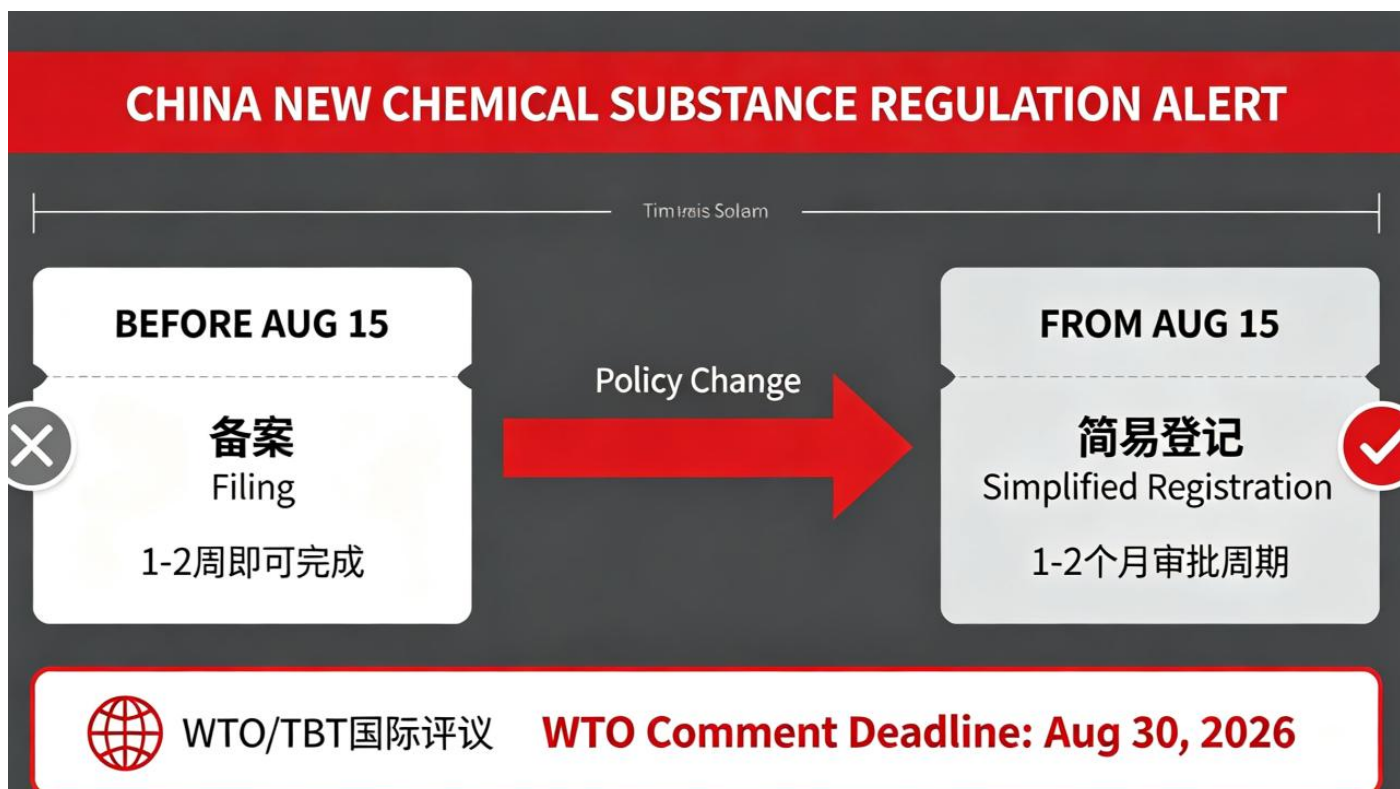


## Urgent: China Ends New Chemical Substance Filing from Aug 15 – What International Chemical Companies Must Know Now

Dear precious client,

On August 4, 2026, China's Ministry of Ecology and Environment (MEE) issued a critical notice that fundamentally changes the compliance landscape for new chemical substances. As of August 15, 2026, the existing Filing (备案) pathway for new chemical substances under 1 ton/year will be completely discontinued.



As a third-party service provider specializing in compliance with the registration of new chemical substances, Compliance Men has promptly conducted a systematic review of the notice to help enterprises understand the changes, identify risks, and plan ahead.

### < Issue & Focus >

- I. What This Means for Your Business
- II. Key proposed changes in this revision that affect international companies
- III. Compliance Men's Recommended Actions

### I. What This Means for Your Business

From August 15 onward, substances that previously qualified for the simple filing procedure must now be submitted as **Simplified Registration applications**. The MEE will review and approve these applications following the procedures and timelines for Simplified Registration under Decree No 12.

This shift is significant. Filing was essentially an immediate notification process, whereas Simplified Registration involves:

- **Formal review** by the authorities
- A **technical review period of up to 30 days**
- An administrative decision period of **20 working days** (extendable by 10 days)

**Practical timeline:** The transition from filing (1-2 weeks) to Simplified Registration (1-2 months) means companies should **adjust supply chain planning accordingly**.

#### **WTO/TBT Comment Period Still Open – Deadline August 30**

The broader regulatory overhaul – the revised *Measures on the Environmental Management Registration of New Chemical Substances* – is currently in the WTO/TBT notification phase. The international comment period remains open until **August 30, 2026**

## **II. Key proposed changes in this revision that affect international companies include**

- **Applicant eligibility:** Under the draft, only **Chinese domestic manufacturers or importers** can apply for registration. Overseas manufacturers can no longer act as direct applicants, and the agent system may be eliminated.
- **Expanded scope:** Products such as pharmaceuticals, pesticides, cosmetics, and fertilizers previously excluded may now require registration when used for industrial purposes.

**Important:** The August 30 WTO deadline is for **international feedback** through member state TBT enquiry points. The final text and implementation details – including how the new applicant rules will be enforced – are expected after this period. Companies should **monitor official MEE announcements closely** for the final regulation text and transition arrangements.

## **III. Compliance Men's Recommendations**

1. **Review your portfolio** – Identify any substances that were filed under the old system and assess the new registration pathway.
2. **Prepare for timeline changes** – Factor in 1-2 months for registration approvals instead of immediate filing.
3. **Engage with your value chain** – If you are an overseas supplier, confirm registration responsibility with your Chinese importer or subsidiary.
4. **Consider WTO feedback** – International stakeholders may submit comments through their national TBT enquiry points before August 30.

Compliance is not a cost—it is a competitive advantage. For further information on these revisions, please contact Compliance Men—making complex compliance simple.

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## Our services

- ◆ IECSC comprehensive search
- ◆ New chemical substance registration
- ◆ New usage environmental management registration
- ◆ Data-gap analysis/test monitoring
- ◆ PBT Properties Identification
- ◆ Environmental risk assessment report preparation
- ◆ Social and economic benefit analysis report preparation
- ◆ IECSC supplementation (add existing chemical substances into IECSC list)
- ◆ Customized China REACH training

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