Reply of the WTO notification G/TBT/N/TPKM/130 comments

No	Comments	Reply Content
1	Comments concerning Confidential Business information (CBI), data sharing and testing report requirements.	After the approval of the Toxic Chemical Substance Control Act amendment, Taiwan EPA will be authorized to stipulate the Regulation of Chemical Substance Registration including the requirement of existing and new chemical substance registration. This regulation will specify the information required for registration, including its manufacturing/ importing condition, physiochemical, toxicity exposure, and hazard assessment information, deadlines, joint registration, evaluation procedure, approval, cancelation, addendum, dossier storage, CBI, and other details. Public consultation and hearings will be held to receive stakeholders' comments and to reach consensus of all registration details in the Regulation.
2	Comments concerning the development of Taiwan's national chemical substance inventory (draft) and suggestions of adopting the US, Canada, Australia and Japan's prioritization approach, instead of the EU REACH approach.	Taiwan EPA will continue to consider international harmonization sachem of existing chemical substance registration suitable for Taiwan's management needs to prevent unnecessary burdens to industries and competent authority.
3	Comments on adopting risk-basis approach instead of hazard-basis approach to require registration in the prioritization process.	Taiwan EPA will assess the tonnage bands and hazard property to assign the priority of substance requiring registration. Other than the exemption categories, new chemical substances will be required to complete registration.
4	Comments on possible redundancy of	Taiwan is evaluating the need for pre-registration.

pre-registration to cause extra burden to companies and competent authority.	
Comments on possible competent authority intervention in joint registration application.	The current draft stipulates both single and joint registration formats. When joint registration is not possible, applicants can request competent agency's intervention.