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EMB Memorandum Circular No. 009  
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**SUBJECT: CLARIFICATIONS ON PERMITTING REGULATIONS FOR SMALL QUANTITY IMPORTATION (SQI), PRE-MANUFACTURE PRE-IMPORTATION NOTIFICATION (PMPIN), PRIORITY CHEMICAL LIST (PCL) AND CHEMICAL CONTROL ORDERS (CCO)**

## I. INTRODUCTION

Pursuant to Republic Act 6969, "Toxic Substances and Hazardous and Nuclear Waste Control Act of 1990", and DENR Administrative Order (DAO) No. 29 Series of 1992, "Implementing Rules and Regulations of RA 6969", DAO 2007-23, "Revised Priority Chemicals List", EMB MC 2015-002, "Harmonization of Registration Forms, Issued Certificates and Procedures for Chemical Control Orders (CCOs), and Small Quantity Importation (SQI)", and DMC 2002-12, "Delegation of Authority to the EMB Regional Offices to Issue 'Permit to Transport' for Hazardous Wastes, and 'Certification' and 'Importation Clearance' for Chemicals and Chemical Substances", this Circular is hereby issued for clarification on the permit necessary for products with multiple permitting requirements.

## II. OBJECTIVE

This Circular aims to clarify permitting priority and act as guidance to applicants.

## III. DEFINITIONS

Chemical Control Order or CCO – a policy to regulate, restrict or prohibit the importation, manufacture, processing, sale, distribution, use and disposal of certain chemical substances and mixtures that present unreasonable risk and/or injury to health or the environment

Compound – a chemical substance consisting of two or more different chemically bonded chemical elements, with a fixed ratio determining the composition. Compounds have properties distinctly different from its individual elements.

Mixture – mixtures are physically combined element(s)/compound(s). Each of its components retains its characteristic properties.

New chemical – a chemical or chemical substance not yet listed in the Philippine Inventory of Chemicals and Chemical Substances (PICCS)

Philippine Inventory of Chemicals and Chemical Substances or PICCS – an updated list of chemicals being imported, used and manufacture in the Philippines.

Polymer exemption – an exemption from the Pre-Manufacture Pre-Importation Notification (PMPIN) notification for certain polymers.

*Protect the environment... Protect life...*



Pre-Manufacture Pre-Importation Notification or PMPIN – notification process in which a new chemical will be imported or manufactured. Chemicals notified in the PMPIN will eventually be listed in the PICCS.

Priority Chemical List or PCL – a list of chemicals or chemical compounds regulated by the Environmental Management Bureau due to its toxicity and other hazardous properties.

PCL Exemption – an exemption from the PCL regulation for mixtures with PCL chemical(s) with a total concentration of less than 1%.

Small Quantity Importation or SQI – exemption from the PMPIN process for new chemicals imported at 1000 kg or less per year.

#### IV. GENERAL RULING

4.1. In the case of a mixture with two or more chemicals under a Chemical Control Order, the applicant shall only apply under the CCO regulations of the chemical with the higher weight percentage.

4.2. For a compound of two or more chemicals under a Chemical Control Order, the applicant shall only apply under the CCO regulations of the chemical composition of higher percentage which would pose higher risk.

4.3. For a mixture with two or more chemicals under the PCL, the applicant shall only apply for one PCL Compliance Certificate for the mixture. All of the chemical names of the PCL chemicals will be indicated in the Certificate.

PCL Exemption shall only apply to mixtures with cumulative PCL percentage composition of equal or less than 1% concentration.

4.4. For a mixture of chemical(s) under a CCO and chemical(s) under the PCL, the applicant shall only apply for CCO Registration Certificate/Importation Clearance.

4.5. For a chemical previously under PCL and subjected to be controlled under a CCO, the applicant shall apply under CCO regulation.

4.6. For a compound regulated under both PCL and CCO, the applicant shall only apply under CCO regulation.

4.7. For a compound which is both a new chemical and a chemical under PCL regulations, the applicant shall apply for PMPIN first, then apply for PCL. The applicant is not allowed to apply for an SQI Clearance.

However, if the compound is  $\leq 1\%$ , the company shall apply under PMPIN first, then apply for PCL Exemption. The applicant is not allowed to apply for an SQI Clearance.

4.8. For a mixture of new chemicals (cumulative weight of new chemical(s) > 1000 kg/year) and chemical(s) under PCL, the company shall apply for PMPIN Compliance Certificate first, then for a PCL Compliance Certificate.

However, if the PCL composition is  $\leq 1\%$ , the company shall apply for PMPIN Compliance Certificate first, then for a PCL Exemption.


- 4.9. For a mixture of new chemicals (cumulative weight of new chemical(s)  $\leq 1000$  kg/year) and chemical(s) under PCL, the applicant shall apply for PCL Compliance Certificate prior to applying for Small Quantity Importation (SQI) Clearance or PMPIN Compliance Certificate.

However, if the PCL composition is  $\leq 1\%$ , the company shall apply for PCL Exemption first, then apply for either SQI Clearance or PMPIN Compliance Certificate.

- 4.10. For a mixture of new chemicals and chemical(s) under CCO, the applicant shall apply for PMPIN Compliance Certificate first, then for a CCO Registration/Importation Clearance. The applicant is not allowed to apply for SQI Clearance.
- 4.11. For a compound which is both a new chemical and a chemical under CCO regulation(s), the applicant shall apply for PMPIN first, then apply for CCO. The applicant is not allowed to apply for SQI Clearance.
- 4.12. Chemicals that are covered under CCO which are intended for laboratory use are not exempted from complying with EMB regulations.

For strict compliance.

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Director

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