번호 (CAS No.)	등록 유예기간
234	Cadimium selenide	1306-24-7	고시일로부터 3년
235	Cobalt monooxide	1307-96-6	고시일로부터 3년
236	Lead dioxide	1309-60-0	고시일로부터 3년
237	Diantimony trioxide	1309-64-4	고시일로부터 3년
238	Potassium hydroxide	1310-58-3	고시일로부터 3년
239	Sodium hydroxide	1310-73-2	고시일로부터 3년
240	Nickel monoxide	1313-99-1	고시일로부터 3년

The registration details for Sodium hydroxide (CAS No. 1310-73-2) are shown in a table below the search results:

CAS No.	Chemical Name	KE No.	Toxic substances	Substances requiring preparation for accidents	Restricted/Prohibited/Permitted substances	Substances subject to intensive control	Remark	Percentage & Regulatory Information
1310-73-2	Sodium hydroxide [Other names : Caustic soda; Soda lye; 알칼리액; Sodium hydrate;]	KE-31487	97-1-136				No grace period for registration	

Annotations in the image include:

- Input:** An arrow pointing to the search input field containing '1310-73-2'.
- Result:** An arrow pointing to the search results table.
- PEC list of 510 substances:** A red box pointing to the table of 510 substances, with a red dashed box highlighting the row for Sodium hydroxide.
- PEC substance (also “Existing substance”), registration required before placing on the market for the first time:** A red box pointing to the registration details for Sodium hydroxide, with red dashed circles highlighting the 'KE No.' and 'No grace period for registration' fields.

# Overview of K-REACH

## Search Example 3: “New Substance” (Non-Phase-in Substance)

The screenshot shows the K-REACH web portal. At the top, there are navigation links for 'GLP Test Facility' and 'GLP Regulation'. A blue banner reads 'Chemical Search'. Below this is a search input field containing '12345-67-8' and a 'Search' button. Underneath the search bar, there are options for 'Search within results' and 'Space search condition' (OR and AND). The search results section shows 'Search Results 0' and '10 Items per Page'. A table with columns for 'CAS No.', 'Chemical Name', 'KE No.', 'Toxic substances', 'Substances requiring preparation for accidents', 'Restricted/Prohibited/Permitted substances', 'Substances subject to intensive control', 'Remark', and 'Percentage & Regulatory Information' is displayed. The 'KE No.' column is circled in red. A red arrow points from the 'Input' label to the search bar, and another red arrow points from the 'Result' label to the circled 'KE No.' column. A red box on the right contains text explaining that no matching result leads to a new substance. A blue box at the bottom provides a definition for 'Non-phase-in substance'.

Input → 12345-67-8

Search Results 0 | 10 Items per Page

CAS No.	Chemical Name	KE No.	Toxic substances	Substances requiring preparation for accidents	Restricted/Prohibited/Permitted substances	Substances subject to intensive control	Remark	Percentage & Regulatory Information

Result →

When there is no matching result, or the substance is only marked on the “OECD HPV chemicals”, it is considered “Non-phase-in substance” (※ “OECD HPV chemicals” means chemical substances that are globally manufactured or imported over 1,000 tons.)

When there is no matching result → New substance (=Non-phase-in substance)

# Overview of K-REACH

## Only Representatives - K-REACH Act Article 38

### Article 38 (Application for Registration by Person Appointed by Overseas Manufacturer or Producer)

(1) Any person who manufactures or produces or intends to manufacture or produce a chemical substance or product overseas that is imported to the Republic of Korea (hereafter in this Article referred to as "overseas manufacturer or producer") may appoint a person meeting the requirements prescribed by Ordinance of the Ministry of Environment and require him or her to perform the following affairs in lieu of a person who imports or intends to import the chemical substance or product: *<Amended on Mar. 20, 2018; Oct. 16, 2018>*

1. Registration and reporting of the chemical substance, and reporting of any change thereof under Article 10;
2. Filing an application for confirmation of exemption from registration, or any change thereof, etc. under Article 11;
3. Registration of any change, reporting and reporting of any change under Article 12;
4. Reporting under Article 32;
5. Other affairs prescribed by Presidential Decree.

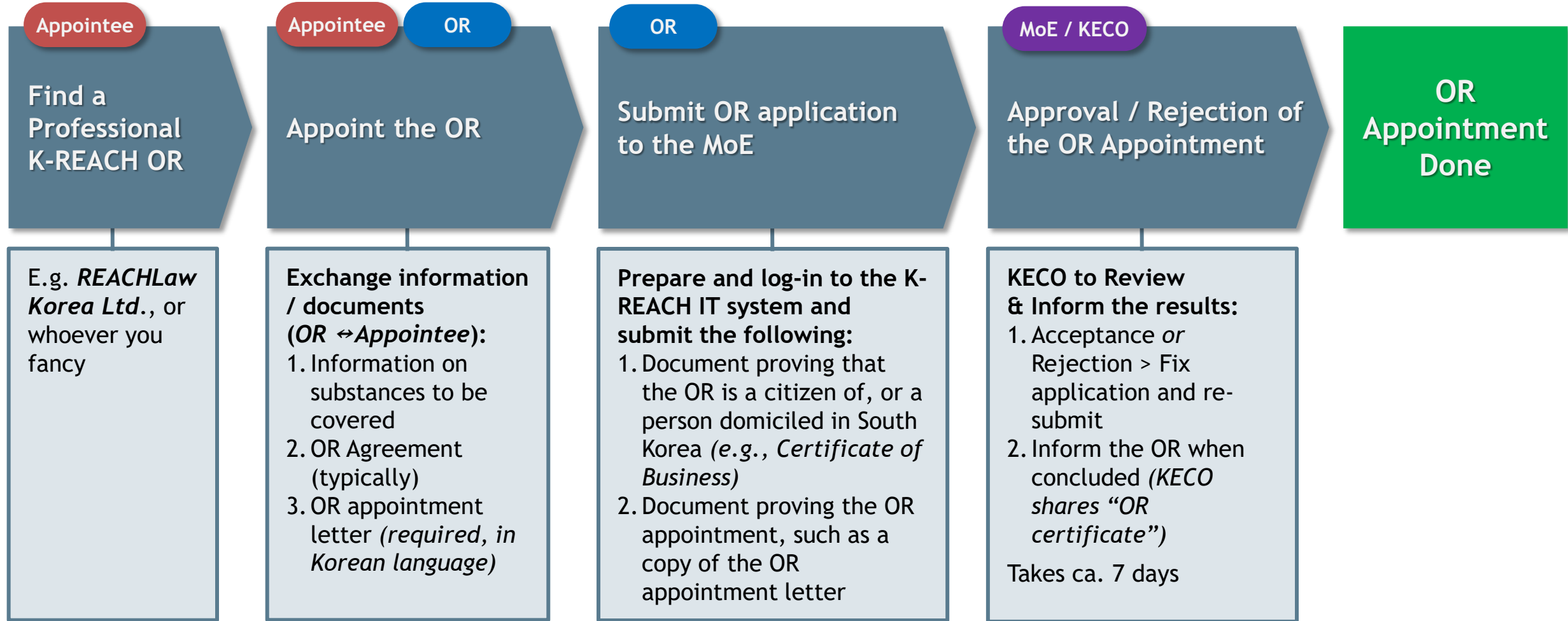
(2) Any person appointed pursuant to paragraph (1) shall report the Minister of Environment of the fact that he or she is appointed or dismissed by an overseas manufacturer or producer, as prescribed by Ordinance of the Ministry of Environment.

