

Record-keeping checklist

Exempted introductions



Australian Government
Australian Industrial Chemicals
Introduction Scheme

Highest indicative risk for your introduction is very low risk

Use this checklist to make sure you have the records to prove your introduction is authorised as an **exempted introduction – highest indicative risk is very low risk**. The records we'll accept indicate the type and level of information you must keep. You must give us the information in these records if we ask for them.

Any declaration must be dated prior to your introduction.

Chemical identity

If you know the CAS number – written or electronic record of the CAS number and either the CAS name or INCI name for the chemical.

If you don't know the CAS number – you must have **either** A or B.

- A. Written or electronic record of the CAS name or IUPAC name. An INCI name can only be used if the chemical and its name meet all 4 criteria:
- the chemical does not have a CAS or IUPAC name
 - the chemical is a plant extract – examples are extracts of flowers, seeds, or leaves of trees, shrubs, herbs, grasses, ferns, and mosses.
 - the name of the plant extract is an INCI name based on a proper botanical name – for example, 'Helianthus Annus Leaf/Stem Extract' is acceptable but 'Sunflower extract' is not acceptable.
 - the plant extract cannot be chemically modified – for example, the chemical cannot be hydrolysed, acetylated, or hydrogenated.
- B. The names you use to refer to your chemical – written or electronic record of the names including the name given in your post-introduction declaration.

- The names of any products containing your chemical that you have imported into Australia.
- If it's a UVCB substance and the human health exposure band is 4 or the environment exposure band is 3 or 4 – a record of the UVCB substance description.
 - If you don't have this information – a written undertaking from the supplier or manufacturer that they will give us the UVCB substance description, if we ask for it.

- If it's a high molecular weight polymer and its human health exposure band is 4 – records to prove the:
- number-average molecular weight
 - weight-average molecular weight
 - polydispersity index

- percentage by mass of molecules with molecular weight that is less than 1000g/mol
- percentage by mass of molecules with molecular weight that is less than 500g/mol

We'll accept a GPC analysis report. If you don't have this information – a written undertaking from the supplier or manufacturer confirming it's a high molecular weight polymer. (They must provide information to prove the polymer molecular weight details if we ask for it.)

The introduction isn't medium to high risk or low risk

A record of the indicative human health risk and indicative environment risk for your introduction.

You will also need all of the following records or a written undertaking from the supplier or manufacturer confirming your introduction doesn't meet the criteria for medium to high risk or low risk. They must provide the following information if we ask for it.

- Records to prove your chemical:
- isn't listed in Annex III of the Rotterdam Convention or Part 1 of Annex A, B or C of the Stockholm Convention on POPs (unless it is introduced solely for use in research and analysis and the amount that you introduce in a registration year does not exceed 100kg).
 - isn't listed on the Inventory with conditions of introduction or use that will be contravened

We'll accept a signed and dated declaration that these checks took place.

Fully fluorinated – records to prove it doesn't contain a sequence of greater than or equal to 4 and less than or equal to 20 fully fluorinated carbon atoms. We'll accept a signed and dated declaration that this check took place.

Polyhalogenated – records to prove one of the following:

- it's not a polyhalogenated organic chemical. We'll accept a signed and dated declaration that this check took place.
- the total volume introduced in a registration year is less than or equal to 100kg. We'll accept shipping documents and any associated calculations.
- your chemical and its known environmental degradation products are not persistent (see Guidelines). We'll accept a study report.

Nanoscale – records to prove one of the following:

- it's not introduced as a solid or in dispersion (if applicable). We'll accept an SDS or product information sheet that indicates the appearance.
- it doesn't meet the definition of 'not soluble'. We'll accept a study report (OECD test guideline 105 or 120) showing the solubility of the chemical in water is greater than or equal to 33.3 g/L; or the dissolution rate is greater than 70%.
- it doesn't consist of particles in an unbound state or as an aggregate or agglomerate, where at least 50% (by number size distribution) of the particles have at least one external dimension in the nanoscale. We'll accept a study report.
- the introduction of the nanoscale portion of the chemical is incidental to the non-nanoscale portion. We'll accept a justification for this.

