

# Chemical Regulatory Overview

AICM 会员分享

Singapore and Vietnam

October 21, 2025

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# Agenda

01

**An Overview of Chemical Regulation in Singapore**

02

**An Overview of Chemical Regulation in Vietnam**

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01

Singapore

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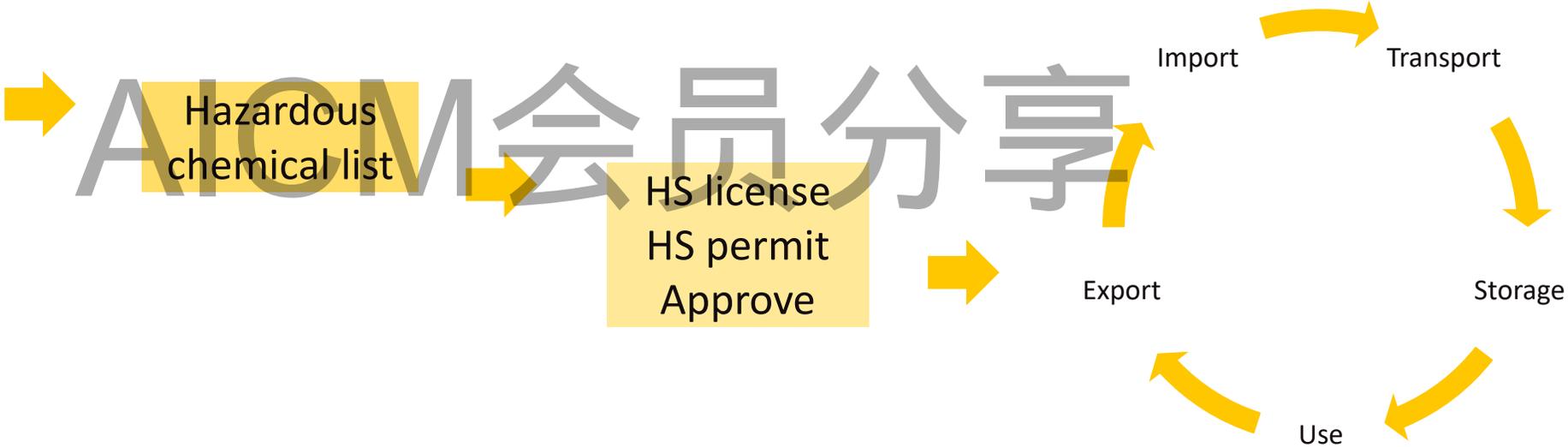
# ENVIRONMENTAL PROTECTION AND MANAGEMENT ACT (EPMA)



Authority: National Environment Agency (NEA)



Environmental Protection and Management Act



- <https://sso.agc.gov.sg/SL/EPMA1999-RG4>

# ENVIRONMENTAL PROTECTION AND MANAGEMENT ACT (EPMA)



## ENVIRONMENTAL PROTECTION AND MANAGEMENT (HAZARDOUS SUBSTANCES) REGULATIONS

### THE SCHEDULE

- The storage and use of these hazardous substances require a Hazardous Substances Permit
- The transportation of these hazardous substances, in quantities exceeding those shown, requires a Transport Approval

Substance	Qty (kgs)
1,2-Dibromoethane (EDB)	0
**2,2-Diphenyl-2-hydroxyacetic acid	50
Sulphur in diesel intended for use in Singapore as a fuel for motor vehicles or industrial plants	0
Sulphur tetrafluoride	0
Sulphur trioxide	50
Sulphuric acid	1000
Sulphuryl chloride	0
Sulphuryl fluoride	0
Tetraethyl lead, tetramethyl lead and similar lead containing compounds	0
**Thiodiglycol: Bis(2-hydroxyethyl)sulfide	50
**Thionyl chloride	50
Titanium tetrachloride	1000
**Triethanolamine	50
Tris(2,3-dibromo-1-propyl)phosphate	0
Tungsten hexafluoride	0
*UV-328	0

(List is updated as of 27 Jun 2025)