(3) Any person appointed pursuant to paragraph (1) shall notify a person who imports or intends to import a chemical substance or product prescribed in paragraph (1) of the matters prescribed by Presidential Decree, such as the fact that he or she has been appointed or affairs entrusted, as prescribed by Ordinance of the Ministry of Environment. *<Newly Inserted on Mar. 20, 2018>*



# Overview of K-REACH

## Only Representative Appointment Process



Timeline

Ca. 1 - 3 weeks

# Overview of K-REACH

## KECO K-REACH OR Certificate

- Example of an official **KECO K-REACH Only Representative Certificate** provided as confirmation of OR appointment by KECO
  - Also includes the substance covered in the same document

제 34-B-1905-11025 호

### 국외 제조(생산)자에 의한 선임 사실 신고증

1. 상호(명칭) : [REDACTED] Company/OR name
2. 사업자등록번호 : [REDACTED] Business registration number
3. 성명(대표자) : [REDACTED] Contact Person
4. 소재지(사업장) : [REDACTED] Address of Business
5. 신고내용 : [  ] 선임 [  ] 해임
6. 국외 제조(생산)자 또는 최종 수출자: Foreign Manufacturer  
[REDACTED]
7. 제품명 등 :  
2,2'-(Butylimino)bisethanol ; N-Butyldiethanolamine (CAS No.: 102-79-4)

「화학물질의 등록 및 평가 등에 관한 법률」 제38조제2항 및 같은 법 시행규칙 제49조제4항에 따라 화학물질 또는 제품의 국외 제조(생산)자는 수입자를 갈음하여 업무를 수행할 수 있는 자를 신고하였음을 확인합니다.

2019년 05월 27일

한국환경공단의



# Overview of K-REACH | K-REACH & EU REACH Comparison

Task / Scope	EU REACH	K-REACH
Only Representative Appointment	No approval from the authority required	Required approval from the authority
Pre-registration	Yes, but no longer possible	Yes
Registration	All chemicals at $\geq 1$ t/a (exemptions apply)	Simplified registration required for $\geq 100$ kg/a <u>new substances</u> (exemptions apply)
		All existing substances at $\geq 1$ t/a (exemptions apply)
Polymer registration	Exempted, but not monomers. REACH Review may bring changes to this for some polymers	Polymers that are non-Polymer of Low Concern (PLC) require (data reduced) registration
Exemptions from Registration	Self-declaration only, may be reviewed during inspections etc.	Applicant must obtain exemption from the authority <u>before</u> first manufacture or import
Registration Data requirement	More volume, more data required	More volume, more data required - Reduced data requirement (classification based)
Joint Registration	Yes	Yes
R&D Exemptions	Yes	Yes
Product notification as such	No (SVHC's yes)	No (PCS's Yes)
Safety Data Sheets	Yes	Yes, and submission to the authority required
SDS Certification	No	No
Dossier review by certified person	No	No

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# K-REACH Pre-Registration

## Overview of Deadlines, Including Pre-Registration

- **1 July 2018:** companies manufacturing or importing  $\geq 1$ t/y any of the **510 PEC substances** had to have the PEC substance registered (*Already behind us*)
- **1 January 2019 - 30 June 2019:** Pre-registration period for all  $\geq 1$  t/a existing substances (*Already behind us*) > Late pre-registration possible ( $\rightarrow$  next page)
  - Only pre-registered substances can benefit from extended registration deadlines, meaning they can be manufactured or imported with the pre-registration until the extended registration deadline is up for their annual substance volume.

### K-REACH Extended Registration Deadlines (for existing substances only)

31 December 2021: CMR substances @  $\geq 1$  and Substances t/a @  $\geq 1\ 000$  t/a (*Passed*)

31 December 2024: Substances @  $\geq 100 - 1\ 000$  t/a

31 December 2030: Substances @  $\geq 1 - 100$  t/a

***(Late) Pre-Registration only applies to Existing Substances, not New Substances***

# K-REACH Pre-Registration

## What Information is Submitted in the (Late) Pre-Registration

- Information included in the (*late*) Pre-Registration:
  1. Substance identity information (name, CAS No.)
  2. Estimated annual import/manufacture tonnage band: Given based on in what tonnage band you wish to register (*as far as currently known*) > Can be updated
  3. Classification & labelling of the substance according to GHS
  4. Uses information (*K-REACH use descriptor system*)
  5. Legal entity information (*is taken from the K-REACH IT system based on account details*)
  6. In case Only Representation: Importers information (*company name, business ID, location, contact details, exporting country*)->*Active Importer!!*
- Compilation and submission of the Pre-Registration to the MoE is done using the **K-REACH IT system**
- Any updates related to the (*late*) pre-registration information should be made **within one (1) month** of the “trigger” for change in the information