Gas – records to prove one of the following:

- it's not a gas. We'll accept an SDS or product information sheet that indicates the appearance.
- the total volume introduced in a registration year is less than or equal to 100kg. We'll accept shipping documents and any associated calculations.
- it's not persistent (see Guidelines). We'll accept a study report.

Organotin – records to prove one of the following:

- it's not an organotin chemical. We'll accept a signed and dated declaration that this check took place.
- the total volume introduced in a registration year is less than or equal to 10kg. We'll accept shipping documents and any associated calculations.

UV filter – records to prove it's not a UV filter. For most introductions, we'll accept a signed and dated declaration that this check took place, but it will depend on your chemical and its end uses.

Biocidal active – records to prove it doesn't have an end use as a biocidal active. For most introductions, we'll accept a signed and dated declaration that this check took place, but it will depend on your chemical and its end uses.

Introduction, use and exposure

- Whether your chemical is imported and/or manufactured in Australia.
- The maximum total volume of your chemical that you intend to introduce in a registration year.
- Records to prove the end use for your chemical.

We'll accept product labels, a list of product names and uses, or technical information sheets.

The human health exposure band for your introduction and the applicable human health exposure band criteria.

If the applicable human health exposure band criteria include a concentration upper limit – a record of the maximum concentration at introduction and at each end use. We'll accept an SDS, product labels, technical information sheets or documents from your supplier.

If the applicable human health exposure band criteria include a human health categorisation volume (HHCV) upper limit – a record of the HHCV for your chemical and records to prove the HHCV doesn't exceed that specified in the exposure band criteria. We'll accept shipping documents and any associated calculations.

Whether your introduction involves a designated kind of release into the environment, and if so, which kind. We'll accept information included as part of a spreadsheet on the chemical.

The environment exposure band for your introduction **and** the applicable environment exposure band criteria.

If the applicable environment exposure band criteria include an environment categorisation volume (ECV) upper limit – a record of the ECV for your chemical and records to prove the ECV doesn't exceed that specified in the exposure band criteria. We'll accept shipping documents and any associated calculations.

Hazard characteristics

Records to prove any known hazard classification for the chemical. We'll accept an SDS.

A record of any human health hazard characteristics and environment hazard characteristics of your chemical that are known to you.

Detailed information, including full study reports, of the kind specified in the Guidelines to demonstrate the absence of certain human health and environment hazard characteristics that would otherwise render the introduction medium to high risk or low risk. If you don't have this information – a record of the outcomes of the information specified in the Guidelines, plus a written undertaking from the person who has the information that they'll give us the detailed information, including full study reports, if we ask for it.

Specified class of introduction

If your introduction is a specified class of introduction, you'll also need the following records. If you don't hold the information, there are circumstances when you can hold a written undertaking from the person who does have the information as set out below. They must provide the information to us if we ask for it.

For introductions that involve a **designated kind of release into the environment** – if practicable, a record of the:

- location of the release into the environment (including all receiving water bodies)
- frequency of the release into the environment
- the quantity of the chemical released to the environment

We'll accept information included as part of a spreadsheet on the chemical.

For **biochemicals** – a record of:

- the concentration of any remaining viable cell or cellular components of the organisms used to produce the biochemical
- any known adverse effects of any remaining viable cell or cellular components of the organisms used to produce the biochemical
- We'll accept a document from your supplier. If you don't have this information, you must have a written undertaking.

For **GM products** – a record of:

- the name of the genetically modified organism from which the GM product was derived or produced
- details of any genetically modified organism that remains in the GM product as an impurity

We'll accept a document from your supplier. If you don't have this information, you must have a written undertaking.

Where **the end use is in an article with food contact** – a record of:

- any approval (if known) for the chemical for an end use in an article with food contact in another country by an agency or authority of that country
- the potential for the chemical to migrate to food (see Guidelines). We'll accept study reports or other information. If you don't have this information, you must have a written undertaking.

Where the **end use is in an article that's a children's toy or children's care product** – a record of:

- whether the article can be placed in the mouth
- if so, the potential for the chemical to be released into the mouth during end use or mouthing (see Guidelines). We'll accept quantitative information on the extent of the chemical's transfer to the mouth. If you don't have this information, you must have a written undertaking.