

# 2021产业政策促进报告

2021 AICM Industry Policy Advocacy Report



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## 关于 AICM

AICM 成立于 1988 年，目前代表近 70 多家在中国有重大投资的跨国化工公司，各公司业务涵盖化学品制造、运输、分销、加工等环节。

## AICM 愿景

AICM 及其公司有着共同的愿景：建设和谐社会，促进中国化工产业的可持续发展。作为国际领先化工企业的在华代表，AICM 致力于：

1. 向利益攸关方推广责任关怀及其他全球范围认知的化学品管理理念；
2. 向政策制定者倡导实行成本有效、技术和风险控制型政策；
3. 树立化工行业在经济建设中贡献的地位。

## AICM Introduction

The Association of International Chemical Manufacturers (AICM) was founded in 1988. AICM represents nearly 70 major multinational companies across China's chemical industry. Its companies businesses cover the manufacturing, sales, transportation, distribution and disposal of chemicals.

## Our Vision

AICM and its companies share a common vision: to contribute to the development of a harmonious society and the sustainable growth of China's chemical industry. As the representation of the leading international chemical players in China, AICM commits to

- Promoting Responsible Care and other globally recognized chemical management principles among all stakeholders,
- Advocating cost-effective science and risk-based policies,
- Building up the chemical industry's contribution to the Chinese economy.

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# 产业政策促进委员会

## 工作目标

- 倡导科学的化工产业政策和基于风险管理的法规管理体系，促进中国化工产业的可持续发展；
- 跟踪中国化工产业政策法规进展，协助会员理解执行以及与相关部门进行沟通；
- 促进国内外化工产业政策法规方面的交流、合作，实现协调发展

## 主要职能

- 拓展和加强与化工产业政策法规相关决策者及其他利益攸关方的合作与沟通；
- 代表会员的共同利益，提出对中国化学工业发展政策、法律、法规和标准方面的意见和建议；
- 关注中国化工产业政策、法律、法规、标准的动态和趋势，及时向会员传达并协助贯彻执行；
- 创建国际化工行业交流平台，发挥桥梁纽带作用，共享国际化工领域在政策法规方面的管理经验

# Industrial Policy Advocacy Committee (IPAC)

## Objectives

- Advocate science-based chemical industry policy and risk-based regulation system to promote the sustainable development of China chemical industry;
- Monitor the updates of China chemical industry policies and regulations to assist members' understanding, implementation and communication with the authorities;
- Facilitate the international exchange and collaboration on chemical industry policies and regulations for harmonization.

## Functions

- Enhance cooperation and communication with relevant policy makers and other stakeholders on chemical industry policy and regulation;
- Provide comments and proposals on policies, laws, regulations and standards of China chemical industry development on behalf of members' interests;
- Monitor and inform members the updates and trends of policies, laws, regulations and standards of China chemical industry;
- Create the exchange platform bridging the international and domestic chemical industry, sharing the experiences on international chemical policies and regulations.





# 2021 产业政策促进报告

AICM Industry Policy Advocacy Report

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## 1

## AICM Attended NMPA Roundtable Meeting on Cosmetic New Ingredient

On January 6, the NMPA organized a seminar on the registration and filing of new cosmetic raw materials, focusing on the registration and filing management of new cosmetic raw materials. Yan Jiangying, member of the Party group and deputy director general of the State Food and Drug Administration, attended the meeting and delivered a speech. Director Li Jinju of the cosmetics supervision department presided over the meeting. Also present at the meeting were relevant leaders and responsible comrades of the cosmetics Supervision Department of the State Food and drug administration. AICM representatives attended the workshop.

During the seminar, leaders and responsible comrades of the cosmetics Supervision Department of the State Food and Drug Administration listened carefully to the introduction and feedback of industry representatives. AICM introduced the situation of registration and filing of new cosmetics raw materials under the new regulations, and put forward opinions and suggestions on the implementation of relevant new policies. Subsequently, the responsible comrades of the cosmetics supervision department and the Central Inspection Institute responded to the questions and suggestions put forward by the industry representatives.

The regulation on the supervision and administration of cosmetics has been officially implemented on January 1, 2021, and the supporting regulatory documents are also in the process of preparation and revision. AICM will continue to build a communication platform and contribute to the construction of a scientific, reasonable and risk-based regulation and standard system.

### AICM 参加化妆品新原料注册备案工作研讨会

1月6日，国家药品监督管理局组织了化妆品新原料注册备案工作研讨会，围绕化妆品新原料注册备案管理工作进行研讨。国家药监局党组成员、副局长颜江瑛出席会议并讲话，化妆品监管司李金菊司长主持会议。出席会议的还有国家药监局化妆品监管司的相关领导和负责同志。AICM代表参加了研讨会。

研讨会上，国家药监局化妆品监管司各位领导和负责同志认真听取了行业代表的介绍和反馈的意见。AICM就新法规下，化妆品新原料注册备案的预估情况进行了介绍，就相关新政策的实施提出了意见和建议。随后，化妆品监管司和中检院负责同志就行业代表提出的问题和意见建议进行了回应，并与代表们展开讨论。

《化妆品监督管理条例》已于2021年1月1日正式施行，与之配套的法规文件也在紧锣密鼓的制修订进程之中。AICM将持续构建搭建沟通的平台，为构建科学、合理、基于风险防控的法规和标准体系做出贡献。

## 2

## AICM and Shanghai Environmental Society Successfully Jointly Held a Salon Seminar on Chemical Environmental Management and Risk Assessment

On January 27, 2021, AICM and Shanghai Environmental Science Society successfully held a salon seminar on chemical environmental management and risk assessment in Shanghai. The seminar focused on the newly issued measures for environmental management registration of new chemical substances and the chemical risk assessment and polymer registration and testing scheme under the guidelines. In addition to the on-site meeting room of Shanghai Testing Center, online meeting was opened, which attracted more than 60 representatives from 40 member companies to participate actively.

In the morning, Ms. Huang Mei presided over the environmental risk assessment of chemicals. Professor Yin Haowen from Shanghai Testing Center first shared the principles and methods of chemical environmental risk assessment; Then, Chen Xiaoqian, director of the laboratory of Shanghai Testing Center, introduced the application of ecotoxicological data in hazard assessment. Mr. Zou Hanjun of ExxonMobil, shared the application of QSAR in complex toxicological endpoints. Representatives of all parties and participants also had an in-depth discussion on some new requirements for environmental hazard identification and risk assessment.

Dr. Zhao Yu of AICM IPAC Chemical Environmental Management Subcommittee presided over the registration and testing of difficult new substances in the afternoon. Deng yunyun, a professor from Shanghai Testing Center, shared the exclusion clauses for the filing of new polymer substances. Representatives of AICM member companies also introduced from the perspective of practical operation. Gu Yucheng of Eastman shared the experience of polymer registration in Japan; Shen Min of Dow Chemical shared the experience of isocyanate polymer; Then, Mr. Liu Min of Shanghai testing center introduced the formulation of polymer ecological testing scheme. The speakers also exchanged experience in polymer application with the delegates.

This year is the first year after the formal implementation of the environmental management registration measures for new chemical substances and supporting guidelines. All parties pay great attention to the requirements and implementation details of the new regulations. AICM Industrial Policy Promotion Committee will continue to serve member enterprises, build an internal communication and exchange platform, continue to dialogue with policy makers, and build a scientific, reasonable and risk-based regulation and standard system.

## AICM 和上海环境学会成功联合举办化学品环境管理和风险评估沙龙研讨会

2021年1月27日，AICM与上海市环境科学学会化学品污染物排放毒性鉴别与风险防控委员会成功在上海召开了化学品环境管理和风险评估沙龙研讨会。本次研讨会聚焦新出台的《新化学物质环境管理登记办法》及指南下化学品风险评估和聚合物登记及测试方案，除了在上海检测中心的现场会议室以外，同时开通了线上参与方式，共吸引了来自40位会员公司的超过60位代表的积极参加。

上午的化学品环境风险评估环节由黄梅女士主持。来自上海市检测中心的殷浩文教授首先分享了化学品环境风险评估原则和方法；随后，上海市检测中心实验室的陈晓倩主任介绍了生态毒理学数据在危害评估中的应用。AICM会员公司埃克森美孚的邹汉军先生分享了QSAR在复杂毒理终点的应用。各方代表和与会人员还就一些环境危害识别和风险评估的新要求做了深入的讨论。

AICM IPAC 化学品环境管理分委会的赵宇博士主持了下午进行的疑难新物质登记及测试环节。上海检测中心的邓芸芸老师就聚合物新物质备案排除条款与大家进行了分享。AICM会员公司的代表们还从实操的角度进行了介绍。伊士曼的顾煜澄分享了日本聚合物登记经验；陶氏化学的沈敏分享了异氰酸酯聚合物的经验；随后，上海检测中心的刘敏老师介绍了聚合物生态检测方案的制定。各位与会的发言嘉宾还与参会代表展开了聚合物申报经验的交流。

今年是《新化学物质环境管理登记办法》及配套指南正式施行后的第一年，各方对新规的要求和实施细节高度关注。AICM产业政策促进委员会也将一如既往的为会员服务、搭建内部沟通和交流的平台，并持续与政策制定者对话，构建科学、合理、基于风险防控的法规和标准体系。



## 3

## AICM issued 2020 IPAC Report

On Feb. 3, 2021, AICM issued 2020 Industry Policy Advocacy Report. The report summarized key activities, key regulations or standards officially issued from national authorities, and position papers submitted on behalf of multinational companies. It covers the scope of chemical management, Site HSE, food safety, auto materials, and E&E, Coating, Life science, etc. For report, please go to the link of <http://aicm.cn//download/newsletter>.

Acting as a valuable bridge platform, AICM has been contributing to the development of a sound science & risk-based regulatory and standard system in China for years, which also represents more common interest of members. Through extensive communication with relevant stake holders, a good communication mechanism was established, continuously strengthened. And the platform effect was improved.



## AICM 发布 2020 产业政策促进报告

2021 年 2 月 3 日，AICM 发布 2020 产业政策促进报告。涉及 2020 年开展的重大活动、国家发布的重大法律、法规及标准的更新，以及 2020 年 AICM 代表跨国企业提交的建议函。报告内容涵盖危险化学品安全管理、化学品环境管理、作业场所环境健康与安全、食品安全、特殊化学品应用（汽车材料 / 电子电器 / 涂料 / 生命科学）等关注热点。链接地址可见：<http://aicm.cn//download/newsletter>。

AICM 代表会员公司的共同利益，长期致力于构建科学、合理、基于风险防控的化学品及产品应用领域法规和标准体系，也在此过程中，通过与政策制定者和各行业协会的广泛交流，建立了良好的沟通机制，并使平台效应得到了不断地加强与完善。

## 4

## AICM and China Association of Chemical Safety Signed a Strategic Cooperation Agreement in Beijing

On March 11, 2021, AICM and China Association of Chemical Safety (CCSA) reached a strategic collaboration agreement and held a signing ceremony in Beijing. Mr. Fernando Vallina, board member of AICM, attended and delivered a speech. Mr. Nianming Lu, Party Secretary, Executive Vice President and Secretary General of China Chemical Safety Association, attended and signed. Ms. Beryl Ma, Executive Director of AICM, Ms. Karin Xu, Chair of Industrial Policy Advocacy Committee (IPAC), and Mr. Xiao Li, Chair of Responsible Care Committee (RCC) attended and witnessed.

Mr. Nianming Lu welcomed Mr. Fernando Vallina and AICM delegation, briefly introduced the development history and business development of CCSA, and expressed his great hope to further strengthen collaboration and make contributions to the development of chemical industry. Mr. Fernando Vallina expressed his gratitude to CCSA for its contribution to the industry and introduced AICM and IPAC. Mr. Xiao Li briefly introduced Responsible Care Committee. Both sides agreed that strengthening collaboration between industry associations will play a positive role in promoting the sound development and implementation of domestic laws and regulations, and will conduct active collaboration in policy and standard studies, chemical industry summits and other aspects.

AICM will continue to work closely with all stakeholders to provide members with a more extensive and in-depth communication platform in the formulation, revision and practice of Chinese laws and regulations. At the same time, AICM will pay close attention to the hot trends of enterprises in the industry and provide strong support for the compliance and efficient development of enterprises.



## AICM 与中国化学品安全协会在北京签署战略合作协议

2021年3月11日，AICM与中国化学品安全协会在北京达成战略合作协议，并举行了签署仪式。AICM理事会成员万立帆先生出席并致辞。中国化学品安全协会常务副理事长兼秘书长路念明先生出席并签约。AICM执行理事马一兵女士，产业政策促进委员会主席徐琨女士和责任关怀委员会主席肖利先生参加并见证。

路念明先生对AICM万立帆先生一行六人表示欢迎，简要介绍了协会的发展历程和业务开展情况，并表示非常希望进一步加强合作，为化工行业的发展做出贡献。AICM马一兵女士介绍了AICM整体框架，万立帆先生和徐琨女士介绍了产业政策促进委员会业务范围和开展的工作，肖利先生介绍了责任关怀委员会主要开展的活动和亮点。双方均表示，加强行业协会合作对促进国内法律法规的健全发展和实施具有非常积极的促进作用，并将在政策和标准研究，化工行业峰会等方面开展积极合作。

AICM将一如既往地与各方向密切合作，在法律法规的制订、修改和实践领域为会员提供更广泛、更深入的交流平台，同时持续关注热点动态，为企业、行业的合规和高效发展提供有力支持。

中国化学品安全协会副总工程师、法规标准部、教育培训部和新闻中心负责同志出席。

AICM产业政策促进委员经理霍立彬先生和公共事务与传播委员会总监林宇翔先生列席。



## 5

## AICM IPAC Successfully Organized Annual General Meeting 2021

On Mar. 17<sup>th</sup>, 2021, AICM successfully organized IPAC General Meeting in Shanghai. A total of 70 representatives from 36 member companies attended the meeting. Ms. Beryl MA, AICM Executive Director, briefed the antitrust code, AICM latest membership and chaired the morning session. AICM Board Members, Mr. Mingcheng Chien and Mr. Fernando Vallina attended the meeting and gave the opening speeches. Mr. Chien and Mr. Vallina both indicated that IPAC and member companies reached 92% participations in 2020, maintained a high level of active and positive, and comprehensively assessed the focus and impact of our work, and IPAC's core value were well acknowledged by the board and member companies.

Ms. Karin Xu, Chair of IPAC, delivered the overall committee report, which introduced key achievements in 2020 and work plan for 2021. The sub-chairs of all sub-committees respectively reported on work achievements and their work plans. During the discussion of the meeting, member companies exchanged and discussed the difficulties and problems in the revision and implementation of regulations, provided observation and thought of the industry in various professional directions.

It fully addressed members' common interest, emerging issues and specific concerns on chemical management and application fields. The priorities and evaluation were settled on those subjects with highest impact to members and upon member's needs. The all sub-committees reported accomplishments and work plan in 2019 and 2020 in the whole day.

The IPAC will continue to work with member companies to fully respond to comment interests in the areas of chemical management and food, automotive, life sciences, electronics, coatings and toxicology, actively deal with urgent issues and specific needs of member companies. At the same time, we will continue to expand and deepen relationship and cooperation with Chinese policy makers, and contribute to the scientific formulation and implementation of policies and regulations.



## AICM 产业政策促进委员会成功举办 2021 年度会议

2021 年 3 月 17 日，AICM 产业政策促进委员会（IPAC）在上海成功举行了 2021 年度会议，共有来自 36 家会员公司的 70 位代表参与了大会。AICM 执行理事马一兵女士到会并介绍了反竞争法，AICM 最新会员现状并主持会议。AICM 理事会成员钱明诚先生与万立帆先生为大会做开场致辞。两位理事会成员均表示，在经历 2020 年新冠疫情的情况下产业政策促进委员会及会员公司的参与度达 92%，保持了高度的活跃性和积极性并全面评估了工作重点和影响力，其核心价值受到了董事会及会员公司的高度认可。

产业政策促进分委会主席徐琨女士做了委员会整体报告，介绍了 2020 年委员会取得的主要成就和 2021 年主要工作计划。各分委会主席分别汇报了 2020 年的工作成果和 2021 年工作计划。会议讨论环节，各会员公司热烈地交流和探讨了法规制修订和实施的困难和问题、对各专业方向法规变化的观察以及产业界的思考。

产业政策促进委员会将与会员公司一起继续在化学品管理和食品、汽车、生命科学、电子电器、涂料以及毒理学等领域全面反映会员公司普遍关注问题、并积极回应紧急事务及特定需求。同时，我们将不断扩大和加深与中国政策制定者的联系和合作，为政策法规的科学合理制定实施贡献行业力量。



## 6

## AICM Attend the 10<sup>th</sup> International Forum on Automotive Materials

From March 24 to 25, 2021, China International Forum on Automotive Ecological Design and International Forum on automotive materials were successfully held in Tianjin. As the main sponsor of this conference, AICM and members are invited to participate. Mr. Tan Yecao, AICM IPAC performance chemicals of auto subcommittee chair, and more than 10 representatives from Evonik, DuPont, Huntsman, INVISTA, Poly plastics, SABIC and other member companies attended the meeting.

With the theme of "ecological materials and automotive future", the conference focuses on the hot topics of material application in the fields of automotive material industry planning, in vehicle air quality, healthy cockpit, thermal management, coating anti-corrosion, lightweight, ADAS and intelligent surface during the 14th Five Year Plan period. At this meeting, three representatives of AICM member companies, Mr. Yan Zhenlong, R & D Manager of Evonik, Mr. Liu Yang, application and development director of DuPont automobile market, and Mr. Sun Hong, technology minister of Polyplastics. They delivered keynote speeches at the sub forum on in car environmental protection and health development, the sub forum on new energy and thermal management, and the sub forum on material attribute driven forward development.

