

# Session 3: GOST 30333-2007 Chemical Safety passports - webinar

## Questions and Answers

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#	Questions	Answers
1.	Hello, CSP is only for substances? Or for mixtures too?	CSP is required for chemical products placed on the EAEU market. If you are placing substances on their own on the EAEU market, you will need to have CSP for those substances. If you are placing mixtures, then CSP is done for mixtures. In the latter case you do need to make CSP for substances inside the mixture separately, unless you place some of those substances on the EAEU market on their own. The logic is the same as with the EU SDS which is done for the product you are placing on the market.
2.	Hi! Shall candles have a Russian Passport? Are candles actually in the scope of the TR 041?	Candles are not defined in GOST 30333-2007 or in the TR041, however they seem to fall under chemical mixture definition and likely will be in the scope of TR041 and CSP accordingly. Specific product types have to be evaluated case-by-case.
3.	Are the different reference documents (GOST, guideline, ...) available in English or other EU language ?	We are not aware of any English translations of these documents.
4.	Will substance classification be based on the EU CLP (if existing) or on a proper EURASIA rules ?	The classification has to be done according to GOST 32419–2013 "Classification of chemical products. General requirements" (under update to reflect TR041 requirements and transition to GHS Rev.7) and GOST 12.1.007-76 "Occupational safety standards system (SSBT). Harmful substances. Classification and general safety requirements". The latter classification has to be placed on the Title page as required by the CSP requirements.

5.	Is the Chemical Safety Passport required for non-hazardous mixtures?	Yes.
6.	Are the regulations and guidelines available in English?	We do not have such information.
7.	What are the advantages of being the LR?	The role of LR is not foreseen under TR041. There won't be any data sharing procedure. Only new substances (not listed in the inventory) can be notified to the inventory by a group of companies working together with one company as a Lead Registrant. The registration logic under TR041 is very different from other REACH-like regulations. The majority of the work will be with having a compliant CSP.
8.	Are the CLP requirements different from other REACH(s)?	We have provided a list of different GOST standards applicable for classification, labeling and packaging of the chemical products on the Slides 29 and 30.
9.	Must the QR code be on the CSP?	Yes, it's a new procedure implemented by the authority and it proves the registration of the CSP. However, once GOST 30333-2007 is updated and the registration of the CSP is no longer required, most likely QR will not be needed anymore. However, even once the registration of CSP is not required, you will be able to go through the voluntary authority expertise and most likely get the QR code. This is something to be confirmed at a later stage.
10.	And on the label as well?	QR code is placed on the Title Page of the CSP.
11.	what does it mean closed nomenclature	This is not defined in the GOST 30333-2007. Most likely, this is related to the state secrecy/defence sector.
12.	Composition is not only CBI issue. Moreover the problem is that sometimes this information does not exist. That is if the formulator is mixing raw materials with unknown composition	Yes, this is valid concern. We at REACHLaw, have also raised this issue with the authority a few times. In the most recent Explanatory note published together with the new Commission Draft Decision related to the TR041, the authority has stated that the CBI issue is currently being discussed.
13.	Instead of giving 100% composition on substance level, can we give the composition on raw material level being mixtures, if these mixtures are approved?	Could you please contact us separately with this question, providing practical example if possible and what is meant by "approved".
14.	Can a CSP made for a colour series?	Once CSP can cover a number of grades. There are certain conditions that have to be met (Section 4.5 of the Guidance).
15.	Will the CSP be mandatory for products that are mixtures also from 30th Nov 2020 on?	If TR041 enters into force on the 30 <sup>th</sup> Nov 2022, then CSP will become mandatory for all chemical products placed on the EAEU market, including mixtures.