\* Take effect from 1 Mar 2023

\*\* Take effect from 21 Aug 2023

\*\*\* Take effect from 01 Aug 2025

## HS License

- Import
- Sell
- export

## HS Permit

- Purchase
- Store
- Use

~ 40+ Highly toxic/strategic chemical

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# ENVIRONMENTAL PROTECTION AND MANAGEMENT REGULATIONS



## Hazardous Substances:

*Iprodione	0
Isocyanates	500
Lead tetra-ethyl and similar lead containing compounds in petrol intended for use in Singapore as a fuel for motor vehicles	0
**Lewisites	0
***Long-chain perfluorocarboxylic acids (LC-PFCAs) (chain lengths at least C9 but not exceeding C21); their salts and related compounds	0
***Medium-chain chlorinated paraffins (chain lengths at least C14 but not exceeding C17)	0

New added substances

(List is updated as of 27 Jun 2025)

- \* Take effect from 1 Mar 2023
- \*\* Take effect from 21 Aug 2023
- \*\*\* Take effect from 01 Aug 2025

# INDUSTRY GUIDANCE DOCUMENT FOR NEA'S CHEMICAL REPORTING FRAMEWORK



## ❖ Date:

31 Jul 2025

## ❖ To:

Hazardous Substances Licence and Permit Holder

## ❖ Purpose:

Implementation of mandatory chemical reporting framework for HS licence and permit holders

## ❖ Key requirements:

With effect from **1 Jan 2026**, HS Licence and Permit Holders must carry out chemical reporting during their licence and/or permit renewals that are due on or after this implementation date.



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# NINDUSTRY GUIDANCE DOCUMENT FOR NEA'S CHEMICAL REPORTING FRAMEWORK



**Target Group:**



**Not Target Group:** Users, purchaser, third-party warehouse operators etc.

# IMPLEMENTATION OF MANDATORY CHEMICAL REPORTING FRAMEWORK FOR HAZARDOUS SUBSTANCES LICENCE AND PERMIT HOLDERS



Which chemicals are required to be report?

pure substances, including individual chemical components within mixtures

and

$\geq 1$  metric tonne (MT)/year

and

The chemicals meet at least one of the criteria below:

- I. Category 1 or 2 acute toxicity for any exposure route under Globally Harmonised System (GHS) classification
- II. Category 1 aquatic toxicity (acute) under GHS classification
- III. Category 1A, 1B or 2 for Carcinogenic, Mutagenic or Reproductive (CMR) toxicity under GHS classification
- IV. Persistent in the environment (i.e., half-life of more than 6 months in air, water, soil, or sediment)
- V. Bioaccumulative in the environment (i.e., Bioaccumulation Factor (BAF) or
- VI. Bioconcentration Factor (BCF) exceeding 5000)

# TYPES OF SUBSTANCES EXCLUSIONS



1



Naturally occurring substances

2



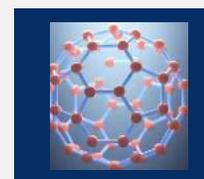
Chemicals used for laboratory testing and Research and Development (R&D)

3



Non-isolated intermediates and onsite isolated intermediates

4



Polymer

5



Impurities

6



Discarded substances, by-products or wastes

7



Mixtures  
Exemption is not applicable to the individual chemical constituents of the mixtures

8



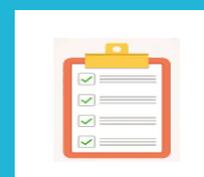
Articles and consumer products

9



Any substances that are in transit through Singapore or imported solely for re-export purposes only

10



Chemical list

# TYPES OF SUBSTANCES EXCLUSIONS



Chemicals listed below:



- i. Hazardous Substances under the Environmental Protection and Management Act (EPMA) and Environmental Protection and Management (Hazardous Substances) Regulations
- ii. Petroleum and Flammable Materials under the Fire Safety (Petroleum and Flammable Materials) Regulations
- iii. Toxic Chemicals and their Precursors under Chemical Weapons (Prohibition) Act
- iv. Controlled Drugs under the Misuse of Drugs Act and Misuse of Drugs Regulations
- v. Explosives and Explosive Precursors under the Arms and Explosives Act
- vi. Poisons under the Poisons Act
- vii. Radioactive Materials under the Radiation Protection Act

# SCOPE OF CHEMICAL REPORTING FRAMEWORK- EXAMPLE



Chemical	Does it meet the criteria in Section 2.3?	Is it under exclusions lists?	Reporting required?
A	Yes	Yes	No
B	No	-	No
C	Yes	No	Yes

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# IMPLEMENTATION OF MANDATORY CHEMICAL REPORTING FRAMEWORK FOR HAZARDOUS SUBSTANCES LICENCE AND PERMIT HOLDERS