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# K-REACH Registration and the 2024 Deadline

## Process, What is a Co-Registrant?

Pre-Submission

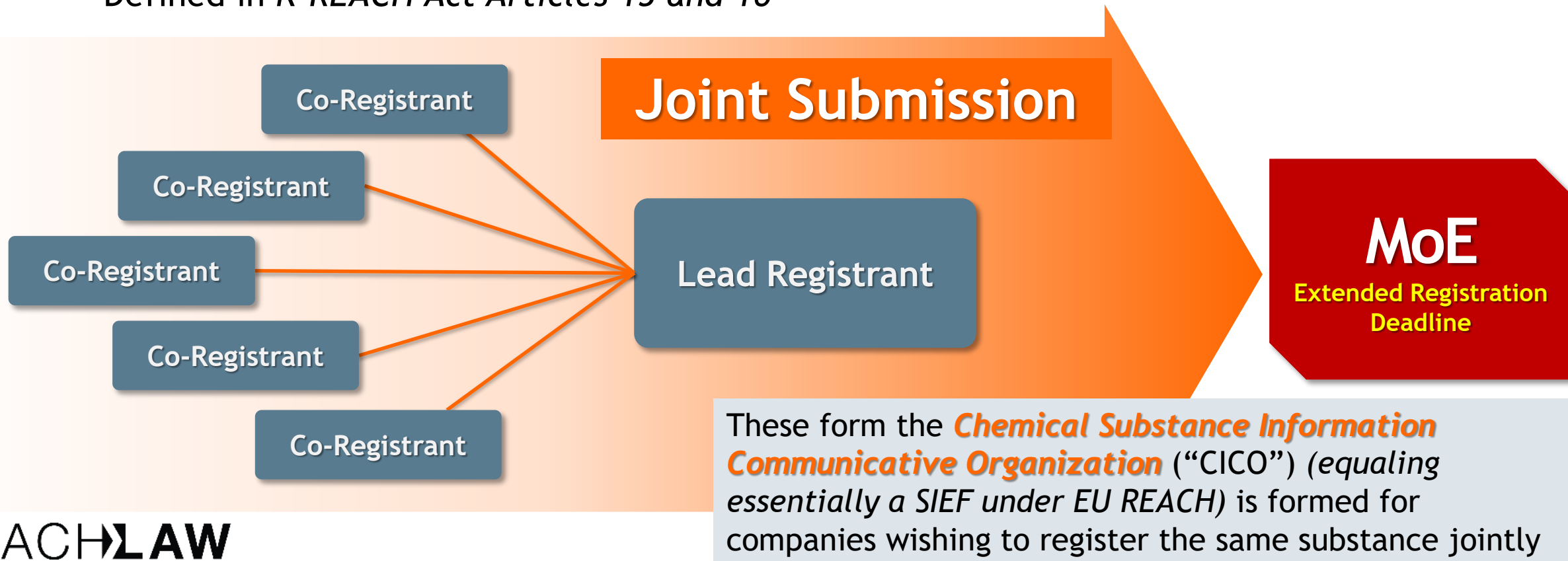
- **The Co-Registrant is responsible for its own registration:**
  1. Cooperate in the CICO (Active / Passive member) (*discussed more later*)
  2. Agree on substance identity
  3. Share data (*if available*) unless the Joint Submission already exists
    - You may own data for EU REACH purposes
  4. Share costs (*e.g. purchase a “**Letter of Access**”*)
  5. Compile and submit the Co-Registration **as part of the Joint Submission** and submit the dossier to the MoE using the K-REACH IT System **well before the applicable K-REACH registration deadline to have the registration accepted before the deadline, e.g. 31.12.2024** (*discussed more later*)
  6. Keep the Co-Registration dossier up-to-date
  7. Record keeping and communicate with authorities