AICM pays a lot attention on the policy progress related to vehicle materials and maintains close contact with China Automotive Data Co., Ltd. This is also the 10th year for AICM to join hands with China Automotive Data Co., Ltd. to support this annual international event of automotive materials. With the help of the conference platform, AICM will display and share the latest progress and achievements of chemical manufacturers related to the automotive industry chain at home and abroad in product compliance and material innovation. AICM will continue to pay attention to the regulations and standards in the automotive field and build a communication platform for members.



## AICM 助力第十届车用材料国际论坛

2021年3月24日至25日，2021中国汽车生态设计国际论坛暨车用材料国际论坛成功在天津举办。作为本次会议的主要支持赞助单位，AICM及会员单位受邀参加。AICM IPAC 功能化学品分会联合主席谭业操先生，还有来自赢创、杜邦、亨斯迈、英威达、宝理塑料、沙比克等会员公司的10多位代表出席会议。

本届大会以“生态材料与汽车未来”为主题，重点围绕十四五期间汽车材料产业规划、车内空气质量、健康座舱、热管理、涂装防腐、轻量化、ADAS、智能表面等领域的材料应用热点话题开展深入交流。在本次会议上，AICM三位会员公司代表，赢创的研发经理闫振龙先生、杜邦汽车市场应用开发总监刘洋先生、宝理塑料技术部长孙竑先生发言。他们分别在车内环保与健康发展分论坛、新能源与热管理分论坛、以及材料属性驱动正向开发分论坛做主题演讲。

AICM非常重视车用材料相关的政策进展，并与中汽数据有限公司保持着密切联系。此次也是AICM第十年携手中汽数据有限公司，支持这一年度汽车材料国际盛会，借助会议平台，展示分享国内外汽车产业链相关的化学品制造商在产品合规、材料创新方面的最新进展和成果。AICM将持续关注汽车领域的法规和标准，为会员搭建交流沟通平台。



## 7

## AICM Organized Food Contact Resin Standard Revision Round Table Meeting

On April 2, 2021, AICM IPAC organized a round table meeting on the revision of food contact resin standard in Shanghai. The meeting invited Dr. Rongfang Chen, the drafter of standard revision, to attend. Members' representatives from 16 member companies also attended the meeting. The meeting began with Dr. Sam Bian, Chair of Food Safety sub-committee, who introduced common concerns of member companies in the revising process of food contact resin standard. Then the representatives had in-depth discussion and exchange with Dr. Chen on the specific issues such as polymer list, labeling, standard connection and implementation. AICM will continue to follow up the revision of food contact resin standard and provide active technical supports.



### AICM 组织食品接触树脂标准修订研讨会

2021年4月2日，AICM 产业政策促进委员会在上海组织食品接触树脂标准修订研讨会。会议邀请标准修订老师陈蓉芳博士参加。来自16家会员公司代表也参加了会议。会议首先由食品安全分委会主席卞华松博士介绍了近期会员公司对食品接触用塑料标准修订过程中普遍关心的问题。然后会员公司代表就聚合物物质清单、标签标识、标准衔接、实施等具体问题与陈博士进行了深入的讨论和交流。AICM 将继续跟踪食品接触用塑料标准的修订工作，并积极给予技术支持。

## 8

# AICM Organized EHS Database Development Project Vendor Bidding Meeting

On April 6, 2021, AICM organized a bidding meeting for vendors of EHS regulatory database development projects. Thirteen representatives from 11 member companies were invited to the meeting to discuss and make suggestions for the development of the EHS regulatory database.

Through the recommendation of members, we selected three suppliers willing to undertake this project and invited them to attend the meeting to introduce the design ideas, general framework, price, service and other key contents of their development. Then the representatives of the member companies had an internal discussion on the reports of the three vendors, and scored them by secret ballot. Finally, the supplier is determined through centralized discussion and multi-consideration.

AICM EHS Regulatory Database has been a brand offering value-added services to its members for many years. We hope that this project will continue to optimize and improve the content and use of the database, to provide convenient services for the majority of members in terms of regulations and standards.

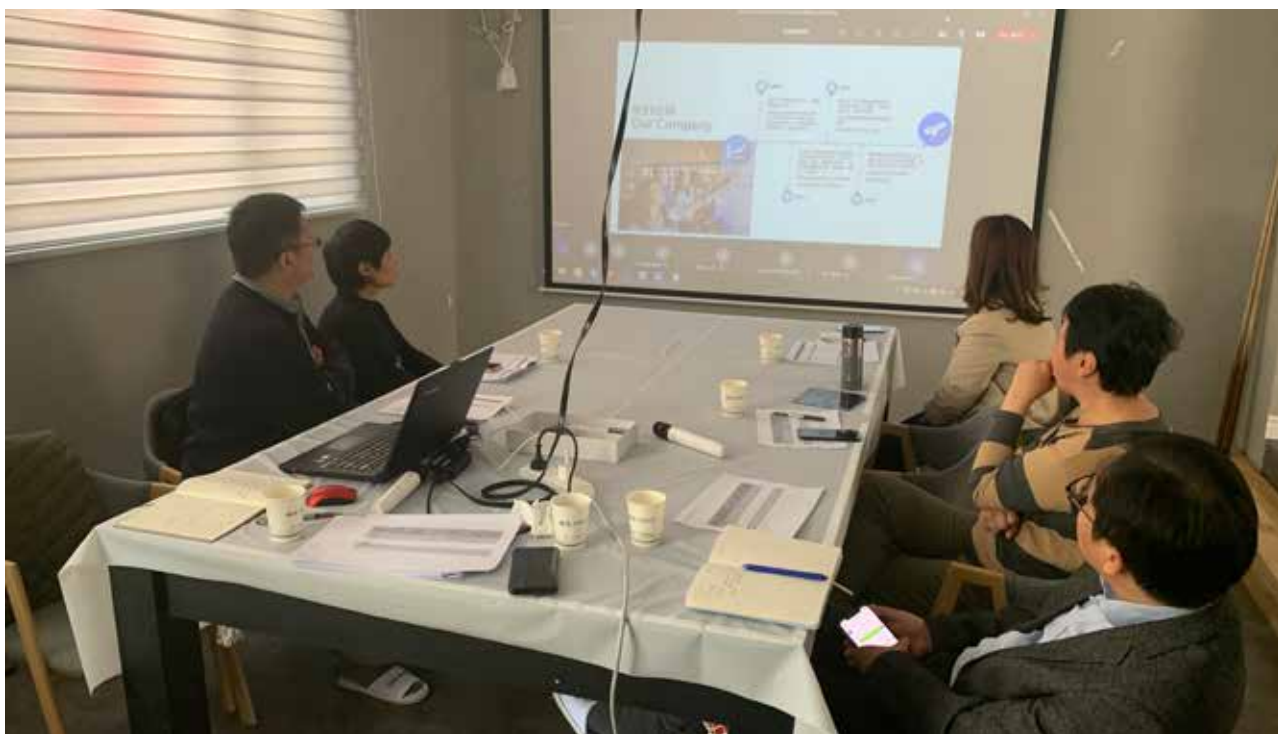


## AICM 组织 EHS 法规数据库开发项目供应商招投标会议

2021 年 4 月 6 日，AICM 组织了 EHS 法规数据库开发项目供应商招投标会议。会议邀请了 11 家会员公司的 13 名代表参加此次会议，为 EHS 法规数据库的开发项目进行讨论和提出建议。

通过前期的会员推荐，我们遴选了三家愿意承担此项目的供应商，并邀请他们参加会议介绍各自开发的设计思路，大概框架，价格，服务等关键内容。随后会员公司代表针对三家供应商的汇报进行了内部讨论，并不记名进行投票打分。最后通过集中讨论和多方考虑确定供应商。

AICM EHS 法规数据库多年来一直是为会员提供增值服务的品牌项目。我们希望借此项目不断优化完善数据库的内容和使用，为广大会员在法规标准方面提供便利的服务。



9

## AICM Representatives Participated in National Hazardous Chemical Standard Committee (SAC/TC251) Experts Meeting

On April 9, 2021, National Technical Committee on the Management of Hazardous Chemicals of Standardization Administration (SAC/TC251) organized an expert meeting on the draft standard in Hangzhou. As hazardous chemicals standard committee member unit, AICM representatives attended the meeting. The meeting mainly discussed the revised draft of the national standard "Classification and Product Name Number of Dangerous Goods" (GB6944-2012) and "List of Product Name of Dangerous Goods" (GB12268-2012), and organized all expert representatives to discuss.

At the beginning of the meeting, the revision team introduced the history, application of the two standards and the latest revision drafts. Then, all the participants were held heated discussions. AICM experts shared the problem of consistency between domestic and foreign practices in the management of dangerous goods, and advised to directly quote the Standard Number of the existing dangerous goods standards, and there is no need to repeat the content of other standards.

AICM will continue to focus on important regulatory and standards processes, strengthen communication with all stakeholders, and provide industry recommendations and opinions on behalf of member companies.



## AICM 代表参加危险化学品管理标准化技术委员会专家研讨会

2021年4月9日，全国危险化学品管理标准化技术委员会（SAC/TC251）在杭州组织召开了标准草案专家研讨会。作为危险化学品标委会委员单位，AICM 会员公司两位代表参加了会议。会议主要讨论国家标准《危险货物分类和品名编号》（GB6944-2012）和《危险货物物品名表》（GB12268-2012）的修订草案，并请参加会议的专家代表发言讨论。

会议首先由修订组介绍了两个标准的历史沿革，应用情况及最新的修订方案。然后，组织所有参会代表进行了热烈讨论。AICM 专家分享了危险货物管理上国内外实操上的一致性问题，以及建议直接引用已有危险货物标准的标准号，无需重复出现其他标准的内容。

AICM 将一如既往关注重要的法规和标准进程，加强与各利益相关方的沟通，代表会员公司提出行业的建议和意见。



## 10

## AICM Successfully Held the Seminar on Chemical Environmental Management and Coordinate the Industrial Research

The Chemical Environmental Management of Chemical Substance Sub-committee held the seminar on "environmental protection policy and chemical environmental management" in Nanjing on March 31, 2021, which attracts more than 50 member representatives from 30 member companies. Dr. Zhao Yu, chairman of the Chemical Environmental Management Subcommittee, chaired the meeting.

The seminar invited experts to introduce the policy progress in the field of chemical environmental management, and discussed the practical operation related to the registration of new chemical substances. Mr. Brooks Yu from Nouryon made a wonderful sharing on the topic of "comprehensive management of chemicals - laws and regulations and enterprise practice". Members' representatives also had a heated discussion on the registration practice, registration system, computational toxicology and exposure assessment model of new chemical substances.

After the seminar, via coordination of AICM, a delegation from the SCC-MEE investigated the factories of BASF and Eastman in Nanjing on April 1. He Chang, manager of AICM's industrial policy promotion committee, accompanied the survey. She said that AICM was very happy to facilitate the industrial survey and thanked BASF, Yangzi Petrochemical BASF and Eastman for their warm reception.

SCC first came to Yangzi Petrochemical BASF Co., Ltd., an integrated base jointly built by BASF and its partner Sinopec in Nanjing. And they met with Ms. Huang Mei-senior manager of BASF Greater China product safety and Regulations Department, Ms. Wu-Wen Sheng, senior manager of BASF Greater China environmental protection and project, Yangzi Petrochemical BASF safety, health Que Zilong, manager of the environmental protection department, and others had an exchange and discussion. Mr. Shan Jianhua,



general manager of safety, health, environmental protection, engineering and maintenance department of Yangzi Petrochemical BASF, warmly welcomed the arrival of SCC and his delegation.

Mr. Que Zilong introduced Yangzi Petrochemical BASF and shared EHS concept and experience; Ms. Huang Mei shared BASF's experience and practice in chemical management. Both parties also had in-depth discussions on hot topics such as new substance registration and hazardous waste treatment.

Then SCC came to Eastman's factory in Nanjing. Mr. Li Shuangcheng, Asia Pacific safety, environmental protection and security (HSEs) operation director of Eastman (China) Investment Management Co., Ltd. and Eastman chemicals Ms. Chen Xiaoyan, general manager of (Nanjing) Co., Ltd., join the visit. The representatives of Eastman introduced the situation of Eastman factory and shared Eastman's practical experience in compliance and HSEs management. Both parties also discussed hot topics such as new material registration and hazardous waste treatment.

The purpose of this survey is to strengthen the communication and exchange between industry and policy makers. AICM has long been committed to the improvement and development of chemical management regulation system, and has been widely recognized by all parties. The industrial policy promotion committee will continue to serve enterprises, build a communication platform, and continue to build a scientific, reasonable and risk-based regulation and standard system.

## AICM 成功举办化学品环境管理研讨会并组织产业调研

2021年3月31日，AICM 产业政策促进委员会化学品环境管理分委会在南京举办了“环保政策和化学品环境管理研讨会”，来自30家会员公司的50多位会员代表参加了本次研讨会。化学品环境管理分委会主席赵宇博士主持了此次会议。

本次研讨会请到了领域内的专家为大家介绍了化学品环境管理领域的政策进展，并就新化学物质登记相关的实操开展了讨论。来自诺立昂的郁建先生以“化学品的全面管理 - 法规制度与企业的实践”为题做了精彩的分享。各位会员代表还就新化学物质登记实务、登记系统、计算毒理学与暴露评估模型等议题进行了热烈讨论。

研讨会后，在AICM的组织协调下，生态环境部固体废物和化学品管理技术中心一行于4月1日调研了AICM 会员公司巴斯夫和伊士曼在南京的工厂。AICM 产业政策促进委员会经理贺畅全程陪同调研，她表示AICM很高兴能够促成此次产业调研，也非常感谢巴斯夫、扬子石化—巴斯夫和伊士曼的热情接待。

固管中心一行首先来到巴斯夫与其合作伙伴中石化在南京合资共建的一体化基地——扬子石化—巴斯夫有限责任公司，与巴斯夫大中华区产品安全与法规部高级经理黄梅女士、巴斯夫大中华区环境保护和项目高级经理吴文胜女士、扬子石化—巴斯夫安全、健康、环保部门经理阙子龙先生等进行了交流讨论。扬子石化—巴斯夫安全、健康、环保、工程和维修部总经理单建华先生对固管中心一行的到来表示热烈欢迎，阐明了扬子石化—巴斯夫对安全、健康和环保工作的重视。

阙子龙先生介绍了扬子石化—巴斯夫的情况并分享了EHS理念和经验；黄梅女士分享了巴斯夫化学品管理的经验和实践。双方还就新物质登记、危废处理等热点议题进行了深入讨论。

随后固管中心一行来到伊士曼位于南京的工厂。伊士曼(中国)投资管理有限公司亚太区安全环保及安保(HSES)运营总监李双程先生和伊士曼化学品(南京)有限公司总经理陈晓燕女士等接待了此次拜访。伊士曼与会代表介绍了伊士曼工厂的情况，分享了伊士曼的合规和HSES管理实践经验。双方还就新物质登记、危废处理等热点议题进行了讨论。



## 11

## AICM Attended Foreign Enterprises in China Safety Production Expert Founding Meeting and Delivered Speech

On April 22, 2021, National Institute of Safety Science and Engineering of the Ministry of Emergency Management held the inaugural meeting of experts committee on Work Safety of Foreign Enterprises in China (hereinafter referred to as the Committee) in Shanghai. At the meeting, the responsibilities of the committee were briefly introduced and the names of the first 28 experts of the committee were read out. More than 80 safety experts from foreign enterprises in China attended the meeting.

Mr. Bradley Morrison, AICM Board member, attended and addressed the conference on behalf of AICM. AICM has maintained long-term and close cooperation with the Ministry of Emergency Management, the Regulatory Division, the Hazardous Chemicals Division and the Centre for International Cooperation and Exchange on high-level visits and hazardous chemicals management for many years. AICM member companies have rich management experience and practical operation experience of safety production at home and abroad, and are willing to share these with Chinese government and experts to expand cooperation and exchange, and promote and support the healthy development of China's chemical industry. AICM recommended Board member Mr. Fernando Vallina as one of the first group of experts. We hope that the foreign expert Committee can actively organize discussions on safety production of industrial enterprises, smooth communication channels, so that industry suggestions and experience sharing can play a real role.

The meeting also discussed and exchanged topics such as enterprise risk management and the improvement of intrinsic safety level.



## AICM 出席在华外资企业安全生产专家成立大会并致辞

2021年4月22日，应急管理部国家安全科学与工程研究院在上海召开在华外资企业安全生产专家（简称外专委）成立大会。会议简要介绍了外专委的职责，并宣读了首批28位外专委专家名单。80多位在华外资企业安全生产专家出席了会议。

AICM 理事会成员莫立森先生出席，并代表AICM向大会致辞。AICM多年来与应急管理部、法规司、危险化学品司及国际合作交流中心在高层拜访和危险化学品管理等多方面一直保持着长期和密切的合作。AICM 会员公司有丰富的国内外安全生产的管理心得和实操经验，非常愿意将这些分享给中国的政府和专家，扩大合作交流，推动和支持中国化工行业的健康发展。AICM 推荐理事会成员万立帆先生作为专家列入首批专家。我们希望外专委能够积极组织行业企业的安全生产研讨，畅通沟通交流渠道，使行业建议和经验分享能起到真正作用。

会议还就企业风险管理和本质安全水平提升等议题展开了研讨交流。



## 12

## AICM Delegation Visited NRCC of MEM and Had a Round Table Meeting

On Jun. 1<sup>st</sup>, 2021, AICM Delegation, led by Ms. Beryl Ma, Executive Director, Ms. Karin Xu of chair of Industry Policy Advocacy Committee (IPAC), Mr. Li Xiao of Chair of Responsible Care Committee (RCC) and other 5 colleagues visited National Registration Center for Chemicals (NRCC) of Ministry of Emergency Management and had a round table meeting in Qingdao. Ms. Xiuyun Guo, vice director of NRCC, welcomed AICM delegation. Leaders and colleagues from General Department, Registration Department, Identification and Classification, Emergency Response and Nuo Cheng joined the meeting.