## How to report?

submit the following information during the licence and/or permit renewal period via the Chemical Reporting Form on FormSG at:

<https://form.gov.sg/6846325c0b06f01fa6fbdd48>

- a) Chemical identity
- b) Safety Data Sheet (SDS)
- c) Maximum annual production and/or import quantity
- d) Intended / identified use(s) of the chemical

# IMPLEMENTATION OF MANDATORY CHEMICAL REPORTING FRAMEWORK FOR HAZARDOUS SUBSTANCES LICENCE AND PERMIT HOLDERS



## I: Reporting of Pure chemicals:

Chemical name	CAS No.	Maximum production and/or import quantity(MT/year)	Chemical use type (i.e. industrial, commercial or consumer)

+ Add another row

# IMPLEMENTATION OF MANDATORY CHEMICAL REPORTING FRAMEWORK FOR HAZARDOUS SUBSTANCES LICENCE AND PERMIT HOLDERS



## II: Reporting of chemicals in mixture

Mixture name	Component name	CAS No.	Composition(%)	Maximum production and/or import quantity(MT/year)	Mixture use type (i.e. industrial, commercial or consumer)
			Upper limit of the range	Total quantity of the mixture	

**Scenario 1: Reporting a chemical present in multiple mixtures.**

E.g. Chemical X meets the reporting criteria and is present in both Mixture A and Mixture B. For such cases, create one row for Chemical X in Mixture A and another row for Chemical X in Mixture B.

**Scenario 2: Reporting multiple components in a mixture.**

E.g. Mixture C contains 3 chemicals (Chemicals XX, YY, ZZ), out of which only Chemicals YY and ZZ meet the reporting criteria. For such cases, create one row for Chemical YY in Mixture C and one row for Chemical ZZ in Mixture C.

**Scenario 3: Reporting mixtures when component information is unavailable.**

Mixture D contains Chemicals XXX, YYY, ZZZ, but the chemical properties of Chemicals XXX, YYY, ZZZ remain unavailable after checks. For such cases, create a single row for Mixture D and enter 'N.A.' for fields that are not applicable (i.e. name of chemical component and composition).

# IMPLEMENTATION OF MANDATORY CHEMICAL REPORTING FRAMEWORK FOR HAZARDOUS SUBSTANCES LICENCE AND PERMIT HOLDERS



## Licence & Fee Changes (from 2026)

- **Validity Extension:**

HS licences, permits & transport approvals: 1 year → 5 years.

- **Fee Adjustments:**

HS licence renewal: S\$525 (1 yr) → S\$700 (5 yrs).

HS permit renewal: S\$160 (1 yr) → S\$450 (5 yrs).

Temporary three-month licences from S\$135 to S\$200.



1.Importers and Manufactures who are not existing HS license and permit holders exempted from the mandatory chemical reporting

2.For new HS licence/permit, the company is expected to start fulfilling its reporting obligations during the licence/permit's first renewal period.

3.For CBI substances, the HS license and permit holders can entrust oversea suppliers to submit chemical reporting on their behalf.