Post-Submission

# K-REACH Registration and the 2024 Deadline

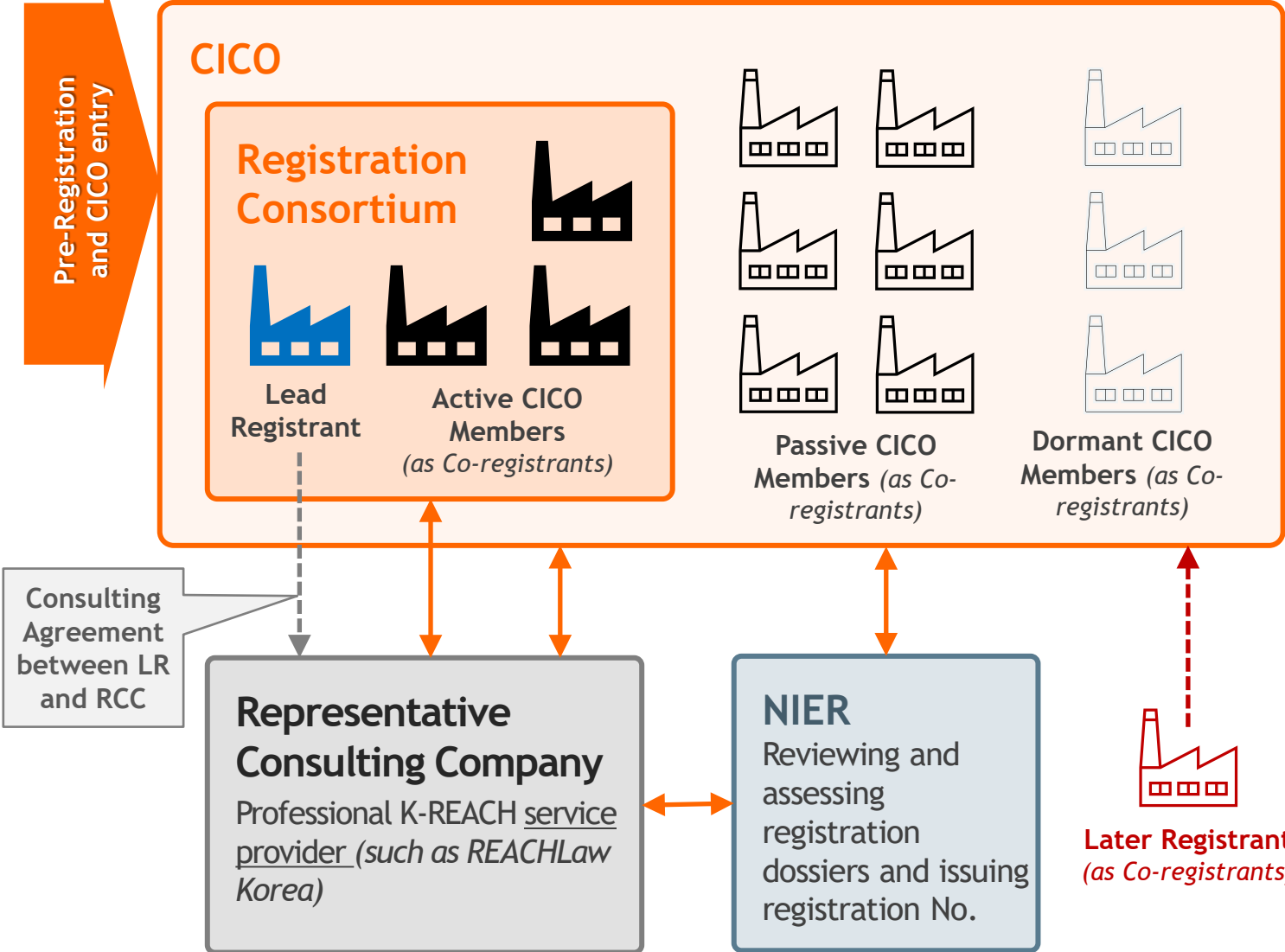
## Joint Submission Concept

- When a substance is intended to be **K-REACH registered** by one or more companies, a **Joint Submission** of “core registration data” is required
  - Opt-Out’s are possible
  - Defined in *K-REACH Act Articles 15 and 16*



# K-REACH Registration and the 2024 Deadline

## CICO and the Joint Registration Effort/ Players of the Joint Registration Effort



### Definitions:

**CICO** = Chemical substance Information Communicative Organization (~“SIEF”)

**Registration Consortium** = Is the “*steering entity*” of the CICO comprised of the LR and active members. Governed by a *registration consortium agreement*. The lead registrant will lead the formation of the registration consortium.

**Representative Consulting Company (RCC)**, is typically an independent 3<sup>rd</sup> party consulting company that is hired to take care of the CICO management, the preparation of the technical dossiers and CSR, meaning all technical, managerial and administrative work, etc.

**Active CICO member:** Is a Co-registrant that will/is a registration consortium member and actively involved in the registration preparation process and bearing the costs of the registration effort (*will be reimbursed later through the LoA process*). Typically, also part of establishing the registration consortium.

**Passive CICO Member:** Is a Co-registrant that is not part of the registration consortium and only participating in select work of the registration effort (e.g., data collection). Are not bearing any of the initial costs > Will later purchase a LoA (*governed by the LoA agreement*) to become a member of the Joint Submission.

**Dormant CICO Member:** Is a Co-registrant that is not part of the registration consortium and not participating in any. Are not bearing any of the initial costs > Will later purchase a LoA (*governed by the LoA agreement*) to become a member of the Joint Submission.

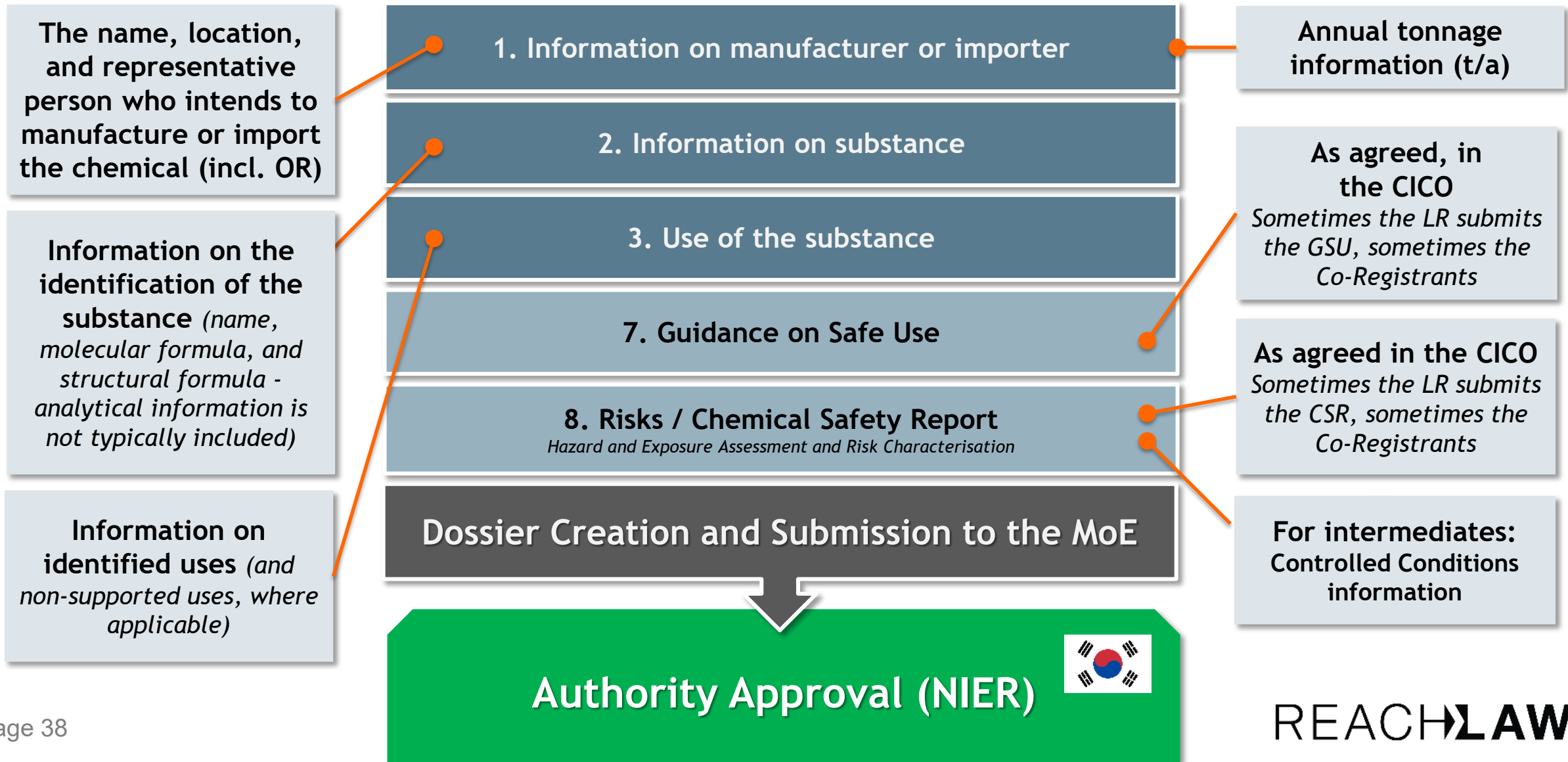
**Later Registrant:** Essentially the same as *dormant* and could not have taken part in the JS work as not part of the CICO then.