Ms. Xiuyun Guo extended a warm welcome to the AICM delegation and briefed on the overall situation, structure and staffing of the Center. Ms. Beryl Ma gave a brief introduction to all member representatives and expressed the hope that both sides could continue to communicate in a healthy and regular manner. AICM member companies exchanged views on legislation progress of hazardous chemicals, update of registration system, QR code labeling, chemical accident emergency response and worker training. We will further cooperate and exchange on registration guidelines and system updates, as well as emergency response training.

AICM will continue to work closely with all stakeholders to provide a more reliable and influential platform for member companies, and provide scientific and risk based suggestions on the formulation and revision of laws and regulations in China.



## AICM 拜访应急管理部化学品登记中心并就危险化学品管理关注问题进行座谈

2021 年 6 月 1 日，AICM 执行理事马一兵，产业政策促进委员会主席徐琨，责任关怀委员会主席肖利等一行 8 人拜访应急管理部化学品登记中心（NRCC）并座谈交流。化学品登记中心郭秀云副主任，登记中心综合处、登记处、鉴别分类部、应急响应部以及诺诚公司相关负责领导和同事参加了会议。

NRCC 郭秀云主任向 AICM 代表团拜访表示热烈欢迎，并向大家简要通报了中心的整体情况、架构以及人员配置。AICM 执行理事马一兵女士简要介绍了参加的会员代表，并表示希望双方能继续良性的规律的交流。AICM 会员公司代表着重对危险化学品立法进展情况，登记系统更新，“一书一签”和二维码标签，化学品事故应急响应以及化工公司员工培训等内容交换了意见。我们将进一步就登记指南和系统更新，以及应急响应培训等方面进行进一步的合作和交流。

AICM 将继续与各利益相关方进行密切沟通，为广大会员公司提供更可靠更有影响力的平台，为中国的法律法规制定提供科学合理的建议。



## 13

## AICM and CCSA Successfully held the seminar on safety regulations and standards for hazardous chemicals

On July 8, 2021, AICM and China Chemical Safety Association (CCSA) successfully held the seminar on hazardous Chemical safety Regulations and Standards in Shanghai. A total of 101 member company representatives from 43 companies attended the conference.

AICM and CCSA signed a MoU of Strategic Cooperation in March this year. In order to further implement strategic cooperation and strengthen the in-depth understanding and exchange of chemical safety regulations and standards among member companies, the two sides specially organized this seminar to conduct in-depth interpretation of important documents and regulations and standards of hazardous chemical enterprises in safety, and provide a face-to-face communication platform for member companies and experts.

At the meeting, Mr. Bill Zhou, Deputy Chair of IPAC, warmly welcomed CCSA experts. The interaction between the two sides on safety regulations and standards is very important, which plays a great role in compliance work and production safety of our member companies. Mr. Li Xiao, Chair of RCC, also thanked CCSA experts for coming, and said that this is an important and rare opportunity to learn and exchange, hoping that member companies can seize the opportunity to fully exchange ideas and suggestions from foreign companies with experts.

Mr. Wenzhe Tai, director of CCSA Regulation and Standards Department, was invited to interpret the Catalogue of Safety Classification and Regulation of Hazardous Chemicals Enterprises (2020) and the Catalogue of Technology and Equipment for Safe Production of Backward Hazardous Chemicals (The first batch), and shared the special operation management based on risk. In combination with the accident case, Mr. Tai vividly and brilliantly shared the background, main purpose and main changes of the formulation of documents and standards for members, and communicated with member companies the thinking before



and after the formulation. His firm grasp of the idea of risk management and focus on the actual control effect impressed the member companies.

The meeting also invited Mr. Zhiyan Sun, deputy director of CCSA Regulations and Standards Department, to explain the two important standards of "Major Hazard Safety Guarantee Responsibility System for Hazardous Chemical Enterprises (Trial)" and "Guidelines for The Investigation and Management of Safety Risks and hidden dangers of Hazardous Chemical Enterprises". Mr. Sun made an in-depth explanation of the compilation, key points and application of the standard. Based on his practice and experience in field visits and inspections of various types of enterprises, he discussed the problems and solutions in the implementation of the standard with everyone in detail.

In the interactive discussion session, representatives of member companies and two experts had a detailed and lively discussion on the new Work Safety Law and all the issues. Colleagues from member companies shared their management and site practical problems and discussed compliance and solutions with experts. After the meeting, we will continue to collect questions and suggestions from member companies and form positive interaction with CCSA experts.

AICM has been committed to close communication with the Chinese government and stakeholders, and continues to expand its influence, provide a more reliable and influential platform for the majority of member companies, and provide scientific and reasonable suggestions for the formulation of Chinese laws and regulations.

## AICM 与 CCSA 成功举办危险化学品安全法规标准研讨会

2021 年 7 月 8 日，AICM 与中国化学品安全协会（CCSA）在上海成功举办危险化学品安全法规标准研讨会。会议共有来自 43 家公司的 101 名会员公司代表参加了大会。

今年 3 月份，AICM 与 CCSA 签署了战略合作备忘录。为进一步落实战略合作，加强会员公司化学品安全法规标准的深度理解和交流，双方特组织此次研讨交流会，针对危险化学品企业在安全方面的重要文件和法规标准进行深入解读，为会员公司提供与专家的面对面交流平台。

会议首先由 AICM 产业政策促进委员会副主席周纪标先生对 CCSA 专家表示热烈地欢迎，双方在安全法规和标准的互动交流是至关重要的，对我们广大会员公司合规工作，保障生产都有很大的作用。AICM 责任关怀委员主席肖利先生也感谢 CCSA 专家到来，并表示这是一次重要难得的学习交流机会，希望会员公司能把握机会，将外企的想法和建议与专家充分交流。

会议邀请 CCSA 法规标准部主任太文哲先生首先为我们解读了《危险化学品企业安全分类整治

目录（2020年）》和《淘汰落后危险化学品安全生产工艺技术设备目录（第一批）》，并分享了基于风险的特殊作业管理。太主任结合事故案例，为我们生动精彩地分享了文件和标准的制定背景，主要目的和主要变化，将制定前后的思考与大家进行了交流，他牢牢抓住风险管理的思路以及注重实际管控效果的观点令会员公司印象深刻。

会议还邀请了CCSA法规标准部副主任孙志岩先生为大家讲解了《危险化学品企业重大危险源安全包保责任制办法（试行）》和《危险化学品企业安全风险隐患排查治理导则》两个重要标准。孙主任将标准的编写情况、要点和解释应用为大家做了深入的讲解，大量结合他实地探访检查各类型企业的实践和经验，与大家细致探讨了标准在实施层面的问题和解决办法。

在互动讨论环节，会员公司代表与两位专家就《安全生产法》以及所有议题进行了细致热烈的讨论。会员公司同事分享了各自管理和工厂实际问题，与专家探讨合规和解决办法。会后，我们将继续收集会员公司的问题和建议，与CCSA专家形成良性互动。

AICM一直致力于与国内政府及各利益相关方进行密切沟通，持续扩大影响，为广大会员公司提供更可靠更有影响力的平台，为中国的法律法规制定提供科学合理的建议。



## 14 AICM Attended Expert Round Table Meeting on Guideline for Petition of New Food Contact Materials

On July 28, 2021, CFSA of NHC organized an expert round table meeting on the guidelines for petition of new food contact materials in Beijing. More than 20 experts and industry representatives were invited to attend the conference. Four representatives of AICM member companies attended.

At the meeting, the leaders of the Food Department of NHC introduced the main management ideas and concerns of the new variety petition, and then CFSA reported the draft of the current guideline, and pointed out the key issues to be discussed. All participants at the meeting held detailed and intense discussions on key issues such as restrictions on the use of the declared substances, toxicological data, free marketing certificates, exemption principles and validation of test methods. Representatives of AICM member companies shared their experiences and practices on issues such as balancing the rights and interests of companies, simplifying toxicology tests and the operability of free sales certificates from the perspective of the industry. After the meeting, CFSA will further collect their opinions and report to NHC. AICM will continue to maintain close communication with policy makers to provide industry science with practical experience.



## AICM 参加食品接触材料新品种申报指南专家研讨会

2021年7月28日，卫健委国家食品安全风险评估中心在北京组织召开食品接触材料新品种申报指南专家研讨会。会议邀请标准修订专家和行业代表共20余人参加。AICM 四家会员公司代表受邀参加。

会议首先由卫健委食品司领导介绍了对新品种申报的主要管理思路 and 关注问题，然后风险评估中心老师汇报了目前起草的申报指南草稿，并指出其中关键的待讨论的问题。与会代表对申报物质的使用限制条件、毒理学资料、自由销售证明、豁免原则和试验方法有效性确认等关键问题进行了细致激烈的讨论。AICM 会员公司代表在会上从产业界角度提出了平衡申报企业的权益、简化毒理学实验、自由销售证明的可操作性等问题分享了经验和企业做法。会后中心老师将进一步汇总意见，上报卫健委。AICM 将一如既往与政策制定者保持密切沟通，提供行业科学可操作的实践经验。



# 15

## AICM Successfully IPAC hazardous chemical management round table meeting on QR Code with NRCC

On August 26, 2021, AICM successfully organized IPAC hazardous Chemicals management round table meeting on "One Product, one Code" policy. Mr. Jun Chen, expert from NRCC of MEM, was invited to attend the meeting and fully discussed and exchanged with member companies. The conference was attended by 33 representatives from 21 member companies both online and offline.

Ms. Karin Xu, chair of IPAC, thanked Mr. Chen for attending the meeting and expressed the importance of the policy of hazardous chemical safety management to the chemical industry and member companies. She hoped to understand the changes of the policy and raise industry suggestions for policy makers' reference. Then Mr. Jun Chen shared the latest pilot situation of the "one product, one code" policy of hazardous chemicals management in Guangdong, the background of policy making, and the direction and consideration of future policy modification. Member representatives shared the impact of the pilot policy on companies, specific operational problems and suggestions for revision. Mr. Jun Chen had an in-depth communication with the representatives of all member companies and shared some solutions and the areas to be improved in the policy implementation.

AICM will, as always, keep close contact with policy making, timely follow up policies and regulations concerned by member companies, and provide scientific and reasonable suggestions from member companies and the chemical industry for policy makers.



## AICM 成功举办 IPAC 危险化学品管理“一品一码”政策圆桌讨论会

2021年8月26日，AICM成功组织IPAC危险化学品管理“一品一码”政策圆桌讨论会。会议邀请了应急管理部化学品登记中心的陈军老师出席，并与会员公司充分的讨论交流。会议共有来自线上线下21家会员公司的33位代表参加。

会议首先由IPAC主席徐琨女士对陈军老师参加表示感谢，并表示危险化学品安全管理的政策对化工行业和会员公司的重要性，希望能更早期了解政策的改变和提出行业建议为政策制定者参考。然后由陈军老师分享了最新的危险化学品管理“一品一码”政策在广东的试点情况，政策制定背景以及未来的政策修改方向和考虑。会员代表分享了这一试点政策对各公司的影响，具体的操作问题及修改建议。陈局老师与所有会员公司代表进行了深入的交流，分享了一些解决办法以及后续在政策实施中需改进的地方。

AICM将一如既往地和政策制定紧密联系，及时跟进会员公司关心的政策法规，将会员公司及化工行业的科学合理建议反馈给政策制定者。



## 16

## AICM Officially Visited CIPA of MOFCOM and Had a round table meeting

On September 6, 2021, Ms. Beryl Ma, Executive Director of AICM, Ms. Karin Xu, Chair of IPAC, and Mr. Huo Libin, manager of IPAC visited the third Department of Industry (Medicine and Chemical Industry) of Investment Promotion Agency of Ministry of Commerce and had a discussion. Mr. Lei Song, Director of the third Department of Industry attended the meeting, and Mr. Fan Zhang, Mr. Zening Zhang and other two colleagues attended the meeting and exchange.

Ms. Beryl Ma firstly introduced the overall situation, main structure and concerns of AICM. Ms. Karin Xu shared the value of AICM to member companies and shared members' suggestions on regulatory hot spots such as precursor chemicals. Mr. Lei Song welcomed AICM visit and thanked for its supports to CIPA over the years. Mr. Song introduced the institutional adjustment and policy support made by the Ministry of Commerce to stabilize foreign investment and foreign trade in the past two years, including special working group for foreign investment and foreign complaints center. He hopes to fully communicate with industry representatives such as AICM to conduct deeper cooperation in policy interpretation and exchange, investment promotion seminars and other aspects.

AICM will continue to maintain close communication with all stakeholders to provide a platform for members to promote the business environment in China.

## AICM 拜访商务部投资促进事务局并座谈

2021年9月6日，AICM 执行董事马一兵女士，AICM 产业政策促进委员会主席徐琨女士及经理霍立彬先生一行三人拜访了商务部投资促进事务局产业三部（医药化工产业部）并进行座谈。产业三部主任宋雷先生出席，部门张凡先生、张泽宁先生等四位同事一同参加了见面和交流。

AICM 执行董事马一兵女士首先介绍了 AICM 整体情况、主要架构和关心问题。AICM 产业政策促进委员会主席徐琨女士分享了 AICM 对广大会员公司的价值，并就易制毒化学品等法规热点交流了会员的建议。宋雷主任对 AICM 来访表示欢迎，并感谢过去多年来对投促局工作的支持。宋主任着重介绍了商务部近两年对稳定外资外贸工作做出的机构调整和政策支持，包括重点外资工作专班及外商投诉中心等举措。他希望与 AICM 这样的行业代表充分交流沟通，在政策解读和交流、投资促进研讨等方面进行更深入的合作。

AICM 将一如既往地与各利益相关方保持紧密沟通，为广大会员促进国内营商环境提供交流平台。

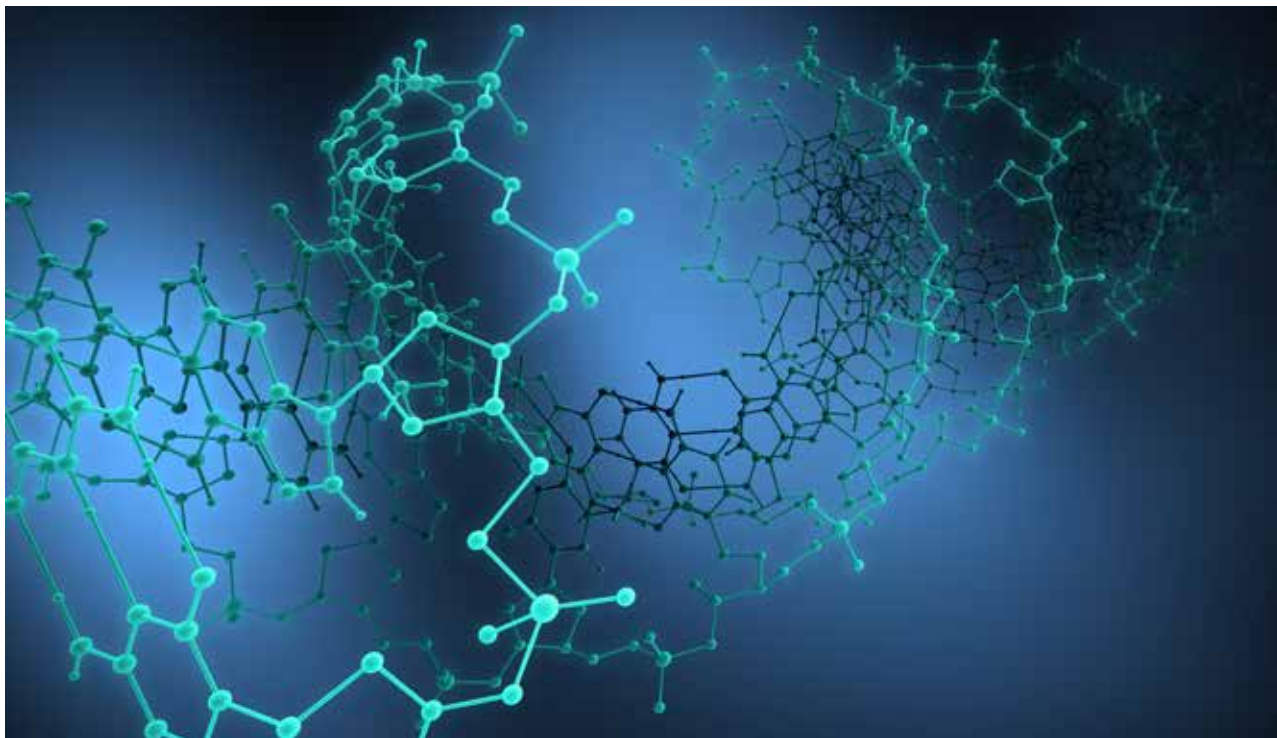
## 17

## AICM Successfully Held the 2021 Seminar on Life Science Regulations

On September 8, 2021, AICM successfully held a seminar on life science regulations in the form of combination of online and offline. The seminar attracted 34 representatives from nearly 30 member companies. Mr. Xie Wei, chairman of the functional chemicals Subcommittee, presided over the meeting and delivered a welcome speech.