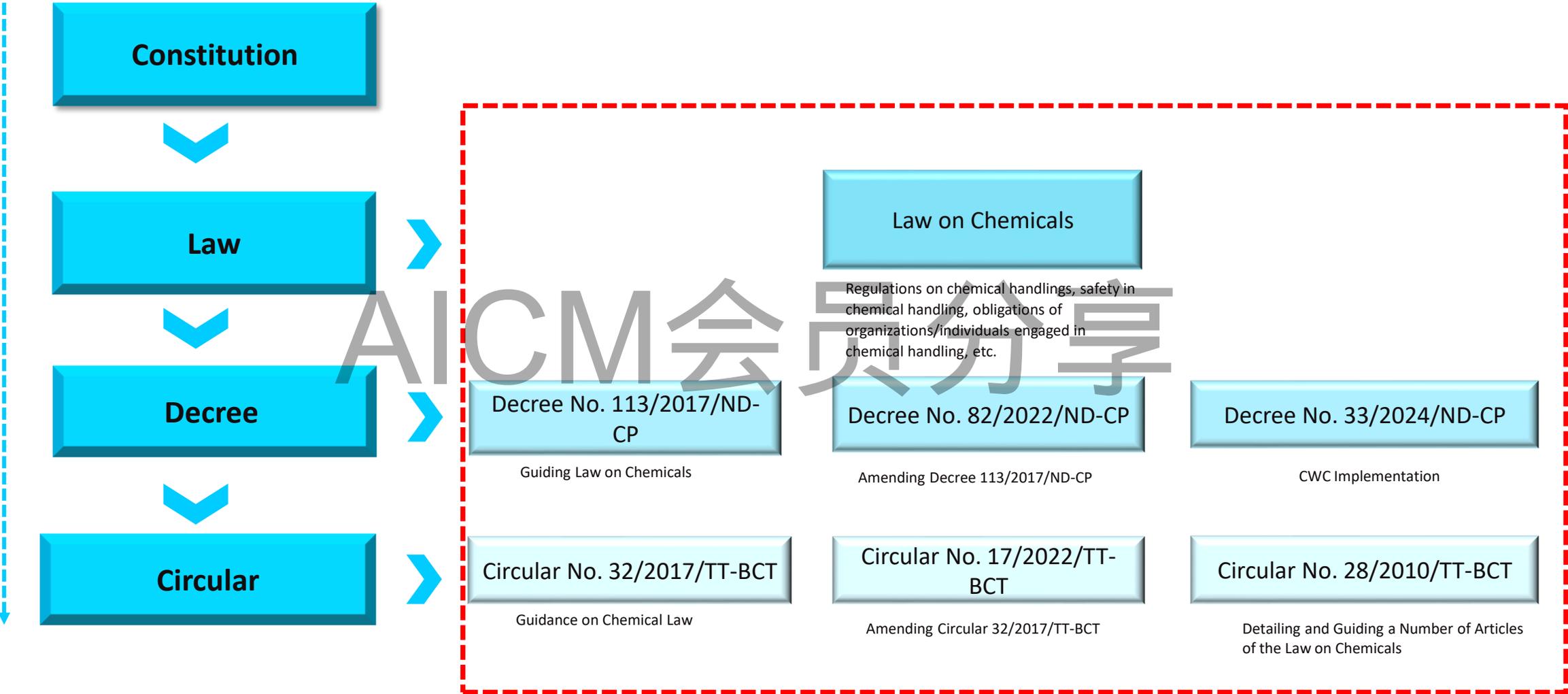
02

Vietnam

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# LEGAL FRAMEWORK IN VIETNAM