**NIER:** National Institute of Environment in Korea

1. REACHLAW IN BRIEF
2. OVERVIEW OF K-REACH
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7. CONCLUSIONS
8. QUESTIONS & ANSWERS
9. CONTACT

# Co-Registration Dossier Preparation and Submission

## What does the K-REACH Co-Registrant Dossier Contain?

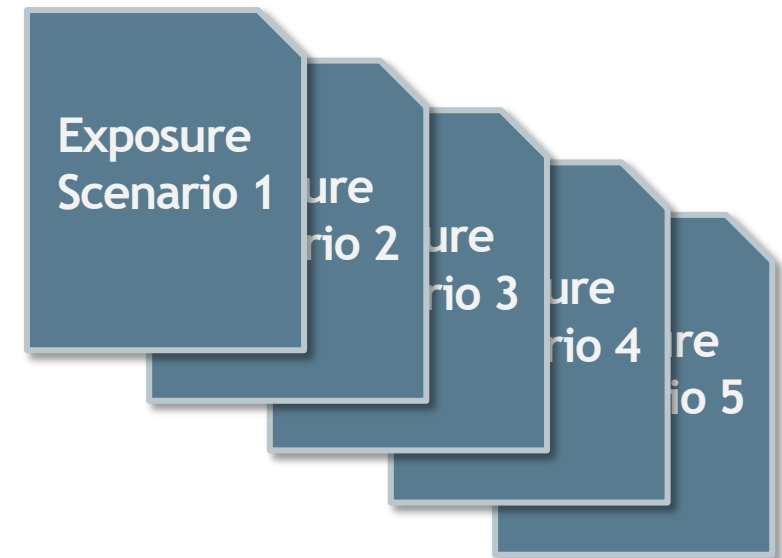


# Co-Registration Dossier Preparation and Submission

## Exposure Scenario Information Collection

- Although the CSR (*Hazard Assessment part*) is typically included (*or Option to include*) in the data package covered by the LoA, it is quite common **that Exposure Scenarios (“ES”) are not.**
- Therefore, the **Co-Registrant may have to develop Exposure Scenarios for the required identified uses** (*one ES may group several identified uses*)
  - *Exposure scenarios describe operational conditions and risk management measures.*
- Exposure Scenarios can be prepared using the K-CHESAR tool with information from the **Hazard Assessment part** of the CSR and information on the **identified uses** specific to the Co-Registrant
  - Professional K-REACH consultants, such as **REACHLaw Korea**, can prepare such Exposure Scenarios

Identified uses of the substance should be collected from your downstream users / your entire supply chain  
*Should already be included in the K-REACH pre-registration*



# Co-Registration Dossier Preparation and Submission

## CSR Preparation

- Typically, a **CSR template** document is provided as part of the LoA package, **whereby the Co-registrant will have to adopt it to reflect the Co-Registrants situation**
  - Typically, this means including Co-registrant specific information on the substance, uses, tonnage bands, etc.
- **The CSR will be included in the Co-registration Dossier for submission to the MoE required above 10tpa.**



# Co-Registration Dossier Preparation and Submission

## Co-Registration Dossier Preparation

- The K-REACH Co-Registration dossier is compiled and submitted using the online **K-REACH IT system in the Korean language**
  - Everything is in **Korean language** (search is in *English*)
  - Login requires registration on the system and can only be done by Korean based companies.

Substance  
Registration

Available at:

<https://kreach.me.go.kr/repwrt/index.do>

“K-REACH panel”

“CICO”

알림판

산업계도움센터

화학물질등록평가법 이행 안내

공지사항



# Co-Registration Dossier Preparation and Submission | K-REACH IT System Views (1/4)

When you select **“Registration”** on the main K-REACH IT menu, you will get to this view where information can be entered into the registration dossier

**Everything is online!!!**

화학물질 등록 신청서 **“Substance Registration Application”**

신청사항

상태  작성중  최종제출

필수 시험자료 입력현황 0%

작성완료 | 작성중

신청사항

원도 및 분류 표시/첨부서류

관리적·화학적 특성

인체유해성

환경유해성

고분자 자료

나노물질

처리이력

Refresh / Submission

Save / Save and Next

· 제조/수입 구분: 선택  선임원자 · 제출 구분: 등록대상(10.1이후)  기존화학물질  신규화학물질

· 신청인 (법 제38조에 따라 선임된 자 포함)

상호(명칭)	리치로코리아				
사업자등록번호	1428802902				
성명(대표자)	유우니 안테로 존카바라, 프레데릭 테드 빌헬름 요한손				
담당자 성명	정수연	연락처	02-6956-7305	이메일 주소	kreach@reachlaw.fi
소재지(사업장)	(06164) 서울 강남구 영동대로 511 (삼성동, 트레이드타워) 트레이드타워 30층				
전화번호	02-6956-7304	팩스번호	02--		
기업구분	소기업	중소기업확인서 유효기간	2023-07-10 ~ 2024-03-31		

· 신청사항 \*첨부파일명이 일본어나 특수문자가 포함되면 업로드가 불가능합니다.