AICM member companies had in-depth discussions on the adverse reaction monitoring of new cosmetics raw materials, safety assessment of cosmetics raw materials, application for account number of new cosmetics raw materials application system, and communicated the next work plan. First of all, Yang Zhuqing from Dow made a detailed interpretation of the relevant contents related to raw material safety in the regulations. Subsequently, Dow's Guan Na shared the latest results of the cosmetic raw material safety assessment working group. Then, Zhang Jin from Ashland focused on analyzing the difficulties and problems encountered in the application process of new raw material account, and shared the mini operation manual produced by the working group to help member companies register more efficiently and conveniently. Finally, Gu Jun from Symrise made a detailed report on the topic of safety risk monitoring and evaluation system, and shared the "template for overview of safety risk monitoring and evaluation system of new raw materials" drafted by the working group for the reference of AICM member companies.

AICM and the industrial policy promotion committee will continue to serve members, build a communication platform, and continue to build a scientific, reasonable and risk-based regulatory and standard system.



## AICM 成功举办 2021 年生命科学法规研讨会

2021 年 9 月 8 日，AICM 产业政策委员会成功以线上线下相结合的形式举办了生命科学法规研讨会。本次研讨会吸引了来自近 30 家会员公司的 34 名代表参加。功能化学品分委会主席谢巍先生主持会议，并致欢迎词。

AICM 会员公司就化妆品新原料不良反应监测、化妆品原料安全评估、化妆品新原料申报系统账号申请等议题展开深入讨论，同时就下一步工作计划进行了沟通。首先，来自陶氏的杨竹青针对法规中涉及原料安全的相关内容做了详细解读。随后，陶氏的管娜分享了化妆品原料安全评估工作组的最新成果。接着，来自亚什兰的张跻着重对新原料账户申请过程中遇到的困难和问题做了解析，并且分享了工作组制作的迷你版操作手册以帮助会员公司更高效便捷的注册。最后，来自德之馨的顾琚针对安全风险监测和评价体系的议题做了详细报告，并分享了工作组起草的供 AICM 会员公司参考的“新原料安全风险监测和评价体系概述表模板”。

AICM 及产业政策促进委员会将一如既往的为会员服务、搭建沟通的平台，持续构建科学、合理、基于风险防控的法规和标准的体系。



## 18

## AICM Successfully Held Chemical Environmental Management Seminar

On October 20, 2021, the Chemical Environmental Management Subcommittee of AICM Industrial Policy Promotion Committee held the "chemical environmental management seminar" in Hangzhou, which was attended by more than 30 member representatives from 24 member companies. Ms. Xu Kun, chairman of AICM IPAC, delivered an opening speech. Dr. Zhao Yu, chairman of the Chemical Environmental Management Subcommittee, chaired the meeting.

Ms. Liu Hongying, senior engineer of SCC, and Ms. Wang Yanfei, senior engineer, were invited to the seminar. The two experts made wonderful sharing on the environmental management registration policy of new chemical substances and the background of new pollutant treatment. Members' representatives also had a heated discussion on new pollutant screening, new chemical substance registration practice, registration compliance and other topics.

AICM has long been committed to the improvement and development of chemical management regulation system, and has been widely recognized by all parties. The industrial policy promotion committee will continue to serve enterprises, build a communication platform, and continue to build a scientific, reasonable and risk-based regulation and standard system.



## AICM 成功举办化学品环境管理研讨会

2021年10月20日，AICM 产业政策促进委员会化学品环境管理分委会在杭州举办了“化学品环境管理研讨会”，来自24家会员公司的30多位会员代表参加了本次研讨会。AICM 产业政策促进委员会主席徐琨女士致开幕词并对专家的莅临表示欢迎。化学品环境管理分委会主席赵宇博士主持了此次会议。

本次研讨会邀请到了生态环境部固体废物与化学品管理技术中心的高级工程师刘洪英女士及高级工程师王燕飞女士，二位专家分别就新化学物质环境管理登记政策及新污染物治理背景做了精彩分享。各位会员代表还就新污染物筛查、新化学物质登记实务、登记合规等议题进行了热烈讨论。

AICM 长期致力于化学品管理法规系统的完善与发展，也受到了各方广泛的认可。产业政策促进委员会也将一如既往的为企业服务、搭建沟通的平台，持续构建科学、合理、基于风险防控的法规和标准体系。



## 19

## AICM Successfully Organized IPAC Regional Regulatory Exchange Annual Seminar 2021

On October 21, 2021, AICM IPAC successfully held Regional regulatory exchange annual seminar on Chemicals Regulation 2021. The seminar invited Intertek Asia Pacific team and official experts to share the recent hot topics of chemical regulatory management for AICM members. 50 members' representatives and Intertek experts attended the conference in online and offline form, and had a heated discussion.

Ms. Beryl Ma, Executive Director of AICM, and Ms. Karin Xu, Chairwoman of IPAC, respectively delivered welcome speeches at the seminar, and emphasized to build the regional communication platform into AICM's brand service. Ms. Bing Wang, Chair of IPAC's Regional Regulatory Exchange Platform, hosted the meeting and extended a warm welcome to all industry colleagues in person and online and thanks to Intertek ASSURIS for their support. Dr. Rainbow Zhang, Deputy General Manager of Intertek Expert Services In China, introduced the operation of Regional Regulatory Monitoring Program and Intertek service capabilities of Asia-Pacific and global regulatory teams to all participants.

Foreign experts shared 4 keynote speeches for the seminar via video, and had interactive discussions with all representatives. Two Korean experts from Intertek Services team shared interpretation and experience with K-REACH and KOSHA, and two Indian experts explained the requirements and progress of India REACH(CMSR). In addition, Intertek invited senior environmental management experts from Philippine Environmental Management Authority (EMB) to speak on the management of chemicals regulations in the Philippines.

The meeting was informative and warm. All participants expressed their expectation for more opportunities to share and discuss chemical and product compliance requirements. AICM has always been committed to maintaining close communication with stakeholders, creating a high-quality regulatory exchange platform for our members, and promoting regulatory exchange at home and abroad.



## AICM 成功举办 IPAC 区域间化学品法规年度研讨会

2021 年 10 月 21 日，AICM 产业政策促进委员会成功举办 2021 区域间化学品法规年度研讨会。本次研讨会邀请 Intertek 亚太及官方权威专家为 AICM 广大会员分享了近期热点的化学品法规管理，线上线下 50 名会员公司代表和 Intertek 专家代表参加了此次会议并热烈讨论。

AICM 执行理事马一兵女士和产业政策促进委员会主席徐琨女士分别为研讨会致欢迎辞，并强调希望将区域间交流平台打造成 AICM 的品牌服务。IPAC 区域间法规交流平台主席王冰女士主持会议，她对现场及线上的所有行业同仁的参加表示热烈欢迎，对 Intertek 专家服务部（ASSURIS）的大力支持表示感谢。Intertek 专家服务部中国区副总经理张霞博士向与会人员介绍了区域间法规交流快讯项目运行情况及其亚太和全球法规团队的服务支持能力。

海外专家通过视频连线方式为会议分享 4 个主题演讲，并与现场观众进行跨国互动讨论。Intertek 专家服务部两位韩国专家分享了 K-REACH 和 KOSHA 的实操经验，两位印度专家讲解了 India REACH(CMSR) 相关要求和进展。同时，Intertek 还特别邀请了菲律宾环境管理局（EMB）高级环境管理专家讲解了菲律宾化学品法规管理。

此次会议内容充实，精彩纷呈，现场氛围热烈，与会代表纷纷表示期待有更多的机会分享和讨论化学品及产品合规要求。AICM 一直秉承与各利益相关方保持紧密沟通，为广大会员打造高质量的法规交流平台，促进国内外法规交流沟通。



## AICM Participated the Online Seminar on Cosmetic Raw Material Information Submission and Safety Information Platform Construction

On October 29, 2021, China Institute of Food and Drug Control organized an online seminar on the submission of cosmetics raw material information and the construction of safety information platform. Leaders and responsible comrades of the cosmetics Supervision Department of the State Drug Administration, relevant experts and experts of the Chinese Academy of inspection attended the meeting, and more than 40 industry and enterprise representatives attended the seminar. Representatives of five AICM member companies were invited to attend.

Focusing on the submission of raw material safety information and smart review, the seminar fully discussed the content and submission of cosmetic raw material safety information, cosmetic raw material management and numbering rules, database docking and utilization and smart review rules. The participating experts introduced the feedback in detail, and discussed and interpreted the construction scheme of cosmetic raw material safety information registration platform one by one, including the classification of cosmetic raw materials, raw material identification and characteristic indicators, risk information control indicators, etc. AICM will further submit relevant suggestions and contents according to the discussion of the seminar, continue to pay attention to the progress of regulations and standards related to new cosmetics raw materials, maintain close communication with policy makers, and contribute scientific and operable practical experience of the industry.

## AICM 参加化妆品原料信息报送和安全信息平台建设线上研讨会

2021年10月29日，中国食品药品检定研究院组织召开化妆品原料信息报送和安全信息平台建设线上研讨会。国家药品监督管理局化妆品监管司领导及负责同志、相关专家和中检院专家出席会议，共有行业和企业代表40余人参加本次研讨会。AICM五家会员公司代表受邀参加。

研讨会围绕原料安全信息报送以及智慧审评相关工作，对化妆品原料安全信息内容和报送，化妆品原料管理和编号规则，数据库对接利用和智慧审评规则等议题进行充分讨论。与会专家详细介绍了反馈意见的情况，并对化妆品原料安全信息登记平台建设方案进行了逐条讨论和解读，包括化妆品原料的分类、原料鉴别和特征指标、风险信息控制指标等。AICM将根据研讨会讨论情况进一步提交相关建议和内容，并持续关注化妆品新原料相关的法规标准进展，与政策制定者保持密切沟通，贡献行业科学、可操作的实践经验。

## 21 AICM Successfully Organized IPAC Food Contact Standards Revision Workshop

On November 16, 2021, AICM IPAC held Food Contact Standards revision workshop in Shanghai. The conference was attended by 55 representatives from 33 member companies.

The workshop invited the drafting experts of the standards of plastics, rubber and adhesives for food contact to introduce the background and progress of the revision of the three standards. At the same time, the comments and suggestions made by member companies were discussed item by item with the drafting experts. The three experts responded to the opinions raised by member companies and shared their compliance suggestions and solutions to specific problems and challenges of member companies.

AICM will continue to maintain close and in-depth contact with policy makers, providing a platform for member companies and industry to communicate with the government and experts, and provide scientific and sound advice for policy makers.



### AICM 成功举办 IPAC 食品接触标准修订研讨会

2021 年 11 月 16 日，AICM 产业政策促进委员会在上海举办食品接触标准修订研讨会。会议共有来自 33 个会员公司的 55 名代表参加。

此次研讨会特别邀请了食品接触用塑料、橡胶和粘合剂标准的起草专家为大家介绍了三个标准的修订背景和进展。同时，会员公司将提出的意见和建议逐条与起草专家进行了讨论。三位专家针对会员公司提出的意见进行了回应，并且对会员公司的具体问题和挑战分享了合规的建议和解决方案。

AICM 将继续保持与政策制定者保持深入紧密的联系，为会员公司和行业提供与政府和专家交流的平台，将科学合理的建议反馈给政策制定者。

## 22

## AICM Successfully Organized IPAC Regional Chemical Regulations On-line Workshop 2021

On November 24, 2021, AICM IPAC successfully held Regional regulatory exchange annual seminar on Chemicals Regulation 2021. The seminar invited Intertek Asia Pacific team and official experts to share the recent hot topics of chemical regulatory management for AICM members. 50 members' representatives and Intertek experts attended the conference in online and offline form, and had a heated discussion.

Ms. Bing Wang, Chair of IPAC's Regional Regulatory Exchange Platform, hosted the meeting and extended a warm welcome to all industry colleagues for their supports. The meeting began with a presentation by Intertek ASSURIS India experts on BIS certification program for chemicals. After that, experts from Korea, India and the Philippines answered the chemical management concerns and questions of member companies, and all participants had interactive discussions.

The conference was rich in content, targeted and heated online discussion. The regional regulatory exchange platform will continue to adhere to the full investigation of the needs of members, focusing on sharing and solving the issues of chemical management regulations in hot areas, and providing more value-added services for member companies. AICM has always been committed to maintaining close communication with stakeholders, creating a high-quality regulatory exchange platform for our members, and promoting regulatory exchange at home and abroad.

## AICM 成功举办 IPAC 区域间化学品管理法规线上研讨会

2021 年 11 月 24 日，AICM 产业政策促进委员会成功举办 2021 区域间化学品法规线上研讨会。本次研讨会邀请 Intertek 亚太及官方权威专家为 AICM 广大会员分享了近期热点区域的化学品法规管理，并对会员公司关心的问题进行了解答，线上共有 60 多名会员公司代表和 Intertek 专家代表参加了此次会议并热烈讨论。

AICM IPAC 区域间法规交流平台主席王冰女士主持会议。会议首先由 Intertek 专家服务部印度专家分享了印度标准局对化学品的认证方案。之后各国专家针对会员公司关于韩国、印度和菲律宾等国化学品管理关心的问题进行了解答，并且进行了互动讨论。

此次会议内容丰富，针对性强，线上讨论热烈。区域间法规交流平台将继续坚持充分调研会员需求基础上，着重分享和解决各热点区域的化学品管理法规问题，为会员公司提供更多增值服务。AICM 一直以来秉承与各利益相关方保持紧密沟通，为广大会员打造高质量的法规交流平台，促进国内外法规交流沟通。

## 23

## AICM Successfully Held the 2021 Seminar on Regulations and Management of Automotive Applied Materials

On November 24, 2021, AICM successfully held a seminar on regulations and management of automotive application materials in Shanghai. The seminar attracted 48 representatives. Mr. Tan Yecao, chairman of the sub committee of functional chemicals automobile, presided over the meeting and delivered a welcome speech. In addition, Mr. Tan Yecao also invited regulatory experts from Bosch, Continental, Denso, APTIV and Hella to have in-depth exchanges with member companies.

Experts from China Automotive Technology Research Center (CATARC) were specially invited to give a detailed introduction and interpretation of China's automobile related policies and regulations from different dimensions, including the research on the development of China's automobile market in 2021, the introduction of automobile material carbon emission industry standards and research work plan, and road motor vehicles (MNL) recycling management trends and CAMDS progress introduction, analysis of the current situation and development trend of in vehicle air quality control. The delegates had a heated discussion on the above issues.

AICM is committed to closely cooperating with and paying attention to the laws, regulations and standards related to materials in the automotive application field of relevant parties in the upstream and downstream of Chinese automobiles, and continues to maintain communication and interaction with CATARC and all parties in the supply chain, build an exchange platform and provide better services for member companies.



## AICM 成功举办 2021 年汽车应用材料法规和管理研讨会

2021 年 11 月 24 日，AICM 产业政策促进委员会在上海成功举办了 AICM 汽车应用材料法规和管理研讨会。本次研讨会吸引了 48 名代表参加，功能化学品汽车分委会主席谭业操先生主持会议，并致欢迎词。此外，谭业操先生还邀请到了来自 Bosch, Continental, DENSO, APTIV, HELLA 的法规专家与会员公司进行了深入交流。

本次研讨会特别邀请了中国汽车技术研究中心（CATARC）的专家，从不同维度对我国汽车相关的政策法规进行了详细介绍和解读。包括 2021 年中国汽车市场发展研究，汽车材料碳排放行业标准、研究工作方案介绍，道路机动车辆（MNL 类）回收利用管理动态及 CAMDS 进展介绍，车内空气质量管控现状及发展趋势分析。针对上述议题，与会代表们展开了热烈的讨论。

AICM 致力于紧密配合并关注中国汽车上下游相关方的汽车应用领域材料相关的法规和标准，并持续与 CATARC 和供应链上各方保持交流和互动，构建交流平台、为会员公司提供更优质的服务。



## 24

# AICM Successfully Held the 2021 Online Seminar on Pharmaceutical Excipients

On November 26, 2021, AICM successfully held the 2021 online seminar on pharmaceutical excipients. The seminar attracted nearly 32 member representatives. Mr. Xie Wei, chairman of the Life Science Subcommittee, presided over the meeting and delivered a welcome speech.

Ms. Wang suming, President of IPEC, was specially invited to give a speech on the similarities and differences of excipients management system requirements at home and abroad and the consideration of change management after the listing of Chinese pharmaceutical excipients. Including American and European auxiliary material management and master document management system,

The regulatory characteristics and change requirements of pharmaceutical excipients under the new "double law", the impact of pharmaceutical excipients change on preparations and post marketing change management, and the thinking of change countermeasures. The delegates had a heated discussion on the above topics.

AICM and the industrial policy promotion committee will continue to serve members, build a communication platform, and continue to build a scientific, reasonable and risk-based regulatory and standard system.