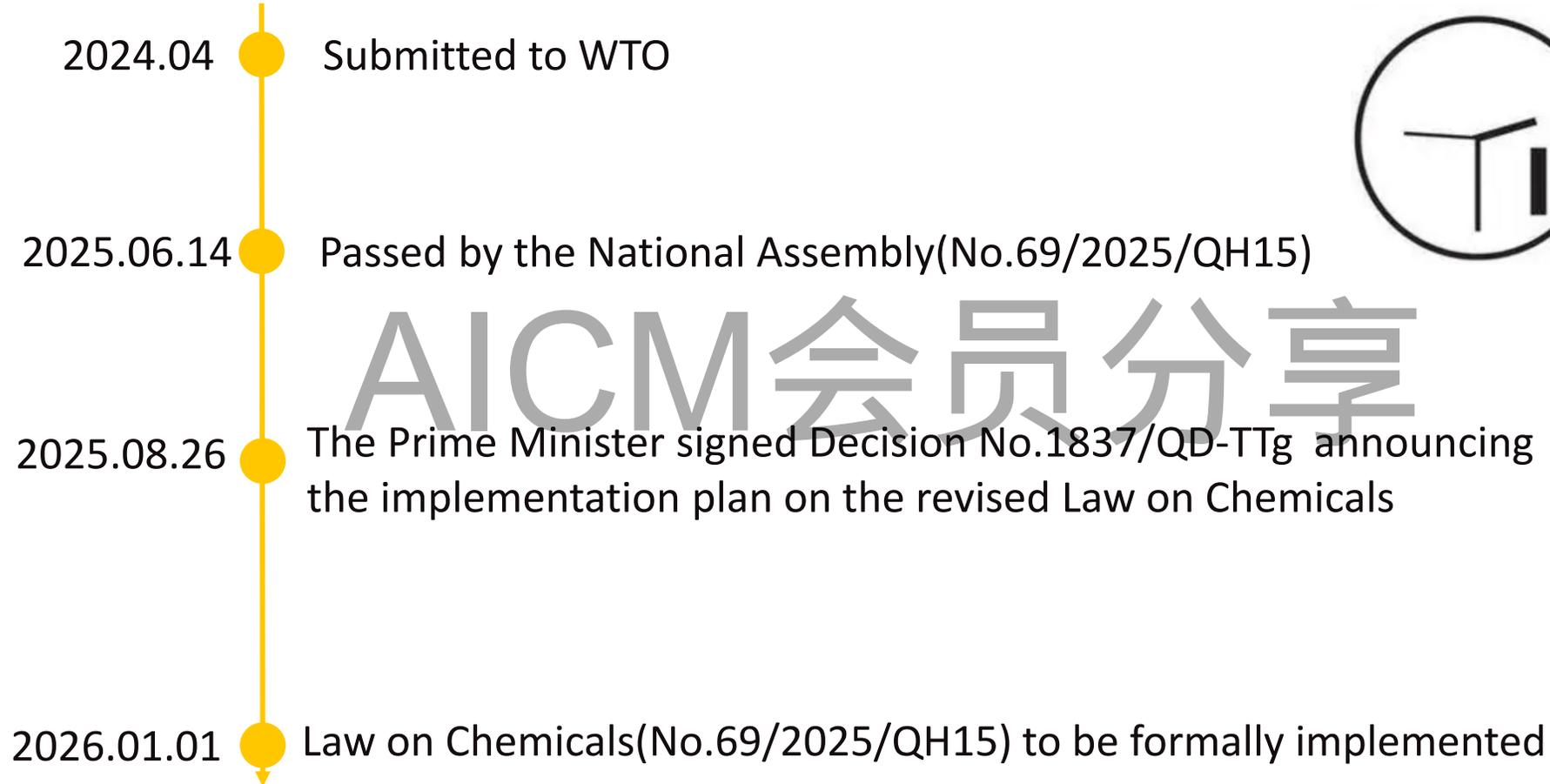


Awaiting enactment of updated regulations

# AMENDMENTS OF THE LAW ON CHEMICAL



## Timeline



# AMENDMENTS OF THE LAW ON CHEMICALS



## Submission of Decree-

*by 15/10/2025*



- Implementation of various provisions, including the management of toxic substances, industrial chemicals, new chemicals, confidentiality, and the disclosure of information on hazardous chemicals in products.
- Decree on the list of chemicals subject to conditions, chemicals requiring special control, and chemicals for which chemical accident prevention plans need to be formulated.
- Decrees on the development of the chemical industry and the safety and security of chemicals

## Submission of Circular-

*by 15/11/2025*



- Full life cycle management of chemicals and the management of chemicals in products

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# Public consultation sheds light on draft decrees to implement Vietnam's Law on Chemicals-MOIT



Under a government mandate issued on 14 July, MOIT is responsible for drafting detailed implementing measures. On 4 and 5 September, it published four separate draft decrees covering:

Until  
14.09

- regulation for the list of chemicals within the law's scope (comments to GiangPHTH@moit.gov.vn);
- promotion of the development of the chemical industry and strengthening chemical safety and security (comments to TheuNT@moit.gov.vn);
- general implementation and organisational provisions across multiple articles of the law (comments to UyenPLP@moit.gov.vn); and
- management of chemical activities and hazardous substances in products – described by officials as the "backbone" regulation of the law.



# LAW ON CHEMICALS( (06/2007/QH12) VS (No.69/2025/QH15)

Annex	Substance	Requirement
I	Subject to conditional production or import	<b>Certificate</b>
II	Restricted from production or trade	<b>License</b>
III	<b>Banned</b> chemicals	<b>Banned</b>
IV	Hazardous chemicals for which chemical incident prevention and response plans are required	<b>License</b>
V	Subject to compulsory declarations	<b>Declaration</b>

➔ Replaced by “Chemicals Requiring Special Control”

