



Waiver aus Industriesicht

**Maximilian Thannbichler
Syngenta Crop Protection AG**

Gliederung

- 1 Einleitung
- 2 Beantragung eines Waivers durch Syngenta Crop Protection AG
 - 2.1 Cover letter

1 Einleitung

- Name: Maximilian Thannbichler
- Diplom-Finanzwirt, Zoll
- Zuständigkeiten
 - strategische Zollthemen
 - Übermittlung der Export-Notifikationen
 - Kontakt zur deutschen DNA (Designated National Authority)
- Firma: Syngenta Crop Protection AG
- Hauptsitz in Basel
- Agrobusiness-Fusion von AstraZeneca und Novartis
- Hersteller und Exporteur von Pflanzenschutzmitteln

syngenta



2 Waiver via ePIC

- Herausforderung für Unternehmen bei Exporten in Länder ohne consent-Feedback
- 60 Tage nach Import consent request, bei OECD Ländern sofortige Antragstellung möglich
- Antragstellung über ePIC unter der beabsichtigten export RIN
- Beispiel:

27/01/2023 14:30	Export Notification - RIN activated following waiver by ECHA RIN active period: 27/01/2023 - 31/12/2023 Waiver ID: [REDACTED]
27/01/2023 11:43	Waiver - Request accepted by DG Environment Standard Waiver active period: 27/01/2023 - 26/01/2024
26/01/2023 07:14	Waiver - Proposal checked by Federal Institute for Occupational Safety and Health, Federal o Germany Standard
25/01/2023 19:50	Waiver - Proposal submitted by Syngenta Crop Protection AG Germany (Trade Compliance) Standard. ID: [REDACTED]
14/11/2022 12:05	Export Notification - Notification validated by ECHA
24/10/2022 12:45	Explicit Consent Request - Request registered by Federal Institute for Occupational Safety and Health, Federal o Germany [REDACTED]
17/10/2022 09:42	Export Notification - Notification checked by Federal Institute for Occupational Safety and Health, Federal o Germany
14/10/2022 13:07	Export Notification - Notification submitted by Syngenta Crop Protection AG Germany (Trade Compliance)




2 Waiver via ePIC - Beantragung

Export notification for a mixture: ██████████ (version1)

Download PDF View Actions

- Create duplicate (new)
- Propose waiver



Importing country:
Egypt

Section 2 - IDENTITY OF THE MIXTURE TO BE EXPORTED

2.1 Trade name and name of the mixture:
██████████ (Part 2 of Annex I)

2.2 Harmonized system customs code:

2.3 CN code:
38 08 92

2.4 CUS code:

Concentration (%) and information of substance(s):

Annex I Chemical	Group substance	Part	CAS number	EC number	(%)
		Part 2	██████	-	64

Section 3 - INFORMATION CONCERNING THE EXPORT

3.1 Expected date of first export:
01/01/2023

2.1 Waiver via ePIC – Beantragung / Cover letter

Export Notification - Propose Waiver

Please check [here](#) that the conditions for proposing a waiver are met.

The following required documents can be uploaded in the Attachments section:
1) Cover letter explaining the nature of the document(s)
2) Evidence from an official source in the importing country and
3) Translation if the original evidence is not in English, French or Spanish.

RIN:

Mixture name:
 (Part 2 of Annex I)

Mixture composition:

Annex I Chemical	Group substance	Part	CAS number	EC number	(%)
<input type="text"/>	<input type="text"/>	Part 2	<input type="text"/>	-	64

Importing country:
Egypt

Waiver Type:
Standard - This waiver can be proposed only if no response to the explicit consent request has been received 60 days after sending it.

* denotes required fields

List of documents

The following documents have been attached :

Type	File name	Language	Action
No records found.			

Attach new documents

1. Please select the documents to attach

No file chosen

No file chosen

No file chosen

Legal declaration

*I declare that

(a) there is evidence from official sources in the importing Party or other country that the chemical is licensed, registered or authorised; or

(b) the intended use declared in the export notification and confirmed in writing by the natural or legal person importing the chemical into a Party or other country, is not in a category for which the chemical is listed in Part 2 of Annex I, and there is evidence from official sources that the chemical has in the last five years been used in or imported into the importing Party or other country concerned.

- Cover letter enthält folgende Angaben:
 - Handelsname
 - PIC-Substanz
 - Gültigkeitsdaten des Registrierungszertifikats
 - RIN
 - einführendes Land

Vielen Dank für Ihre Aufmerksamkeit !