## AICM 成功举办 2021 年药用辅料线上研讨会

2021 年 11 月 26 日，AICM 产业政策委员会成功举办了 2021 年药用辅料线上研讨会。本次研讨会吸引了来自近 32 名会员代表参加。功能化学品生命科学分委会主席谢巍先生主持会议，并致欢迎词。

本次会议特别邀请到 IPEC 主席王粟明女士，针对国内外辅料管理制度要求异同及中国药用辅料上市后变更管理的考量发表演讲。包括美国欧洲辅料管理及主控文件管理系统，新“双法”下药用辅料的监管特点及变更要求，药用辅料变更对制剂的影响及上市后变更管理的影响，及变更应对策略思考。针对上述议题，与会代表们展开了热烈的讨论。

AICM 及产业政策促进委员会将一如既往的为会员服务、搭建沟通的平台，持续构建科学、合理、基于风险防控的法规和标准的体系。

## 25

## AICM Successfully Organized AICM Site Safety and Health Regulations Annual Meeting 2021

On December 7, 2021, AICM IPAC successfully held 2021 AICM Site Safety and health Regulation Annual meeting in Shanghai. 60 representatives from 31 member companies attended this meeting.

As an important activity, IPAC deputy chair Mr. Bill Zhou gave a welcome address, and said Our annual regulation meeting is based on the hot trends of the regulations this year, to summarize, analyze and interpret the laws and regulations that have a greater impact on our member companies, promote our communication with government experts and policy makers, and help us do a better job in compliance work. This year we are honored to invite to experts from China Chemical Safety Association, Shanghai Emergency Management Agency, Shanghai Emergency Management and Chemical Registration Center , Shanghai Institution of Occupational disease for Chemical Industry for the member companies to share the latest progress of the hazardous chemical safety regulations, workplace occupational health management regulations, Shanghai safe production regulations revision and chemical registration center of business development and in the future.

Member companies' representatives and experts had lively and pragmatic discussions on each of the keynote speeches, which helped member companies to understand the original intention of the legislation and solve practical problems.

As a representative of chemical raw material manufacturers, AICM will continue to promote communication and exchanges with the government, research institutions and stakeholders, to put forward scientific and reasonable suggestions for safety, health and environmental protection regulations of common interest to the industry and member companies, and promote the revision and operability of Chinese laws and regulations.



## AICM 成功举办 2021 危险化学品和工厂 EHS 法规年会

2021 年 12 月 7 日, AICM 产业政策促进委员在上海成功举办 2021AICM 厂区安全与健康法规年会。会议共有来自 31 家会员公司的 60 位代表参加。

作为 IPAC 一年一度的重要活动, 产业政策促进委员副主席周纪标先生向大家致欢迎词, 并表示我们的法规年会立足结合当年法规的热点动态, 为大家总结、分析和解读对会员公司影响较大的法律法规, 促进我们与政府专家和政策制定者之间的沟通, 同时帮助我们更好地做好合规工作。今年我们盛情邀请了中国化学品安全协会、上海应急管理局、上海应急管理事务与化学品登记中心和上海化工职业病防治院专家为会员公司分享了危险化学品安全法规的最新进展、工作场所职业卫生管理规定、上海安全生产条例修订和上海化学品登记中心业务发展及未来重点等内容。

会员公司代表与专家们就各个主题演讲都进行了热烈和务实的讨论, 对会员公司理解法规的制定初衷以及解决实际问题都有很大帮助。

作为化工原材料生产商代表, AICM 将持续推进与政府、研究机构和利益相关方的沟通和交流, 为行业和会员公司共同关心的安全、健康和环保等法规提出科学合理的建议, 促进我国法律法规制修订和可操作性。



## 26

## AICM Successfully Held the 2021 Seminar on Medical Device Raw Material Regulations

On December 8, 2021, AICM IPAC successfully held a seminar on regulations on raw materials of medical devices. The seminar attracted 28 representatives from 22 member companies. Mr. Xie Wei, chairman of the Life Science subcommittee, presided over the meeting and delivered a welcome speech.

AICM member companies shared the current situation of China's medical device MAF system and the strategies of raw material enterprises to submit MAF, sorted out the problems related to medical device raw materials of member companies, and finally the participants prospected the main work direction of the Life Science Subcommittee in medical device raw materials in 2022. The delegates had a heated discussion on the above topics.

AICM and IPAC will continue to serve members, build a communication platform, and continue to build a scientific, reasonable and risk-based regulatory and standard system.



### AICM 成功举办 2021 年医疗器械原材料法规研讨会

2021 年 12 月 8 日，AICM 产业政策委员会成功举办了医疗器械原材料法规研讨会。本次研讨会吸引了来自 22 家会员公司的 28 名代表参加。功能化学品分委会主席谢巍先生主持会议，并致欢迎词。

AICM 会员公司就中国医疗器械 MAF 制度的现状以及原料企业递交 MAF 的策略进行了分享，针对会员公司的医疗器械原料有关问题进行了梳理，最后参会代表就 2022 年生命科学分委会在医疗器械原材料主要的工作方向进行了展望。针对上述议题，与会代表们展开了热烈的讨论。

AICM 及产业政策促进委员会将一如既往的为会员服务、搭建沟通的平台，持续构建科学、合理、基于风险防控的法规和标准的体系。

## 27

## AICM Successfully Organized AICM Hazardous Chemical Management Regulations Annual Workshop 2021

On December 16, 2021, AICM IPAC successfully held 2021 AICM Hazardous Chemical Management Regulations Annual Workshop in Shanghai. More than 60 representatives from 40 member companies attended the conference in person and more than 60 member representatives participated online.

First of all, Mr. Bill Zhou, IPAC Deputy Chair, gave a welcome speech to all members. He thanked all member companies for their active participation in the meeting and all experts for their support and sharing. The morning meeting was hosted by Mr. Dong Xie, chairman of hazardous Chemicals Management Sub-committee, and the afternoon meeting was hosted by Ms. Sandy Ma, group leader of Hazardous chemicals Sub-committee.

Due to the impact of the epidemic, this year the workshop adopted online and offline to invite experts in hot regulations and standards to share, interpret and interact with member companies. We warmly invited five experts from NRCC of MEM, Shanghai Customs Industrial Products and Raw Materials Testing Technology Center, China National Institute of Standardization and Shanghai Chemical Research Institute testing Center for member companies to share Hazardous chemicals registration progress and “One enterprise One product One QR code”, Import and Export of Hazardous chemicals and Dangerous goods and packaging inspection technology, Revision and progress of the standard for prohibited chemical substances in consumer goods and GHS domestic and foreign policy update and implementation progress. Member companies’ representatives and experts conducted online and offline interactive discussions on each keynote speech, to help member companies understand the original intention of regulations, solve and respond to compliance challenges, as well as communicate on specific operational issues.

As a representative of chemical raw material manufactures, AICM and member companies are most concerned about hazardous chemicals management policy. We will continue to promote communication and exchanges with the government, research institutions and stakeholders, to put forward scientific and reasonable suggestions for safety, health and environmental protection regulations of common interest to the industry and member companies, and promote the revision and operability of China's laws and regulations.



## AICM 成功举办 2021 AICM 危险化学品管理法规年度研讨会

2021 年 12 月 16 日，AICM 产业政策促进委员在上海成功举办 2021 AICM 危险化学品管理法规年度研讨会。会议共有来自 40 家会员公司的 60 多位代表参加了现场会议，同时还有 60 多位会员代表在线上参会。

会议首先由产业政策促进委员副主席周纪标先生向大家致欢迎词，感谢所有会员公司在疫情期间仍然积极参与会议，感谢所有专家的支持和分享。上午会议由危险化学品管理分委会主席谢栋先生主持，下午会议由危险化学品管理分委会小组领导马书霞女士主持。

由于疫情影响，今年的会议采取线上线下相结合的模式邀请热点法规标准政策制定专家为会员公司分享、解读和互动。今年我们盛情邀请了来自应急管理部化学品登记中心、上海海关检测中心、中国标准化研究院和上海化工研究院的五位专家为会员公司分享了危险化学品登记进展和“一企一品一码”政策、进出口危险化学品与危险货物及其包装检验技术、消费品中禁限用化学物质标准制修订及进展和 GHS 国内外政策更新和实施进展等内容。

会员公司代表与专家们就各个主题演讲都进行了线上线下的互动讨论，帮助会员公司理解法规的制定初衷，解决和应对合规挑战，同时也有针对具体操作问题进行交流。

作为化工原材料生产商代表，AICM 及会员公司最为关注危险化学品的管理政策。我们将持续推进与政府、研究机构和利益相关方的沟通与交流，为行业和会员公司共同关心的安全、健康和环保等法规提出科学合理的建议，促进我国法律法规制修订和可操作性。



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## AICM Participated in the Online Meeting Organized by NMPA with Cosmetics Industry Association

On December 21, 2021, the Cosmetics Supervision Department of the NMPA held an online meeting with cosmetics industry associations. Leaders and responsible comrades of the cosmetics Supervision Department of NMPA, responsible comrades of provincial and Municipal Drug Administrations attended the meeting. Nearly 30 representatives of industry associations attended the seminar. AICM was invited to attend and delivered a speech on by Mr. Xie Wei, the chairman of the Life Science Subcommittee.

The seminar focused on listening to the opinions and suggestions of the association on the construction and implementation of cosmetics regulations, as well as discussing the problems that could not be implemented of regulations. The participating experts introduced the opinions from the industry in detail, discussed and interpreted the topics with concentrated feedback from the industry one by one. AICM will further submit relevant suggestions and contents according to the discussion of the meeting, continue to pay attention to the progress of regulations and standards related to new cosmetics raw materials, maintain close communication with policy makers, and contribute scientific and operable practical experience of the industry.



## AICM 参加化妆品行业协会视频座谈会

2021年12月21日，国家药品监督管理局化妆品监管司以线上方式召开化妆品行业协会视频座谈会。国家药品监督管理局化妆品监管司领导及负责同志、各省市药品监督管理局负责同志出席会议，共有行业协会代表近30人参加本次研讨会。AICM受邀参加并由生命科学分委会主席谢巍代表发言。

研讨会聚焦听取协会对化妆品监管法规建设和实施的意见和建议，以及对法规和规范性文件实施过程中落实不到的问题进行讨论。与会专家详细介绍了行业意见的情况，并对行业反馈较为集中的议题进行了逐条讨论和解读。AICM将根据研讨会讨论情况进一步提交相关建议和内容，并持续关注化妆品新原料相关的法规标准进展，与政策制定者保持密切沟通，贡献行业科学、可操作的实践经验。

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## AICM Successfully Co-organized 2021 International Food Contact Material Safety Forum

On Dec. 22-24, 2021, 2021 International food contact material safety forum was successfully held online. As important co-organizer, AICM have been closely working with FCM expert committee of CFIA and State Key Laboratory of Food Contact Material Testing (Guangzhou, Changzhou and Ningbo) seven years, to organize this forum. In the context of the worldwide COVID-19 outbreak, the forum adopted an online approach for the first time, inviting domestic and foreign government experts and industry representatives to share and exchange views on domestic and foreign regulatory trends, compliance and risk management, and testing and analysis technologies of food contact materials. The forum lasted for three days, with more than 350 representatives from more than 100 enterprises in the food contact material industry attending and more than 7,000 viewers. AICM organized 34 representatives from 21 companies to join in this great event.

At the conference, experts from National Health Commission, State Administration for Market Regulation and other departments shared wonderful speeches on the development trend of product safety standards for food contact materials, the progress of national standards for various materials, detection methods, tracking evaluation and supervision, etc. The conference also discussed the current hot topic of sustainable development of food contact materials, the latest analysis and testing research. As the representative of the industry, AICM shared the industry's compliance practices, key pain points and initiatives after the implementation of new national standards. During the forum, experts and representatives had extensive and in-depth exchanges on the difficulties and specific issues in the implementation of regulations and standards through question and answer sessions interactions.

AICM always insists on expanding the communication and cooperation with all stakeholders, and builds the communication platform for member companies, hoping to promote the continuous progress of food contact material safety and compliance management.



## AICM 成功合办 2021 国际食品接触材料安全论坛

2021 年 12 月 22-24 日，2021 国际食品接触材料安全论坛在线上成功举办。作为大会的共同主办方，AICM 已经连续七年与中国食品工业协会食品接触材料专业委员会、国家食品接触材料检测重点实验室（广东、常州、宁波）紧密合作，共同组织举办该论坛。在世界范围内的新冠疫情背景下，此次论坛首次采用线上方式，邀请国内外的政府专家和行业代表，围绕食品接触材料的国内外法规趋势、合规与风险管理、检测与分析技术三个论坛进行了分享和交流。论坛一共进行三天，共有来自食品接触材料行业 100 多家企业的 350 多位代表参加，共 7000 多收看人次。其中 AICM 组织了来自 21 家公司的 34 名代表参会。

大会由卫健委、市场监管总局等部门的标准制修订专家分享了食品接触材料的产品安全标准发展方向、各材质产品标准进展、检测方法、跟踪评价以及监管等方面的精彩演讲。此次大会还就目前热点的食品接触材料类可持续发展思路、最新的分析与测试研究等话题进行了讨论。作为行业代表，AICM 针对在新国标实施后行业的合规实践、重点痛点以及建议做了精彩的分享。大会期间，各位专家和参会代表通过问答环节互动等方式就法规标准的实施难点和具体问题进行了广泛而深入的交流。

AICM 一直坚持扩大与各方的沟通和合作，为广大会员公司搭建交流平台，希望推动食品接触材料安全和合规管理的不断进步。



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## AICM and Japan Chamber of Commerce in China had a talk on 2021 White Paper and future cooperation

On December 28, 2021, representatives of chemical Working Group of Japan Chamber of Commerce in China had a discussion and exchange with AICM Executive Director, IPAC chair and manager on 2021 White Paper on Chinese economy and Japanese enterprises.

The two sides mainly discussed chemicals environmental management of, hazardous chemicals safety management and the latest policies in import and export of chemicals industry. At the same time, we also communicated with each other on hot topics such as chemical management, environment, health and safety regulations, and fully discussed some problems encountered in policy implementation. Both sides indicated that they will continue to enhance communication and cooperation, strengthen the role of industry interaction and exchange platform, and submit professional scientific suggestions to policy makers timely on behalf of the industry.



### AICM 与日本商会化学工作组就 2021 白皮书和深化合作进行会谈

2021 年 12 月 28 日，中国日本商会化学工作组代表与 AICM 执行理事、产业政策促进委员会主席及经理就中国经济与日本企业 2021 年白皮书进行了座谈和交流。

双方主要讨论了工业化学品部分中在化学品环境管理、危险化学品安全管理、进出口环节中最新政策等方面。同时也就共同关注的化学品管理、环境、健康、安全等热点话题进行了沟通，也对政策执行中遇到的一些问题进行了充分的讨论。双方均表示将继续加强沟通与合作、强化行业互动与交流平台作用，及时有效的将代表行业的专业性建议反馈给政策的制定者。

## Section II. IPAC Key Regulations/Standards\_2021

### 重大法律、法规、标准汇总

Items 序号	Subject 内容	Duty Authorities 主管部门	Implementation 发布 执行日期
<b>I Hazardous Chemical Safety Related 危险化学品安全管理相关</b>			
1	关于印发国务院安委会成员单位安全生产工作任务分工的通知 Notice on members' tasks of the work safety Committee of the State Council <a href="http://www.mem.gov.cn/gk/zfxxgkpt/fdzdgknr/202101/t20210108_376690.shtml">http://www.mem.gov.cn/gk/zfxxgkpt/fdzdgknr/202101/t20210108_376690.shtml</a>	MEM	Jan. 22, 2020
2	广东省应急管理厅关于开展化学品登记综合服务系统和“一企一品一码”标识化管理应用工作的通知 Guangdong launching chemical registration system and "One enterprise One product One QR code"	MEM	July 30, 2021
3	关于征求《化工过程安全管理导则（征求意见稿）》意见的函 MEM soliciting opinions on Guidelines of Process Safety Management of Chemical Industry (Draft) <a href="https://www.mem.gov.cn/gk/zfxxgkpt/fdzdgknr/202108/W020210827365000463686.docx">https://www.mem.gov.cn/gk/zfxxgkpt/fdzdgknr/202108/W020210827365000463686.docx</a>	MEM	Aug. 27, 2021
4	交通运输部关于印发《港口危险货物重大危险源监督管理办法》的通知 Measures for supervision and Administration of Major Hazardous Installations of Dangerous Goods in Ports <a href="https://xxgk.mot.gov.cn/2020/jigou/syj/202111/t20211108_3625235.html">https://xxgk.mot.gov.cn/2020/jigou/syj/202111/t20211108_3625235.html</a>	MOT	Nov. 8, 2021
5	关于公开征求《化工园区安全风险智能化管控平台建设指南（试行）》和《危险化学品企业安全风险智能化管控平台建设指南（试行）》（征求意见稿）意见的函 Letter of soliciting public opinions on The Construction Guide of Intelligent Control Platform for Safety Risks in Chemical Industrial Parks (Trial) and The Construction Guide of Intelligent Control Platform for Safety Risks in Hazardous Chemical Enterprises (Trial) (Draft) <a href="https://www.mem.gov.cn/gk/zfxxgkpt/fdzdgknr/202111/t20211125_403551.shtml">https://www.mem.gov.cn/gk/zfxxgkpt/fdzdgknr/202111/t20211125_403551.shtml</a>	MEM	Nov. 25, 2021
6	关于征求《危险化学品安全信息码管理规定（试行）》（征求意见稿）的函 Letter on Soliciting Regulations on The Administration of Safety Information Codes for Hazardous Chemicals (Trial) (Draft for Soliciting Comments)	MEM/NRCC	Dec. 22, 2021