16. Please explain again on the relation competent sources and competent authority.	Competent information sources are the reliable approved information sources that have to be used for the compilation of the CSP. In practice it means that translation of your EU SDS into Russian will not suffice to comply with GOST 30333-2007 and TR041. Competent authority will evaluate the information sources used for CSP compilation during the CSP review, thus it's important to follow the guidance P 50.1.102-2014 and GOST 30333- requirements.
17. Will there an english translation available of e.g. GOST 30333-2007?	We are not aware of such translation.
18. Has CSP registration to be done separately in each EAEU member state?	Registration under TR041 will have to be done in one member-state and it will be enough to cover the whole EAEU. CSP will have to be provided as part of documentation for the registration.
19. Do the authorities plan to extend the CSP to finished product	Articles will not require CSP.
20. Do all CSPs for a company need to registered before the 11/29/2022 deadline?	We are currently waiting for GOST 30333-2007 to be updated. The most recent draft did not require registration of CSP. Thus, if the latest version is approved at some point this or next year, then you will not have to register your CSPs by 30 <sup>th</sup> November 2022. However, you will have to develop CSPs according to the valid GOST 30333- and make it available upon anyone's request in the EAEU. In addition, you will need to provide your CSP for the manual authority check during the registration period for your chemical product tonnage band (if tonnage band registration will be approved in the 2 <sup>nd</sup> tier legislation).
21. What are specific requirement for RU label, do you have any sample labels to show how they need to look like	GOST 31340-2013 covers precautionary labelling. This standard will be also updated later this year or next year to reflect GHS Rev.7 and TR041 requirements.
22. Hi, it was specified that finished products don't need CSP. We manufacture household glues, household glues are considered finished products?	Articles are not in scope of the TR041 and CSP. Glues would most likely fall under chemical mixtures definition and thus will be in scope of both TR041 and CSP.
23. Candles are defined as chemical products in EU. Is this the same for Russian GOST 30333-2007? That means will the requirement of Chemical Safety Passports also apply for candles?	Candles are not defined in the GOST 30333-2007 or in the TR041, however they seem to fall under chemical mixture definition and likely will be in the scope of TR041 and CSP accordingly. Specific product types have to be evaluated case-by-case.
24. Are CSP required also for products only provided to consumers? In EU SDSs are only required for professional and industrial users.	Under GOST 30333-2007, Yes, upon consumer request the CSP has to be provided (Art.3.4. GOST 30333-2007). However, the following art 3.5. limits this requirement to hazardous products.

<p><b>25.</b> Are there any tonnage cut-off in relation to the CSP?</p>	<p>Under TR041 anyone can request the CSP and it has to be provided (Art.43). Unless clearly exempted, chemical products can not be placed on the EAEU market without CSP once TR041 enters into force.</p> <p>No.</p>
<p><b>26.</b> you mentioned the obligation to disclose the full composition of the products. Is it possible to do it using range of concentration ? I am thinking, for instance, to products including UVCB. If Yes are these range pre-defined ?</p>	<p>UVCBs can be defined by the applicable CAS/EC No. No need to go into UVCB compositional ranges.</p> <p>In the CSP you will be able to use ranges, however 100% composition will have to be provided to the authority. We need to wait for further instructions and guidances from the authority and the TR041 2<sup>nd</sup> tier legislation approval.</p>
<p><b>27.</b> The GOST R 58475-2019 "Safety Data Sheet for chemical products. General requirements" will replace the GOST 30333-2007 "Chemical product safety passport General requirements"?</p>	<p>GOST R is national standard. Most likely GOST 30333-20XX will be similar (same) to the GOST R 58475-2019 and will replace GOST 30333-2007.</p>
<p><b>28.</b> The Guidance P 50.102-2014 will also be updated during 2020-2021, or can we consider it as for SDS guidance?</p>	<p>We expect it to be updated, but the logic of the compilation will stay the same.</p>
<p><b>29.</b> The title page will be provided by the authorities after the registration together with the QR code? or it is provided by the supplier?</p>	<p>The title page has to be prepared by the company making the CSP.</p> <p>The requirement of "re-registration" depends on the update that is made in the chemical product, whereas classification update is definitely a requirement to register the CSP again.</p>
<p><b>30.</b> Russia has published GOST R 58475-2019, what's a difference between GOST and Gost R. Do we comply with GOST R where placing on Russian market.</p>	<p>GOST R and GOST (without R) are not mandatory unless implemented by the Regulation. In the context of TR041, you will have to comply with GOST 30333-2007 (or its update when enters into force).</p>
<p><b>31.</b> Is there is any special provision for registration of Synergist or adjuvants used in Agrochemical formulations ?</p>	<p>No special provisions. Pesticide formulations are generally exempted from the TR041. The definition, however, has not been provided for such products yet.</p>
<p><b>32.</b> Is it still possible to submit substances for the Russian inventory?</p>	<p>The inventory closed on the 1<sup>st</sup> August 2020 in Russia.</p>
<p><b>33.</b> Who is the applicant? the Nominative Representative or the non-Russian company?</p>	<p>Non-EAEU companies can be represented by the Nominated Representative.</p>
<p><b>34.</b> If registration is not mandatory anymore after regulation comes into force, is it still required that a Nominative Representative prepares the CSP or can non-Russian company do it by themselves</p>	<p>Non-EAEU companies can be represented by the Nominated Representative.</p> <p>Non-EAEU company can not be liable in the EAEU, thus CSP has to be made by a local company: Nominated Representative of the non-EAEU company, importer or local manufacturer (or its Nominated Representative).</p>