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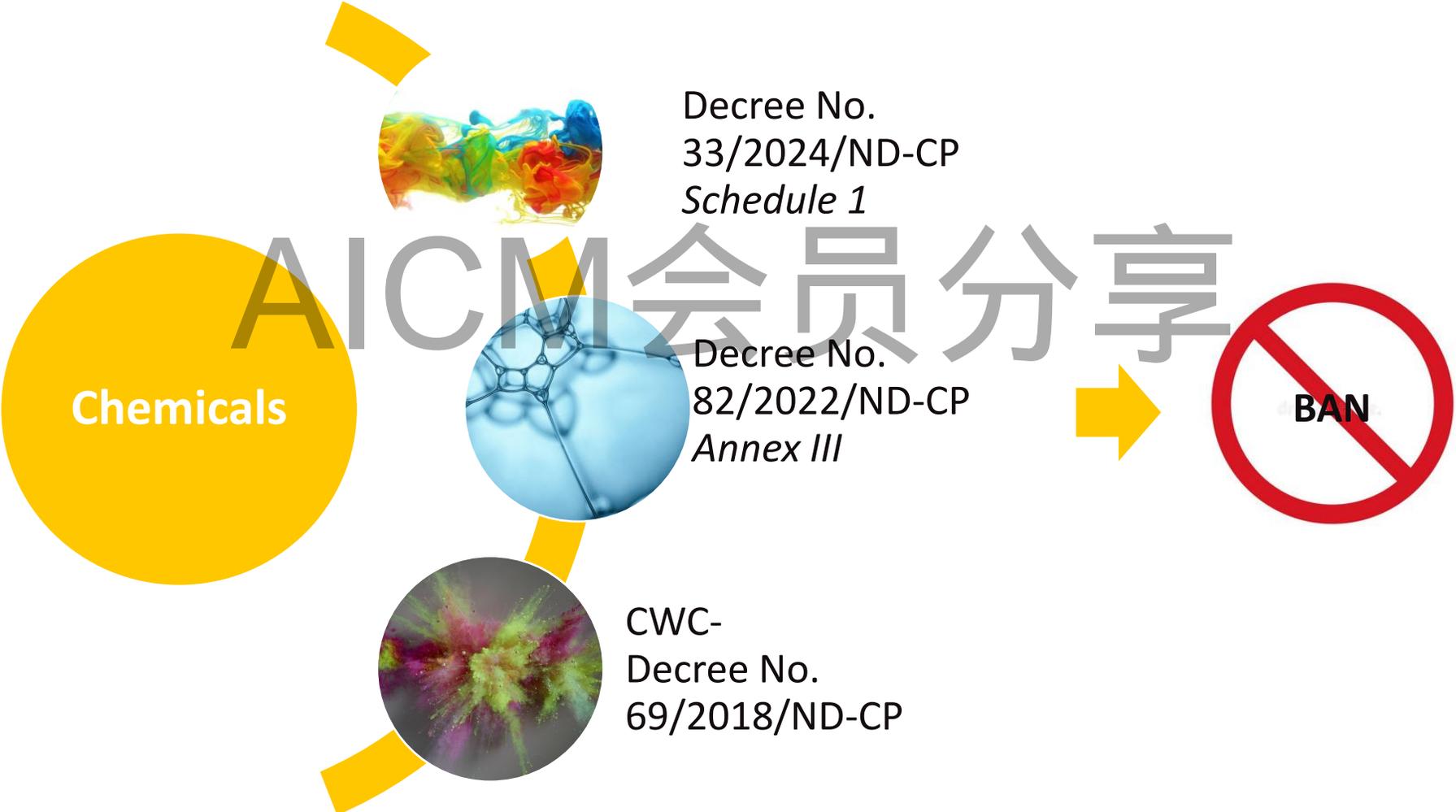
➔ Elimination of mandatory declaration categories