화학물질명\*  물질검색

CAS NO 등\*

상품명\*

분자식\*

물분명

구조식

구조식 파일첨부  업로드

순도(%)\*

확인된 물질명-부산물	이름*	CAS No.	비율(%)*	행추가
	<input type="text"/>	<input type="text"/>	<input type="text"/>	삭제

연간제조(수입) 예정량(톤)\*

0.1≤Ton<1  
 1≤Ton<10  
 10≤Ton<100  
 100≤Ton<1000  
 1000≤Ton

고분자  
 수송분리중간체  
 원장분리중간체  
 나노물질

영 제13조제1호외3에 따라 제출자료의 일부는 생략하여 등록  
 영 제10조제5항에 따라 지정·고시된 화학물질  
 (  0.01<Ton    0.01≤Ton<0.1    0.1≤Ton<1 )

자료보호 신청 여부\*  해당  해당없음

새로고침 최종제출 저장 저장 후다음단계

Required sections to fill

Save / Save and Next

**Registrant Information**

- Company name
- Business ID
- Representative
- Contact information
- Address
- SME Information

**Substance Information**

- Substance Name
- CAS Number
- Product Name
- Molecular formula
- Structural formula
- Purity
- Impurities

**Other Information**

- (Expected) Tonnage
- Type of registration (tonnage band, polymer, Intermediate)
- Data Protection

# Co-Registration Dossier Preparation and Submission | K-REACH IT System Views (2/4)

Required sections to fill

This Part is for the LR. If LR grant this part, these are deactivated.

화학물질 등록 신청서 **"Substance Registration Application"**

최종제출 하기 위해선 신청사항 항목으로 이동해주세요.

용도 및 분류 표시/첨부서류

상태 **작성중**

필수 시험자료 입력현황 0%

작성완료 | 작성중

신청사항

용도 및 분류 표시/첨부서류

물리적·화학적 특성 **완료**

인체유해성 **완료**

환경유해성 **완료**

고분자 자료 **완료**

나노물질 **완료**

**새로고침** **Refresh** **삭제** **저장** **Delete / Save**

용도

용도입력추가 용도입력삭제

용도분류체계\* 선택

구체적 용도에 대한 설명\*

사용하지 않아야 할 용도

상품의 물리적 형태 및 용도\*

상품 내 함량(%)\*

분류

표시문구 적용

유해성 분류 구분

행추가

선택 선택 삭제

표시

그림문자

북한외 폭발(GHS01)  물폭(GHS02)  원위의 물폭(GHS03)  가스실린더(GHS04)  부식성(건강, GHS05)  부식성(문송, GHS05)

해골과 X자점 뼈(GHS06)  인턴부호(GHS07)  건강유해성(GHS08)  환경유해성(GHS09)

신호어

위험  경고

유해위험 문구

H200  H201  H202  H203  H204  H205  H220  H221  H222  H223  H224  H225  H226  H227

H228  H229  H232  H240  H241  H242  H250  H251  H252  H260  H261  H270  H271  H272

H280  H281  H290  H300  H301  H302  H303  H304  H305  H310  H311  H312  H314  H315

H317  H318  H319  H320  H330  H331  H332  H334  H335  H336  H340  H341  H350  H351

H360  H361  H362  H370  H371  H372  H373  H375  H400  H410  H411  H412  H413  H420

예방조치 문구

P101  P102  P103  P201  P202  P210  P211  P212  P220  P222  P223  P230  P231  P232

P233  P234  P235  P240  P241  P242  P243  P244  P250  P251  P260  P261  P262  P263

P264  P270  P271  P272  P273  P280  P282  P283  P284  P231+P232  P301  P302  P303  P304

P305  P306  P308  P310  P311  P312  P313  P314  P315  P320  P321  P330  P331  P332

P333  P334  P335  P336  P337  P338  P340  P342  P351  P352  P353  P360  P361  P362

P363  P364  P370  P371  P372  P373  P375  P376  P377  P378  P380  P381  P390  P391

P301+P310  P301+P312  P301+P330+P331  P302+P334  P302+P352  P302+P335+P334  P303+P361+P353  P304+P312

P304+P340  P305+P351+P338  P306+P360  P308+P311  P308+P313  P332+P313  P333+P313  P336+P315  P337+P313

P342+P311  P361+P364  P362+P364  P370+P376  P370+P378  P370+P380+P375  P371+P380+P375  P370+P372+P380+P373

P370+P380+P375(+P378)  P401  P402  P403  P404  P405  P406  P407  P410  P411  P412  P413

P420  P402+P404  P403+P233  P403+P235  P410+P403  P410+P412  P501  P502

**Uses**

- Technical Function
- Explanation for Uses
- Uses to Avoid
- Physical State and Uses
- Component in Product

**Classification**

- Several classifications can be added

**Warning label items**

- Signal word(s)
- Hazard statement(s)
- Precautionary statement(s)

# Co-Registration Dossier Preparation and Submission | K-REACH IT System Views (3/4)

Required sections to fill

This Part is for the LR. If LR grant this part, these are deactivated.

화학물질 등록 신청서 **"Substance Registration Application"**

최종제출 하기 위해선 신청사항 업로드로 이동해주세요.