35. What if the composition of your product is confidential information?	Currently, there is no solution to this problem.
36. EU SDS translated into Russian; Does the same apply to Additional information? e.g. Test reports?	<p>If your question is related to the documents provided in the application package for registration of CSP, then: yes, you need to provide source-file (SDS) translated into Russian.</p> <p>For test reports in the documentation package (if needed for your specific case) you need to provide an original report in English and translation to Russian (summary is usually enough).</p> <p>If your question is related to whether you can translate your EU SDS into Russian and whether it may be enough for the compliance purposes with TR041 and GOST 30333-2007, then the answer is No.</p> <p>EU SDS translated into Russian will not be compliant with TR041, GOST 30333-2007 and related applicable standards and norms in the EAEU/Russia.</p>
37. Is CSP will be valid for 3-5 years or will it be forever document?	Currently, it's 3-5 years, but with TR041 commencement the validity will not be limited.
38. new regulation 041 telling that CSP will not have validity dates	Yes, this is true.
39. Was it correctly understood that you need to insert the received QR code into the SDS?	Currently, yes. CIS Center assigns this code on the Title Page of the CSP after registration.
40. Is the guidance available in English?	No.
41. what is meant by differing classification vs ECHA? Is it the harmonized classifications? How about substances lacking harmonized classifications? In these cases we use the self classifications from our suppliers, is this accepted?	<p>Classification and labelling has to be done according to:</p> <ul style="list-style-type: none"> <li>- GOST 30333–2007 "Chemical Safety Passport. General requirements"</li> <li>- GOST 32419–2013 "Classification of chemical products. General requirements"</li> <li>- GOST 31340–2013 "Precautionary Labelling of chemical products. General requirements"</li> </ul>
42. Will multilingual labels be accepted provided Russian is one of the languages?	Labels have to be done according to GOST 31340–2013 "Precautionary Labelling of chemical products. General requirements", where the example is provided in Russian language. TR041 has a requirement of Russian language and other member-state language if required in the member-state where the chemical product is placed.
43. So the SDS is valid for 3-5 years, but what if something is updated during this time, do you	Yes, you need to update and re-apply for registration (Section 4.2.7., GOST 30333-2007).

	then need to apply again for CSP or what is the process?	
44.	Hello. Will CSP be mandatory for both substances & mixtures?	Yes. The requirement will become mandatory from the date of the commencement of the TR041.
45.	Hello. Have mixtures a CSP registration number?	Yes, at the moment if you make GOST 30333-2007 compliant CSP (regardless if it's a substance or a mixture), you have to register it with the competent authority CIS Center.

**CONTACT FOR FURTHER QUESTIONS:**

Please contact Olesia Pochapska at [olesia.pochapska@reachlaw.fi](mailto:olesia.pochapska@reachlaw.fi) or via phone (mobile) at +358 504 534 465 if you have any questions about TR041 or Chemical Safety Passports.

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