New requirement:  
All imported chemicals must be declared

# SPECIFIC REQUIREMENT UNDER LAW ON CHEMICALS (No.69/2025/QH15)



## Banned

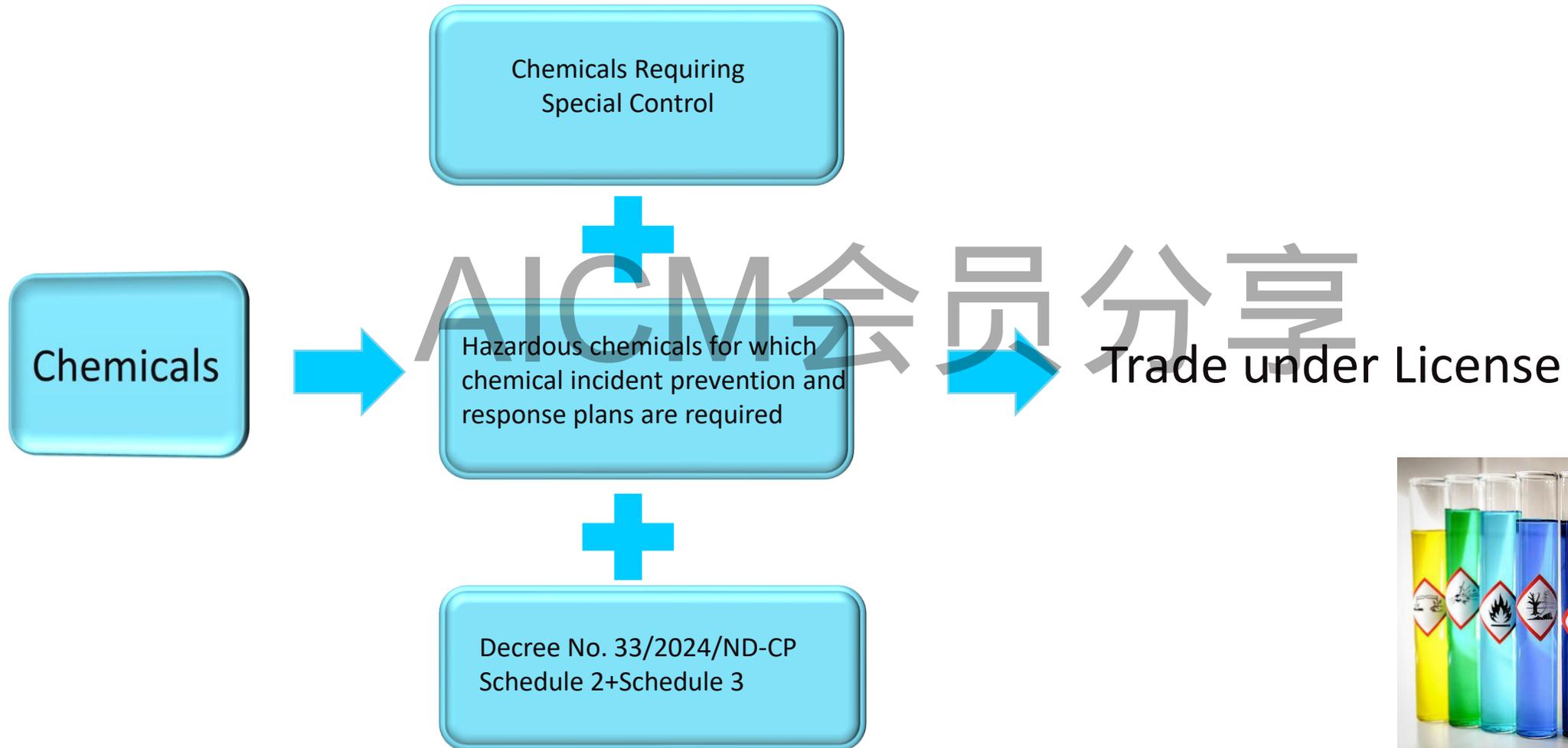


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# SPECIFIC REQUIREMENT UNDER LAW ON CHEMICALS (No.69/2025/QH15)



## License





## Chemical Declaration

**Basic Requirements:** All imported chemicals must be declared

### Required documents:

- ✓ Declaration form
- ✓ Chemical Safety Data Sheet(In Vietnamese)
- ✓ Sales invoice(importer)

### Submission Channel:

➤ Via National Single Window(NSW)

A large watermark is present in the center of the slide. It features a blue rectangular box containing the word "declaration" in white. Below this box, the text "AICM" is written in large, light grey letters, followed by the Chinese characters "会员分享" (Member Share) in a similar font.

# CHEMICAL INVENTORY -VIETNAM



Current situation: New chemical substance can not be nominated in window  
Plan to be announced in May 2025( Based on the time submitted to WTO)