용도 및 분류 표시/첨부서류

상태 **작성중**

필수 시점자료 입력진행률 0%

작성완료 | 작성중

신청사항

- 용도 및 분류 표시/첨부서류
- 물리적·화학적 특성
- 인체유해성
- 환경유해성
- 고분자 자료
- 나노물질

**첨부서류** \*첨부파일명이 일본어나 특수문자가 포함된 경우 업로드가 불가합니다.

위해성에 관한 자료	업로드 해주세요	Upload
안전사용을 위한 지침*	업로드 해주세요	Upload
용도 및 노출 추가자료	업로드 해주세요	Upload 추가
화학물질의 용도와 관련한 노출 정보*	업로드 해주세요	Upload 추가
생각사유 및 증명자료	업로드 해주세요	Upload 추가
시험계획서	업로드 해주세요	Upload
개별제품 확인 소견서	업로드 해주세요	Upload
적수동물 시험자료 시용부동의 확인소견서	업로드 해주세요	Upload
선임사상신고증	34-B-2312-00211	
위탁계약서 사본(위탁제조시)	업로드 해주세요	Upload
물질 식별정보*	업로드 해주세요	Upload 추가
화학물질 분류표시에 대한 자료	업로드 해주세요	Upload
중소기업확인서	SME certificate_RLK 중소기업확인서.pdf	
사업자등록증*	REACHLaw Korea_Certificate of Business*Tax Registration_Incorporation.pdf	
자료제공 동의서	업로드 해주세요	Upload
민원대행업체 위임서류	업로드 해주세요	Upload

**민원대행업체(등록자가 대행인 경우 필수입력)**

상호(명칭)			
사업자등록번호			
담당자 성명	연락처	이메일 주소	
전화번호	팩스번호		

**기타제출자료** 추가

첨부 파일

업로드 해주세요 Upload

- Attachments**
- Chemical Safety Report
  - GSU
  - Additional information on uses and exposure scenarios
  - Exposure scenarios
  - Exemption documents
  - Study Plan
  - OR Agreement
  - Substance Information
  - MSDS
  - SME Certificate
  - Certificate of business registration

- Third Party Information**
- Name
  - Business registration number
  - Contact information

**Other Documents**

# Co-Registration Dossier Preparation and Submission

## K-REACH IT System Views (4/4)

### “Substance Registration Application”

· 수입인지    납부하실 금액은 총 40,000원 입니다.     전액 감면대상    **추가**

**삭제**

수입인지*	금액	번호
	<input type="text"/>	<input type="text"/>

수입인지 첨부\*        **Upload**

※ 전액 감면자인 경우에는 증빙서류 첨부  
\* 감면 대상자가 아닌 경우에는 제시된 금액을 납부합니다.  
\* 감면 대상자인 경우에는 위에 제시된 금액과 무관하게 다음 기준에 따릅니다.  
법 제10조제2항에 따른 등록유예기간에도 불구하고 2022년 12월 31일까지 기준화확물질을 등록하는 다음의 어느 하나에 해당하는 기업에 대해서는 기준금액을 전액 감면.  
1) 「중소기업기본법」 제2조제2항에 따른 소기업 및 중기업  
2) 「중견기업 성장촉진 및 경쟁력 강화에 관한 특별법」 제2조제1호에 따른 중견기업  
\* 증빙서류 중소기업확인서 또는 중견기업확인서를 첨부합니다.

**새로고침**    **삭제**    **저장**

#### Payment

- Price
- Reference number
- Receipt

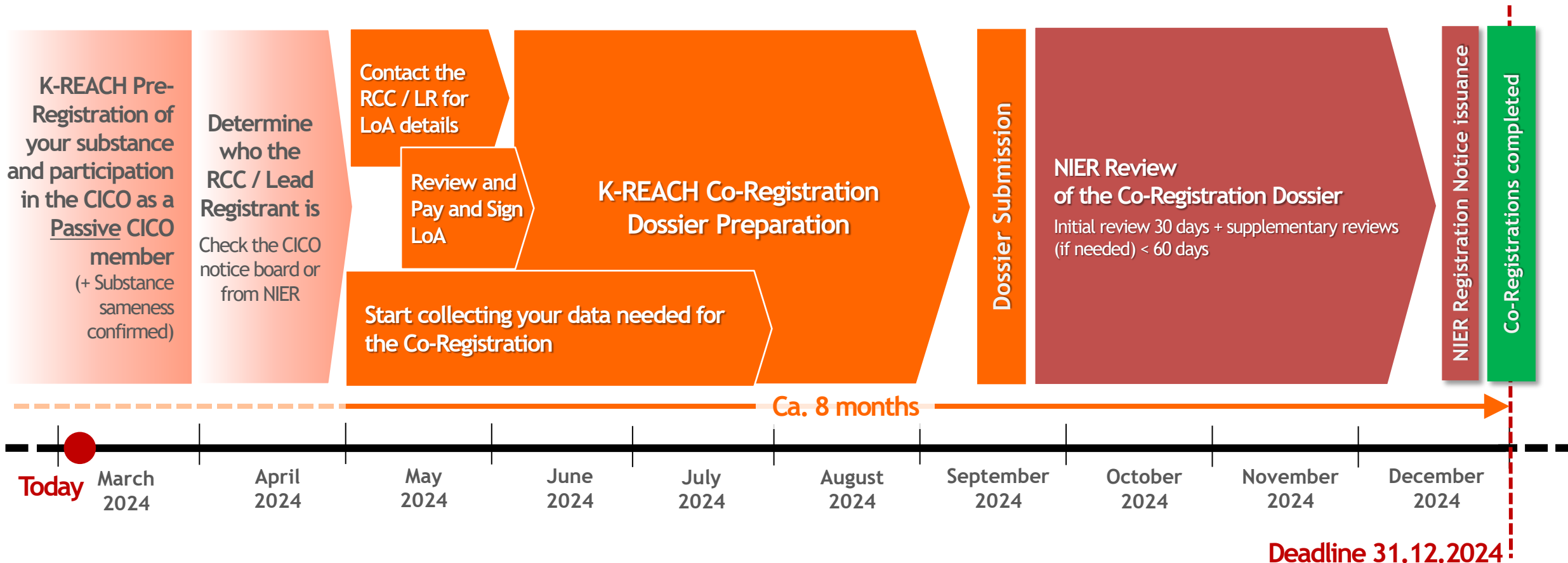
Delete / Save

***The Korean authority (NIER) does both completeness and compliance check on the submitted dossier, before they provide a K-REACH registration number***

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# Timeline & Cost | Example for 100 - 1000 t/a K-REACH Co-Registration