Items 序号	Subject 内容	Duty Authorities 主管部门	Implementation 发布 执行日期
7	关于公开征求《危险化学品生产建设项目安全风险防控指南（试行）》（征求意见稿）意见的函 Letter on soliciting public comments on The Guidelines for The Prevention and Control of Safety Risks in Hazardous Chemical Production and Construction Projects (Trial) (Draft) <a href="https://www.mem.gov.cn/gk/zfxgkpt/fdgdgknr/202112/t20211222_405416.shtml">https://www.mem.gov.cn/gk/zfxgkpt/fdgdgknr/202112/t20211222_405416.shtml</a>	MEM	Dec. 22, 2021
8	关于公开征求危险化学品生产使用企业老旧装置安全风险评 估指南（征求意见稿）意见的函 Letter on soliciting public comments on safety Risk Assessment Guidelines for Old Installations of Enterprises producing and using Hazardous Chemicals (Draft) <a href="https://www.mem.gov.cn/gk/zfxgkpt/fdgdgknr/202112/t20211229_405877.shtml">https://www.mem.gov.cn/gk/zfxgkpt/fdgdgknr/202112/t20211229_405877.shtml</a>	MEM	Dec. 29, 2021
<b>Environmental Management of Chemical</b>			
<b>II Substances Related</b>			
<b>化学品环境管理</b>			
1	关于增补《中国现有化学物质名录》的公告 Announcement on updating the list of existing chemical substances in China <a href="http://www.mee.gov.cn/xxgk2018/xxgk/xxgk01/202104/t20210425_830319.html">http://www.mee.gov.cn/xxgk2018/xxgk/xxgk01/202104/t20210425_830319.html</a>	MEE	Apr.21,2021
2	关于征求国家生态环境标准《优先评估化学物质筛选技 术导则（征求意见稿）》意见的通知 Notice on Soliciting comments on the National Ecological and environmental Standards "Technical Guidelines for Screening Priority Assessment Chemicals (Draft)"	MEE	May 19, 2021
3	关于增补《中国现有化学物质名录》的公告 Announcement on updating the list of existing chemical substances in China <a href="http://www.mee.gov.cn/xxgk2018/xxgk/xxgk01/202106/t20210623_841359.html">http://www.mee.gov.cn/xxgk2018/xxgk/xxgk01/202106/t20210623_841359.html</a>	MEE	Jun.08,2021
4	关于增补《中国现有化学物质名录》（2021 年第 1 批总 第 4 批） Updating the list of existing chemical substances in China (the first batch and the fourth batch in 2021) <a href="https://www.mee.gov.cn/xxgk2018/xxgk/xxgk01/202107/t20210712_846416.html">https://www.mee.gov.cn/xxgk2018/xxgk/xxgk01/202107/t20210712_846416.html</a>	MEE	Jul.08,2021
5	关于已登记新化学物质列入《中国现有化学物质名录》 （2021 年第 2 批总第 8 批）的公告 Announcement on the inclusion of registered new chemical substances in the list of existing chemical substances in China <a href="http://www.mee.gov.cn/xxgk2018/xxgk/xxgk01/202108/t20210820_858462.html">http://www.mee.gov.cn/xxgk2018/xxgk/xxgk01/202108/t20210820_858462.html</a>	MEE	Aug.18,2021

Items 序号	Subject 内容	Duty Authorities 主管部门	Implementation 发布 执行日期
6	关于新化学物质年度报告提交情况的通报 Notification on the submission of annual reports on new chemical substances <a href="https://www.meesc.cn/zhxx/tzgg/202109/t20210930_955164.shtml">https://www.meesc.cn/zhxx/tzgg/202109/t20210930_955164.shtml</a>	MEE	Sep.30,2021
7	关于增补《中国现有化学物质名录》（2021 年第 2 批 总第 5 批） Updating the list of existing chemical substances in China (the second batch and the fifth batch in 2021) <a href="https://www.mee.gov.cn/xxgk2018/xxgk/xxgk01/202110/t20211019_957145.html">https://www.mee.gov.cn/xxgk2018/xxgk/xxgk01/202110/t20211019_957145.html</a>	MEE	Oct.18,2021
8	关于印发《环境保护综合名录（2021 年版）》的通知 Notice on printing and distributing the comprehensive directory of environmental protection (2021 Edition) <a href="https://www.mee.gov.cn/xxgk2018/xxgk/xxgk06/202111/t20211102_958837.html">https://www.mee.gov.cn/xxgk2018/xxgk/xxgk06/202111/t20211102_958837.html</a>	MEE	Nov.02.2021
9	关于 2021 年第 3 批（总第 6 批）拟增补列入《中国现有化学物质名录》的化学物质信息的公示 Publicity on the information of chemical substances to be added to the list of existing chemical substances in China in the third batch <a href="http://www.mee.gov.cn/ywgz/gtfwyhxpj/hxphjgl/wzml/202112/t20211202_962603.shtml">http://www.mee.gov.cn/ywgz/gtfwyhxpj/hxphjgl/wzml/202112/t20211202_962603.shtml</a>	MEE	Dec.02,2021
10	关于发布《危险废物排除管理清单（2021 年版）》的公告 China MEE Publishes Revised Hazardous Waste Exclusion Management List <a href="https://www.mee.gov.cn/xxgk2018/xxgk/xxgk01/202112/t20211203_962984.html">https://www.mee.gov.cn/xxgk2018/xxgk/xxgk01/202112/t20211203_962984.html</a>	MEE	Dec.03,2021
<b>III Site HSE Related 环境、健康与安全</b>			
1	职业病诊断与鉴定管理办法 Measures for the management of diagnosis and appraisal of occupational diseases <a href="http://www.nhc.gov.cn/cms-search/xxgk/getManuscriptXxgk.htm?id=ecdae14ac7c640ffb11a26d1de4cbe38">http://www.nhc.gov.cn/cms-search/xxgk/getManuscriptXxgk.htm?id=ecdae14ac7c640ffb11a26d1de4cbe38</a>	NHC	Jan. 26, 2021
2	安全生产法（修正草案）征求意见 NPC solicited comments on <Work Safety Law > (amended draft) <a href="http://www.npc.gov.cn/flcaw/userIndex.html?lid=ff808081773f34620177425e063e032f">http://www.npc.gov.cn/flcaw/userIndex.html?lid=ff808081773f34620177425e063e032f</a>	NPC	Feb. 3, 2021
3	应急管理部办公厅关于印发危险化学品企业重大危险源安全包保责任制办法（试行）的通知 <a href="https://www.mem.gov.cn/gk/zfxxgkpt/fdzdgnr/202102/t20210207_379780.shtml">https://www.mem.gov.cn/gk/zfxxgkpt/fdzdgnr/202102/t20210207_379780.shtml</a>	MEM	Feb. 4, 2021

Items 序号	Subject 内容	Duty Authorities 主管部门	Implementation 发布 执行日期
4	关于征求《精细化工反应安全风险评估规范（征求意见稿）》意见的函 Letter of Soliciting comments on "Specification for Safety Risk Assessment of Fine Chemical Reactions (Draft)" <a href="http://www.mem.gov.cn/gk/zfxgkpt/fdzdgknr/202103/t20210329_382322.shtml">http://www.mem.gov.cn/gk/zfxgkpt/fdzdgknr/202103/t20210329_382322.shtml</a>	MEM	Mar. 31, 2021
5	《关于进一步加强硝酸铵安全管理的通知》《硝酸铵安全技术规范》 Notice on <Further Strengthening the Safety Management of Ammonium Nitrate> and <Safety Technical Specification for ammonium nitrate>	MEM	May 26, 2021
6	全国人大对《中华人民共和国噪声污染防治法（草案）》征求意见 National People's Congress(NPC) solicit public comments on draft law <The Prevention and Control of Noise Pollution> <a href="http://www.npc.gov.cn/flcaw/userIndex.html?lid=ff8081817b5e8676017b6158a4dd02af">http://www.npc.gov.cn/flcaw/userIndex.html?lid=ff8081817b5e8676017b6158a4dd02af</a>	NPC Standing Committee	Aug. 24, 2021
7	征求新《安全生产法》存在的问题和建议 Solicit problems and suggestions on New <Work Safety Law>		Sep. 16, 2021
8	应急管理部 工业和信息化部 公安部 交通运输部 海关总署关于进一步加强硝酸铵安全管理的通知 Jointly announced a notice on further strengthening the safety management of Ammonium Nitrate <a href="https://www.mem.gov.cn/gk/zfxgkpt/fdzdgknr/202109/t20210926_399098.shtml">https://www.mem.gov.cn/gk/zfxgkpt/fdzdgknr/202109/t20210926_399098.shtml</a>	MEM, MIIT, MPS, MOT	Sep. 27, 2021
9	关于公开征求《危险废物排除管理清单（2021年版）》（征求意见稿）意见的通知 Hazardous waste exclusion management list (2021) <a href="https://www.mee.gov.cn/xxgk2018/xxgk/xxgk06/202109/W020210928375091939126.pdf">https://www.mee.gov.cn/xxgk2018/xxgk/xxgk06/202109/W020210928375091939126.pdf</a>	MEE	Sep. 29, 2021
	限期淘汰产生严重污染环境的工业固体废物的落后生产工艺设备名录 List of outdated production process equipment that produces industrial solid waste seriously polluting the environment and shall be eliminated within a time limit <a href="https://www.miit.gov.cn/zwgk/zcwj/wjfb/gg/art/2021/art_5202c6c6032a476c8d7591e895dd30f0.html">https://www.miit.gov.cn/zwgk/zcwj/wjfb/gg/art/2021/art_5202c6c6032a476c8d7591e895dd30f0.html</a>	MIIT	Oct. 27, 2021
10	关于公开征求《重点排污和环境风险管控单位名录管理规定（征求意见稿）》意见的通知 Notice on soliciting public comments on the Provisions on the Management of the List of Key Pollutant Discharge and Environmental Risk Control Units (Draft) <a href="https://www.mee.gov.cn/xxgk2018/xxgk/xxgk06/202110/t20211013_956367.html">https://www.mee.gov.cn/xxgk2018/xxgk/xxgk06/202110/t20211013_956367.html</a>	MEE	Nov. 3, 2021

Items 序号	Subject 内容	Duty Authorities 主管部门	Implementation 发布 执行日期
11	《危险废弃物转移管理办法》（部令第23号） Measures for Hazardous Waste Transfer Management <a href="http://www.mee.gov.cn/xxgk2018/xxgk/xxgk02/202112/t20211203_962985.html">http://www.mee.gov.cn/xxgk2018/xxgk/xxgk02/202112/t20211203_962985.html</a>	MEE	Dec. 8, 2021
12	关于公开征求危险化学品企业重大危险源开车前安全风险评估报告制度（试行）（征求意见稿）意见的函 Letter on soliciting comments on the Safety Risk Assessment Report System for Major Hazard Installations before driving of hazardous chemical Enterprises (trial) (Draft for soliciting comments) <a href="https://www.mem.gov.cn/gk/zfxxgkpt/fdzdgknr/202112/t20211222_405414.shtml">https://www.mem.gov.cn/gk/zfxxgkpt/fdzdgknr/202112/t20211222_405414.shtml</a>	MEM	Dec. 22, 2021
<b>IV</b>	<b>Food Safety Related 食品安全相关</b>		
1	关于蝉花子实体（人工培植）等15种“三新食品”的公告（2020年第9号） Announcement on 15 kinds of New raw material of food/food additives/food related products <a href="http://www.nhc.gov.cn/sps/s7892/202101/59f6380209494ea6b67a49648e59fd84.shtml">http://www.nhc.gov.cn/sps/s7892/202101/59f6380209494ea6b67a49648e59fd84.shtml</a>	NHC	Jan. 7, 2021
2	解读《关于蝉花子实体（人工培植）等15种“三新食品”的公告》（2020年第9号） Interpretation of announcement on 15 kinds of New raw material of food/food additives/food related products <a href="http://www.nhc.gov.cn/sps/s7892/202101/7b251e3af454452e894dc6f55941be85.shtml">http://www.nhc.gov.cn/sps/s7892/202101/7b251e3af454452e894dc6f55941be85.shtml</a>	NHC	Jan. 7, 2021
3	食品安全国家标准审评委员会秘书处关于征求《食品营养强化剂L-肉碱酒石酸盐》等26项食品安全国家标准（征求意见稿）意见的函 NHC solicited opinions on 26 food safety standards <a href="http://www.nhc.gov.cn/sps/s7891/202102/ef7581625f58468ca8bc1c2a73b98755.shtml">http://www.nhc.gov.cn/sps/s7891/202102/ef7581625f58468ca8bc1c2a73b98755.shtml</a>	NHC	Feb. 18, 2021
4	关于α-淀粉酶等16种“三新食品”的公告 Announcements on 16 new kinds of Food/Food Additives/Food related Products <a href="http://www.nhc.gov.cn/sps/s7892/202102/b03cdbca10464f2890d1b5d50d7bbb48.shtml">http://www.nhc.gov.cn/sps/s7892/202102/b03cdbca10464f2890d1b5d50d7bbb48.shtml</a>	NHC	Feb. 23, 2021
5	关于征求《食品添加剂使用标准》等12项食品安全国家标准（征求意见稿）意见的函 Letter of soliciting comments on 12 National Food Safety Standards (draft), including the Standard for The Use of Food Additives <a href="http://www.nhc.gov.cn/sps/s7891/202103/eda1a07030544d0e8640e6f32ff4e5c0.shtml">http://www.nhc.gov.cn/sps/s7891/202103/eda1a07030544d0e8640e6f32ff4e5c0.shtml</a>	NHC/CFSA	Mar. 31, 2021

Items 序号	Subject 内容	Duty Authorities 主管部门	Implementation 发布 执行日期
6	关于 4- $\alpha$ -糖基转移酶等 28 种“三新食品”的公告 Announcement on 28 New Food/Food additives/Food related Products including 4- $\alpha$ -glycosyltransferase <a href="http://www.nhc.gov.cn/sps/s5853/202107/6502707e8eba433a8ae53ac78c020a8b.shtml">http://www.nhc.gov.cn/sps/s5853/202107/6502707e8eba433a8ae53ac78c020a8b.shtml</a>	NHC	Jul. 26, 2021
7	公开征求三烯丙基异氰尿酸酯等 11 种食品相关产品新品种意见 Solicited opinions on 11 kinds of new food related products such as triallyl isocyanurate opinions <a href="https://www.cfsa.net.cn/Article/News.aspx?id=5BAEE1640538137A39D886A07B30273D5745349A8AC53786">https://www.cfsa.net.cn/Article/News.aspx?id=5BAEE1640538137A39D886A07B30273D5745349A8AC53786</a>	NHC/CFSA	Aug. 20, 2021
8	关于食叶草等 15 种“三新食品”的公告 NHC issued the notice of 15 new kind of food/food additives/Food related products Link: <a href="http://www.nhc.gov.cn/sps/s7892/202110/0c1d177c19384989acfd24a37a8b8692.shtml">http://www.nhc.gov.cn/sps/s7892/202110/0c1d177c19384989acfd24a37a8b8692.shtml</a>	NHC	Oct. 22, 2021
9	解读《关于食叶草等 15 种“三新食品”的公告》（2021 年第 9 号） NHC issued interpretation of the notice of 15 new kind of food/food additives/Food related products Link: <a href="http://www.nhc.gov.cn/sps/s7892/202110/00b263944e9c474ab85c15872c845bbf.shtml">http://www.nhc.gov.cn/sps/s7892/202110/00b263944e9c474ab85c15872c845bbf.shtml</a>	NHC	Oct. 22, 2021
10	关于征求《食品安全国家标准 食品接触用橡胶材料及制品》等 34 项食品安全国家标准（征求意见稿）意见的函 NHC issues 34 drafts for comment on Food safety national standards Measures for food safety standards management <a href="http://www.nhc.gov.cn/wjw/yjzj/202009/f50795a01382421b82dbb0aec7c56855.shtml">http://www.nhc.gov.cn/wjw/yjzj/202009/f50795a01382421b82dbb0aec7c56855.shtml</a>	NHC	Oct. 26, 2021
11	公开征求 C10-C22 脂肪酸聚甘油酯等 10 种食品相关产品新品种意见 Solicited opinions on 10 new varieties of food related products such as C10-C22 fatty acid polyglycerin ester <a href="https://www.cfsa.net.cn/Article/News.aspx?id=BAC03B8FDEC5D39687C9F8696B47E59E83E6950CE9F64BF5">https://www.cfsa.net.cn/Article/News.aspx?id=BAC03B8FDEC5D39687C9F8696B47E59E83E6950CE9F64BF5</a>	NHC/CFSA	Oct. 27, 2021
12	食品接触用涂料及涂层标准（草稿）征求意见 Standard for coatings for food Contact applications (draft) for comments	NHC	Nov. 17, 2021
13	公开征求磷酸锆（2:1）等 4 种食品相关产品新品种意见 Solicited comments on four new varieties of food related products including zirconium phosphate (2:1) <a href="https://www.cfsa.net.cn/Article/News.aspx?id=8641D960C473073F5590F1E767241C12">https://www.cfsa.net.cn/Article/News.aspx?id=8641D960C473073F5590F1E767241C12</a>	NHC/CFSA	Dec. 9, 2021

