

ECHA-21-B-04-EN

Special RIN requests



BACKGROUND

In certain cases, an exporter can follow a simplified procedure for notifying an export of a PIC chemical and obtaining a reference identification number (RIN). This procedure is known as a *Special RIN request*. Unlike the export notification, which is required 35 days prior to the expected export, the special RIN allows an export to take place right away.

The Special RIN request can be applied to the following exports:

- a) an Annex I or Annex V chemical exported for research or analysis purposes, in quantities of 10 kg or less, per year and per importing country; 10 kg refers to the pure substance and 10 kg of the substance in a mixture;
- b) a chemical listed in Annex I part 3 for which a positive import decision is available in the latest [PIC Circular](#);
- c) if the importing country has waived its right to receive an export notification for this/all chemical(s).

BULK SPECIAL RIN REQUESTS

When your export concerns several chemicals and/or several countries, you can submit a bulk special RIN request. The bulk special RIN request can be submitted if:

- a) several chemicals are to be exported to one country;
- b) several chemicals are to be exported to different countries; or
- c) one chemical is to be exported to several countries.

INFORMATION REQUIREMENTS

Special RIN requests (individual and bulk) are submitted through the PIC IT system, ePIC.

In order to submit a special RIN request notification, minimum information should be provided in ePIC, for example: importing country, chemical(s) to be exported, expected date of export, intended use, expected yearly amount and importer contact details.

For a bulk special RIN request, the exporter must provide the importing countries and the year of export in ePIC and the remaining information (in line with what is provided for an individual submission) must be included in the spreadsheet(s) which are provided to the DNA and customs. For example,

the following spreadsheet can be used https://echa.europa.eu/documents/10162/1254637/special_rin_request_template_en.xlsx/bf8a7e3b-fca6-d58c-17ea-33837dfea2fb. The exporter creates one submission after which the request for each country will be handled as a separate case by the DNA and a dedicated RIN will be generated for each case.



IMPORTANT TO REMEMBER

- ! It is important to select 'Research or Analysis' in the section 'Intended use' while creating a special RIN request.
- ! All the exports must individually fulfil the conditions for a special RIN request.
- ! Annex I and V chemicals cannot be submitted together.
- ! The Designated National Authorities (DNAs) have the right to reject the bulk Special RIN request and ask the exporter to submit multiple individual Special RIN requests.

FURTHER INFORMATION AND SUPPORT

ePIC User Manual for Industry (Section 9):

- » <https://echa.europa.eu/support/dossier-submission-tools/epic/epic-manuals>

PIC Regulation (Article 2(3)):

- » <https://www.echa.europa.eu/web/guest/regulations/prior-informed-consent/legislation>

Guidance on PIC (Section 4.2.9):

- » <https://echa.europa.eu/guidance-documents/guidance-on-pic>