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## China Announces Transition Document for Amended New Chemical Regulation

On October 27, 2020, China's Ministry of Ecology and Environment (MEE) published the *Announcement on the Transitional Issues of Environmental Management Registration for New Chemical Substances* (hereinafter "the Transition Document"). [1] It aims to establish a harmonized transition from the current MEP Order 7 to the coming MEE Order 12, which will become effective on January 1, 2021. [2] More details of MEE Order 12 can be found in our previous CRM newsletter- [Breaking News: China Publishes Amended New Chemical Regulation](#).

Different from the draft version published in early June, the Transition Document specifies that new chemical notifications filed under MEP Order 7 by December 31, 2020, will continue to be reviewed by MEE until June 30, 2021. However, if the registration certificates are not issued by this date, the notifiers must re-submit the dossiers pursuant to MEE Order 12. Therefore, those who are preparing notifications per the requirements under MEP Order 7 should make efforts to submit the dossiers by December 31, 2020.

The Transition Document also elaborates on various issues related to new chemical substances registered under MEP Order 7. For example, the registration certificate holders for Regular Notifications must pass relevant information to downstream customers, keep records, submit a report for the first activity, and report new hazard information to MEE per the provisions of MEE Order 12. Other details suggest some requirements will be loosened. For example, annual reports are only required for hazardous chemicals that are subject to high-priority environmental management. For Simplified Notifications, annual reports are no longer needed, and the registration certificate holders are only required to keep records and report new hazard information to the Chinese authority in accordance with MEE Order 12.

Should you have any questions concerning the MEE Order 12 or the chemical management policies in China, please do not hesitate to contact David Ettinger ([ettinger@khlaw.com](mailto:ettinger@khlaw.com)), Chen Hu ([hu@khlaw.com](mailto:hu@khlaw.com)), or your existing contact at Keller and Heckman LLP.

[1] [http://www.mee.gov.cn/xxgk2018/xxgk/xxgk01/202010/t20201029\\_805427.html](http://www.mee.gov.cn/xxgk2018/xxgk/xxgk01/202010/t20201029_805427.html)

[2] [http://www.gov.cn/gongbao/content/2010/content\\_1671246.htm](http://www.gov.cn/gongbao/content/2010/content_1671246.htm) (MEP Order 7) [http://www.mee.gov.cn/xxgk2018/xxgk/xxgk02/202005/t20200507\\_777913.html](http://www.mee.gov.cn/xxgk2018/xxgk/xxgk02/202005/t20200507_777913.html) (MEE Order 12)