Items 序号	Subject 内容	Duty Authorities 主管部门	Implementation 发布 执行日期
<b>Performance Chemical (Cosmetics, Auto, EE, Coatings)</b> <b>V 功能化学品应用 (化妆品原料, 汽车, 电子电器, 涂料)</b>			
1	化妆品注册备案管理办法 Administrative measures for registration and filing of cosmetics <a href="https://www.nmpa.gov.cn/xxgk/fgwj/bmgzh/20210112114521164.html">https://www.nmpa.gov.cn/xxgk/fgwj/bmgzh/20210112114521164.html</a>	NMPA	Jan.07,2021
2	国家药监局关于发布《化妆品新原料注册备案资料管理规定》的公告 Announcement of the State Food and Drug Administration on Issuing the provisions on the administration of registration and filing materials of new cosmetics raw materials <a href="https://www.nmpa.gov.cn/xxgk/ggtg/qtggtg/20210304140454159.html">https://www.nmpa.gov.cn/xxgk/ggtg/qtggtg/20210304140454159.html</a>	NMPA	Feb.26,2021
3	《香港玩具及儿童产品安全条例 (修订附表 1 及 2) 公告》 HK Toys and Children's Products Safety Ordinance (Amendment of Schedules 1 and 2) Notice 2021		Apr. 8, 2021
4	国家药监局关于做好新旧化妆品注册备案信息管理平台衔接有关工作事项的通知 Notice of the State Food and Drug Administration on doing a good job in connection with the registration and filing information management platform of old and new cosmetics <a href="https://www.nmpa.gov.cn/xxgk/fgwj/gzwj/gzwjzhzhp/20210507172725111.html">https://www.nmpa.gov.cn/xxgk/fgwj/gzwj/gzwjzhzhp/20210507172725111.html</a>	NMPA	May.07,2021
5	国家药监局关于发布实施《化妆品标签管理办法》的公告 Announcement of the State Food and Drug Administration on Issuing and implementing the measures for the administration of cosmetics labels <a href="https://www.nmpa.gov.cn/xxgk/ggtg/qtggtg/20210603171933181.html">https://www.nmpa.gov.cn/xxgk/ggtg/qtggtg/20210603171933181.html</a>	NMPA	Jun.03,2021
6	国家药监局综合司关于印发 2021 年医疗器械行业标准制修订计划项目的通知 Notice of the comprehensive Department of the State Food and Drug Administration on printing and distributing the project of the preparation and revision plan of medical device industry standards in 2021 <a href="https://www.nmpa.gov.cn/xxgk/fgwj/gzwj/gzwjylqx/20210707141730119.html">https://www.nmpa.gov.cn/xxgk/fgwj/gzwj/gzwjylqx/20210707141730119.html</a>	NMPA	Jul.07,2021

Items 序号	Subject 内容	Duty Authorities 主管部门	Implementation 发布 执行日期
7	国家药监局关于发布实施《化妆品标签管理办法》的公告 Announcement of the State Food and Drug Administration on Issuing and implementing the measures for the administration of cosmetics labels <a href="https://www.nmpa.gov.cn/xxgk/ggtg/qtggtg/20210603171933181.html">https://www.nmpa.gov.cn/xxgk/ggtg/qtggtg/20210603171933181.html</a>	NMPA	Jun.03,2021
8	国家药监局综合司关于印发 2021 年医疗器械行业标准制修订计划项目的通知 Notice of the comprehensive Department of the State Food and Drug Administration on printing and distributing the project of the preparation and revision plan of medical device industry standards in 2021 <a href="https://www.nmpa.gov.cn/xxgk/fgwj/gzwj/gzwjylqx/20210707141730119.html">https://www.nmpa.gov.cn/xxgk/fgwj/gzwj/gzwjylqx/20210707141730119.html</a>	NMPA	Jul.07,2021
9	化妆品生产经营监督管理办法 Measures for the supervision and administration of the production and operation of cosmetics <a href="https://www.nmpa.gov.cn/xxgk/fgwj/bmgzh/20210806170256199.html">https://www.nmpa.gov.cn/xxgk/fgwj/bmgzh/20210806170256199.html</a>	NMPA	Aug.06,2021
10	国家药监局关于发布《儿童化妆品监督管理规定》的公告 Announcement of the State Food and Drug Administration on Issuing the provisions on the supervision and administration of children's cosmetics <a href="https://www.nmpa.gov.cn/xxgk/ggtg/qtggtg/20211008171226187.html">https://www.nmpa.gov.cn/xxgk/ggtg/qtggtg/20211008171226187.html</a>	NMPA	Oct.08,2021
11	电器电子产品有害物质限制使用（中国 RoHS）公共服务平台信息报送情况 China Receives Conformity Assessments for 18,420 Products under China RoHS <a href="https://wap.miit.gov.cn/jgsj/jns/gzdt/art/2021/art_179bd7af8531428d9ef60275896f0ddf.html">https://wap.miit.gov.cn/jgsj/jns/gzdt/art/2021/art_179bd7af8531428d9ef60275896f0ddf.html</a>	MIIT	Oct.13,2021
12	电器电子产品限制释放挥发性有机物种类及阈值设定指南（征求意见稿） Guide for setting the types and threshold of volatile organic compounds with restriction emission from electrical and electronic product. <a href="http://www.cesi.cn/rohs/202111/8022.html">http://www.cesi.cn/rohs/202111/8022.html</a>	MIIT	Nov.18,2021

## Section III. Position Papers 建议函汇总 2021

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2	AICM Position Paper on Nationwide Promotion of Labelling Management ("One enterprise One Product One QR code") of Hazardous Chemical AICM 关于危险化学品“一企一品一码”标识化管理工作全国推广实施的建议和意见	MEM	74
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## 1

## AICM position on Concentration Management Limit for $\gamma$ -Butyrolactone mixtures

### Summary:

**Name:** AICM position paper on <Concentration Management Limits for  $\gamma$ -Butyrolactone mixtures >

**Issuer:** IPAC Hazardous Chemical safety Management sub-committee

**Contributing members mainly from:** Totally 5 members, Dupont, BASF, Dow, Evonik, Merck

### Our activities:

*IPAC circulated the notice to all members on June 1, 2021*

*Member raised the issues on July 12, 2021*

*Drafted position paper, revised comments and align on Aug. 10, 2021*

*Search the department in charge and get in touch the contact person on Aug. 10, 2021*

### Trigger situation and background:

On May 28, 2021, the General Office of the State Council issued the Letter on Agreeing to include six Substances including methyl  $\alpha$ -phenyl acetoacetate in the Catalogue of Precursor Chemicals (Letter [2021] No. 58).  $\gamma$ -Butyrolactone was added to the third category of precursor chemicals.

Through members' discussions and alignments, we raised comments for this letter. We would like to brief the comments for you reference.

### AICM Comments:

**We suggest to set up the concentration limit of  $\gamma$ -butyrolactone mixture in China, and when the limit is exceeded, the mixture shall comply with the provisions on the management of precursor chemicals.**

### Reasons:

1.  $\gamma$ -butyrolactone is widely used in the industry, and is very difficult to purify  $\gamma$ -butyrolactone in the mixture products.  $\gamma$ -butyrolactone is a solvent with high boiling point, strong solubility, excellent electrical properties and good stability. It can be used for antioxidant, plasticizer, extraction agent, absorbent, dispersant, color fixing agent, coagulant. Especially it has important applications in advanced grease, photoresist, ink, batteries, capacitors and other industrial fields.
2. Referring to the previous provisions of MOFCOM on the concentration limit of the import and export administration of the mixture containing precursor chemicals, as well as the international concentration limit management of  $\gamma$ -butyrolactone, the mixture exceeding the limit shall be governed by precursor chemicals.

**Communication schedule:** Send to MOFCOM and MEM, and communicate with the policy makers in relevant departments.

## AICM 关于 $\gamma$ -丁内酯申请混合物浓度管理限值的建议

尊敬的商务部  
尊敬的应急管理部

AICM（国际化学品制造商协会）是近 70 家在中国有重大投资的国际石油化工跨国公司组成的非盈利性行业协会，所有会员都在华生产、经营和储运化学品。作为跨国化工集团在华企业的代表，AICM 以贡献中国的和谐社会和化工行业的可持续发展为己任，致力于向各利益攸关方推广“责任关怀”理念；向政策制定者倡导基于成本控制和风险控制的科学的政策；树立化工产业在国民经济中的积极形象。

2021 年 5 月 28 日，国务院办公厅发布《关于同意将  $\alpha$ -苯乙酰乙酸甲酯等 6 种物质列入易制毒化学品品种目录的函》（国办函[2021]58 号）。其中， $\gamma$ -丁内酯增列为第三类易制毒化学品。AICM 会员公司仔细研究该文件，结合行业情况，提出建议如下：

建议出台  $\gamma$ -丁内酯混合物限值，超过限值时混合物按照易制毒化学品管理的规定。

理由：

1.  $\gamma$ -丁内酯在工业界被广泛使用，且终端特种化学品价值高昂，在混合物产品中的  $\gamma$ -丁内酯提纯难度大，提纯可能性低。

$\gamma$ -丁内酯，英文名： $\gamma$ -Butyrolactone，CAS 号：96-48-0；是一种沸点高、溶解性强、电性能优良及稳定性好的溶剂。由于其沸点高，闪点高，与低闪点溶剂相比具有高安全性，且具有优良的稳定性和导电性优势。 $\gamma$ -丁内酯工业应用领域广泛，涉及的领域如抗氧化剂、增塑剂、萃取剂、吸收剂、分散剂、固色剂、凝固剂、电池、电容器制作等诸多领域。除纯物质外， $\gamma$ -丁内酯也被用作优良的溶剂或者原材料残留杂质存在于如高级润滑脂、光刻胶、油墨等不可分离终端产品中，其在产品中重量百分含量比为 0.001%~70% 范围内。

2. 参考以往商务部对含易制毒化学品的混合物的进出口管理的浓度限值管理规定，以及国际上对  $\gamma$ -丁内酯的浓度限值管理，超过限值时混合物按照易制毒化学品管理。

2007 年商务部针对常用溶剂甲苯，丙酮，丁酮，甲苯，硫酸和盐酸规定在超过一定浓度才进行易制毒化学品的管理（商务部对含易制毒化学品的混合物的进出口管理作出具体规定见附件 1）。在欧亚经济联盟  $\gamma$ -丁内酯易制毒管理浓度限值为  $\geq 15\%$ （欧亚经济联盟几乎对所有列入的第二类和第三类易制毒化学都规定了管理浓度限值），在美国  $\gamma$ -丁内酯易制毒管理浓度限值为  $>70\%$ （法规规定见附件 2）。

AICM  
2021 年 8 月 11 日

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## 附件 1:

## 《商务部对含易制毒化学品的混合物的进出口管理作出具体规定》

索引号	000013223/2007-11555	发文单位	安全与管制局
公文名称	商务部对含易制毒化学品的混合物的进出口管理作出具体规定		
文 号	商务部2007第23号公告	发文日期	2007-05-16
主题分类	进出口贸易	主 题 词	

## 商务部对含易制毒化学品的混合物的进出口管理作出具体规定

《易制毒化学品进出口管理规定》（商务部令2006年第7号，以下简称《规定》）第七条所称的“混合物”是指：

（一）含甲苯、丙酮、丁酮、硫酸4种易制毒化学品之一且比例高于40%（不含）的货物以及含盐酸比例高于10%（不含）的货物；

（二）含上述5种以外的《易制毒化学品进出口管理目录》所列的其他易制毒化学品的货物。

含易制毒化学品的复方药品制剂除外。

经营者进出口上述混合物，应当按照《规定》申请许可。

含甲苯、丙酮、丁酮、硫酸、盐酸等5种易制毒化学品之一且比例低于上述规定含量的货物，不属于《规定》第七条所称的“混合物”。经营者进出口上述货物，无需按照《规定》申请许可。

经营者在办理通关手续时，应当如实申报易制毒化学品含量，并主动出示有关证件。

特此公告。

中华人民共和国商务部  
二〇〇七年五月十六日

## 附件 2:

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**欧亚经济联盟（包括俄罗斯，白俄罗斯，亚美尼亚，哈萨克斯坦和吉尔吉斯斯坦）EEU. Narcotics and psychotropic substances subject to license for export/import (EEC Decision No 30/2015, list 2.12 (I) as amended through October 19, 2018)**

CAS RN: **96-48-0**

Name: gamma-Butyrolactone (en-US)

[Additional languages >>](#)

Eurasian Economic Union CommodityClassification of Foreign Economic Activity Code: 2932 20 200 0

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**EEU. Precursors of narcotics and psychotropic substances subject to license for import/export (EEC Decision No 30/2015, list 2.12 (II&III), as amended through October 19, 2018)**

CAS RN: **96-48-0**

Name: Butyrolactone (en-US)

[Additional languages >>](#)

Synonym(s): Dihydrofuran-2-one;

Butanolide

Concentration: >= 15 %.

EEUCCFEA Code: 2932 20 900 0

List: III

美国：

CFR- Code of Federal Regulations Title 21

TITLE 21--FOOD AND DRUGS

CHAPTER II--DRUG ENFORCEMENT ADMINISTRATION DEPARTMENT OF JUSTICE

PART 1310 RECORDS AND REPORTS OF LISTED CHEMICALS AND CERTAIN MACHINES; IMPORTATION AND EXPORTATION OF CERTAIN MACHINE

Sec. 1310.12 Exempt chemical mixtures.

(c) Mixtures containing a listed chemical in concentrations equal to or less than those specified in the "Table of Concentration Limits" are designated as exempt chemical mixtures for the purpose set forth in this section. The concentration is determined for liquid-liquid mixtures by using the volume or weight and for mixtures containing solids or gases by using the unit of weight.

Table of Concentration Limits

	DEA chemical code number	Concentration	Special conditions
List I Chemicals			
N-Acetylanthranilic acid, its salts and esters	8522	20% by Weight	Concentration based on any combination of N-acetylanthranilic acid and its salts and esters.
Alpha-phenylacetacetone, and its salts, optical isomers, and salts of optical isomers. (APAAN)	8512	Not exempt at any concentration	Chemical mixtures containing any amount of APAAN are not exempt.
Anthranilic acid, and its salts and esters	8530	50% by Weight	Concentration is based on any combination of anthranilic acid and its salts and esters.
Benzaldehyde	8256	50% by Weight or Volume	
Benzyl cyanide	8570	20% by Weight or Volume	
N-(1-benzylpiperidin-4-yl)-N-phenylpropionamide (benzylfentanyl), including its salts	8334	Not exempt at any concentration	Chemical mixtures containing any amount of benzylfentanyl are not exempt.
Ephedrine, its salts, optical isomers, and salts of optical isomers	8113	Not exempt at any concentration	Chemical mixtures containing any amount of ephedrine and/or pseudoephedrine, and their salts, optical isomers and salts of optical isomers are not exempt due to concentration, unless otherwise exempted.
Ergocristine and its salts	8612	Not exempt at any concentration	Chemical mixtures containing any amount of ergocristine and its salts are not exempt.
Ergonovine and its salts	8675	Not exempt at any concentration	Chemical mixtures containing any amount of ergonovine, including its salts, are not exempt.
Ergotamine and its salts	8676	Not exempt at any concentration	Chemical mixtures containing amount of any ergotamine, including its salts, are not exempt.
Ethylamine and its salts	8678	20% by Weight or Volume	Ethylamine or its salts in an inert carrier solvent is not considered a mixture. Concentration is based on ethylamine in the mixture and not the combination of ethylamine and carrier solvent, if any.
Gamma-Butyrolactone	2011	70% by weight or volume.	
Hydriodic acid	6695	20% by Weight or Volume	

## 2

## AICM Position Paper on Nationwide Promotion of Labelling Management ("One enterprise One Product One QR code") of Hazardous Chemical

### Summary:

**Name:** AICM position paper on < Nationwide Promotion of Labelling Management("One enterprise One Product One QR code") of Hazardous Chemical >

**Issuer:** IPAC Hazardous Chemical safety Management sub-committee

**Contributing members mainly from:** Totally 18 members

### Our activities:

*IPAC circulated the notice to all members on July 30, 2021*

*IPAC organized sub-committee meeting to discuss on Aug. 3, 2021*

*Collected member comments before Aug. 12, 2021*

*IPAC hazardous chemical sub-committee core members meeting on Aug. 13, 2021*

*IPAC organized round table meeting with NRCC expert on Aug. 26, 2021*

*Drafted position paper and revised before Aug. 31, 2021*

*Circulated to members and aligned comments before Sep. 2, 2021*

*Finalized the position paper on Sep. 8, 2021*

### Trigger situation and background:

On July, 2021, Guangdong pilot launched a comprehensive registration system of hazardous chemical enterprises and "One enterprise One product One QR code" labeling management. That should be affected to Guangdong enterprises, and have an impact on hazardous chemical management in China once implementation nationwide. So many members are very concerned about this topic. Through members' discussions and alignments, we raised comments for this letter. We would like to brief the comments for you reference.

### AICM Comments:

**1. We suggest that when promoting the implementation of "one enterprise one product one code" to the whole country, a transitional period of half a year to one year should be set up, and the implementation should be carried out step by step, first covering the hazardous chemicals listed in the <Catalogue of Hazardous Chemicals> (2015 edition), and then extending to the chemicals in line with the judgment principle.**

**Reason:** Enterprise label system upgrade needs project approval, design and debugging. There are many kinds of hazardous chemicals in accordance with the determination principle, and the workload is huge. The implementation of the policy may lead to the stagnation of logistics and supply chain, which will seriously affect the industrial chain of chemical enterprises.