Recommended to start the Co-Registration process asap, where possible, but in this example, we start it **+8 months before the registration deadline of 31.12.2024** as a **passive CICO member** → *Assuming JS exists / Lead Registration submitted and not accepting any new Active CICO members - Likely situation in many cases*



# Cost & Timeline

## MoE K-REACH Registration Fees

- The K-REACH Registration fees are specified on the K-REACH website at: <https://kreach.me.go.kr/repwrt/portal/feeIntrcn.do> (in Korean language)
  - Discounts of 50% for medium-sized enterprises and 80% for small businesses apply

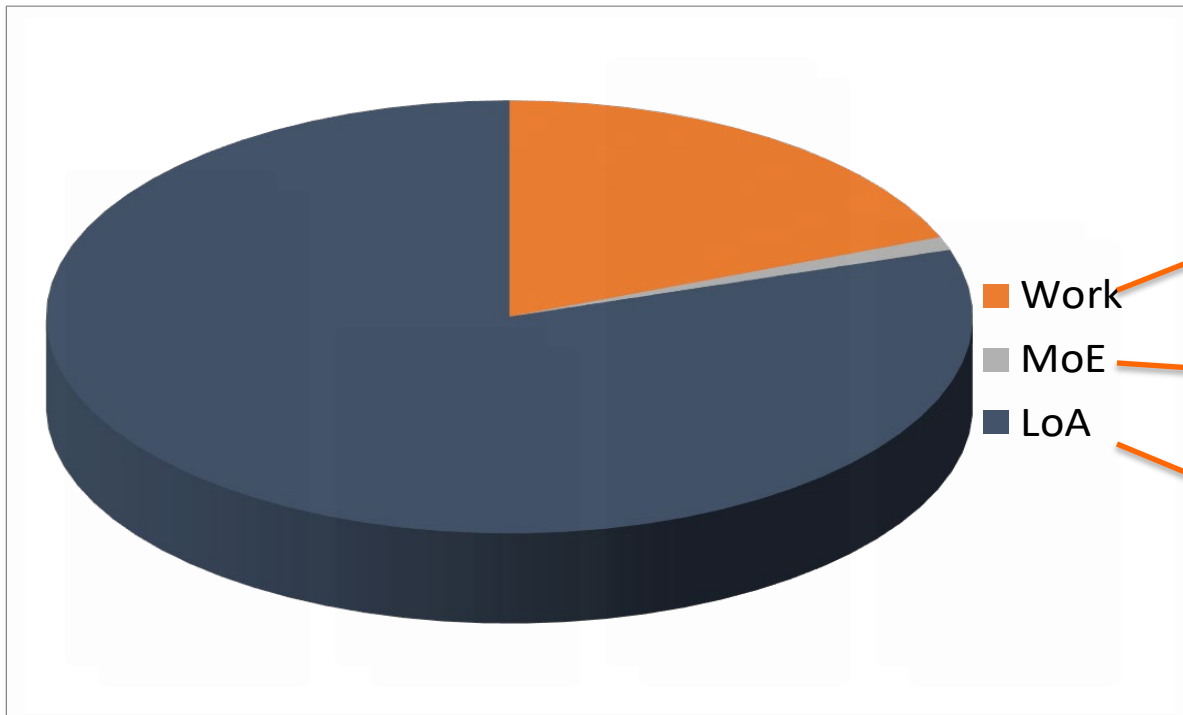
Type	Tonnage band	Fee (Estimate)
<b>K-REACH Registration fee</b> <i>Joint and Individual submission</i>	1 - 10 t/a	<b>200 000 KRW (Ca. 138 € *)</b>  <i>Only one fee covering all tonnage bands</i>
	10 - 100 t/a	
	100 - 1 000 t/a	
	> 1 000 t/a	
<b>K-REACH Registration <u>update</u> fee</b>	<i>All t/a</i>	<b>50 000 KRW (Ca. 34 € *)</b>

\* Exchange rate of **15.03.2024**



# Cost & Timeline

## Total Estimate of K-REACH Co-Registration Cost Distributions



### Work:

*Internal resources  
Service provider costs*

### MoE/Authority fixed fees

### Letter of Access fee:

*Data costs and Lead  
Registration work costs  
Check ES is covered in CSR  
for all reported uses*

The LoA is typically the most expensive component of the K-REACH Co-Registration

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# K-REACH 2024 Registration Deadline

## Conclusions

- **K-REACH has been in force since 2015** and the **next registration deadline is 31.12.2024** (*Late pre-registration is still possible under certain conditions*)
- A Joint Submission **must have a Lead Registrant** and **Co-registrants must become part of the Joint Submission through the CICO**
- **Start the Co-Registration work as soon as possible** (for the 31.12.2024 deadline)
- **Contact the RCC / Lead Registrant in good time for LoA details**
- **Follow the progress of the Joint Submission**, if not already submitted
- **Submit the Co-Dossier in good time before the registration deadline** to give NIER ample time to process the dossier
- **Keep the Co-Registration dossier up-to-date**
- **REACHLaw Korea (Seoul) can be your professional K-REACH OR, Co-Registrant and “Representative Consulting Company”, if needed.**

***REACHLaw stands ready to  
support you with your  
K-REACH compliance efforts  
and more***

*Ask for a quotation today!*

**sales@reachlaw.fi**



# *Questions & Answers*

1. REACHLAW IN BRIEF
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# Thank You for Your Attention!

## Contact Details

### REACHLaw (HQ)

Aleksanterinkatu 19

FI-00100 Helsinki

Finland

[www.reachlaw.fi](http://www.reachlaw.fi)

[info@reachlaw.fi](mailto:info@reachlaw.fi)

[sales@reachlaw.fi](mailto:sales@reachlaw.fi)

### GAGAN KUMAR

Managing Director

REACHLaw India Private Ltd.

Mobile: +91 987 100 2075

[gagan.kumar@reachlaw.fi](mailto:gagan.kumar@reachlaw.fi)



# REACH→LAW

*We Specialize in Chemical Regulatory  
Compliance, Advocacy and Sustainability*