HỆ THỐNG CƠ SỞ DỮ LIỆU HÓA CHẤT QUỐC GIA  
VIETNAM NATIONAL CHEMICAL DATABASE SYSTEM

Trang chủ | Tài liệu | Tìm kiếm

### Hóa chất

Nội dung cần tìm

STT	Mã	Cas	Tên chất	Phụ lục quản lý	Thao tác
1	Nci No: HSCode:	50-00-0	Tiếng Việt: Formaldehyde Quốc tế: Formaldehyde	- 113/2017/NĐ-CP ngày 09/10/2017: Hóa Chất Phải Khai Báo - 82/2022/NĐ-CP ngày 18/10/2022: Hóa Chất Phải Khai Báo - 113/2017/NĐ-CP ngày 09/10/2017: Hóa Chất Hạn Chế Sản Xuất, Kinh Doanh Trong Lĩnh Vực Công Nghiệp - Khác - 82/2022/NĐ-CP ngày 18/10/2022: Hóa Chất Hạn Chế Sản Xuất, Kinh Doanh Trong Lĩnh Vực Công Nghiệp - Khác	
2	Nci No: HSCode:	50-01-1	Tiếng Việt: Salt of hydrogen chloride and guanidine (1:1) Quốc tế: Salt of hydrogen chloride and guanidine (1:1)		
3	Nci No: HSCode:	50-02-2	Tiếng Việt: 9-Fluoro-11beta,17,21-trihydroxy-16alpha-methylpregna-1,4-diene-3,20-dione Quốc tế: 9-Fluoro-11beta,17,21-trihydroxy-16alpha-methylpregna-1,4-diene-3,20-dione		
4	Nci No: HSCode:	50-03-3	Tiếng Việt: Hydrocortisone acetate Quốc tế: Hydrocortisone acetate		
5	Nci No: HSCode:	50-04-4	Tiếng Việt: 21-Acetoxy-17-hydroxypregn-4-ene-3,11,20-trione Quốc tế: 21-Acetoxy-17-hydroxypregn-4-ene-3,11,20-trione		
6	Nci No: HSCode:	50-06-6	Tiếng Việt: Phenobarbital Quốc tế: Phenobarbital		
7	Nci No: HSCode:	50-07-7	Tiếng Việt: Mitomycin Quốc tế: Mitomycin		

1 - 50 trong 175.447 bản ghi

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Điện thoại: 024 2220 5056 - Fax: 024 2220 5038. Email: [admin@chemicaldata.gov.vn](mailto:admin@chemicaldata.gov.vn). Website: [www.cuchoachat.gov.vn](http://www.cuchoachat.gov.vn). - Hỗ trợ kỹ thuật: Điện thoại: 091 895 3916 hoặc 024.39362506 (phím lẻ 814).

## Current status:

- Contains 175,486 records
- Currently on temporary hiatus
- If the substance is not in the NCI but still belongs to other management lists, it must still comply with the regulations of those lists.

# NEW CHEMICALS IN VIETNAM



190.	Điều 23	Khoản 5, Khoản 6	<p>- Hiện dự thảo chưa có Danh mục hóa chất Quốc gia, do đó doanh nghiệp chưa thể chủ động rà soát hóa chất nào là hóa chất mới theo danh mục hóa chất Quốc gia khi Luật Hóa chất 2025 có hiệu lực (ngày 01/01/2026).</p> <p>- Chưa có quy trình quy định rõ thủ tục cho hóa chất mới không nằm trong danh mục hóa chất quốc gia nhưng nằm trong danh mục hóa chất nước ngoài được Việt Nam thừa nhận như ECHA, U.S EPA, ENCS, METI (theo Khoản 5, Điều 23). Việc này gây lúng túng cho doanh nghiệp trong việc xác định thủ tục tiến hành đăng ký hóa chất mới.</p> <p>- Theo dự thảo, quy trình quản lý hóa chất mới</p>	<p><b>Công ty TNHH Merck Việt Nam; Hội Hóa học Việt Nam</b></p>	<p>Giải trình</p> <p>- Lộ trình trình Chính phủ ban hành Danh mục hóa chất quốc gia năm 2028, do đó tại thời điểm hiện nay chưa có chính thức danh mục hóa chất quốc gia để công ty rà soát, đối chiếu làm cơ sở xem xét hóa chất mới.</p> <p>- Việc quản lý hóa chất mới là rất cần thiết vì để giảm thiểu nguy cơ, rủi ro đến an ninh, an toàn và môi trường khi thông tin hóa chất chưa được đánh giá, sàng lọc cụ thể, sau khi hóa chất được ghi nhận, đánh</p>
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**Inventory:** MOIT to lead National Chemical Inventory (NCI), targeted for government submission in **2028**.



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New chemicals: The substances not listed in NCI



Registration



Comments from Industry: Not on the NCI but listed on foreign chemicals recognized by Vietnam



Refer to Philippines(RA6969)

# SUMMARY



1. Law on chemical and accompanying Decree and Circular will be published and implemented soon, and companies need to pay attention to the main points of the update and the implementation details.
2. Inventory list(NCI) +Type of registration to be determined

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WAITING~

**Thanks for your attention!**

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