**2. We suggest that hazardous chemicals less than 1 ton/year be exempted from the registration of hazardous chemicals and the implementation of "one enterprise one product one QR code". Meanwhile, we also suggest that specific small quantities (small packages or kits) of hazardous chemicals should be exempted from the implementation of "one company one product one code".**

**Reason:** Hazardous chemicals (such as samples and reagents, etc.) whose output or import volume is less than 1 ton/year are of small quantity and variety with low risk. For hazardous chemicals in small packages

or kits, there is not enough space to post additional QR code due to the small package size and limited space.

**3. We suggest to shorten the approval time of hazardous chemicals registration within one week and optimize the registration system.**

**Reason:** Currently it takes at least three weeks to register a batch of chemicals. The enterprise audit shall not exceed 1 week at most. Coupled with the time spent on posting the QR code, the time cost for import enterprises is too high to meet the needs of domestic customers.

**4. We suggest that label information link should be deleted from the content of QR code, and SDS should be prohibited to download and edit.**

**Reason:** Product labels generally have anti-counterfeiting information. If the safety labels can be downloaded directly by scanning QR code, it will greatly facilitate the illegal use of authentic labels, which will have a negative impact on the registered enterprises, and also cause safety risks in the management of dangerous chemicals.

**5. We suggest to add the entrusting party as the registration subject in the hazardous chemicals registration system.**

**Reason:** Business models of enterprises often belong to trade secrets and need to be protected according to law. Most of products commissioned processing belong to the mixture. We hope that the government can allow the entrusting party as an operator to register, that is responsible for the safety of the products they operate, and can also register and paste QR code to protect commercial information.

**6. We suggest to allow overseas suppliers to register hazardous chemicals.**

**Reason:** Foreign suppliers in the same product to deal with multiple QR code management. The workload is huge and very error-prone.

**7. It is recommended that the hazardous chemicals registration system have interfaces for uploading data.**

**Reason:** The work can be done using automated techniques such as artificial intelligence. Enterprises can access the data interface of the registration system, which can improve the efficiency of registration and entry.

**8. We suggest that Customs and other ministries coordinate and clarify the supervision content of "one enterprise one product one code".**

**Reason:** The implementation of "One enterprise One product One code" requires multiple ministries to coordinate regulatory requirements in advance, to ensure the understanding and consistency of law enforcement requirements among ministries and local departments, so that enterprises can better comply with these regulatory requirements.

**Communication schedule:** Send to MEM and NRCC, and visit to MEM department officials

## AICM 关于危险化学品“一企一品一码”标识化管理工作全国推广实施的建议和意见

尊敬的应急管理部：

AICM（国际化学品制造商协会）是近 70 家在中国有重大投资的国际石油化工跨国公司组成的非盈利性行业协会，所有会员都在华生产、经营和储运化学品。作为跨国化工集团在华企业的代表，AICM 以贡献中国的和谐社会和化工行业的可持续发展为己任，致力于向各利益攸关方推广“责任关怀”理念；向政策制定者倡导基于成本控制和风险控制的科学的政策；树立化工产业在国民经济中的积极形象。

2021 年 7 月 16 日，广东省应急管理厅发布《开展化学品登记综合服务系统和“一企一品一码”标识化管理工作的通知》（粤应急函[2021]271 号）。获悉预计不久后“一企一品一码”将会推广到全国。AICM 会员公司仔细研究该文件，并且根据目前在广东省会员企业的准备和实施情况，提出以下意见和建议：

一、建议向全国推广实施“一企一品一码”时，设立半年到一年的过渡期，并且进行分步实施，先覆盖列入《危险化学品目录》（2015 版）中的危险化学品，然后再扩展到符合判定原则的化学品。

理由：

（1）企业标签系统升级需立项、设计和调试

对于产品类别众多的化学品企业，致力于快速和精准提供产品，一般都会寻求应用企业资源管理系统（比如 SAP）实现自动加贴“一企一品一码”方案。企业针对“一企一品一码”的法规要求会成立项目组，通过项目管理流程召集业务、供应链（物流和仓库等）、工厂、标签、法规、IT、数据和危害沟通等部门的相关方立项项目计划，开发满足“一企一品一码”要求的功能和技术，更新管控流程。

（2）手动加贴二维码需要立项准备

“一企一品一码”是对地方主管部门和企业的新增的要求，此要求会增加所涉及产品二维码的下载、打印、张贴等工作以及所需的管理工作。为实现上述工作，政府管理部门和企业均需要准备配置相应的人力和物力。

（3）一步到位的实施方案对全行业影响和挑战极大

符合判定原则的危险化学品种类繁多，工作量巨大，方案的实施可能导致物流和供应链的停滞，会严重影响化工企业的产业链。企业有责任也有意愿符合产品和安全法规的要求，但是企业也需要时间来满足新的法规要求。很多我们日常使用的消费品，在原料生产开始阶段都用到很多危险化学品。比如牙膏的原料生产用了氯乙酸钠，洗涤剂中表面活性剂的生产用到了环氧乙烷，塑料的生产用到了有机过氧化物和烷基金属等。在疫情期间，我们充分认识了化工产品对于人类社会的贡献，包括抗疫本身使用的口罩、塑料、消毒剂和药品都离不开化学品，其中有不少属于危险化学品。我们必须管理好危险化学品，但是如果这些化学品的供应和运输、储存出现中断，也会对我们的生活和生产造成很大的影响。

二、建议低于 1 吨 / 年的危险化学品豁免其危险化学品登记和“一企一品一码”的实施。

**理由：**产量或进口量低于1吨/年的危险化学品（如样品和试剂等）量小且品种多，风险低。欧盟 REACH、韩国 K-REACH 等化学品管理法规实施普遍采纳了1吨/年作为化学品管理的门槛，对于低于该门槛的化学品进行豁免。对于部分化学品企业和试剂公司，其品种可超过一千种，但绝大多数都是少量的产品，甚至低至几毫升，其安全风险相对较低。扩展到全国如果不区分数量，使用一把尺子管理二维码，将极大地增加相关企业的负担，也不利于相关的科研工作。

### 三、建议缩短危险化学品登记审批时间在1周之内，优化登记系统。

**理由：**在不进行任何补正的情况下，目前登记一批化学品一般至少需要三周的时间。企业平时进口新产品审核所使用的时间是2~3天，最多不超过1周。在此基础之上再加上二维码加贴环节所用的时间，时间成本对进口企业太高，无法满足国内客户的需求。

如果将来把危化品登记与产品二维码统一管理，则需要简化危化品登记的手续。比如，企业只需要输入公司名、产品名、生产/进口/使用数量、危害组分信息和 SDS 等信息即可快速获得二维码。如果需要非常详细的资料，企业可以在系统中进行详细信息登记。这样，企业可以快速登记并获得二维码，也可提供产品详细信息。

同时，希望危险化学品登记系统保持开放的状态，企业需要时即可登记或修改登记内容，而不要设定锁定期，否则将会对危险化学品企业的生产和创新造成很大困难。

### 四、建议二维码内容中删除标签的超链接，且禁止 SDS 超链接下载和编辑。

**理由：**产品标签一般会有防伪信息，如果安全标签通过扫描二维码即可直接下载，将大大方便非法使用获得正版的标签，用在假冒伪劣产品上，对登记企业有不良影响，也造成了危化品管理的安全隐患。故建议删除标签信息。

SDS 不属于保密文件，但正常情况下企业只向运输公司和下游客户传递，用于包装安全运输、存储和使用。SDS 通过扫描二维码下载，容易被使用在假冒伪劣产品上，与实际产品信息不对应，造成运输和使用过程的安全隐患。故应避免 SDS 扫码即可直接下载和编辑。

### 五、建议在危险化学品登记系统中增加委托方作为登记主体

**理由：**委托加工是中国目前非常重要的企业间合作共赢的商业模式。目前危险化学品登记系统中只有生产者和进口者可以成为登记主体。由于企业的业务模式往往属于商业秘密，需要进行依法保护，且委托加工的产品很多属于混合物。希望政府可以允许被委托方进行登记，而委托方作为经营者对所经营的产品负有安全主体责任，也可进行登记并加贴二维码以保护商业信息。

### 六、建议允许境外供应商进行危险化学品登记

**理由：**境外企业同一个产品有多个国内进口者时，按照目前的法规要求会有多个二维码，国外供应商在为同一个产品应对多个二维码管理上，程序管理任务重。此种情况二维码的张贴工作使用

系统或人工都非常容易出错且工作量巨大。另当上市前开箱加贴二维码会破坏包装，并且重新封装也会遇到被客户要求退货的情况。因此我们建议允许境外企业对其产品直接进行登记，一个产品就有一个统一的二维码并指定国内的单一管理企业。

#### 七、建议危险化学品登记系统留有接口用于上传数据

**理由：**录入的工作可以使用诸如人工智能的自动化技术来完成。目前大多数企业都是使用手动录入的形式进行危险化学品登记的填写工作，一份登记需要好几个小时。《食品生产企业电子追溯系统数据链要求和接口规范》提供了数据自动上传的功能，节省了企业大量的人力和时间成本。危险化学品登记系统的数据要求基本不变，希望给企业留有数据接口，可以提高登记录入效率，造福整个危险化学品行业。

#### 八、建议海关等部委协调明确对“一企一品一码”的监管内容

**理由：**目前危险化学品进口时，海关会对危险化学品的标签进行查验。部分地方的海关也推出了自己的危化品二维码要求。因此“一企一品一码”的实施，需要多个部委事前协调监管要求，确保在部委之间和各地方执法部门理解和执法要求一致，以便于企业更好的遵守这些法规要求。

以上建议请酌情予以考虑。

此致

敬礼！

AICM

2021 年 9 月 1 日

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## 3

## AICM position paper on < Basic terminology in the testing of chemicals>.

### Summary:

AICM Position Paper on < Basic terminology in the testing of chemicals >

**Issuer:** Industry Policy Advocacy Committee

**Contributing members:** altogether 5 members: Covestro, ExxonMobil, Dow, Lubrizol, Symrise

### Our activities:

*Circulate the notice and call for comment to all members Aug 13, 2021*

*The first group meeting on Sep 5, 2021 upon comments collected*

*Develop position based on comments from members on Sep 9, 2021*

*Review of draft position Sep 10-16, 2021*

*Finalize position paper at sub-committee, Sep. 17, 2021*

### Trigger / Initial situation:

In order to implement the Environmental Protection Law of the People's Republic of China and further standardize the terms and definitions of chemical biological toxicity and environmental testing, the Ministry of Ecology and Environment of People's Republic of China issued the < Basic terminology in the testing of chemicals >(Exposure Draft). Since the accurate definition of basic terms for chemical testing is the basis for all future work of member companies and inaccurate translation will hinder our communication with the authorities, the environmental management of chemical substances sub-committee organized call for comment to voice out on behalf of members.

### Comment Summary:

1. Recommend to delete the terms which are not within the standard scope.
2. Recommend to clarify and add the important term definition.
3. Recommend to correct the English spelling mistake.

### Communication schedule:

Send to MEE, initiate technical discussion if necessary.

## AICM 对于《化学品测试基础术语（征求意见稿）》 的意见与建议

尊敬的生态环境部固体废物与化学品司：

AICM（国际化学品制造商协会有限公司）是近 70 家在中国有重大投资的国际石油化工跨国公司组成的非盈利性行业代表，所有会员都在华生产、经营和储运化学品。作为跨国化工集团在华企业的代表，AICM 以贡献中国的和谐社会和化工行业的可持续发展为己任，致力于向各利益攸关方推广“责任关怀”理念；向政策制定者倡导基于成本控制和风险控制的科学的政策；树立化工产业在国民经济中的积极形象。

贵司在 2021 年 8 月发布了关于公开征求《化学品测试基础术语（征求意见稿）》意见的通知，对此，AICM 和会员公司高度重视，并组织了学习和讨论，提出如附件的意见和建议，供您参考。

AICM  
2021 年 9 月 17 日

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## 附件：AICM 对于《化学品测试基础术语（征求意见稿）》的意见与建议

章节	条款	原文内容	修改建议	主要理由
第一章	1	目前标题为：化学品测试基础术语。	建议标题改为：化学品测试基础术语 - 生物系统效应，降解与蓄积。	与标准的范围和内容一致，作为系列标准的一部分，物理测试和健康测试建议作为第二和第三部分分别制定。
第二章	2.1.8	雾 mist 悬浮在气体（通常是空气）中的物质或混合物的液滴。	建议删掉。	雾的定义与生态系统效应无关。
第二章	2.1.9	物理危险。	建议删除。	物理危险不在本标准范围。
第二章	2.2.1	在正式测试开始前，依据预测的 4 个剂量反应关系，对 LD50 大致范围进行初步估算。	建议改为：在正式测试开始前，"依据预测得出的浓度效应关系，对 LC50 大致范围进行初步估算"。	多数时候预实验时采取三个浓度，偶尔是四个，所以不应做具体限定。将剂量反应关系该为浓度效应关系的理由是生态学测试使用的是浓度而非剂量。
第二章	2.2.10	在最大 96 小时的测试周期内，使用一次剂量经口给药产生的不良效应，或 24 小时内多次经口给予动物后所引起的有害效应。	建议删除。	与生态无关，不在本标准范围。
第二章	2.2.12	检测限 limit of detection, LOD 由特定分析步骤合理地检测出的最小分析信号得到的最低浓度。	增加 LOQ 的定义 定量限 (LOQ): 特定分析方法对测定物质定量测定的最低量。	增加 LOQ 的定义。
第二章	2.2.17	在给定测试周期内，导致 100% 受试动物死亡的受试物浓度。	在给定测试周期内，导致 100% 受试生物死亡的受试物浓度。	
第二章	2.2.31	反应（包括转化、消减等）速率与物质浓度或量成正比的过程或反应。	反应（包括转化、消减等）速率与物质浓度或量成正比的过程或反应，即 $dx/dt = Kx$ 。	
第二章	2.2.32	正辛醇 - 水分配系数 octanol-water partition coefficient, Kow or Pow 受试物在正辛醇 / 水两相介质中达到平衡时的浓度比值。	建议增加 "Koc" 的定义 吸附系数 Koc: 化学物质在环境中的固体（土壤或沉积物）和水相之间的分配的量度。	建议增加 "Koc" 的定义。
第二章	2.3.1	14 日龄幼鸟存活率 14-day-old survivors	14 日龄幼鸟存活率 14-day-old survivors	拼写错误。
第二章	2.3.22	蜂类急性毒性测试中，经点滴法单次给药后产生的不良效应。	蜂类急性毒性测试中，经点滴法单次给药后产生的不良效应。	该标准应适用于广泛的化学品，而不仅仅是药品。
第二章	2.3.31	偶尔死亡。	偶然死亡。	习惯性翻译为：偶然。

第二章	2.3.46	驯化 acclimation 受试生物在生理或行为上对受试环境条件（如容器、鸟舍与食物等）的适应过程。	建议增加生物降解性试验中预驯化 (pre-adaption/pre-exposure) 和预处理 (pre-acclimation) 的定义 可依据国标水质词汇第三 - 第七部分征求意见稿修改： 预驯化：在存在受试物的试验条件下接种体的培养，目的是通过微生物的适应和选择，增强接种体对受试物的降解能力。 预处理：在不存在受试物的试验条件下接种体的培养，目的是通过微生物对试验条件的适应，提高试验效果	这两个是生物降解试验中非常重要的概念，建议加以区分。
第二章	2.4.8	初级基质	初级底物	
第二章	2.4.11	次级基质	次级底物	
第二章	2.4.14	底栖寡毛纲环节动物蓄积测试中，直接由沉积物吸收速率常数和消除速率常数比得到的生物蓄积系数，也被称为动力学生物蓄积系数。	生物蓄积测试中，直接由吸收速率常数和消除速率常数比得到的生物蓄积系数，也被称为动力学生物蓄积系数。	水生生物蓄积测试中同样有动力学生物蓄积系数概念，参考 OECD305。
第二章	2.4.23	光敏作用 photosensitization 由于光敏剂的吸光作用导致的光化学或光物理变化的过程。	建议删除。	与本标准的 scope 不符合。
第二章	2.4.27	降解期 degradation phase 从停滞期结束到降解率达到最大降解率 90% 的时间。	建议增加“十天窗口期 (10-day window)”以及“通过水平 (pass-level)”的定义 十天窗口期：生物降解率达到 10% 之后的 10 天试验时间。 通过水平：快速生物降解试验中按 DOC 计达到 70%，按 ThOD 或 ThCO <sub>2</sub> 计达到 60% 的去除率。	这两个定义是快速生物降解试验中非常重要的概念。
第二章	2.4.35	理论需氧量 theoretical oxygen demand, ThOD 根据分子式计算得到的受试物完全被氧化需要的氧总量，以每毫克受试物消耗的氧气毫克数 (mg•mg <sup>-1</sup> ) 表示。	建议增加化学需氧量 (COD) 的定义 化学需氧量：通过化学氧化剂氧化水中有机物所需要的氧化剂的量	与 ThOD 相对应。
第二章	2.4.35	以每毫克受试物消耗的氧气毫克数 (mg •mg <sup>-1</sup> ) 表示。	以每毫克受试物消耗的氧气毫克数 (mg O <sub>2</sub> •mg <sup>-1</sup> ) 表示。	
第二章	2.4.39	清除 elimination。	消除 elimination。	
第二章	2.4.40	清除速率常数 elimination rate constant, Ke。	消除速率常数 elimination rate constant, Ke 或删除。	2.4.30 已经定义清楚速率常数，此处若指的是 PK 和 ADME 中常用的参数，可改成消除速率常数，或删除。
第二章	2.4.58	相对移动系数 relative mobility factor, RMF。	相对迁移系数 relative mobility factor, RMF。	





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