

Proposal for Legal Inspection of Paints for Buildings

By the Bureau of Standards, Metrology and Inspection (BSMI), Ministry of Economic Affairs

Background:

Volatile organic compounds (VOC) are the precursor of ozone formation. The VOC emissions of the paints for buildings are approximately 5.64% of national pollutant discharge amount. The solvents, benzene, toluene, xylene and styrene which are used for manufacture of paints for buildings are harmful for health. For protecting the environment and the safety of consumers, the BSMI, after having consulted with interested parties, intends to regulate paints for buildings.

Proposed date of implementation:

1 May 2012

Products (HS/CCCN codes) covered:

- HS/CCCN 3208.10.10.00.0-B Paints or enamels, based on polyesters (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3208.10.20.00.8-B Conductive paints (containing copper powder, silver powder or nickel powder only), based on polyesters (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3208.10.91.00.2-B Other paints (including enamels and lacquers) based on polyesters, dispersed or dissolved in a non-aqueous medium (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3208.10.92.00.1-B Other varnishes based on polyesters, dispersed or dissolved in a non-aqueous medium (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3208.20.10.00.8-B Paints or enamels, based on acrylic or vinyl polymers (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3208.20.20.00.6-B Conductive paints (containing copper powder, silver powder or nickel powder only), based on acrylic or vinyl polymers (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3208.20.91.00.0-B Other paints (including enamels and lacquers) based on acrylic or vinyl polymers, dispersed or dissolved in a non-aqueous medium (inspection scope: ready mixed paint (synthetic resin

- type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3208.20.92.00.9-B Other varnishes based on acrylic or vinyl polymers, dispersed or dissolved in a non-aqueous medium (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3208.90.10.00.3-B Other paints or enamels (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3208.90.20.00.1-B Other conductive paints (containing copper powder, silver powder or nickel powder only) (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3208.90.91.00.5-B Other paints (including enamels and lacquers) based on synthetic polymer or chemically modified natural polymers dispersed or dissolved in a non-aqueous medium (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3208.90.92.00.4-B Other varnishes based on synthetic polymer or chemically modified natural polymers, dispersed or dissolved in a non-aqueous medium (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3208.90.93.00.3-B Solutions as defined in note 4 to this Chapter (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3209.10.10.00.9-B Paints (including enamels and lacquers) based on acrylic or vinyl polymers, dispersed or dissolved in a aqueous medium (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3209.10.20.00.7-B Varnishes based on acrylic vinyl polymers, dispersed or dissolved in a aqueous medium (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
- HS/CCCN 3209.90.10.00.2-B Other paints (including enamels and lacquers) based on synthetic polymers or chemical modified natural polymers, dispersed or dissolved in a aqueous medium (inspection scope:

	ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
HS/CCCN 3209.90.20.00.0-B	Other varnishes based on synthetic polymers or chemically modified natural polymers, dispersed or dissolved in a aqueous medium (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
HS/CCCN 3210.00.10.00.8-B	Prepared water pigments of a kind used for finishing leather (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
HS/CCCN 3210.00.20.00.6-B	Lacquers (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
HS/CCCN 3210.00.91.00.0-B	Other varnishes (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).
HS/CCCN 3210.00.92.00.9-B	Other paints (inspection scope: ready mixed paint (synthetic resin type), enamel, emulsion paint, water-base masonry paint, solvent-base masonry paint).

Inspection standards:

CNS 601, CNS 606, CNS 2070, CNS 4940, CNS 8144

Conformity assessment procedures:

Registration of Product Certification (RPC) Scheme (Module II + IV, V or VII) or
Type-Approved Batch Inspection (TABI) Scheme

Registration of Product Certification (RPC) Scheme

Under this procedure, manufacturers must have their products type-tested by the BSMI or designated testing laboratories recognized by the BSMI (Module II) before applying for registration of their products. Manufacturers or importers will also be required to ensure by declaration that all products made at their manufacturing facilities are in conformity with the prototypes submitted for type testing in Module II.

For Module IV or V, manufacturers may establish a quality system complying with the requirements of ISO 9001 and obtain ISO 9001 certificates from the BSMI or certification bodies recognized by the BSMI.

For Modules VII, manufacturers may establish a quality system that complies with the requirements stipulated by the BSMI and obtain a factory inspection report issued by the BSMI or inspection bodies recognized by the BSMI.

Products will be allowed to use the Commodity Inspection Mark, the letter “R” and the identification number given by the BSMI, after they are certified and registered with the BSMI. These products can then pass through customs directly without any further inspection. The

application fee and annual fee for RPC is NT\$5,000 for each type of product, and a RPC certificate is valid for three years.

Type-approved Batch Inspection (TABI) Scheme

Under this procedure, manufacturers or importers shall have their products type-tested by the BSMI or designated testing laboratories recognized by the BSMI, and then file an application for type approval with the BSMI, in Taipei or at branch offices, depending on where the manufacturer or importer is located.

After manufacturers or importers have obtained a type-approval certificate, they are required to file an application for inspection with the BSMI each time before their products are to be released from the production premises or arrive at the port of entry. The BSMI will then review the application and accompanying documents according to the simplified procedures. Additional samples may be required for further testing if it is deemed necessary. The fees for type testing vary by product and depend on the testing laboratories. The fee for a type approval is NT\$3,500, and a type approval certificate is valid for three years.

Further information on the two procedures is also available on the BSMI web site at <http://www.bsmi.gov.tw/wSite/ct?xItem=8673&ctNode=811>

Locations to apply for Type Testing:

- The BSMI, its branches or designated testing laboratories recognized by the BSMI

Locations to apply for Registration of Product Certification, Type Approval or Type-approved Batch Inspection:

- The BSMI or its branches.

Time required for Registration of Product Certification or Type Approval:

- Fourteen working days. (This does not include the time for corrective actions by the applicant due to deficiencies in the documents or samples; another 7 days may be required if additional tests are required)

Inspection Fee Rate for Type-approved Batch Inspection:

- 2.5‰ of CIF.